FHWA-AZ-EIS-14-01-F

South Mountain Freeway (Loop 202)

Interstate 10 (Papago Freeway) to Interstate 10 (Maricopa Freeway)

Final Environmental Impact Statement and Section 4(f) Evaluation

Volume III: Comment Response Appendix

Submitted pursuant to
42 U.S.C. § 4332(2)(c), 49 U.S.C. § 303, and 33 U.S.C. § 1251
by the
Federal Highway Administration
and
Arizona Department of Transportation

in cooperation with the
U.S. Army Corps of Engineers
U.S. Bureau of Indian Affairs
Western Area Power Administration

September 2014

PUBLIC COMMENTS ON THE SOUTH MOUNTAIN FREEWAY DRAFT ENVIRONMENTAL IMPACT STATEMENT AND SECTION 4(F) EVALUATION

The 90-day comment period on the Draft Environmental Impact Statement (DEIS) for the South Mountain Freeway began on April 26, 2013, and closed on July 24, 2013. During that period, 8,221 comments were submitted to the Arizona Department of Transportation (ADOT) and Federal Highway Administration through various media, including the ADOT project Web site, e-mails, telephone hotline, letters, and oral and written testimony.

The comment documents and responses are presented side-by-side in this appendix. Comments are organized alphabetically by the affiliation of the commenter (see Table of Contents). Anonymous comments are located at the end of the *Citizen Comments and Responses* section. Comments received after the July 24, 2013, deadline are at the end of the entire document.

The responses are structured to be comprehensive and address the content of the comments. The reader may be referred to other similar responses and/or the text in the DEIS or Final Environmental Impact Statement (FEIS); this is done to create a more concise response section and to help guide the reader to the sections of the DEIS and FEIS where the information about the content of the comment is contained.

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FEDERAL AGENCY COMMENTS AND RESPONSES

Code	Comment Document

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Pacific Southwest Region
333 Bush Street, Suite 515
San Francisco, CA 94104

IN REPLY REFER:
(ER 13/0257)

Filed Electronically

24 July 2013

Alan Hansen
Team Leader, Planning, Environment,
Air Quality and Right-of-Way (PEAR)
USDOT-FHWA
Arizona Division
4000 N. Central Avenue
Phoenix, AZ 85012

Subject: Draft Environmental Impact Statement and Section 4(f) Evaluation for the Proposed South Mountain Freeway (Loop 202), Interstate 10 (Papago Freeway) to Interstate 10 Maricopa Freeway), Maricopa County, AZ

Dear Mr. Hansen:

Thank you for the opportunity to review the Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for South Mountain Freeway (Loop 202) Phoenix, Arizona. The Department of the Interior has reviewed the document, and offers these comments for your consideration and use.

SECTION 4(f) COMMENTS

We acknowledge that this project will constitute direct use of public parklands and will also have adverse effects to historic properties. We further understand that you are preparing a Programmatic Agreement (PA) in consultation with the Arizona State Historic Preservation Office and other consulting parties to minimize adverse effects to historic properties.

Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources. Please note however, that this concurrence is contingent upon successful completion of the PA among the consulting parties.

SECTION 6(f) COMMENTS

We have reviewed the subject Draft Environmental Impact Statement for any possible relationship to or conflict with the Land and Water Conservation Fund (LWCF) and the Urban Park and Recreation Recovery grant programs within the State of Arizona and have the following comment:

Code	Issue	Response

Code	Comment Document
1	There are Land and Water Conservation Fund (LWCF) projects within or near the study area that could be affected by this project. These include the following LWCF Grants: 04-00013, South Mountain Park 04-00552, Development of Vista Park and Acquisition South Mountain Parcel 04-00548, Acquisition - Parcel 49 Phoenix Mountain Preserve We recommend consultation directly with the official who administers the LWCF program in Arizona to determine any potential conflicts with Section 6(f)(3) of the LWCF Act (Public Law 88-578, as amended.) This section states: "No property acquired or developed with assistance under this section shall without the approval of the Secretary (of the Interior), be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the then existing comprehensive statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location." The Administrator for the LWCF program in the state of Arizona is Ms. Doris Pulsifer, Chief, Resources and Public Programs, Arizona State Parks, 1300 West Washington Street, Phoenix, Arizona 85007. Ms. Pulsifer's phone number is 602-542-7172 and her email is dpulsifer@azstateparks.gov. We appreciate the opportunity to review this document. Should you have questions about the Section 4(f) comments, please contact Cheryl Eckhardt at 303.969.2851 and for Section 6(f) comments, please contact Kelly Pearce at 402.661.1552 Sincerely, Patricia Sanderson Port Regional Environmental Officer cc: Director, OEPC OEPC Staff Contact: Dave Sire David Hurd, NPS Roxanne Runkel, NPS Cheryl Eckhardt, NPS Kelly Pearce, NPS

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The referenced Land and Water Conservation Fund projects are associated with the Phoenix South Mountain Park/Preserve. No property acquired or developed with assistance under Section 6(f) would be used for the proposed project. The proposed South Mountain Freeway would pass through the park's southwestern edge. The portion of the park that would be used for the proposed freeway would be 31.3 acres of the park's 16,600 acres (0.2 percent). During the design phase, the Arizona Department of Transportation would consult directly with the City of Phoenix to identify and purchase replacement land. Replacement land would not exceed a 1:1 ratio unless the Arizona Department of Transportation and City of Phoenix determine jointly that exceeding the 1:1 ratio would be in the best interests of both parties (see page 5-23 of the Final Environmental Impact Statement).

Code	Comment Document

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

JUL 23 2013

OFFICE OF THE
REGIONAL ADMINISTRATOR

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

1

Subject: South Mountain Freeway Project, Maricopa County, Arizona [CEQ#20130104]

Dear Ms. Petty,

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the South Mountain Freeway Project. Our review and comments are provided pursuant to the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

As stated in the DEIS, the South Mountain Freeway Project is a proposal to build a new 8-lane freeway extending approximately 22 to 24 miles from the Interstate 10 and Santan Freeway interchange westward through the community of Ahwatukee, paralleling the Gila River Indian Community (GRIC) border. The DEIS has identified a preferred alternative which is estimated to displace 845 housing units, including 680 multifamily units and 165 single family residences.

The project represents a new highway alignment in a heavily urbanized area currently designated as nonattainment for particulate matter less than 10 microns in diameter (PM10). It is therefore critically important that potential impacts to air quality be accurately analyzed, disclosed, and reduced as much as possible. The DEIS does not provide the information needed to assess the potential significance of the air quality impacts of the proposed action. In view of the area's current designation as nonattainment for PM10, it is essential to accurately assess and disclose potential PM10 hotspot impacts, as well as determine whether the project meets the transportation conformity requirements of the Clean Air Act. The Act and its implementing regulations provide that a project may not cause or contribute to any new localized violation of a national ambient air quality standard (NAAQS), increase the frequency or severity of any existing violations, or delay timely attainment of the NAAQS (CAA section 176(c)(1)(B) and 40 CFR 93.116(a)). The analysis found in the DEIS does not provide the information necessary to make an accurate determination of PM10-related impacts. It also does not sufficiently address other potential air quality issues of concern. The EPA is available to work with FHWA and other agencies to complete needed analyses as this effort moves forward.

The DEIS presents no stand-alone emissions analyses of the portion of the project that introduces new general purpose lanes, despite indications from the carbon monoxide (CO) hotspot analysis that

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Code	Issue	Response
1		The information in the cover letter and introduction is noted. Responses to specific comments are provided on the following pages.

Code	Comment Document

concentrations of criteria pollutants will increase relative to current levels, along with increased emissions of mobile source air toxics (MSATs). The potential increase indicated by the analysis would occur despite the fact that per-vehicle emissions are declining substantially over time. Instead, the DEIS presents an estimated value of emissions that combines the impact of the new freeway alignment with emissions from the adjacent, and existing, I-10 freeway. This methodology does not provide the information needed to disclose, analyze and potentially mitigate the actual emissions anticipated from a new highway segment. Additionally, we believe the analysis of congestion and emissions impacts from the No Action alternative includes estimates of congestion and vehicle miles traveled (VMT) that are higher than appropriate considering relevant facts and analysis. As a result, the relative benefits of all Action alternatives when compared to a future No Action alternative are likely to be overstated.

We also note that no air toxics risk assessment has been provided, even though there is a documented history of local public concern and requests to ADOT and FHWA for analysis of the potential health effects from the proposed new freeway. We do not believe the reasoning provided in the DEIS for not providing such an assessment is compelling, especially in light of the history of requests for such analysis. Risk assessments for air toxics from vehicle traffic have been included in many published studies as well as in EISs for other projects. EPA has emission and air quality models that can be used to predict concentrations of air toxics at receptors near the project, and we would be happy to assist ADOT and FHWA in using the models, which are available on EPA's web site.

Based upon this lack of information important to analyzing the project's potentially significant impacts on air quality, EPA has rated the South Mountain Freeway DEIS as "3 – Inadequate Information" (see Enclosure 1: "Summary of Rating Definitions and Follow-Up Action"). EPA believes the following information would serve as the basis for a robust and meaningful air quality analysis: 1) Assessment and disclosure of potential PM10 hotspot impacts and confirmation of whether the project meets the Clean Air Act's transportation conformity requirements; 2) Emissions analyses that present the emissions of the South Mountain Freeway corridor separate from those of I-10, along with updated traffic forecasting for the No Action alternative; and 3) A robust air toxics risk assessment that addresses potential health effects from the proposed new freeway.

We recommend this information be circulated in a Supplemental DEIS for public comment, in accordance with NEPA and CEQ's NEPA Implementation Regulations. EPA respectfully requests the opportunity to review this information and provide ADOT and FHWA our feedback before a Supplemental DEIS is published. In the attached detailed comments, we also provide recommendations regarding the assessment of impacts to children's health, environmental justice, aquatic resources and other issues we recommend be addressed in the NEPA document.

We appreciate the opportunity to review this DEIS and look forward to working with ADOT and FHWA to address the issues outlined in this letter. If you have any questions, please refer staff to Clifton Meek at (415) 972-3370 or to Angeles Herrera, Associate Director in our Communities and Ecosystems Division, at 415-972-3144. Please send a copy of the Supplemental DEIS to this office (mail code CED-2) when it is electronically filed with our Washington, D.C. office.

Code	Issue	Response

Code	Comment Document

Sincerely,

Jared Blumenfeld

Enclosures
(1) Summary of EPA Rating Definitions
(2) EPA's detailed comments on the South Mountain Freeway DEIS

cc via email: Alan Hansen, Federal Highway Administration
Rebecca Yedlin, Federal Highway Administration
John Halikowski, Arizona Department of Transportation
Ralph Ellis, Arizona Department of Transportation
Chaun Hill, Arizona Department of Transportation
Kathleen Tucker, U.S. Army Corps of Engineers
Kelly Wolff-Krauter, Arizona Game and Fish Department
Steve Spangle, U.S. Fish and Wildlife Service
Ondrea Barber, Gila River Indian Community
Dennis Smith, Maricopa Association of Governments

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SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, “Policy and Procedures for the Review of Federal Actions Impacting the Environment.”

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U.S. EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE SOUTH MOUNTAIN FREEWAY PROJECT, MARICOPA COUNTY, ARIZONA, JULY 23, 2013

Air Quality

2 A new 22- to 24- mile 8-lane freeway in the greater Phoenix area has the potential to negatively affect regional air quality, which is particularly important in light of the existing air quality challenges facing Phoenix and recent efforts to address PM10 undertaken by the Maricopa Association of Governments, Maricopa County Air Quality Department, and Arizona Department of Environmental Quality. Portions of Maricopa County (Phoenix PM10 nonattainment area) are federally designated as serious nonattainment for the 1987 PM10 NAAQS. Currently, the area is violating the 24 -hour PM10 NAAQS of 150 µg/m3. Further, while Maricopa County is currently designated attainment/unclassifiable for the 2006 24-hour and 1997 annual PM2.5 NAAQS of 35 µg/m3 and 15 µg/m3, respectively, monitors in the Phoenix area measure concentrations that approach the new 2012 annual PM2.5 NAAQS of 12 µg/m3. Moreover, the Phoenix area is federally designated as "marginal" nonattainment area for the 2008 Ozone NAAQS and continues to violate the 8-hour Ozone NAAQS of 0.075 ppm. Portions of Maricopa County are also maintenance for the CO NAAQS. Therefore, it is critical that the project's assessment of potential air quality impacts be accurate and thorough. As described below, EPA provides comments and recommendations concerning our finding that the DEIS did not adequately assess and identify potential air quality impacts from the new proposed freeway.

Transportation Conformity

As the project is both 1) located in a PM10 nonattainment area that continues to experience exceedances of the PM10 NAAQS, and 2) needs a PM10 hot-spot analysis according to the transportation conformity regulation at 40 CFR 93.123, it is critical to accurately assess and identify potential PM10 hotspot impacts, as well as determine whether or not the project meets transportation conformity requirements found in the Clean Air Act. However, the DEIS does not do so adequately, and EPA has identified substantial deficiencies in the current draft analysis that preclude the ability to determine whether the project complies with transportation conformity requirements.

First, since the analysis presented is a qualitative one, rather than a quantitative one, the DEIS should clarify when the analysis started and whether the analysis was begun during the grace period for quantitative analyses.[1] Furthermore, the DEIS seems to indicate that the years 2020 and 2035 are being examined but does not clearly explain why these years are chosen for analysis. Section 93.116(a) of the transportation conformity rule requires that PM hot-spot analyses consider the full time frame of an area's transportation plan. To meet this requirement and the general requirements in Section 93.123(c)(1), hot-spot analyses should include the year(s) within the transportation plan during which peak emissions from the project are expected and any new NAAQS violation or worsening of an existing violation would most likely occur due to the impacts of the project and background concentrations in the project area.

While the DEIS provides some information about increases in vehicles, information about total numbers of vehicles and the numbers of diesel trucks on the proposed highway is not easily found in the narrative. Complete traffic data for the proposed project should be included in a PM hot-spot analysis, regardless of whether the analysis is qualitative or quantitative. This section of the DEIS does

1 The grace period for using MOVES for quantitative PM hot-spot analyses has ended (i.e., any new analyses begun after December 20, 2012, must be quantitative and rely on MOVES) (December 20, 2010, 75 FR 79370)

Code	Issue	Response
2	Air Quality	The first sentence of the detailed comments states, "A new 22- to 24-mile 8-lane freeway in the greater Phoenix area has the potential to negatively affect regional air quality." The Clean Air Act requires that transportation plans, programs, and projects that are developed, funded, or approved by departments of transportation and metropolitan planning organizations will not cause new or worsen existing violations of certain transportation-related National Ambient Air Quality Standards and will not delay timely attainment of any National Ambient Air Quality Standards or any required interim emissions reductions or milestones. The U.S. Environmental Protection Agency issued the transportation conformity regulations (40 Code of Federal Regulations § 93) to implement the Clean Air Act requirements. The conformity regulations require that the metropolitan planning organization's transportation plan and Transportation Improvement Program must include the specific federal projects in the regional emissions analysis that must not exceed a certain emissions level for the area. As noted in the Final Environmental Impact Statement on page 4-76, the Preferred Alternative is included in the Maricopa Association of Governments' conforming plan and program. The Preferred Alternative has complied with all requirements related to regional emissions required by the Clean Air Act and 40 Code of Federal Regulations § 93 and has demonstrated that it would not "negatively affect regional air quality."

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not include the average daily traffic (ADT) of the new highway, or the number of trucks within overall traffic volumes. Without this information clearly presented, it is difficult to assess whether the air quality monitor chosen as the comparison for the draft qualitative PM hot-spot analysis represents the expected traffic from the project.

The DEIS should state which method from the 2006 EPA-FHWA PM qualitative guidance was used, (i.e., "Comparison to another location with similar characteristics," from Section 4.1 A of the 2006 guidance). [2] Page 4-68 of the DEIS states that the monitoring locations used for the PM10 qualitative analysis were the Central Phoenix and the Greenwood monitoring sites because they "most closely resemble the characteristics of the Buckeye Road and Baseline Road Interchanges in 2035." This choice of monitoring sites requires further explanation. When comparing the project location to other monitoring locations in the area, the Buckeye monitor may better represent project characteristics such as nearby traffic activity and surrounding land use. Given the contribution of fugitive dust sources to the concentrations of PM10, the monitors referenced in the analysis may underestimate fugitive dust present at the source as they appear to represent central Phoenix, with little proximity to the arid land surfaces near the proposed project.

In addition, the draft qualitative PM10 hot-spot analysis does not address whether transportation-related construction emissions should be considered in the analysis. Section 93.123(c)(5) of the conformity rule states that construction-related PM emissions due to a particular project are not required to be included in a hot-spot analysis if such emissions are considered temporary (i.e., emissions which occur only during the construction phase and last five years or less at any individual site). It is unclear whether the current draft analysis has met this requirement or whether the period of construction and the emissions that would be generated were considered in the selection of analysis years for this project.

Similar issues regarding the MOVES grace period and the analysis years apply for the CO analysis included in the DEIS. It is unclear from the DEIS when the project-level CO analysis started in relation to the grace period for the latest version of the MOVES model (MOVES2010). The DEIS states that the CO analysis was performed for the existing condition (2010) and for the action and No-Action alternatives in the design year (2035). However, the year of peak emissions must be examined in a hot-spot analysis, which is not necessarily the design year.

Given the magnitude of the proposed project and its potential to negatively affect regional and local air quality, we provide the following recommendations:

Recommendations:

3

- Address the deficiencies in the current qualitative PM10 hot-spot analysis, and demonstrate how a revised qualitative analysis complies with CAA conformity requirements for the PM10 NAAQS. Clearly explain and document how the qualitative analysis complies with applicable requirements of the CAA and transportation conformity regulations for conducting a hot-spot analysis. Completing a quantitative PM hot-spot analysis that meets applicable requirements and is fully documented is an option that continues to be available as well. EPA guidance for a quantitative PM analysis is available and can be used. [3] EPA is available to coordinate with

2 "Transportation Conformity Guidance for Qualitative Hot-spot Analyses in PM2.5 and PM10 Nonattainment and Maintenance Areas," EPA420-B-06-902, March 2006.
[3] See http://www.epa.gov/otaq/stateresources/transconf/policy/420b10040.pdf for details on completing such analyses.

Code	Issue	Response
3	**Air Quality**	The U.S. Environmental Protection Agency's detailed comments summarize the requirements for project-level conformity and imply that they should have been addressed in the Draft Environmental Impact Statement. Section 93.104(d) of the conformity regulations states that a project-level conformity determination is required before a project is adopted, accepted, approved, or funded. To clarify this point, the Federal Highway Administration in May 2003 issued guidance on *Clarification of Transportation Conformity Requirements for FHWA/FTA Projects Requiring Environmental Impact Statements*, stating that projects that are evaluated through an environmental impact statement process are encouraged to include a project-level conformity determination in the Final Environmental Impact Statement, but a final conformity determination is required before the record of decision is signed. (This guidance is posted on the U.S. Environmental Protection Agency's Web site at <epa.gov/otaq/stateresources/transconf/policy/dot052003.pdf>.) The U.S. Environmental Protection Agency's comments provide detailed information on the required content for the project-level conformity determination; these comments do not reflect a shortcoming with respect to the Draft Environmental Impact Statement since no project-level conformity documentation is required to be included in the Draft Environmental Impact Statement. 40 Code of Federal Regulations § 93.111(c) was followed to conduct a qualitative analysis for particulate matter (PM_{10}) for the Preferred Alternative. This analysis complied with National Environmental Policy Act requirements for the development of the Draft Environmental Impact Statement. In December 2010, the U.S. Environmental Protection Agency established transportation conformity guidance for performing quantitative particulate matter ($PM_{2.5}$ and PM_{10}) hot-spot analyses for transportation projects and established a 2-year grace period. U.S. Environmental Protection Agency conformity guidance continues to allow qualitative particulate matter (PM_{10}) hot-spot conformity analyses for analyses that were started before or during the grace period and if the final environmental document for the project is issued no more than 3 years after issuance of the draft environmental document. A particulate matter (PM_{10}) qualitative analysis was performed for this project because the initial air quality technical analysis report for the proposed action was produced in October 2005. The Final Environmental Impact Statement has been updated with a quantitative analysis for particulate matter (PM_{10}) to ensure that a state-of-the-art analysis is completed for the Preferred Alternative. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement and in Section 3 of the air quality technical report (see sidebar on page 4-2 of the Final Environmental Impact Statement for information on how to review the report). Thus, the particulate matter (PM_{10}) analysis demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

Code	Comment Document
	ADOT and FHWA through interagency consultation to confirm use of accurate modeling methodology, assumptions, and data for the analysis.
4	• Clearly indicate what the year(s) of peak emissions is expected to be, including supporting information for why that year(s) will result in peak emissions. Include a table with 2020 total ADT, 2020 diesel truck numbers, 2035 ADT, and 2035 diesel truck numbers, or other year(s) where peak emissions are expected. Provide complete traffic information for the new project and provide the source of this data, or provide a page number if this data is found elsewhere in the DEIS.
5	• Clarify, including a specific date, when the project-level CO and PM10 hot-spot analyses began.
6	• EPA believes this is a project of local air quality concern that needs a PM10 hot-spot analysis, but we recommend additional documentation in the conformity section. Discuss why, for PM10, this is a "project of air quality concern" under 40 CFR 93.123(b)(1), including a reference to the number of diesel vehicles expected on the freeway in the analysis year (s) of peak emissions.
	• Clarify which method from the 2006 EPA-DOT PM qualitative guidance was used, i.e., "Comparison to another location with similar characteristics," from Section 4.1 A of the 2006 guidance. If this method was relied on, provide additional discussion of how the location selected for comparison represents the proposed project.
	• As stated in the Air Quality Technical Report provided to our agency on June 15, 2013, ADOT and FHWA will be completing a "final transportation conformity determination" prior to releasing the Final EIS. EPA recommends initiating interagency consultation with our agency prior to the development of the draft transportation conformity analysis, as we believe consultation with EPA prior to the draft analysis will allow for important feedback regarding analysis and methodology.
	• In addition, due to the extended construction phase of the project, additional explanation and documentation is needed that 40 CFR 93.123(c)(5) is met.
	Emissions Analyses and Traffic Forecasting
	The air quality impacts presented in the DEIS for the entire alignment of the South Mountain Freeway corridor are not adequately assessed. The analysis incorporated existing I-10 emissions with emissions anticipated from the project into a "sub-area" which does not permit a clear understanding of emissions from the new freeway alignment, separate from the current setting. For example, the emission trends presented in Chapter 4 convey the conclusion that the preferred alternative reduces emissions throughout the study area. However, the DEIS presents no emissions analyses of the South Mountain Freeway corridor itself, despite indications from the CO hotspot analyses (tables 4-31 and 4-32) that concentrations of criteria pollutants along the Pecos Road corridor will increase above current levels (in spite of falling CO emission factors over time), and indications that MSAT emissions will be higher in the future. Since the South Mountain Freeway corridor is the area to be most heavily affected, not presenting the emissions along the corridor prevents the public and decisionmakers from gaining a clear understanding of the extent of impacts from the different Alternatives and the potential basis for reducing impacts.
	Recommendations:
	• Emissions analyses should be revised with the South Mountain Freeway corridor modeled independently of I-10 and other roads.
	3

Code	Issue	Response
4	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, the year of highest particulate matter (PM_{10}) emissions is expected to be the year of highest vehicle miles traveled, 2035. According to the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area, the largest single source category is paved road dust, including track-out, at 20 percent. By contrast, on-road mobile vehicle exhaust, tire wear, and brake wear contribute 6 percent. The relative contribution of these emissions is expected to represent about the same contribution in the future; therefore, the highest projected vehicle miles traveled occur in the design year, 2035. The analysis year(s) was determined through the process established by the Arizona Department of Transportation interagency consultation procedures [40 Code of Federal Regulations § 93.105(c)(1)(i)]. The selection of 2035 as the peak year of emissions is appropriate. Vehicle miles traveled for 2025 and 2035 may be found in Table 4-36 on page 4-81 of the Final Environmental Impact Statement. The traffic information used in the modeling was obtained from the Maricopa Association of Governments travel demand model.
5	**Air Quality**	The air quality analysis for the project, including the particulate matter (PM_{10}) hot-spot analysis, began in the summer of 2005. The initial air quality technical report, which included discussions of both particulate matter (PM_{10}) and carbon monoxide, was completed in October 2005 (see sidebar on page 4-2 of the Final Environmental Impact Statement for information on how to review the report).
6	**Air Quality**	The transportation conformity rule [40 Code of Federal Regulations § 93.123(b)(1)(i)] defines projects of local air quality concern as new highway projects that have a significant number of diesel vehicles and expanded highway projects that have a significant increase in the number of diesel vehicles. According to the Draft Environmental Impact Statement page 3-19, annual average daily traffic on the Preferred Alternative would range from 120,000 to 175,000 vehicles per day. Revised forecasts provided by the Maricopa Association of Governments and presented in the Final Environmental Impact Statement page 3-19 confirm that annual average daily traffic in some areas would range from approximately 117,000 to 190,000 vehicles per day and projected heavy diesel trucks would range from approximately 3,800 to 17,000 per day. Because this would be a new facility with approximately 3,800 to 17,000 diesel trucks per day, it was determined that this is a project of local air quality concern and a quantitative particulate matter (PM_{10}) hot-spot analysis was conducted for the Final Environmental Impact Statement.

Code	Comment Document
	ADOT and FHWA through interagency consultation to confirm use of accurate modeling methodology, assumptions, and data for the analysis. • Clearly indicate what the year(s) of peak emissions is expected to be, including supporting information for why that year(s) will result in peak emissions. Include a table with 2020 total ADT, 2020 diesel truck numbers, 2035 ADT, and 2035 diesel truck numbers, or other year(s) where peak emissions are expected. Provide complete traffic information for the new project and provide the source of this data, or provide a page number if this data is found elsewhere in the DEIS. • Clarify, including a specific date, when the project-level CO and PM10 hot-spot analyses began. • EPA believes this is a project of local air quality concern that needs a PM10 hot-spot analysis, but we recommend additional documentation in the conformity section. Discuss why, for PM10, this is a "project of air quality concern" under 40 CFR 93.123(b)(1), including a reference to the number of diesel vehicles expected on the freeway in the analysis year (s) of peak emissions.
7	• Clarify which method from the 2006 EPA-DOT PM qualitative guidance was used, i.e., "Comparison to another location with similar characteristics," from Section 4.1 A of the 2006 guidance. If this method was relied on, provide additional discussion of how the location selected for comparison represents the proposed project.
8	• As stated in the Air Quality Technical Report provided to our agency on June 15, 2013, ADOT and FHWA will be completing a "final transportation conformity determination" prior to releasing the Final EIS. EPA recommends initiating interagency consultation with our agency prior to the development of the draft transportation conformity analysis, as we believe consultation with EPA prior to the draft analysis will allow for important feedback regarding analysis and methodology.
9	• In addition, due to the extended construction phase of the project, additional explanation and documentation is needed that 40 CFR 93.123(c)(5) is met.
	Emissions Analyses and Traffic Forecasting The air quality impacts presented in the DEIS for the entire alignment of the South Mountain Freeway corridor are not adequately assessed. The analysis incorporated existing I-10 emissions with emissions anticipated from the project into a "sub-area" which does not permit a clear understanding of emissions from the new freeway alignment, separate from the current setting. For example, the emission trends presented in Chapter 4 convey the conclusion that the preferred alternative reduces emissions throughout the study area. However, the DEIS presents no emissions analyses of the South Mountain Freeway corridor itself, despite indications from the CO hotspot analyses (tables 4-31 and 4-32) that concentrations of criteria pollutants along the Pecos Road corridor will increase above current levels (in spite of falling CO emission factors over time), and indications that MSAT emissions will be higher in the future. Since the South Mountain Freeway corridor is the area to be most heavily affected, not presenting the emissions along the corridor prevents the public and decisionmakers from gaining a clear understanding of the extent of impacts from the different Alternatives and the potential basis for reducing impacts. ***Recommendations:*** • Emissions analyses should be revised with the South Mountain Freeway corridor modeled independently of I-10 and other roads.

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7	**Air Quality**	This comment is applicable only to qualitative particulate matter (PM_{10}) hot-spot analyses. Although a particulate matter (PM_{10}) qualitative analysis was included in the Draft Environmental Impact Statement, a quantitative particulate matter (PM_{10}) hot-spot analysis was completed for the Final Environmental Impact Statement in accordance with the U.S. Environmental Protection Agency's 2013 *Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas*. See page 4-76 of the Final Environmental Impact Statement and Section 3 of the air quality technical report for more information (see sidebar on page 4-2 of the Final Environmental Impact Statement for information on how to review the report).
8	**Air Quality**	The transportation conformity determination reflected on page 4-76 of the Final Environmental Impact Statement is consistent with the *Maricopa Association of Governments Conformity Analysis for the FY 2014-2018 Transportation Improvement Program and the 2035 Regional Transportation Plan*, January 2014 (see Final Environmental Impact Statement Appendix 4-3) and the project-level particulate matter (PM_{10}) hot-spot analysis. The U.S. Environmental Protection Agency was a consulting party in the development of the transportation conformity processes; the U.S. Environmental Protection Agency had the opportunity to comment on the carbon monoxide and particulate matter (PM_{10}) analyses as part of its comments on the Draft Environmental Impact Statement. Subsequent to issuance of the Draft Environmental Impact Statement, the U.S. Environmental Protection Agency was provided an opportunity to review the particulate matter (PM_{10}) analysis protocol for the Final Environmental Impact Statement, was consulted on background concentrations for the particulate matter (PM_{10}) analysis, and was provided an opportunity to review and comment on the air quality technical report and the modeling files and assumptions used in the Final Environmental Impact Statement carbon monoxide and particulate matter (PM_{10}) analyses.
9	**Air Quality**	The transportation conformity rule in 40 Code of Federal Regulations § 93.123(c)(5) states that hot-spot analyses are not required to consider construction-related activities that cause temporary increases in emissions. Temporary increases are defined as those that occur only during the construction phase and last 5 years or less at any individual site. The project is identified in the Fiscal Year 2014–2018 Transportation Improvement Program and the 2035 *Regional Transportation Plan* using several different project identification numbers by construction segment (47518, 43086, 43087, 11305, 15671, 19029, 17193, 6458, 1790, 6919, and 47857). The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would expedite the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method, breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years and the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period; therefore, the construction effects described above would be temporary and would not require additional analysis.

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ADOT and FHWA through interagency consultation to confirm use of accurate modeling methodology, assumptions, and data for the analysis.

- Clearly indicate what the year(s) of peak emissions is expected to be, including supporting information for why that year(s) will result in peak emissions. Include a table with 2020 total ADT, 2020 diesel truck numbers, 2035 ADT, and 2035 diesel truck numbers, or other year(s) where peak emissions are expected. Provide complete traffic information for the new project and provide the source of this data, or provide a page number if this data is found elsewhere in the DEIS.
- Clarify, including a specific date, when the project-level CO and PM10 hot-spot analyses began.
- EPA believes this is a project of local air quality concern that needs a PM10 hot-spot analysis, but we recommend additional documentation in the conformity section. Discuss why, for PM10, this is a "project of air quality concern" under 40 CFR 93.123(b)(1), including a reference to the number of diesel vehicles expected on the freeway in the analysis year (s) of peak emissions.
- Clarify which method from the 2006 EPA-DOT PM qualitative guidance was used, i.e., "Comparison to another location with similar characteristics," from Section 4.1 A of the 2006 guidance. If this method was relied on, provide additional discussion of how the location selected for comparison represents the proposed project.
- As stated in the Air Quality Technical Report provided to our agency on June 15, 2013, ADOT and FHWA will be completing a "final transportation conformity determination" prior to releasing the Final EIS. EPA recommends initiating interagency consultation with our agency prior to the development of the draft transportation conformity analysis, as we believe consultation with EPA prior to the draft analysis will allow for important feedback regarding analysis and methodology.
- In addition, due to the extended construction phase of the project, additional explanation and documentation is needed that 40 CFR 93.123(c)(5) is met.

Emissions Analyses and Traffic Forecasting

10 The air quality impacts presented in the DEIS for the entire alignment of the South Mountain Freeway corridor are not adequately assessed. The analysis incorporated existing I-10 emissions with emissions anticipated from the project into a "sub-area" which does not permit a clear understanding of emissions from the new freeway alignment, separate from the current setting. For example, the emission trends presented in Chapter 4 convey the conclusion that the preferred alternative reduces emissions throughout the study area. However, the DEIS presents no emissions analyses of the South Mountain Freeway corridor itself, despite indications from the CO hotspot analyses (tables 4-31 and 4-32) that concentrations of criteria pollutants along the Pecos Road corridor will increase above current levels (in spite of falling CO emission factors over time), and indications that MSAT emissions will be higher in the future. Since the South Mountain Freeway corridor is the area to be most heavily affected, not presenting the emissions along the corridor prevents the public and decisionmakers from gaining a clear understanding of the extent of impacts from the different Alternatives and the potential basis for reducing impacts.

Recommendations:

11
- Emissions analyses should be revised with the South Mountain Freeway corridor modeled independently of I-10 and other roads.

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10	**Air Quality**	Under the Federal Highway Administration's December 2012 *Interim Mobile Source Air Toxics (MSAT) Guidance*, mobile source air toxics emissions assessments in the agency's National Environmental Policy Act documents are designed to evaluate emissions changes attributable to the project in question plus other roadways affected by the project (e.g., where traffic volumes would change if the project were built). The reason for this approach is to capture changes in emissions attributable to the project within the Study Area, which is a more reliable indicator of potential changes in health risk than estimating changes in emissions on just the Preferred Alternative alone. The Draft Environmental Impact Statement included an overall project study area, along with two "subareas" reflecting the eastern and western ends of the project corridor, in an attempt to address public concerns about potential emissions changes. The U.S. Environmental Protection Agency states that "not presenting the emissions along the corridor prevents the public and decision makers from gaining a clear understanding of the extent of impacts from the different Alternatives and the potential basis for reducing impacts." In addition to the information above, reporting emissions for the corridor alone would not provide an understanding of impacts because there is no "emissions budget" for the corridor that defines an acceptable level of emissions and no other guideline to help the Federal Highway Administration, U.S. Environmental Protection Agency, or the public to determine whether a given amount of emissions represents a potential health risk. Likewise, an emissions estimate for the corridor itself does not help decision makers determine whether mitigation resources should be directed toward reducing corridor emissions or be applied to some more pressing environmental impact. Increases in traffic volumes attributable to a project do not necessarily result in an increase in emissions over time because the U.S. Environmental Protection Agency's emissions control regulations and fleet turnover play an important role. In the U.S. Environmental Protection Agency's MOVES model, emissions rates for mobile source air toxics drop by 80 to 90 percent between 2012 and 2025, and MOBILE6.2 estimated a similar reduction. The effects of this are apparent from the mobile source air toxic analysis conducted for the Final Environmental Impact Statement; in the mobile source air toxics study area, total mobile source air toxics emissions are estimated to decline by more than 80 percent even though traffic is expected to increase by 47 percent (Final Environmental Impact Statement Table 4-36 on page 4-81).
11	**Air Quality**	While the Final Environmental Impact Statement does not produce emissions estimates for the Preferred Alternative itself, the carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the Preferred Alternative. This also applies to the particulate matter (PM_{10}) hot-spot analysis discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the National Ambient Air Quality Standards would not be exceeded at worst-case locations along the project corridor. The mobile source air toxic analysis presented beginning on page 4-70 of the Draft Environmental Impact Statement and updated beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study

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11	• Emissions trends from the South Mountain Freeway corridor should be presented, by themselves, in addition to emissions along other road links (e.g., I-10). Chapters 1 and 4 of the DEIS appear to overstate traffic problems and emissions resulting from the No Action alternative and the benefits of the Action alternatives. The population projections employed in the DEIS are based on pre-recession projections, and now exceed the current highest population projections for Maricopa County by Arizona's Office of Employment and Population Statistics. As a result, the forecasted traffic problems and emissions associated with all alternatives in the DEIS are likely higher than what is reasonably expected to occur based on more current data. Additionally, the congestion issues and emissions that the DEIS describes as a result of the No Action alternative include more trips and more congestion than are reasonable to expect. As a result, the relative benefits of Action alternatives are also likely to be overstated. This overestimate occurs because the travel model forecasts for the Action and No Action alternatives employ the same socioeconomic projections from the Maricopa Association of Governments, which are based on municipal master plans. The underlying master plans assume that the South Mountain Freeway is completed, and do not have land use plans that represent the No Action alternative. ***Recommendations:*** • Present congestion impacts and emissions for the No Action alternative using updated socioeconomic projections that do not assume completion of the South Mountain Freeway (with appropriate caveats about uncertainty).
12	
13	• Present the comparison of impacts from the Action and No Action alternatives to reflect the likely differences in land use (e.g., residential and commercial development) between the Action and No Action alternatives. **Health Effects** The proposed South Mountain Freeway will place a high-volume roadway adjacent to hundreds of residences and several schools. Although the DEIS did not analyze the number of residences remaining within a designated "buffer of impact" (i.e. within 500 feet of the centerline or edge of the new highway alignment), the document does state that the preferred alternative will displace 845 units, including 680 multifamily residences and 165 single family residences. This is an indication of the urbanized footprint of the proposed project and raises a question regarding the number of remaining residences within close distance of the new highway. It also raises the importance of fully assessing, disclosing, and identifying mitigation measures to address the potential health-related impacts to the remaining adjacent residences. Further, as proposed, the new highway alignment will place 8 lanes of high-volume freeway traffic adjacent to Gila River Indian Community (GRIC) land, where little development, residences, or sensitive receptors currently exist. The disclosure of the potential health impacts of the highway within the EIS process could assist the future of GRIC land-use planning and zoning decisions regarding the types of land uses that will be appropriate directly adjacent to the new freeway. In addition to the requirement of NEPA to evaluate and disclose such impacts, FHWA has received numerous public comments expressing concern about the potential health impacts in their communities related to air pollution emitted by construction and operation of the proposed South Mountain Freeway (see Chapter 6 appendices). EPA also received request letters asking us to require ADOT and FHWA to assess health impacts of the proposed freeway. We discussed these requests during an interagency call with ADOT and FHWA on February 23, 2010. The DEIS currently does not address these

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11 (cont.)		Area. Such an inventory would be incomplete without the inclusion of emissions from Interstate 10 because Interstate 10 is within the Study Area, and because, as noted above, emissions changes in the Study Area, accounting for changes in traffic and emissions on all roadways affected by a proposed project, are a more reliable indicator of changes in health risk.
12	**Land Use**	Section 93.110 of the U.S. Environmental Protection Agency transportation conformity rule requires that the population and employment projections used in a conformity analysis be the most recent estimates that have been officially approved by the metropolitan planning organization. The Maricopa Association of Governments is the metropolitan planning organization for the Maricopa County nonattainment and maintenance areas. In accordance with the Arizona Governor's Executive Order 2011-04, county-level population projections used for all State agency planning purposes were updated by the Arizona Department of Administration in December 2012, based on the 2010 U.S. Census. The Arizona Department of Administration projections for Maricopa County were distributed to smaller geographic areas by the Maricopa Association of Governments using the latest available data, including general plans for local jurisdictions, and a state-of- the-art land use model system called AZ-SMART. The nationally-recognized UrbanSim microsimulation model was integrated into AZ SMART and used to allocate county projections of population and employment to regional market areas based upon the pre-existing location of these activities, land consumption, and transportation system accessibility. The allocation from market areas to land use parcels was accomplished with UrbanSim, which simulates real-estate development based on measures such as accessibility to employment, adjacent land uses, highway access, and proximity to other development. Population, households and employment (socioeconomic) projections at the land use parcel level in the Maricopa Association of Governments planning area were aggregated to Traffic Analysis Zones using AZ-SMART. The subcounty socioeconomic projections developed with the AZSMART model were approved by the Maricopa Association of Governments Regional Council in June 2013. The traffic analysis zones socioeconomic projections take into account the transportation improvements contained in the conforming Maricopa Association of Governments Transportation Improvement Program and *Regional Transportation Plan* in effect at the time the projections were approved. As required by the U.S. Environmental Protection Agency, the Maricopa Association of Governments-approved population and employment projections were used to estimate auto and transit trips, vehicle miles of travel, and congestion for each analysis year in the 2014 Maricopa Association of Governments Conformity Analysis and the Final Environmental Impact Statement for the South Mountain Freeway. The methodology used to prepare the socioeconomic projections is described in the *Maricopa Association of Governments Conformity Analysis for the FY 2014-2018 Transportation Improvement Program and the 2035 Regional Transportation Plan*, January 2014 (see Appendix 4-3), which was approved by the U.S. Department of Transportation on February 12, 2014.
13	**Land Use**	Section 93.110 of the U.S. Environmental Protection Agency transportation conformity rule requires that the population and employment projections used in a conformity analysis be the most recent estimates that have been officially approved by the metropolitan planning organization. The Maricopa Association of Governments is the metropolitan planning organization for the Maricopa County

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- Emissions trends from the South Mountain Freeway corridor should be presented, by themselves, in addition to emissions along other road links (e.g., I-10).

Chapters 1 and 4 of the DEIS appear to overstate traffic problems and emissions resulting from the No Action alternative and the benefits of the Action alternatives. The population projections employed in the DEIS are based on pre-recession projections, and now exceed the current highest population projections for Maricopa County by Arizona's Office of Employment and Population Statistics. As a result, the forecasted traffic problems and emissions associated with all alternatives in the DEIS are likely higher than what is reasonably expected to occur based on more current data. Additionally, the congestion issues and emissions that the DEIS describes as a result of the No Action alternative include more trips and more congestion than are reasonable to expect. As a result, the relative benefits of Action alternatives are also likely to be overstated. This overestimate occurs because the travel model forecasts for the Action and No Action alternatives employ the same socioeconomic projections from the Maricopa Association of Governments, which are based on municipal master plans. The underlying master plans assume that the South Mountain Freeway is completed, and do not have land use plans that represent the No Action alternative.

Recommendations:

- Present congestion impacts and emissions for the No Action alternative using updated socioeconomic projections that do not assume completion of the South Mountain Freeway (with appropriate caveats about uncertainty).
- Present the comparison of impacts from the Action and No Action alternatives to reflect the likely differences in land use (e.g., residential and commercial development) between the Action and No Action alternatives.

Health Effects

14 The proposed South Mountain Freeway will place a high-volume roadway adjacent to hundreds of residences and several schools. Although the DEIS did not analyze the number of residences remaining within a designated "buffer of impact" (i.e. within 500 feet of the centerline or edge of the new highway alignment), the document does state that the preferred alternative will displace 845 units, including 680 multifamily residences and 165 single family residences. This is an indication of the urbanized footprint of the proposed project and raises a question regarding the number of remaining residences within close distance of the new highway. It also raises the importance of fully assessing, disclosing, and identifying mitigation measures to address the potential health-related impacts to the remaining adjacent residences. Further, as proposed, the new highway alignment will place 8 lanes of high-volume freeway traffic adjacent to Gila River Indian Community (GRIC) land, where little development, residences, or sensitive receptors currently exist. The disclosure of the potential health impacts of the highway within the EIS process could assist the future of GRIC land-use planning and zoning decisions regarding the types of land uses that will be appropriate directly adjacent to the new freeway.

In addition to the requirement of NEPA to evaluate and disclose such impacts, FHWA has received numerous public comments expressing concern about the potential health impacts in their communities related to air pollution emitted by construction and operation of the proposed South Mountain Freeway (see Chapter 6 appendices). EPA also received request letters asking us to require ADOT and FHWA to assess health impacts of the proposed freeway. We discussed these requests during an interagency call with ADOT and FHWA on February 23, 2010. The DEIS currently does not address these

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13 (cont.)		nonattainment and maintenance areas. In accordance with the Arizona Governor's Executive Order 2011-04, county-level population projections used for all State agency planning purposes were updated by the Arizona Department of Administration in December 2012, based on the 2010 U.S. Census. The Arizona Department of Administration projections for Maricopa County were distributed to smaller geographic areas by the Maricopa Association of Governments using the latest available data, including general plans for local jurisdictions, and a state-of- the-art land use model system called AZ-SMART. The nationally-recognized UrbanSim microsimulation model was integrated into AZ-SMART and used to allocate county projections of population and employment to regional market areas based upon the pre-existing location of these activities, land consumption, and transportation system accessibility. The allocation from market areas to land use parcels was accomplished with UrbanSim, which simulates real-estate development based on measures such as accessibility to employment, adjacent land uses, highway access, and proximity to other development. Population, households and employment (socioeconomic) projections at the land use parcel level in the Maricopa Association of Governments planning area were aggregated to Traffic Analysis Zones using AZ-SMART. The subcounty socioeconomic projections developed with the AZSMART model were approved by the Maricopa Association of Governments Regional Council in June 2013. The traffic analysis zones socioeconomic projections take into account the transportation improvements contained in the conforming Maricopa Association of Governments Transportation Improvement Program and *Regional Transportation Plan* in effect at the time the projections were approved. As required by the U.S. Environmental Protection Agency, the Maricopa Association of Governments-approved population and employment projections were used to estimate auto and transit trips, vehicle miles of travel, and congestion for each analysis year in the 2014 Maricopa Association of Governments Conformity Analysis and the Final Environmental Impact Statement for the South Mountain Freeway. The methodology used to prepare the socioeconomic projections is described in the *Maricopa Association of Governments Conformity Analysis for the FY 2014-2018 Transportation Improvement Program and the 2035 Regional Transportation Plan*, January 2014 (see Appendix 4-3), which was approved by the U.S. Department of Transportation on February 12, 2014.
14	**Health Risk Assessment**	The U.S. Environmental Protection Agency comments request "an air toxics risk assessment that assesses potential health impacts of the project and characterizes exposures to and risks from the pollutants of concern." The U.S. Environmental Protection Agency previously recommended an air toxics risk assessment in an e-mail dated March 12, 2010, and provided two examples from projects in California. The Federal Highway Administration reviewed these materials and provided an extensive response on May 6, 2010. In its response, the Federal Highway Administration provided information on concerns with risk assessment as it relates to highway projects; identified limitations with the two example California studies, including use of a cancer risk factor for diesel particulate matter that has not been adopted or approved by the U.S. Environmental Protection Agency in the Integrated Risk Information System; and pointed out that both of the California examples identified very low risk if diesel particulate matter is excluded. The U.S. Environmental Protection Agency's comments on the Draft Environmental Impact Statement were silent with regard to the Federal Highway Administration's conclusions in its May 6, 2010, review of these studies.

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community concerns. A new freeway would significantly increase the exposure of the surrounding community to mobile source air pollution, including diesel emissions. As many studies suggest this increased exposure is problematic to health, the DEIS should include an air toxics risk assessment that assesses potential health impacts of the project and characterizes exposures to and risks from the pollutants of concern. This analysis could be useful for decision makers by indicating areas where future risk would be elevated, and further mitigation could be considered.

EPA does not agree with the characterization in the DEIS of available modeling tools for conducting emissions and dispersion modeling and risk assessment. The uncertainties in modeling discussed between pages 4-68 and 4-76 have been well-known factors in risk assessment since at least 1983 (http://www.epa.gov/risk_assessment/history.htm), and EPA's risk assessment guidance includes much discussion of such uncertainties, including low-dose extrapolation, and how modeling results may be characterized and assessed in view of these uncertainties. EPA's guidelines on risk assessment have been the subject of numerous reviews by EPA's Scientific Advisory Board and the National Research Council.

Recommendations:

- Analyze and discuss the potential health impacts from the construction and operation at full build out of the new proposed 8-lane freeway to possible receptors along the new corridor.
- The supplemental EIS should describe all sensitive receptors that may be impacted, along with possible mitigation measures to reduce impacts.
- Coordinate with GRIC to disclose potential health impacts from the new freeway corridor so that information will be available to GRIC to assist with land-use and zoning decisions along GRIC lands that are adjacent to the new corridor.
- Available data and methodology for assessing health impacts are provided below.

All of the existing tools and guidance needed to perform a risk characterization for air toxics are available for free on EPA's web site:

- Emissions of air toxics from individual road links may be modeled with MOVES (http://www.epa.gov/otaq/models/moves/index.htm).
- AERMOD may be used to model ambient concentrations of toxics at locations in the project area, given emissions from MOVES. For guidance on how to conduct such analyses, consult the document, "Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM2.5 and PM10 Nonattainment and Maintenance Areas." (http://www.epa.gov/otaq/stateresources/transconf/projectlevel-hotspot.htm#pm-hotspot)
- Given ambient concentrations of air toxics, risk characterization can be done using EPA guidance and data:
    - EPA's Air Toxics Risk Assessment Reference Library (http://www.epa.gov/ttn/fera/risk_atra_main.html) describes how to conduct risk assessment "at the facility and community scale." Volume 1 of the library describes the process and basic technical tools for these analyses, and Volume 2 describes detailed procedures for source-specific or facility-specific risk assessment.
    - EPA's IRIS web site (http://www.epa.gov/IRIS/), referenced on page 4-69, includes the "individual unit risk estimates", also known as "potencies" or "slope factors," which may be employed in the process of cancer risk assessment, and reference concentrations for noncancer risk assessment.

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14 (cont.)		**The Role of Health Risk Assessment in a National Environmental Policy Act Context** The Federal Highway Administration's National Environmental Policy Act documents are developed under two guiding regulations: the Council on Environmental Quality's National Environmental Policy Act regulations applicable to all federal agencies (40 Code of Federal Regulations Parts 1500–1508) and the Federal Highway Administration's implementing regulations governing Federal Highway Administration National Environmental Policy Act documents (23 Code of Federal Regulations Part 771). In its mobile source air toxics guidance, the Federal Highway Administration discusses 40 Code of Federal Regulations Part 1502.22 and acknowledges that while much work has been done to assess the overall health risk of mobile source air toxics, analytical tools and techniques for assessing project-specific health outcomes as a result of lifetime exposures to mobile source air toxics remain limited. These limitations impede the ability to evaluate the potential health risks attributable to exposure to mobile source air toxics as part of the decision-making process in the National Environmental Policy Act context. However, as with any analysis that the Federal Highway Administration conducts for National Environmental Policy Act purposes, the Federal Highway Administration's approach for mobile source air toxic analysis in National Environmental Policy Act documents is informed not just by 40 Code of Federal Regulations Part 1502.22, but by all applicable Council on Environmental Quality requirements. The appropriateness of air toxics health risk assessment as an analysis method for National Environmental Policy Act documents is discussed below, in the context of Council on Environmental Quality requirements for these documents. In addition to the 40 Code of Federal Regulations Part 1502.22 provisions regarding uncertainty and limitations discussed in the Federal Highway Administration's MSAT Interim Guidance Appendix C, three other provisions of the Council on Environmental Quality regulations are particularly relevant to the topic of health risk assessment: *40 Code of Federal Regulations § 1500.1(b): NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.* *40 Code of Federal Regulations § 1502.1: An environmental impact statement is more than a disclosure document. It shall be used by Federal officials in conjunction with other relevant material to plan actions and make decisions.* *40 Code of Federal Regulations § 1502.2: (a) Environmental impact statements shall be analytic rather than encyclopedic. (b) Impacts shall be discussed in proportion to their significance.(c) Environmental impact statements shall be kept concise and shall be no longer than absolutely necessary to comply with NEPA and with these regulations.* Section 1500.1(b) states that information for decision making must be of high quality and based on accurate scientific analysis. Air toxics health risk assessments can involve large uncertainties. The mobile source air toxic health risk assessment uncertainty builds on itself—each step of the analysis involves uncertainties, including modeling traffic and then modeling emissions, and using this estimated output to model dispersion/concentrations, which provide information for

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- EPA's Health Effects Notebook for Hazardous Air Pollutants also includes information on some of the MSATs, including benzene, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, and POMs (http://www.epa.gov/ttn/atw/hlthef/hapindex.html).
- Detailed cancer risk assessment guidance is available in the following EPA documents:
  - "Guidelines for Carcinogen Risk Assessment" (2005) (http://epa.gov/cancerguidelines/)
  - "Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens" (http://epa.gov/cancerguidelines/sup-guidance-early-life-exp-carcinogens.htm)

- If necessary, exposure modeling can be performed using models available from EPA's web site:
  - The Air Pollutants Exposure Model (http://www.epa.gov/ttn/fera/human_apex.html)
  - The Hazardous Air Pollutant Exposure Model (http://www.epa.gov/ttn/fera/human_hapem.html)
  - Another document that can address exposure modeling is EPA's Exposure Factors Handbook (http://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=236252).

Children's Environmental Health and Safety

Executive Order 13045 on Children's Health and Safety directs each Federal agency, to the extent permitted by law, to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and to ensure that its policies, programs, activities, and standards address these risks. Analysis and disclosure of these potential effects under NEPA is necessary because some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to environmental health and safety risks. Although the DEIS identifies communities and public schools located near the proposed project area, the DEIS does not clearly describe the potential direct, indirect, and cumulative impacts of the project on children's health.

Recommendations:

- Evaluate the potential direct, indirect, and cumulative health impacts of the construction and operation of the various project alternatives on children's health. Obtain and discuss relevant health data (e.g., asthma data) for children living near the proposed project area, if available. The analysis should consider the following:
  - Potential respiratory impacts, including asthma, from air pollutant emissions and generation of fugitive dust;
  - Potential noise impacts to health and learning, especially in areas where the project is located near homes, schools, childcare centers and parks; and
  - Potential impacts from the use of chemicals, such as dust suppressants, and hazardous materials to children living near the proposed project areas.
- The population of children living within the affected communities and potential impacts to children's health should be added to the discussion on pages 4-29 through 4-38.
- Additional sensitive receptors, including private schools, charter schools, preschools, and childcare centers, should be added to Figure 5-6, and a discussion of the potential project impacts, including air quality and noise, to these sensitive receptors should be included.
- Further evaluate the proposed project alternatives in order to compare potential impacts to children's health. Clearly identify the project alternatives that have the least impact to children, as well as those alternatives that have the least impact on areas already significantly impacted by existing air pollution, high disease rates, and indicators of social vulnerability.

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14 (cont.)		estimating or assuming exposures to those concentrations, and finally predicting health outcomes. Major uncertainties are associated with traffic and emissions projections over a 70-year period, and dispersion models are typically held to a "factor of 2" performance standard. Health impacts of mobile source air toxics in the U.S. Environmental Protection Agency Integrated Risk Information System are based on a 70-year lifetime exposure, which introduces significant uncertainty (e.g., on average, people in the United States change residence approximately once every 8 years and change jobs once every 3). Finally, as noted above, the U.S. Environmental Protection Agency's Integrated Risk Information System provides toxicity (risk) values for various pollutants and routes of exposure; in a health risk assessment, the Federal Highway Administration would compare calculated concentrations of mobile source air toxic pollutants to the Integrated Risk Information System values to estimate health risk. In the Integrated Risk Information System, the U.S. Environmental Protection Agency states the toxicity values are believed to be accurate to within an order of magnitude (a factor of 10). The total cumulative uncertainty involved in highway project health risk assessment is much larger than the change in emissions attributable to projects (typically a few percentage points). In this context, the information would not necessarily have a strong nexus to the requirements for high-quality information and accurate scientific analysis. Section 1500.1(b) also directs agencies to focus their National Environmental Policy Act analysis and documentation on issues that are truly significant to the action in question. In the context of mobile source air toxics, the Federal Highway Administration must consider whether changes in mobile source air toxic emissions attributable to a project have the potential for significant health risk. Using cancer risk as an example, the U.S. Environmental Protection Agency estimates that the overall risk of cancer in the United States is approximately 330,000 in a million, and that air toxics (from all sources) are responsible for a risk of approximately 50 in a million. In its most recent mobile source air toxics rule-making, the U.S. Environmental Protection Agency estimated mobile source air toxic cancer risk, after implementation of emissions controls, at approximately 5 in a million (or 0.0015 percent of overall cancer risk from any cause). For the Preferred Alternative, the mobile source air toxic emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxic emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxic emissions would decrease by more than 80 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see the discussion beginning on page 4-77 of the Final Environmental Impact Statement). In summary, available information from the U.S. Environmental Protection Agency indicates that mobile source air toxics are a small component of overall cancer risk, and the analysis for the Final Environmental Impact Statement indicates both that the Preferred Alternative would result in a small change in the emissions contributing to this risk and that emissions will decline by a large amount regardless of alternative.

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14 (cont.)		As discussed above and in Appendix C of the Federal Highway Administration's mobile source air toxic guidance, results from the health risk assessment would be influenced more by the uncertainty introduced into the process through assumptions and speculations rather than by genuine insight into the actual health impacts directly attributable to mobile source air toxic exposure associated with a project. Therefore, outcomes of such a health risk assessment do not provide useful information for decision makers, as required by Section 1502.1. The Federal Highway Administration emissions analysis meets the requirement to produce information that is useful for both disclosure and decision making because it allows the public and decision makers to see which alternative has less mobile source air toxic emissions, with much less uncertainty than a health risk assessment. Given the uncertainty of a mobile source air toxic health risk assessment, the Federal Highway Administration instead addresses the potential impacts of mobile source air toxics through an emissions assessment in its National Environmental Policy Act documents. For smaller projects with a lower likelihood of a meaningful impact, this discussion is qualitative. For larger projects, emissions analysis is conducted. The Federal Highway Administration approach is consistent with the Council on Environmental Quality's direction in Section 1502.2(b) to discuss impacts in proportion to their significance. The results of an emissions analysis can be summarized concisely in a National Environmental Policy Act document and provide useful information for decision makers (e.g., an alternative that has lower emissions is likely to be "better" from a mobile source air toxics health risk standpoint than one that has higher emissions). While the U.S. Environmental Protection Agency and the Federal Highway Administration both agree on the usefulness of addressing mobile source air toxics in National Environmental Policy Act documents for highway projects, the agencies disagree about the value of health risk assessment as a method for doing so. This issue has arisen in National Environmental Policy Act consultation for many highway projects around the country and is not unique to the proposed project. In its comment letter, the U.S. Environmental Protection Agency is treating the lack of an mobile source air toxic health risk assessment as a *technical deficiency*, stating that the National Environmental Policy Act document cannot provide a "robust and meaningful air quality analysis" without one. For the reasons described above, a mobile source air toxics health risk assessment is not a "robust and meaningful" method for assessing individual highway projects. As outlined in the Federal Highway Administration's guidance and elsewhere in this response to comments, health risk assessment for mobile source air toxics is not necessary in meeting applicable Council on Environmental Quality regulatory requirements for National Environmental Policy Act documents, nor would the results from the health risk assessment provide additional information over a mobile source air toxic emission assessment for decision makers. Another consideration with respect to health impacts is that the Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No-Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the Preferred Alternative would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times

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- EPA's Health Effects Notebook for Hazardous Air Pollutants also includes information on some of the MSATs, including benzene, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, and POMs (http://www.epa.gov/ttn/atw/hlthef/hapindex.html).
- Detailed cancer risk assessment guidance is available in the following EPA documents:
  - "Guidelines for Carcinogen Risk Assessment" (2005) (http://epa.gov/cancerguidelines/)
  - "Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens" (http://epa.gov/cancerguidelines/sup-guidance-early-life-exp-carcinogens.htm)

- If necessary, exposure modeling can be performed using models available from EPA's web site:
  - The Air Pollutants Exposure Model (http://www.epa.gov/ttn/fera/human_apex.html)
  - The Hazardous Air Pollutant Exposure Model (http://www.epa.gov/ttn/fera/human_hapem.html)
  - Another document that can address exposure modeling is EPA's Exposure Factors Handbook (http://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=236252).

Children's Environmental Health and Safety

Executive Order 13045 on Children's Health and Safety directs each Federal agency, to the extent permitted by law, to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and to ensure that its policies, programs, activities, and standards address these risks. Analysis and disclosure of these potential effects under NEPA is necessary because some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to environmental health and safety risks. Although the DEIS identifies communities and public schools located near the proposed project area, the DEIS does not clearly describe the potential direct, indirect, and cumulative impacts of the project on children's health.

Recommendations:

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- Evaluate the potential direct, indirect, and cumulative health impacts of the construction and operation of the various project alternatives on children's health. Obtain and discuss relevant health data (e.g., asthma data) for children living near the proposed project area, if available. The analysis should consider the following:
  - Potential respiratory impacts, including asthma, from air pollutant emissions and generation of fugitive dust;
  - Potential noise impacts to health and learning, especially in areas where the project is located near homes, schools, childcare centers and parks; and
  - Potential impacts from the use of chemicals, such as dust suppressants, and hazardous materials to children living near the proposed project areas.
- The population of children living within the affected communities and potential impacts to children's health should be added to the discussion on pages 4-29 through 4-38.
- Additional sensitive receptors, including private schools, charter schools, preschools, and childcare centers, should be added to Figure 5-6, and a discussion of the potential project impacts, including air quality and noise, to these sensitive receptors should be included.
- Further evaluate the proposed project alternatives in order to compare potential impacts to children's health. Clearly identify the project alternatives that have the least impact to children, as well as those alternatives that have the least impact on areas already significantly impacted by existing air pollution, high disease rates, and indicators of social vulnerability.

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14 (cont.)		(motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the roadway network. The Federal Highway Administration determined that a supplemental environmental impact statement is not required at this time because there were no changes to the proposed action that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement nor is there new information relevant to environmental concerns and bearings on the proposed action or its impacts that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement.
15	**Children's Health**	Executive Order 13045 provides, in part, that federal agencies make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children and to ensure that their policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks. It further directs federal agencies to protect children from environmental health and safety risks in carrying out their missions. For each "covered regulatory action" (e.g., any substantive action in rule making that is likely to result in a rule that is economically significant [Executive Order 12866] or rule making an agency has reason to believe may disproportionately affect children) submitted to the Office of Management and Budget Office of Information and Regulatory Affairs pursuant to Executive Order 12866, federal agencies should include an evaluation of the effects of the planned regulation on children and why it is preferable. The Federal Highway Administration and the Arizona Department of Transportation do not believe the proposed alternatives would disproportionately affect children, nor are the proposed alternatives described in the Draft Environmental Impact Statement regulatory in nature. Throughout the Draft Environmental Impact Statement, potential impacts on and subsequent mitigation for human health are disclosed and identified, as inherent in the environmental impact statement process. The Draft Environmental Impact Statement incorporates an assessment of the potential impacts of the proposed project on all populations, including children. The Draft Environmental Impact Statement addressed potential impacts of the project on children in the Chapter 4 environmental consequences analysis. In that chapter, the Draft Environmental Impact Statement notes that, based on U.S. Census results, the percentage of female heads of households with children in the Study Area was 59 percent higher than that of the county (see page 4-30 of the Draft Environmental Impact Statement). Additionally, local school districts and other organizations were contacted to determine the effects a major transportation project would have (noting that most low-income children arrived at school by bus) (see page 4-31 of the Draft Environmental Impact Statement). The Draft Environmental Impact Statement also included a review of the U.S. Environmental Protection Agency's Toxicity and Exposure Assessments for Children's Health, which indicated that indoor air concentrations of benzene are usually higher than outdoor levels and that indoor air in smokers' homes is a significant contributor to children's exposures and mentioned children when identifying the effects of acute exposure to naphthalene (see pages 4-63 and 4-64 of the Draft Environmental Impact Statement). The Draft Environmental Impact Statement acknowledged and fully disclosed public scoping comments that raised

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15 (cont.)		the topic of health effects on neighborhoods and adjacent schools (see page 6-12 of the Draft Environmental Impact Statement). The Draft Environmental Impact Statement evaluated Clean Air Act criteria air pollutant concentrations in Maricopa County and the Phoenix area (see pages 4-58 to 4-62 of the Draft Environmental Impact Statement). With regard to air quality impacts, the Draft Environmental Impact Statement addressed children's health impacts within the broader discussion regarding health impacts under the National Ambient Air Quality Standards. Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety and are requisite to protect the public health. As noted by the U.S. Environmental Protection Agency in its 2013 rulemaking for particulate matter, Clean Air Act § 109's legislative history demonstrates that the primary standards are "to be set at the maximum permissible ambient air level ... which will protect the health of any [sensitive] group of the population" (78 *Federal Register* 3086 and 3090) (quoting S. Rep. No. 91-1196, 91st Cong., 2 Sess. 10 [1970]) (alterations in original). Accordingly, the Draft Environmental Impact Statement National Ambient Air Quality Standards-based evaluation of criteria air pollutants included a health-based review of sensitive populations, including children, given the National Ambient Air Quality Standards' inherent consideration of those factors. Furthermore, the National Ambient Air Quality Standards-based assessment ensures adequate consideration of health-based issues as "[t]he requirement that primary standards provide an adequate margin of safety was intended to address uncertainties associated with inconclusive scientific and technical information ... and to protect against hazards that research has not yet identified" (78 *Federal Register* 3090). Sensitive receivers for noise and air are already included in the air quality and noise analyses in accordance with State and federal guidance. Both sections, *Air Quality* and *Noise*, beginning on Final Environmental Impact Statement pages 4-68 and 4-88, respectively, have addressed requirements under the National Environmental Policy Act. As stated on page 4-89 of the Final Environmental Impact Statement, over 220 sensitive receivers were evaluated at exterior locations from a traffic noise perspective. All of the receivers represent noise-sensitive land uses in proximity to the proposed project, including homes, schools, and parks, and these receivers would have higher noise levels than similar facilities more distant from the proposed action. In response to comments by the U.S. Environmental Protection Agency, each modeled school was reexamined to determine whether noise impacts would result from the proposed freeway and whether appropriate mitigation of these impacts was provided. Of the nine schools modeled in the analysis for the Draft and Final Environmental Impact Statements, all were predicted to exceed the Arizona Department of Transportation Noise Abatement Criteria (see Table 4-40, beginning on page 4-93). Mitigation, in the form of noise walls, was proposed for all schools. After applying this mitigation, all schools except one were mitigated according to the Arizona Department of Transportation noise policy. According to Arizona Department of Transportation policy, noise mitigation should achieve a reduction of 5 to 7 A-weighted decibels and result in a noise level of less than 64 A-weighted decibels for residential and similar areas. These criteria were not reached for one school (receiver 67, Santa Maria Elementary School) because the policy limits wall heights to 20 feet. A wall taller than 20 feet would be required to bring levels at this receiver down to 64 A-weighted decibels. However, a 5-decibel reduction would be

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- EPA's Health Effects Notebook for Hazardous Air Pollutants also includes information on some of the MSATs, including benzene, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, and POMs (http://www.epa.gov/ttn/atw/hlthef/hapindex.html).
- Detailed cancer risk assessment guidance is available in the following EPA documents:
  - "Guidelines for Carcinogen Risk Assessment" (2005) (http://epa.gov/cancerguidelines/)
  - "Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens" (http://epa.gov/cancerguidelines/sup-guidance-early-life-exp-carcinogens.htm)

- If necessary, exposure modeling can be performed using models available from EPA's web site:
  - The Air Pollutants Exposure Model (http://www.epa.gov/ttn/fera/human_apex.html)
  - The Hazardous Air Pollutant Exposure Model (http://www.epa.gov/ttn/fera/human_hapem.html)
  - Another document that can address exposure modeling is EPA's Exposure Factors Handbook (http://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=236252).

Children's Environmental Health and Safety

Executive Order 13045 on Children's Health and Safety directs each Federal agency, to the extent permitted by law, to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and to ensure that its policies, programs, activities, and standards address these risks. Analysis and disclosure of these potential effects under NEPA is necessary because some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to environmental health and safety risks. Although the DEIS identifies communities and public schools located near the proposed project area, the DEIS does not clearly describe the potential direct, indirect, and cumulative impacts of the project on children's health.

Recommendations:

- Evaluate the potential direct, indirect, and cumulative health impacts of the construction and operation of the various project alternatives on children's health. Obtain and discuss relevant health data (e.g., asthma data) for children living near the proposed project area, if available. The analysis should consider the following:
  - Potential respiratory impacts, including asthma, from air pollutant emissions and generation of fugitive dust;
  - Potential noise impacts to health and learning, especially in areas where the project is located near homes, schools, childcare centers and parks; and
  - Potential impacts from the use of chemicals, such as dust suppressants, and hazardous materials to children living near the proposed project areas.

16 • The population of children living within the affected communities and potential impacts to children's health should be added to the discussion on pages 4-29 through 4-38.

15 • Additional sensitive receptors, including private schools, charter schools, preschools, and childcare centers, should be added to Figure 5-6, and a discussion of the potential project impacts, including air quality and noise, to these sensitive receptors should be included.

15 • Further evaluate the proposed project alternatives in order to compare potential impacts to children's health. Clearly identify the project alternatives that have the least impact to children, as well as those alternatives that have the least impact on areas already significantly impacted by existing air pollution, high disease rates, and indicators of social vulnerability.

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15 (cont.)		provided by the 20-foot wall proposed in this area. It is important to note that this receiver would be affected only by the W71 Alternative, which is not the Preferred Alternative. The Arizona Department of Transportation noise policy also states that noise abatement shall be considered if "substantial increases" (defined as a 15 A-weighted decibel or greater increase) are predicted. Of the nine schools modeled, substantial increases were predicted at six schools. As discussed above, however, noise walls would reduce noise levels at all schools according to the Arizona Department of Transportation noise policy, with the exception of Santa Maria Elementary School, which would be affected only by the W71 Alternative, which is not the Preferred Alternative. According to the Federal Highway Administration's 1995 Highway Traffic Noise Analysis and Abatement Policy and Guidance, in most cases, if the exterior area can be protected, the interior will also be protected. Likewise, as noted on page 4-65 of the Draft Environmental Impact Statement, over 700 receptors were modeled for carbon monoxide concentrations. Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations § 93.123(a). The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Thus, the particulate matter (PM_{10}) analysis demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Through analysis, the Federal Highway Administration has determined that the proposed project would not produce disproportionate impacts to children.
16	**Children's Health**	Executive Order 12898 and Title VI of the Civil Rights Act of 1964 are discussed on pages 4-29 through 4-38 of the Draft Environmental Impact Statement. In the federal definitions characterizing these populations, "children" is not an included population. Therefore, it would be inaccurate to include a discussion on children.

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15	• Identify mitigation measures to reduce impacts from the proposed project's construction and operation to schools and child care centers near the proposed project area, including measures identified in the voluntary EPA School Siting Guidelines (http://www.epa.gov/schools/siting/download.html), and voluntary EPA Guidelines for States: Development and Implementation of a School Environmental Health Program (http://www.epa.gov/schools/ehguidelines/index.html). Engage local school districts, child care providers, and others to discuss mitigation measures. **Construction Emissions** Page 4-161 discusses mitigation measures to be implemented to reduce emissions from construction. In addition to the identified measures, EPA recommends that FHWA consider implementing the mitigation measures listed below. ***Recommendations:***
17	• Implement a strong anti-idling policy at all construction sites, and limit idling of heavy equipment and trucks to less than five minutes.
18	• Larger Tier 4 construction equipment will be more widely available in 2015.[4] To the extent practicable, starting in 2015, limit construction equipment to EPA's Tier 4 emission standards.
19	• Commit to the use of construction equipment powered by alternative fuels (i.e., biodiesel, compressed natural gas, and electricity) where feasible.
20	• Train construction contractors and their employees on air quality impacts from construction activities and potential health risks to nearby receptors, and ways to reduce emissions (no idling, using PM filters, using alternative fuels, etc.). **Displacement** Page 4-39 states that the preferred alternative will displace 165 single family residences and 680 multifamily residences, for a total of 845 displaced units. While this represents the fewest single family homes affected (other alternatives range in impacts from between 710 to 969 when adding the Eastern and Western alignments), the preferred alignment is the only alignment that will affect multifamily residences (other alternatives will affect no multifamily residences). The DEIS discussion of displacements focuses mainly on single residences being affected and lacks important detail regarding multifamily residential impacts. Page 4-40 states a rental vacancy rate of 9% for the displaced multifamily residences, based on 2009 data. It is unclear what opportunities exist currently for the potentially displaced 680 multifamily residences. The Environmental Justice Analysis on page 4-38 states that the "availability of replacement housing" for Section 8 vouchers is not easily quantified. It is therefore not clear to what extent low-income and/or minority populations will be affected by the project. Additional mitigation and/or community outreach, and assistance may be necessary to offset relocation impacts.

4 More information is available at http://www.dieselnet.com/standards/us/nonroad.php.

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17	**Temporary Construction Impacts**	Environmental analyses conducted for and documented in the Draft Environmental Impact Statement comply with the Federal Highway Administration's regulations for implementing the National Environmental Policy Act at 23 Code of Federal Regulations § 771. Limiting trucks and equipment to 5 minutes of idling would be unsafe and inefficient. In the Phoenix area, equipment operators depend on air conditioning. Shutting down equipment would place equipment operators in danger of hyperthermia. In addition, shutting down equipment requires a cooling down period to allow hydraulic fluid to cool and a corresponding period to allow the fluid to warm to operating temperatures after a restart. As a result, shutting down and restarting equipment could actually result in more idling, not less.
18	**Temporary Construction Impacts**	Environmental analyses conducted for and documented in the Draft Environmental Impact Statement comply with the Federal Highway Administration's regulations for implementing the National Environmental Policy Act at 23 Code of Federal Regulations § 771; however, to address the comment from the U.S. Environmental Protection Agency, the following contractor mitigation measure has been added to the Final Environmental Impact Statement on page 4-173: "To the extent practicable, construction equipment that meets the U.S. Environmental Protection Agency's Tier 4 emission standards shall be used."
19	**Temporary Construction Impacts**	Environmental analyses conducted for and documented in the Draft Environmental Impact Statement comply with the Federal Highway Administration's regulations for implementing the National Environmental Policy Act at 23 Code of Federal Regulations § 771; however, to address the comment from the U.S. Environmental Protection Agency, the following contractor mitigation measure has been added to the Final Environmental Impact Statement on page 4-173: "Where feasible, construction equipment powered by alternative fuels (e.g., biodiesel, compressed natural gas, electricity) shall be used."
20	**Temporary Construction Impacts**	Environmental analyses conducted for and documented in the Draft Environmental Impact Statement comply with the Federal Highway Administration's regulations for implementing the National Environmental Policy Act at 23 Code of Federal Regulations § 771; however, to address the comment from the U.S. Environmental Protection Agency, the following Phoenix Construction District mitigation measure has been added to the Final Environmental Impact Statement on page 4-173: "ADOT will provide training to contractor's personnel regarding air quality impacts from construction activities, potential health risks to nearby residents, and methods to reduce emissions."

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21	***Recommendations:*** • Commit to specific mitigation measures to minimize the impacts of displacement and relocation on low-income and minority populations, with particular attention to the needs of those living in below-market rental housing. Identify each measure along with a description of the responsible party, timing for implementation, and length of time anticipated for complete implementation.
21	• Include commitments to specific funding options or other policy measures that would ensure the relocation of all displaced residents to decent, safe, and sanitary replacement housing that is within the residents' financial means.
21	• Discuss specifics of how and where potential relocation could occur, including reference to actual locations where housing can either be built or currently exists. Include a clear timeline, with responsible parties identified, to indicate the schedule for proposed relocations compared with the schedule for the proposed construction of the project.
21	• Include a more comprehensive vision of the future proposed relocation plan for affected residents as a result of this and other transportation projects in the area. ADOT and FHWA should provide additional information on assumptions, estimates, and projections for where displaced residences will ultimately live based on current (rather than 2009) estimates.
21	• Conduct interviews with all potential displaced residents to determine relocation needs. Confirm that those who have special needs will be accommodated with a plan for assistance as needed. Based on the results from the interviews, consider additional measures to minimize the impacts of relocation, such as providing translations services, transportation to visit potential replacement housing, and/or additional relocation specialists to work with these communities.
21	• To mitigate community character and cohesion impacts to low-income and minority communities, conduct public workshops and work directly with affected populations to identify effective and creative ways to minimize or mitigate these impacts.
	Noise Impacts The DEIS compares estimated noise levels to FHWA Noise Abatement Criteria. It is unclear whether potential project impacts to interior noise levels were estimated.
22	***Recommendations:*** • Clarify whether mitigated interior noise levels were estimated for homes, schools, childcare centers, and other sensitive receptors. If not, assess the potential interior noise levels that may be experienced at these locations. Discuss the potential noise impacts on health and learning, especially at homes, schools, and childcare centers.
22	• Page 4-90 of the DEIS identifies noise walls or earth berms as noise mitigation measures. As several homes and learning environments are located near the proposed project alignments and may be affected by both the construction and operation of the proposed project, EPA recommends that FHWA consider other noise mitigation measures, such as retrofitting homes, classrooms, and childcare centers with acoustic insulation.
	Tolling EPA is aware that several toll feasibility studies are underway in the Phoenix metropolitan area for roadways that are near or adjacent to the proposed project corridor, including I-10, I-17, and the proposed North-South Corridor. Tolling on these roadways has the potential to significantly affect traffic on the future South Mountain Freeway by reducing traffic on tolled facilities and shifting traffic

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21	**Displacements and Relocations**	Based on the comment received, the Arizona Department of Transportation Right-of-Way Group in conjunction with the Federal Highway Administration Right-of-way Officer developed mitigation that explains in detail the actions that would be taken to implement the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act) (see page 4-46 of the Final Environmental Impact Statement). The mitigation would ensure that the Arizona Department of Transportation provides uniform, fair, and equitable treatment of people whose property is affected or who are displaced as a result of the project, including minority and low-income populations. Advisory assistance services and compensation practices are described in detail in the Arizona Department of Transportation's *Right-of-way Procedures Manual*, located at <azdot.gov/business/RightofWay_Properties/booklets-and-manuals>. For further discussion, see page 4-51 of the Final Environmental Impact Statement and Appendix 4-1. For questions on specific properties, contact the Arizona Department of Transportation Right-of-Way Group at (602) 712-7316.
22	**Noise**	The noise analyses conducted for and documented in the Final Environmental Impact Statement complies with the Federal Highway Administration's regulations for conducting noise analysis in 23 Code of Federal Regulations § 772. The Federal Aid Highway Act of 1970 required the Federal Highway Administration to develop highway traffic noise standards for use in the planning and design of new highway projects. These standards were promulgated by the Federal Highway Administration on February 8, 1973, and are currently contained in 23 Code of Federal Regulations Part 772. According to 23 Code of Federal Regulations § Part 772.11(c)(2)(iv), an indoor analysis shall be done only after exhausting all outdoor analysis options; therefore, interior noise levels were not specifically assessed in the Draft Environmental Impact Statement or the Final Environmental Impact Statement. Sensitive receivers for noise were included in the noise analysis in accordance with State and federal guidance. The section, *Noise*, beginning on Final Environmental Impact Statement page 4-88 has addressed requirements under the National Environmental Policy Act. As stated on page 4-89 of the Final Environmental Impact Statement, over 220 sensitive receivers were evaluated at exterior locations from a traffic noise perspective. All of the receivers represent noise-sensitive land uses in proximity to the proposed project, including homes, schools, and parks, and these receivers would have higher noise levels than similar facilities more distant from the proposed action. In response to comments by the U.S. Environmental Protection Agency, each modeled school was reexamined to determine whether noise impacts would result from the proposed freeway and whether appropriate mitigation of these impacts was provided. Of the nine schools modeled in the analysis for the Draft and Final Environmental Impact Statements, all were predicted to exceed the Arizona Department of Transportation Noise Abatement Criteria (see Table 4-40, beginning on page 4-93). Mitigation, in the form of noise walls, was proposed for all schools. After applying this mitigation, all schools except one were mitigated according to the Arizona Department of Transportation noise policy. According to Arizona Department of Transportation policy, noise mitigation should achieve a reduction of 5 to 7 A-weighted decibels and result in a noise level of less than 64 A-weighted decibels for residential and similar areas. These criteria were not reached for one school (receiver 67, Santa Maria Elementary School) because the policy limits wall heights to 20 feet. A wall taller than 20 feet would be required to bring levels at this receiver down to 64 A-weighted decibels. However, a 5-decibel reduction would be provided by the 20-foot wall proposed in this area. It is important to note that this receiver would be affected only by the W71 Alternative, which is not the Preferred Alternative.

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to non-tolled roads. This has potential implications for analyses of air quality, noise, and environmental justice, as well as additional potential indirect and cumulative impacts. It is unclear whether any toll feasibility study was conducted for the proposed South Mountain Freeway, and there is no discussion in the DEIS of the current toll feasibility studies on adjacent roadways.

Recommendations:

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- Disclose results of any toll feasibility study conducted for the proposed project. If no toll feasibility study was conducted, provide a discussion as to why.
- Provide details of current toll feasibility studies being conducted on nearby roadways. Include a discussion of how future tolling on these roadways could affect traffic and associated impacts on the South Mountain Freeway.

Coordination with Gila River Indian Community and Impacts to Sacred Sites

The DEIS describes extensive coordination with the Gila River Indian Community (GRIC) and a history of considering a possible freeway alignment on GRIC lands. We understand that there is still interest within the GRIC community for analyzing a possible freeway alignment on GRIC lands that would avoid the impacts to sacred sites that will result from the current preferred alignment. While we understand that there may never be one alignment route fully supported by the entire tribal community and government, we encourage ADOT and FHWA to continue to work closely with GRIC to reduce impacts to sacred sites and traditional cultural properties to the greatest extent possible.

Further, there are many resources regarding the potential health impacts of locating sensitive receptors adjacent to freeways as well as the benefits of smart growth and location efficient housing. ADOT and FHWA should disclose these potential near-roadway health impacts and ensure GRIC has access to the most current information available regarding optimizing land use decisions and safeguarding health in the face of a potential new freeway directly adjacent to GRIC land.

Recommendations:

- Continue to work closely with GRIC to reduce the proposed project impacts to sacred sites and traditional cultural properties.
- Evaluate all mitigation measures suggested by GRIC to determine their effectiveness and feasibility. Identify where implementation of GRIC mitigation measures has been rejected and provide a discussion of the reasons for rejection.
- Provide all resources available to GRIC regarding near-roadway health impacts and land-use planning and zoning recommendations for lands adjacent to a new highway.
- Should additional alignment alternatives on GRIC land become feasible as a result of tribal approval, these alternatives should be studied in detail and all impacts disclosed in the supplemental DEIS.

Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, directs each Federal agency to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations

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22 (cont.)		The Arizona Department of Transportation noise policy also states that noise abatement shall be considered if "substantial increases" (defined as a 15 A-weighted decibel or greater increase) are predicted. Of the nine schools modeled, substantial increases were predicted at six schools. As discussed previously, however, noise walls would reduce noise levels at all schools according to Arizona Department of Transportation noise policy, with the exception of Santa Maria Elementary School, which would be affected only by the W71 Alternative, which is not the Preferred Alternative. According to the Federal Highway Administration's 1995 Highway Traffic Noise Analysis and Abatement Policy and Guidance, in most cases, if the exterior area can be protected, the interior will also be protected. The noise analysis has been updated for the Final Environmental Impact Statement using the most recent Arizona Department of Transportation and Federal Highway Administration policy and traffic projections provided by the Maricopa Association of Governments in November 2013. This updated analysis begins on page 4-88 of the Final Environmental Impact Statement, but no substantial differences between the analysis presented in the Draft Environmental Impact Statement and the Final Environmental Impact Statement resulted. Therefore, no substantial differences in mitigation between the Draft Environmental Impact Statement and Final Environmental Impact Statement were recommended and no mitigation methods other than noise walls were necessary. It is also important to note that the Arizona Department of Transportation noise analysis process is not complete. As design advances, should an action alternative be selected, additional modeling would occur to further refine the mitigation used for the project (see Figure 4-30 on page 4-100 of the Final Environmental Impact Statement).
23	**Tolling**	According to 40 Code of Federal Regulations § 1502.9(a), the agency shall make every effort to disclose and discuss at appropriate points in the draft statement all major points of view on the environmental impacts of the alternatives including the proposed action. Tolling in relation to the project is disclosed in both Chapters 1 and 3 of the Draft and Final Environmental Impact Statements. In 1996, a consortium of private companies proposed to build a South Mountain Freeway as a toll road. The consortium later withdrew its proposal, saying the project was not financially feasible. The proposal is documented in the *Alignment Recommendation, South Mountain Corridor Loop 202*, as noted on page 1-8 of the Draft Environmental Impact Statement. Tolling has not been considered for the current study. The project would be completely funded through federal sources and a local ½-cent sales tax, as programmed in the Arizona Department of Transportation 5-year Transportation Facilities Construction Program and the Maricopa Association of Governments *Regional Transportation Plan*; therefore, tolling is not required to fund the proposed action.
24	**Tolling**	According to 46 *Federal Register* 18026 (March 23, 1981), the environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or are probable, rather than those that are merely possible. The Maricopa Association of Governments has completed recent studies of the feasibility of implementing congestion pricing, also known as managed lanes or high-occupancy toll lanes, on the region's freeways (see *2035 Regional Transportation Plan*, Maricopa Association of Governments, January 2014). While these types of tolling are being considered in the Phoenix metropolitan area, there is no history of performance in the region by which to assess the effects on the proposed freeway.

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to non-tolled roads. This has potential implications for analyses of air quality, noise, and environmental justice, as well as additional potential indirect and cumulative impacts. It is unclear whether any toll feasibility study was conducted for the proposed South Mountain Freeway, and there is no discussion in the DEIS of the current toll feasibility studies on adjacent roadways.

Recommendations:

- Disclose results of any toll feasibility study conducted for the proposed project. If no toll feasibility study was conducted, provide a discussion as to why.
- Provide details of current toll feasibility studies being conducted on nearby roadways. Include a discussion of how future tolling on these roadways could affect traffic and associated impacts on the South Mountain Freeway.

Coordination with Gila River Indian Community and Impacts to Sacred Sites

The DEIS describes extensive coordination with the Gila River Indian Community (GRIC) and a history of considering a possible freeway alignment on GRIC lands. We understand that there is still interest within the GRIC community for analyzing a possible freeway alignment on GRIC lands that would avoid the impacts to sacred sites that will result from the current preferred alignment. While we understand that there may never be one alignment route fully supported by the entire tribal community and government, we encourage ADOT and FHWA to continue to work closely with GRIC to reduce impacts to sacred sites and traditional cultural properties to the greatest extent possible.

Further, there are many resources regarding the potential health impacts of locating sensitive receptors adjacent to freeways as well as the benefits of smart growth and location efficient housing. ADOT and FHWA should disclose these potential near-roadway health impacts and ensure GRIC has access to the most current information available regarding optimizing land use decisions and safeguarding health in the face of a potential new freeway directly adjacent to GRIC land.

Recommendations:

25 26

- Continue to work closely with GRIC to reduce the proposed project impacts to sacred sites and traditional cultural properties.
- Evaluate all mitigation measures suggested by GRIC to determine their effectiveness and feasibility. Identify where implementation of GRIC mitigation measures has been rejected and provide a discussion of the reasons for rejection.
- Provide all resources available to GRIC regarding near-roadway health impacts and land-use planning and zoning recommendations for lands adjacent to a new highway.
- Should additional alignment alternatives on GRIC land become feasible as a result of tribal approval, these alternatives should be studied in detail and all impacts disclosed in the supplemental DEIS.

Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, directs each Federal agency to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations

Code	Issue	Response
25	**Cultural Resources**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties such as the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
26	**Cultural Resources**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties such as the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resource studies and engaging in an ongoing, open dialogue with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the Gila River Indian Community that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed South Mountain Freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. The physical impact on land designated as part of the South Mountains has been minimized through design and much has already been done to replace or otherwise mitigate that effect. Access to the mountain would be maintained and multiple other mitigation measures would be implemented due in part to suggestions made by the Gila River Indian Community itself. The proposed mitigation for the South Mountains Traditional Cultural Property is discussed in the Final Environmental Impact

(Response 26 continues on next page)

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Recommendations:

- Disclose results of any toll feasibility study conducted for the proposed project. If no toll feasibility study was conducted, provide a discussion as to why.
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Further, there are many resources regarding the potential health impacts of locating sensitive receptors adjacent to freeways as well as the benefits of smart growth and location efficient housing. ADOT and FHWA should disclose these potential near-roadway health impacts and ensure GRIC has access to the most current information available regarding optimizing land use decisions and safeguarding health in the face of a potential new freeway directly adjacent to GRIC land.

Recommendations:

- Continue to work closely with GRIC to reduce the proposed project impacts to sacred sites and traditional cultural properties.
- Evaluate all mitigation measures suggested by GRIC to determine their effectiveness and feasibility. Identify where implementation of GRIC mitigation measures has been rejected and provide a discussion of the reasons for rejection.
- Provide all resources available to GRIC regarding near-roadway health impacts and land-use planning and zoning recommendations for lands adjacent to a new highway. (27)
- Should additional alignment alternatives on GRIC land become feasible as a result of tribal approval, these alternatives should be studied in detail and all impacts disclosed in the supplemental DEIS.

Environmental Justice

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Code	Issue	Response
26 (cont.)		Statement beginning on page 4-143, and measures to minimize harm to the South Mountains Traditional Cultural Property are discussed on page 5-27 of the Final Environmental Impact Statement. No mitigation was "rejected" as part of the environmental impact statement process. Certain community factions and members of the Gila River Indian Community have supported the selection of the No-Action Alternative; however, to be clear, such a recommendation is not a form of mitigation. This is comprehensively discussed in the section, *Cultural Resources*, beginning on page 4-128, and in Chapter 5, *Section 4(f) Evaluation*, beginning on page 5-1 of the Draft Environmental Impact Statement. The Gila River Indian Community submitted comments on the Draft Environmental Impact Statement in a letter dated July 3, 2013. This letter and the responses to the Gila River Indian Community comments may be found beginning on page B38 of Appendix 7, Volume III, to the Final Environmental Impact Statement.
27	**Land Use**	"Near-roadway health impacts" is a broad topic that encompasses air quality and other environmental and social effects, including noise. For air quality, the Draft and Final Environmental Impact Statements present information about the Preferred Alternative compared with the No-Action Alternative that is applicable to both tribal and non-tribal lands. The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Final Environmental Impact Statement also includes a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The emission modeling developed for the proposed action estimated that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. Regardless of alternative, modeled mobile source air toxics emissions would decrease by more than 80 percent relative to 2012 levels, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The Federal Highway Administration does not have land use planning or zoning authority. Its Office of Planning does publish some resources related to smart growth, health in transportation planning, and other related topics; see <fhwa.dot.gov/planning/>. The Gila River Indian Community can also benefit from the experience of many local governments in the Phoenix area that have already made land use and zoning decisions for vacant land adjacent to both new and existing roadway facilities.

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Recommendations:

- Disclose results of any toll feasibility study conducted for the proposed project. If no toll feasibility study was conducted, provide a discussion as to why.
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Further, there are many resources regarding the potential health impacts of locating sensitive receptors adjacent to freeways as well as the benefits of smart growth and location efficient housing. ADOT and FHWA should disclose these potential near-roadway health impacts and ensure GRIC has access to the most current information available regarding optimizing land use decisions and safeguarding health in the face of a potential new freeway directly adjacent to GRIC land.

Recommendations:

- Continue to work closely with GRIC to reduce the proposed project impacts to sacred sites and traditional cultural properties.
- Evaluate all mitigation measures suggested by GRIC to determine their effectiveness and feasibility. Identify where implementation of GRIC mitigation measures has been rejected and provide a discussion of the reasons for rejection.
- Provide all resources available to GRIC regarding near-roadway health impacts and land-use planning and zoning recommendations for lands adjacent to a new highway.
- Should additional alignment alternatives on GRIC land become feasible as a result of tribal approval, these alternatives should be studied in detail and all impacts disclosed in the supplemental DEIS.

28

Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, directs each Federal agency to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations

Code	Issue	Response
28	**Alternatives**	In accordance with 40 Code of Federal Regulations § 1502.14, the Arizona Department of Transportation and Federal Highway Administration explored and evaluated all reasonable alternatives. Page 2-10 of the Draft Environmental Impact Statement discusses the path forward should alternatives on Gila River Indian Community land become available for study. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

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and low-income populations.[5] There is a growing body of evidence that low-income and minority communities are more vulnerable to pollution impacts than other communities, including deficits of both a physical and social nature that make the effects of environmental pollution more burdensome.[6] Environmental justice concerns may arise from the potential human health, ecological, social, cultural, and economic impacts associated with a proposed project. According to the DEIS (page 4-167), the communities within the study area have a much higher minority composition (68%) compared to Maricopa County (41%). The DEIS states that all action alternatives would have direct but not disproportionate impacts on populations with environmental justice characteristics (see page 4-175), but this appears to be a premature and unsupported conclusion. The current analysis does not consider the full suite of potential impacts from the proposed project and how these impacts may disproportionately affect minority, low-income, and indigenous populations. The environmental justice analysis in the DEIS focuses mainly on relocations and displacements. The environmental justice analysis should reference air quality, noise, and other potential project impacts to communities living near the proposed alignments.

Recommendations:

29

- Identify and document all environmental and human health impacts that may have a disproportionately high impact on minority populations, low-income populations, and/or indigenous populations. The environmental justice analysis should evaluate the direct, indirect, and cumulative impacts of each project alternative to these populations, and identify whether there may be disproportionately high and adverse human health or environmental effects. The analysis should incorporate relevant demographic, socioeconomic, environmental and health data, if available, to fully understand potential project impacts.
- Evaluate the localized impacts from the construction and operation of each project alternative and how these impacts affect minority, low-income, and indigenous communities located near proposed project alignments. Communities that are closer to the proposed project alignments are at a higher risk of near-roadway exposure. Near-roadway exposure to air pollution is linked to a variety of adverse health outcomes including asthma and adverse birth and childhood outcomes.[7]
- Identify appropriate mitigation measures to reduce or eliminate any adverse impacts to minority, low-income and indigenous populations throughout the project's construction and operation. Clearly identify project alternatives with the least impact to these populations.
- Mitigation measures should be developed through open, collaborative processes that include the public and affected communities. Identifying mitigation measures responsive to community concerns and supported by affected communities could further protect these communities from any disproportionate and adverse impacts.

5 http://www.archives.gov/federal-register/executive-orders/pdf/12898.pdf

6 EPA Symposium on the Science of Disproportionate Environmental Health Impacts, March 17 - 19, 2010. The fourteen scientific reviews commissioned by EPA and published in the American Journal of Public Health are listed on EPA's website: http://epa.gov/ncer/events/news/2011/10_25b_11_feature.html. The commissioned papers were published in the American Journal of Public Health in December 2011: http://ajph.aphapublications.org/toc/ajph/101/S1. See also EPA's Framework for Cumulative Risk Assessment: http://www.epa.gov/raf/publications/pdfs/frmwrk_cum_risk_assmnt.pdf

7 Padmanabhan, N. & Glenn, B. August 2009. *EPA Research Focus on Health Effects of Near-Roadway Air Pollution.* Air and Waste Management Association, EM Magazine. Available at http://www.epa.gov/ord/ca/pdf/2009padmanabhan.pdf

Code	Issue	Response
29	**Environmental Justice**	Executive Order 12898 on environmental justice requires that environmental justice principles be considered in federal programs, policies, and activities. In preparing the Draft Environmental Impact Statement, a careful and comprehensive review was undertaken to evaluate whether the project would have disproportionately high and adverse effects on minority populations, low-income populations, and/or indigenous populations. According to Federal Highway Administration Order 6640.23A, a disproportionately high and adverse effect on a minority or low-income population means the adverse effect is predominantly borne by such population or is appreciably more severe or greater in magnitude on the minority or low-income population than the adverse effect suffered by the non-minority or non-low-income population. In undertaking this evaluation as to whether the project would result in disproportionately high and adverse impacts on minority, low-income, and/or indigenous populations, in accordance with Federal Highway Administration Order 6640.23A, the beneficial and adverse effects of the project on the overall population, and on minority, low-income, and indigenous populations in particular, were reviewed in the sections of the Draft Environmental Impact Statement pertaining to *Land Use, Social Conditions, Displacements and Relocations, Economic Impacts, Air Quality, Noise, Cultural Resources, Visual Resources, Prime and Unique Farmlands,* and *Temporary Construction Impacts*. Consistent with the National Environmental Policy Act, mitigation was proposed to address potential adverse impacts of the project for the overall population in the Study Area, including minority populations, low-income populations, and/or indigenous populations. It was determined that there would be no disproportionately high and adverse effects on minority populations, low-income populations, and/or indigenous populations. The section, *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionate adverse effects from the proposed action on certain populations including minority and low-income populations. In light of the comments received, the environmental justice and Title VI analyses in the Draft Environmental Impact Statement were reviewed, and the Final Environmental Impact Statement has been revised to discuss environmental justice and Title VI separately and to clarify how the conclusions in the *Environmental Justice and Title VI* section were reached (see pages 4-41 and 4-45 of the Final Environmental Impact Statement). The Final Environmental Impact Statement also clarifies potential impacts on minority, low-income, and/or indigenous populations in sections other than the *Environmental Justice and Title VI* section. For example, in the *Noise* section, the number of receivers affected that are located in census blocks or census block groups with environmental justice populations are identified (see text beginning on page 4-89 of the Final Environmental Impact Statement). With this clarification, conclusions on the subject in the Draft Environmental Impact Statement were validated in so far as there would be no disproportionately high and adverse impacts on minority, low-income, and/or indigenous environmental justice populations or disparate impacts to minority groups protected by Title VI. Potential impacts from each alternative are discussed in the Final Environmental Impact Statement. To the extent this comment suggests that a health risk assessment is required, the Arizona Department of Transportation and Federal Highway Administration respectfully disagree, as explained in response code #14.

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and low-income populations.[5] There is a growing body of evidence that low-income and minority communities are more vulnerable to pollution impacts than other communities, including deficits of both a physical and social nature that make the effects of environmental pollution more burdensome.[6] Environmental justice concerns may arise from the potential human health, ecological, social, cultural, and economic impacts associated with a proposed project. According to the DEIS (page 4-167), the communities within the study area have a much higher minority composition (68%) compared to Maricopa County (41%). The DEIS states that all action alternatives would have direct but not disproportionate impacts on populations with environmental justice characteristics (see page 4-175), but this appears to be a premature and unsupported conclusion. The current analysis does not consider the full suite of potential impacts from the proposed project and how these impacts may disproportionately affect minority, low-income, and indigenous populations. The environmental justice analysis in the DEIS focuses mainly on relocations and displacements. The environmental justice analysis should reference air quality, noise, and other potential project impacts to communities living near the proposed alignments.

Recommendations:

- Identify and document all environmental and human health impacts that may have a disproportionately high impact on minority populations, low-income populations, and/or indigenous populations. The environmental justice analysis should evaluate the direct, indirect, and cumulative impacts of each project alternative to these populations, and identify whether there may be disproportionately high and adverse human health or environmental effects. The analysis should incorporate relevant demographic, socioeconomic, environmental and health data, if available, to fully understand potential project impacts.

30

- Evaluate the localized impacts from the construction and operation of each project alternative and how these impacts affect minority, low-income, and indigenous communities located near proposed project alignments. Communities that are closer to the proposed project alignments are at a higher risk of near-roadway exposure. Near-roadway exposure to air pollution is linked to a variety of adverse health outcomes including asthma and adverse birth and childhood outcomes.[7]
- Identify appropriate mitigation measures to reduce or eliminate any adverse impacts to minority, low-income and indigenous populations throughout the project's construction and operation. Clearly identify project alternatives with the least impact to these populations.
- Mitigation measures should be developed through open, collaborative processes that include the public and affected communities. Identifying mitigation measures responsive to community concerns and supported by affected communities could further protect these communities from any disproportionate and adverse impacts.

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7 Padmanabhan, N. & Glenn, B. August 2009. *EPA Research Focus on Health Effects of Near-Roadway Air Pollution.* Air and Waste Management Association, EM Magazine. Available at http://www.epa.gov/ord/ca/pdf/2009padmanabhan.pdf

Code	Issue	Response
29 (cont.)		The comment makes reference to indigenous populations. As shown in Table 4-10, "*Environmental Justice Population Percentages, Affected Study Area Jurisdictions*," on page 4-30 of the Final Environmental Impact Statement, indigenous populations are accounted for in the impact analyses. Further, Chapter 2, *Gila River Indian Community Coordination*, discloses the comprehensive nature of coordination efforts with the Gila River Indian Community. Important to note is the history of impact study on Gila River Indian Community land. For much of the study, the Gila River Indian Community did not permit any form of impact analyses of resources on its land as is its right as a sovereign nation (see page 2-1 of the Draft Environmental Impact Statement), and it did not wish to have any information about the Gila River Indian Community disclosed in the Draft Environmental Impact Statement. In 2007, right-of-entry was granted but expired 1 year later. In 2010, the permit was reissued to study an alignment on Gila River Indian Community land (which is discussed at length in Chapter 3, *Alternatives*) but was later withdrawn once consideration by the Gila River Indian Community for a Gila River Indian Community-located alignment was withdrawn. Despite the Gila River Indian Community's directive to neither study nor report on Gila River Indian Community resources and assets, the potential for such impacts is highly unlikely. Populations would not be directly affected by the proposed action. As detailed in the *Cultural Resources* section starting on page 4-128 of the Draft Environmental Impact Statement, the proposed action may pose indirect impacts such as altered access to places of tradition. The Draft Environmental Impact Statement, however, includes a detailed review of alternatives considered to avoid impacts to cultural resources, including the South Mountains. See the Chapter 5 section, *Avoidance Alternatives for Public Parkland Resources of the South Mountains Afforded Protection under Section 4(f)*, beginning on page 5-16 of the Draft Environmental Impact Statement; Chapter 2, *Gila River Indian Community Coordination*; and Chapter 3, *Alternatives*. Additionally, mitigation developed in consultation with the Gila River Indian Community and other tribes has been committed to ensure that access to places of tradition would be preserved (see page 5-27 in the Draft Environmental Impact Statement). Further, in addition to access to the overall public hearing outreach efforts, Gila River Indian Community members also had specific access to Gila River Indian Community-specific outreach, which are detailed on page 6-24 of the Final Environmental Impact Statement.
30	**Environmental Justice**	Executive Order 12898 and Title VI of the Civil Rights Act of 1964 are discussed on pages 4-29 through 4-38 of the Draft Environmental Impact Statement and pages 4-29 through 4-45 of the Final Environmental Impact Statement. Please see the response to the above comment. The impacts from the construction and operation of the action alternatives were subjected to analyses with respect to both the overall population and minority, low-income, and indigenous communities located near proposed project alignments. In light of the comments received, the environmental justice and Title VI analyses in the Draft Environmental Impact Statement were reviewed, and the Final Environmental Impact Statement has been revised to discuss environmental justice and Title VI separately and to clarify how the conclusions in the *Environmental Justice and Title VI* section were reached. Regarding the statement concerning the impacts associated with construction and implementation of each action alternative, potential impacts on all population segments located near the proposed freeway are described in the Draft and Final Environmental Impact Statements. For example, the air quality assessment for the

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and low-income populations.[5] There is a growing body of evidence that low-income and minority communities are more vulnerable to pollution impacts than other communities, including deficits of both a physical and social nature that make the effects of environmental pollution more burdensome.[6] Environmental justice concerns may arise from the potential human health, ecological, social, cultural, and economic impacts associated with a proposed project. According to the DEIS (page 4-167), the communities within the study area have a much higher minority composition (68%) compared to Maricopa County (41%). The DEIS states that all action alternatives would have direct but not disproportionate impacts on populations with environmental justice characteristics (see page 4-175), but this appears to be a premature and unsupported conclusion. The current analysis does not consider the full suite of potential impacts from the proposed project and how these impacts may disproportionately affect minority, low-income, and indigenous populations. The environmental justice analysis in the DEIS focuses mainly on relocations and displacements. The environmental justice analysis should reference air quality, noise, and other potential project impacts to communities living near the proposed alignments.

Recommendations:

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31 - Identify appropriate mitigation measures to reduce or eliminate any adverse impacts to minority, low-income and indigenous populations throughout the project's construction and operation. Clearly identify project alternatives with the least impact to these populations.

31 - Mitigation measures should be developed through open, collaborative processes that include the public and affected communities. Identifying mitigation measures responsive to community concerns and supported by affected communities could further protect these communities from any disproportionate and adverse impacts.

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7 Padmanabhan, N. & Glenn, B. August 2009. *EPA Research Focus on Health Effects of Near-Roadway Air Pollution.* Air and Waste Management Association, EM Magazine. Available at http://www.epa.gov/ord/ca/pdf/2009padmanabhan.pdf

Code	Issue	Response
30 (cont.)		proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. No violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). Regardless of alternative, modeled mobile source air toxics emissions would decrease by more than 80 percent relative to 2012 levels, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. To the extent this comment suggests that a health risk assessment is required, the Arizona Department of Transportation and Federal Highway Administration respectfully disagree, as explained in response code #14.
31	**Environmental Justice**	Executive Order 12898 and Title VI of the Civil Rights Act of 1964 are discussed on pages 4-29 through 4-38 of the Draft Environmental Impact Statement and pages 4-29 through 4-45 of the Final Environmental Impact Statement. As detailed in the Draft Environmental Impact Statement, there would be no distinct disproportionately high and adverse impacts on minority populations, low-income populations, and/or indigenous environmental justice populations or disparate impacts to minority groups protected by Title VI, so additional mitigation, beyond the mitigation measures proposed in the Draft and Final Environmental Impact Statements, is not required. See *Environmental Justice and Title VI*, beginning on page 4-29 of the Draft and Final Environmental Impact Statements. The beneficial and adverse effects of the project on the overall population, and on minority, low-income, and indigenous environmental justice populations or disparate impacts to minority groups protected by Title VI, were reviewed for in the sections of the Draft Environmental Impact Statement pertaining to *Land Use, Social Conditions, Displacements and Relocations, Economic Impacts, Air Quality, Noise, Cultural Resources, Visual Resources, Prime and Unique Farmlands,* and *Temporary Construction Impacts*. The impacts of the various alternatives on the overall population as well as minority, low-income, and indigenous environmental justice populations or disparate impacts to minority groups protected by Title VI were also addressed. The conclusions were summarized in the section *Environmental Justice and Title VI*, beginning on page 4-29 of the Final Environmental Impact Statement. In light of the comments received, the environmental justice and Title VI analyses in the Draft Environmental Impact Statement were reviewed, and the Final Environmental Impact Statement has been revised to discuss environmental justice and Title VI separately and to clarify how the conclusions in the *Environmental Justice and Title VI* section were reached.

(Response 31 continues on next page)

Code	Comment Document

Impacts to Aquatic Resources

All of the Western Section alternatives involve placing a roadway bridge over the Salt River and the construction of piers in the channel, with stated impacts varying from 17 to 26 acres depending on which alternative is chosen. The Salt River channel functions as a surface water conveyance system and provides attenuation of flood flows, as well as sediment and nutrient retention from discharge flows, thus serving a valuable water quality function. The Eastern Section alternative involves potential filling of 51 ephemeral washes that originate in the Phoenix South Mountain Park and drain to the south or west, with a potential hydrological connection to the Gila River. Ephemeral washes perform a diversity of hydrologic and biogeochemical functions that directly affect the integrity and functional condition of higher-order waters downstream. Washes provide hydrologic connectivity within the watershed, facilitating the movement of water, sediment, nutrients, wildlife, and plant propagules throughout the watershed. Washes are responsible for a large portion of basin ground-water recharge in arid and semi-arid regions through channel infiltration and transmission losses. These ephemeral systems contribute to the biogeochemical functions of waters within their watershed by storing, cycling, transforming, and transporting elements and compounds. Ephemeral washes also provide habitat for breeding, shelter, foraging and movement of wildlife.[8]

The DEIS does not provide sufficient information to determine accurate impacts to aquatic resources. Acreage of waters impacted appears to be estimated and not accurately delineated. While the DEIS states that all waters were determined to be jurisdictional in 2003, a current jurisdictional determination by the U.S. Army Corps of Engineers (Corps) has not been made. Furthermore, the DEIS does not provide an estimate of the indirect effects to waters that may result from the proposed project. The project proposes to alter the natural surface hydrology though the construction of detention basins and diversions around the freeway to convey and store stormwater originating upgradient of the freeway as well as from the freeway itself. The elimination of minor washes on the northern side of the freeway will likely result in additional lost acreage of waters to the south. Other potential indirect effects include: 1) changes to hydrology; 2) changes to sediment transport; 3) decreases in water quality/quantity from the impairment of floodplain and ecosystem services including water filtration, groundwater recharge, and flood attenuation; 4) disruption of hydrological and ecological connectivity; 5) loss of wildlife and plant habitat due to the consolidation and elimination of washes; and 5) decreases in biodiversity and ecosystem stability.

Clean Water Act Compliance

The basic premise of the Clean Water Act Section 404 permitting program is that no discharge of dredged or fill material into waters of the United States shall be permitted if (1) a practicable alternative exists that is less damaging to the aquatic environment, or (2) the discharge would cause the nation's waters to be significantly degraded (40 CFR 230). When applying for a Section 404 permit, the applicant must demonstrate that the proposed action is the least environmentally damaging practicable alternative (LEDPA), while also not causing or contributing to significant degradation of the aquatic ecosystem.

8 See Levick, L., J. Fonseca, D. Goodrich, M. Hernandez, D. Semmens, J. Stromberg, R. Leidy,M. Scianni, D. P. Guertin, M. Tluczek, and W. Kepner. 2008. *The Ecological and Hydrological Significance of Ephemeral and Intermittent Streams in the Arid and Semi-arid American Southwest*. U.S. EPA and USDA/ARS Southwest Watershed Research Center, EPA/600/R-08/134, ARS/233046, 116 pp.

Code	Issue	Response
31 (cont.)		In response to the comment regarding the identification of action alternatives with the least impact on populations, the impacts of each alternative on all population segments are described in the Draft and Final Environmental Impact Statements. Identifying the alternative with the least impact on populations is not required. With regard to the portion of the comment related to community involvement and collaboration in the identification of mitigation measures, the public outreach for the proposed action has been extensive. Through these efforts, as disclosed in the Draft and Final Environmental Impact Statements, the public played an important role in affecting design and location of the action alternatives as well as in establishing mitigation. Additionally, consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties such as the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed, if an action alternative is the Selected Alternative. The section, *Public Involvement Actions*, beginning on page 6-6 of the Draft Environmental Impact Statement, notes over 200 public presentations, 12 public meetings at-large, numerous newsletters, project Web site access, hotlines, and 800 news articles. The outreach established comprehensive access to the environmental impact statement process for the public at-large including all segments of the population. As detailed throughout Chapter 6, *Comments and Coordination*, all comments were carefully considered as part of the environmental impact statement process. The public engagement, disclosure, and process transparency has been and will continue to be exceptional for the proposed action. The Draft Environmental Impact Statement further points out the nature of public engagement that would occur after completion of the National Environmental Policy Act process in future project development phases. To clarify the efforts to allow environmental justice and Title VI populations access to the Environmental Impact Statement process, these efforts are specifically discussed on pages 4-38 and 4-44 of the Final Environmental Impact Statement, respectively.

Code	Comment Document

As described in the DEIS, the preferred alternative, W59, impacts 26 acres of the Salt River Channel, as compared with 19 acres and 17 acres for the other two alternatives. The DEIS states that the W59 alternative will ultimately have minimal impacts to waters since it involves placing only bridge piers in the river channel. However, the DEIS does not evaluate the specific impacts under each alternative or demonstrate how the preferred alternative, despite having a greater acreage of impacts, is the LEDPA. Additionally, the current alternative analysis does not address the impacts to the functional values of waters that would be impacted under each alternative, and does not include an analysis of design crossings (e.g., bridges and culverts) to address avoidance and minimization of impacts.

Recommendations:

32
- Include the findings of a Corps of Engineers' verified jurisdictional delineation for the proposed project.

33
- Include an alternatives analysis which demonstrates that the preferred alternative is the least environmentally damaging practicable alternative, including an analysis of indirect impacts to waters.
- Include a functional assessment of impacted waters for each alternative, discuss how those functions will be impacted, and explore mitigation measures to maintain functions.
- Provide hydrological modeling to demonstrate that downstream flows will not be disrupted due to proposed changes to any natural washes, or the excavation of large amounts of sediment.
- Provide a comprehensive discussion of mitigation measures, including:
  - A description of how impacts will be avoided or minimized.
  - Consideration of a commitment to maintain natural washes, in their present location and natural form and including adequate natural buffers, to the maximum extent practicable.
  - An analysis of avoidance and minimization options for each alternative, such as the use of bridges and soft bottom culverts.
  - A mitigation plan to compensate for any unavoidable impacts to waters of the United States.

Wildlife Habitat and Connectivity

The DEIS recognizes that there is growing support for maintaining habitat connectivity as it pertains to wildlife movement, and notes that significant work has already been completed in Arizona to identify essential landscape linkages for wildlife. The DEIS identifies the Salt River, as well as the area between South Mountain and the Sierra Estrella Mountains, as potentially important linkage areas for wildlife movement in the project area. The DEIS further acknowledges that the proposed freeway would cross the Salt River in an area proposed for future habitat restoration. This restoration project, known as the Rio Salado Oeste project, is a major river restoration project that would result in a continuous riparian corridor, connecting riparian and wetland habitats downstream with similar areas upstream. Currently, riparian areas in this stretch of the river are limited, and include the adjacent Pee Posh wetlands bald eagle breeding area, as well as several gravel pit ponds. The DEIS does not clearly demonstrate how the project alternatives could adversely affect these wildlife corridors and proposed restoration activities, or how impacts to these features will be addressed. Further, the DEIS provides little discussion of the many opportunities for the project to enhance habitat connectivity in the project area through the use of wildlife overcrossings, exclusionary fencing, and other design commitments that have been successful in facilitating the safe movement of wildlife across other Arizona roadway projects. This is particularly important in light of the projects proposal to cut through multiple

Code	Issue	Response
32	**Waters of the United States**	As required under 33 Code of Federal Regulations § 323.3, and as documented on page 4-108 of the Draft Environmental Impact Statement, a commitment was made between publication of the Draft Environmental Impact Statement and Final Environmental Impact Statement to revisit the field delineation of waters of the United States. The results of this effort are discussed in the prologue to the Final Environmental Impact Statement (page xiv) and are more fully described on page 4-116 of the Final Environmental Impact Statement. A field delineation of jurisdictional waters for the Preferred Alternative (E1 and W59) was conducted in the summer of 2013 to identify jurisdictional waters and to define the jurisdictional limits for the Clean Water Act Section 404 permitting. A preliminary jurisdictional determination was submitted to the U.S. Army Corps of Engineers in January 2014 in accordance with U.S. Army Corps of Engineers and Arizona Department of Transportation guidelines. The U.S. Army Corps of Engineers approved the jurisdictional determination in March 2014. The U.S. Army Corps of Engineers has been engaged in the environmental impact statement process for the proposed action since its inception (early comments as part of the scoping process, as an example, are cited on page 6-3 of the Draft Environmental Impact Statement). As a cooperating agency, the U.S. Army Corps of Engineers has had regular representation at project meetings, has reviewed early versions of the purpose and need and alternatives chapters, and has collaborated closely with the project team in assessing pertinent impacts. This is discussed on page 3-27 of the Draft Environmental Impact Statement, under the section, *Compliance with Section 404(b)(1) Guidelines*, as well as in the agency's lack of substantive comments on the Administrative Draft Environmental Impact Statement. In short, the U.S. Army Corps of Engineers has been an active participant in and supportive of the environmental impact statement process undertaken.
33	**Waters of the United States**	According to Clean Water Act Section 404(b)(1), the U.S. Army Corps of Engineers is required to select the least environmentally damaging practicable alternative after considering cost, existing technologies, and logistics in light of the overall project purpose, in cases where an individual permit is required. As noted on page 4-110 of the Draft Environmental Impact Statement, the U.S. Army Corps of Engineers has been involved in the alternatives analysis for the proposed action, as required by Section 404(b)(1). Based on the results of the field delineation of waters of the United States conducted during the summer of 2013 and subsequent consultation with the U.S. Army Corps of Engineers, disturbances to individual jurisdictional waters were confirmed to require an individual permit for the proposed action (see page 4-118 of the Final Environmental Impact Statement). However, only washes within the E1 Alternative would require an individual permit. All disturbances to jurisdictional waters caused by construction of the Western Section action alternatives would be within the limits for Nationwide Permit Number 14, Linear Transportation Projects. Furthermore, the Draft Environmental Impact Statement concluded that, although the area of impact for the Preferred Alternative in the Western Section is higher than the other action alternatives when comparing the acreage of the bridge design needed to cross the water, the actual physical impact on jurisdictional waters in the region would be negligible because the only permanent disturbances would be from bridge pier placement. This is because the smaller pier placements would occupy far less area than the acreage numbers based on the area of the bridge design needed to cross the waterways that were the source of comparison between right-of-way footprints among action alternatives in the Draft Environmental Impact Statement. As noted on page 4-117 of the Final

(Response 33 continues on next page)

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As described in the DEIS, the preferred alternative, W59, impacts 26 acres of the Salt River Channel, as compared with 19 acres and 17 acres for the other two alternatives. The DEIS states that the W59 alternative will ultimately have minimal impacts to waters since it involves placing only bridge piers in the river channel. However, the DEIS does not evaluate the specific impacts under each alternative or demonstrate how the preferred alternative, despite having a greater acreage of impacts, is the LEDPA. Additionally, the current alternative analysis does not address the impacts to the functional values of waters that would be impacted under each alternative, and does not include an analysis of design crossings (e.g., bridges and culverts) to address avoidance and minimization of impacts.

Recommendations:

- Include the findings of a Corps of Engineers' verified jurisdictional delineation for the proposed project.
- Include an alternatives analysis which demonstrates that the preferred alternative is the least environmentally damaging practicable alternative, including an analysis of indirect impacts to waters.
- Include a functional assessment of impacted waters for each alternative, discuss how those functions will be impacted, and explore mitigation measures to maintain functions. (34)
- Provide hydrological modeling to demonstrate that downstream flows will not be disrupted due to proposed changes to any natural washes, or the excavation of large amounts of sediment. (35)
- Provide a comprehensive discussion of mitigation measures, including: (36)
    - A description of how impacts will be avoided or minimized.
    - Consideration of a commitment to maintain natural washes, in their present location and natural form and including adequate natural buffers, to the maximum extent practicable.
    - An analysis of avoidance and minimization options for each alternative, such as the use of bridges and soft bottom culverts.
    - A mitigation plan to compensate for any unavoidable impacts to waters of the United States.

Wildlife Habitat and Connectivity

The DEIS recognizes that there is growing support for maintaining habitat connectivity as it pertains to wildlife movement, and notes that significant work has already been completed in Arizona to identify essential landscape linkages for wildlife. The DEIS identifies the Salt River, as well as the area between South Mountain and the Sierra Estrella Mountains, as potentially important linkage areas for wildlife movement in the project area. The DEIS further acknowledges that the proposed freeway would cross the Salt River in an area proposed for future habitat restoration. This restoration project, known as the Rio Salado Oeste project, is a major river restoration project that would result in a continuous riparian corridor, connecting riparian and wetland habitats downstream with similar areas upstream. Currently, riparian areas in this stretch of the river are limited, and include the adjacent Pee Posh wetlands bald eagle breeding area, as well as several gravel pit ponds. The DEIS does not clearly demonstrate how the project alternatives could adversely affect these wildlife corridors and proposed restoration activities, or how impacts to these features will be addressed. Further, the DEIS provides little discussion of the many opportunities for the project to enhance habitat connectivity in the project area through the use of wildlife overcrossings, exclusionary fencing, and other design commitments that have been successful in facilitating the safe movement of wildlife across other Arizona roadway projects. This is particularly important in light of the projects proposal to cut through multiple

Code	Issue	Response
33 (cont.)	**Waters of the United States**	Environmental Impact Statement, the W59 Alternative would disturb less than 0.5 acre when considering only the bridge piers (as was done in the jurisdictional delineations approved by the U.S. Army Corps of Engineers). The lack of prudent and feasible alternatives to the E1 Alternative means that avoidance of waters of the United States would not be practicable; therefore, in consultation with the U.S. Army Corps of Engineers during project design, minimization of impacts would be achieved and unavoidable impacts would be mitigated to the extent reasonable and practicable. These steps are outlined beginning on page 4-118 of the Final Environmental Impact Statement and the U.S. Army Corps of Engineers has concurred with this approach.
34	**Waters of the United States**	According to 33 Code of Federal Regulations § 323.3, a permit is required for discharges of dredged or fill material into waters of the United States. As noted on page 4-110 of the Draft Environmental Impact Statement, as design proceeds, the Arizona Department of Transportation would prepare and submit an application to the U.S. Army Corps of Engineers for a permit under Section 404 of the Clean Water Act. As noted in the previous response, the lack of prudent and feasible alternatives to the E1 Alternative means that avoidance of waters of the United States would not be practicable; therefore, in consultation with the U.S. Army Corps of Engineers during project design, minimization of impacts would be achieved and unavoidable impacts would be mitigated to the extent reasonable and practicable. These steps are outlined beginning on page 4-118 of the Final Environmental Impact Statement and the U.S. Army Corps of Engineers has concurred with this approach.
35	**Hydrology**	Consistent with the Arizona Department of Transportation's 2012 *Roadway Design Guidelines*, preliminary hydrologic analysis has been performed. The project would pose no differences in treatment of hydrologic conditions than would other Phoenix metropolitan area projects. Experts in the field have adequately assessed the issue, which is neither an issue to be deemed a substantial adverse effect or a differentiator in the performance of alternatives. As noted on page 4-107 of the Draft Environmental Impact Statement, if an action alternative were to become the Selected Alternative, it would need comprehensive hydrologic, hydraulic, sediment transport, and erosion-related assessments regarding potential 100-year flood effects associated with ephemeral washes. Results would provide information necessary to make a determination regarding what mitigation measures would need to be implemented. Measures may include physical structures associated with the freeway such as culverts. These measures would be determined during the design phase.
36	**Waters of the United States**	According to Clean Water Act Section 404(b)(1), the U.S. Army Corps of Engineers is required to select the least environmentally damaging practicable alternative after considering cost, existing technologies, and logistics in light of the overall project purpose, in cases where an individual permit is required. As noted on page 4-118 of the Final Environmental Impact Statement, as design proceeds, the Arizona Department of Transportation would prepare and submit an application to the U.S. Army Corps of Engineers for a permit under Section 404 of the Clean Water Act and the U.S. Army Corps of Engineers has concurred with this approach. In consultation with the U.S. Army Corps of Engineers during project design, minimization of impacts would be achieved and unavoidable impacts would be mitigated to the extent reasonable and practicable. The general and special conditions of the Section 404 Individual Permit would minimize impacts on waters of the United States to the extent practicable. Detailed mitigation measures, including those noted in the comment, are described beginning on page 4-118 of the Final Environmental Impact Statement.

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	ridgelines of South Mountain in an area known to be the last remaining connection for wildlife to move between South Mountain and the Sierra Estrella Mountains. ***Recommendations:*** 37 • Provide additional qualitative information on any unavoidable impacts to wildlife movement corridors and proposed restoration activities in the Salt River. 38 • Document coordination with Fish and Wildlife Service and Arizona Department of Game and Fish regarding appropriate avoidance, wildlife crossings, and mitigation measures to address these impacts. 39 • Include specific design commitments that: 1) remove wildlife movement barriers; 2) enhance use of identified wildlife corridors; and 3) provide crossings with suitable habitat and topography to accommodate multiple species. • Describe specific project elements that would be constructed to enable wildlife connectivity, including types of features and approximate locations. • Commit to replacing any riparian and wetland habitat anticipated to be lost as a result of this project prior to project construction in order to avoid impacting occupancy and productivity of the adjacent Pee Posh bald eagle breeding area. • Provide further details regarding how stormwater runoff from the proposed freeway could be used in irrigating future restoration projects.

Code	Issue	Response
37	**Biological Resources/Waters of the United States**	Riparian and wetland habitat would be replaced in compliance with the Section 404 Clean Water Act nationwide permit received for the proposed action in the Salt River, as required by 33 Code of Federal Regulations § 323.3. This information is noted on page 4-118 of the Final Environmental Impact Statement. As noted on page 4-15 of the Draft Environmental Impact Statement, the City of Phoenix is aware of, has planned for, and has incorporated the proposed South Mountain Freeway in the City of Phoenix *General Plan* and in conceptual plans for the Rio Salado Oeste project (see Project Features Map in Appendix 4-8 of the Final Environmental Impact Statement). As noted on page 4-15 of the Draft Environmental Impact Statement and as agreed upon by the Bureau of Land Management, U.S. Army Corps of Engineers, and City of Phoenix, the project team would continue to consult with those entities to coordinate design efforts to minimize impacts on the proposed uses of the Rio Salado Oeste project (see Appendix 4-8 of the Final Environmental Impact Statement).
38	**Scoping**	Early and open scoping pursuant to 40 Code of Federal Regulations § 1501.7 is documented throughout the Draft and Final Environmental Impact Statements. Coordination efforts with the U.S. Fish and Wildlife Service and Arizona Game and Fish Department are documented throughout the *Biological Resources* section of the Final Environmental Impact Statement. Connectivity is planned to allow wildlife movement beneath the freeway. This is described in the text box, "*Habitat Connectivity and the Proposed Action*", on page 4-137 and in the section, *Habitat Connectivity*, on page 4-137 of the Final Environmental Impact Statement. Crossing structures are planned along major movement corridors (see Figure 4-38, on page 4-126, and the discussion on page 4-137 of the Final Environmental Impact Statement) and would provide connectivity between the South Mountains and the Sierra Estrella. Wildlife-friendly culvert design information would be considered during the design of the drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have submitted the Biological Evaluation to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community's Department of Environmental Quality to continue coordination regarding wildlife concerns as a result of the freeway's potential implementation.
39	**Biological Resources**	The National Environmental Policy Act does not require the proposed action to improve the baseline condition. In correspondence, the Arizona Game and Fish Department (see page A139 in Appendix 1-1 of the Final Environmental Impact Statement) stated that the movement corridor between the South Mountains and the Sierra Estrella is degraded by the 51st Avenue travel corridor and that future planned development in the areas affected (supported by data presented in the sidebar, "*Existing versus planned land use*", on page 4-3 of the Final Environmental Impact Statement, showing the projected conversion of land in the Study Area to nonagricultural uses) will continue to inhibit movement between the South Mountains and the Sierra Estrella. Further, the comment requests enhancement of movement corridors, which indicates the historic habitat has already been adversely affected. Therefore, the current state of habitat limits is the baseline condition under consideration. It is not the obligation of the proposed action to mitigate impacts caused by other unrelated actions. Text beginning on page 4-138 of the Final Environmental Impact Statement discusses mitigation commitments for the proposed action, including continued coordination with the U.S. Fish and Wildlife Service and Arizona Game and Fish Department on wildlife crossing design.

Code	Comment Document
	ridgelines of South Mountain in an area known to be the last remaining connection for wildlife to move between South Mountain and the Sierra Estrella Mountains. *Recommendations:* • Provide additional qualitative information on any unavoidable impacts to wildlife movement corridors and proposed restoration activities in the Salt River. • Document coordination with Fish and Wildlife Service and Arizona Department of Game and Fish regarding appropriate avoidance, wildlife crossings, and mitigation measures to address these impacts. • Include specific design commitments that: 1) remove wildlife movement barriers; 2) enhance use of identified wildlife corridors; and 3) provide crossings with suitable habitat and topography to accommodate multiple species.
40	• Describe specific project elements that would be constructed to enable wildlife connectivity, including types of features and approximate locations.
41	• Commit to replacing any riparian and wetland habitat anticipated to be lost as a result of this project prior to project construction in order to avoid impacting occupancy and productivity of the adjacent Pee Posh bald eagle breeding area.
42	• Provide further details regarding how stormwater runoff from the proposed freeway could be used in irrigating future restoration projects.

Code	Issue	Response
40	**Biological Resources**	These elements are discussed on pages 4-137 and 5-27 of the Final Environmental Impact Statement. Potential locations of multiuse crossings are presented in Figure 4-38 on page 4-126 of the Final Environmental Impact Statement.
41	**Biological Resources**	The general and special conditions of the Section 404 Individual Permit obtained pursuant to 33 Code of Federal Regulations § 323.3 would minimize impacts on waters of the United States to the extent practicable. The Bald and Golden Eagle Protection Act protects bald eagles in the Study Area. Riparian and wetland habitat would be replaced in compliance with any Clean Water Act permit conditions as noted beginning on page 4-118 of the Final Environmental Impact Statement. This compliance is sufficient for the purposes of the environmental impact statement process. The Pee Posh bald eagle breeding area is discussed in the Draft Environmental Impact Statement on page 4-124, but not by name. The eagle information has been updated based on comments received on the Draft Environmental Impact Statement and may be found on page 4-136 of the Final Environmental Impact Statement; however, the discussion of impacts resulting from the action alternatives is largely unchanged from page 4-124 of the Draft Environmental Impact Statement. Namely, although the action alternatives are not expected to affect the nesting activities of these eagles because of the project's distance from the nest, the project may affect their foraging behavior along the Salt River when foraging opportunities exist near action alternatives.
42	**Biological Resources**	As discussed on page 4-125 of the Draft Environmental Impact Statement, the City of Phoenix and U.S. Army Corps of Engineers have anticipated a South Mountain Freeway crossing of the Rio Salado Oeste restoration project and view stormwater runoff from the proposed freeway as an opportunity to "irrigate" the river habitat. Also as discussed on page 4-125 of the Draft Environmental Impact Statement, as planning would progress, the City of Phoenix and U.S. Army Corps of Engineers have agreed to coordinate with the Arizona Department of Transportation on enhancement opportunities for the proposed action (see Appendix 4-8 in the Final Environmental Impact Statement).

TRIBAL ENTITY COMMENTS AND RESPONSES

Code	Comment Document

Gregory Mendoza
Governor

Stephen Roe Lewis
Lieutenant Governor

GILA RIVER INDIAN COMMUNITY
Executive Office
"A New Generation of Leadership Serving the People"

July 11, 2013

South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

Dear South Mountain Study Team:

The Gila River Indian Community (Community) hereby submits its comments on the Draft Environmental Impact Statement (DEIS) for the proposed South Mountain 202 Freeway Project (Project).

1 It is the firm position of the Community that the Arizona Department of Transportation (ADOT) should select the No-Action Alternative to avoid irreversible impacts to cultural resources and Traditional Cultural Properties and to protect the health, safety, welfare, and environment of the Community and its members. In addition, the DEIS fails to adequately analyze an alternative that avoids impacts to South Mountain. Finally, while the Community has objected to a Project alignment on its Reservation lands, ADOT and the Federal Highway Administration maintain their obligations to study the Project's impacts on Community lands. The DEIS fails, however, in many environmental resource areas, to adequately analyze the impacts of the Project on the Community's Reservation and its members.

Thank you for your consideration of the Community's comments.

Sincerely,

Gregory Mendoza, Governor
Gila River Indian Community

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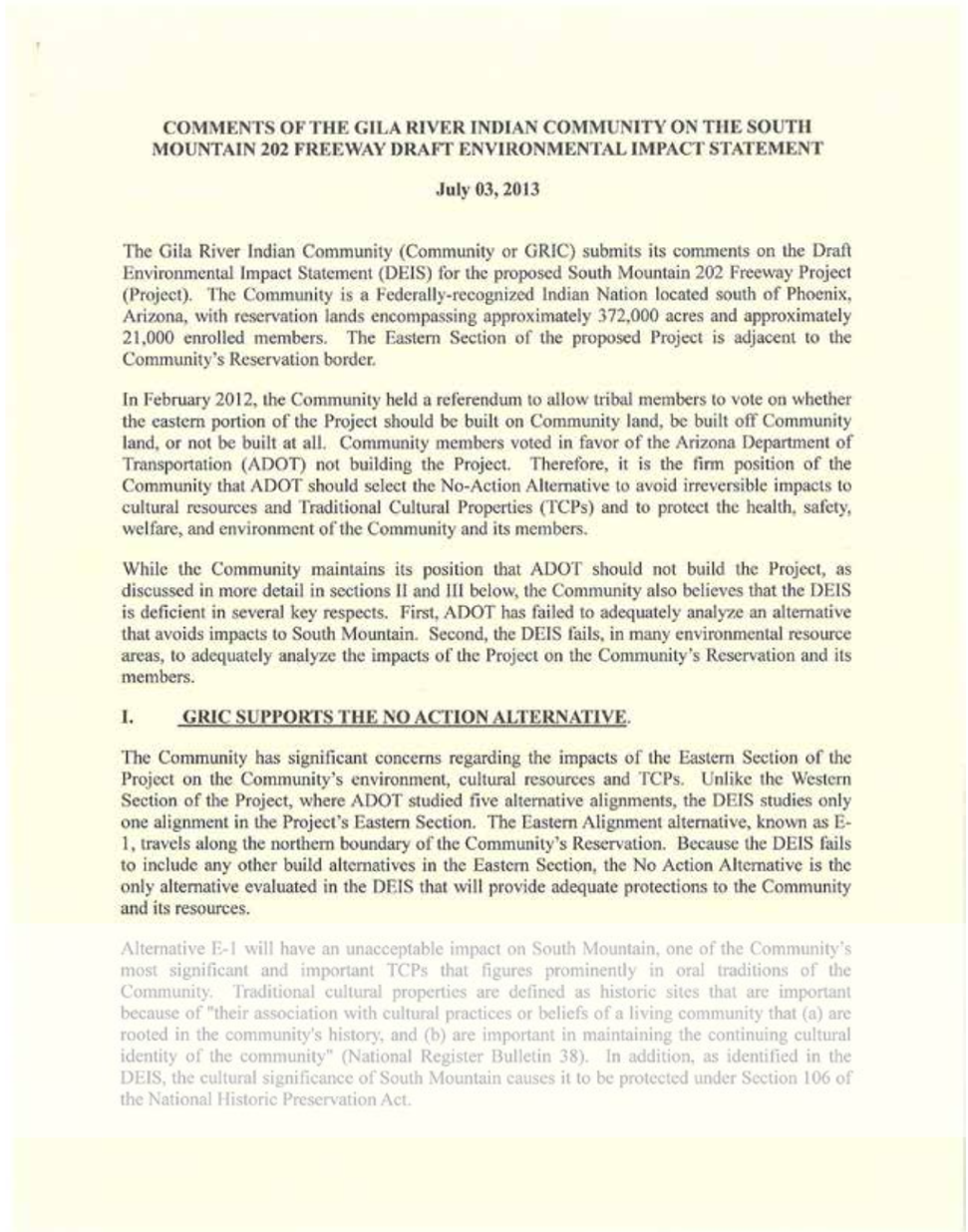
web: www.gilariver.org

(Comment codes continue on next page)

Code	Issue	Response
1		Comment noted. Responses to specific comments are provided on the following pages.

Code	Comment Document



COMMENTS OF THE GILA RIVER INDIAN COMMUNITY ON THE SOUTH MOUNTAIN 202 FREEWAY DRAFT ENVIRONMENTAL IMPACT STATEMENT

July 03, 2013

The Gila River Indian Community (Community or GRIC) submits its comments on the Draft Environmental Impact Statement (DEIS) for the proposed South Mountain 202 Freeway Project (Project). The Community is a Federally-recognized Indian Nation located south of Phoenix, Arizona, with reservation lands encompassing approximately 372,000 acres and approximately 21,000 enrolled members. The Eastern Section of the proposed Project is adjacent to the Community's Reservation border.

2

In February 2012, the Community held a referendum to allow tribal members to vote on whether the eastern portion of the Project should be built on Community land, be built off Community land, or not be built at all. Community members voted in favor of the Arizona Department of Transportation (ADOT) not building the Project. Therefore, it is the firm position of the Community that ADOT should select the No-Action Alternative to avoid irreversible impacts to cultural resources and Traditional Cultural Properties (TCPs) and to protect the health, safety, welfare, and environment of the Community and its members.

3

While the Community maintains its position that ADOT should not build the Project, as discussed in more detail in sections II and III below, the Community also believes that the DEIS is deficient in several key respects. First, ADOT has failed to adequately analyze an alternative that avoids impacts to South Mountain. Second, the DEIS fails, in many environmental resource areas, to adequately analyze the impacts of the Project on the Community's Reservation and its members.

I. GRIC SUPPORTS THE NO ACTION ALTERNATIVE.

4

The Community has significant concerns regarding the impacts of the Eastern Section of the Project on the Community's environment, cultural resources and TCPs. Unlike the Western Section of the Project, where ADOT studied five alternative alignments, the DEIS studies only one alignment in the Project's Eastern Section. The Eastern Alignment alternative, known as E-1, travels along the northern boundary of the Community's Reservation. Because the DEIS fails to include any other build alternatives in the Eastern Section, the No Action Alternative is the only alternative evaluated in the DEIS that will provide adequate protections to the Community and its resources.

Alternative E-1 will have an unacceptable impact on South Mountain, one of the Community's most significant and important TCPs that figures prominently in oral traditions of the Community. Traditional cultural properties are defined as historic sites that are important because of "their association with cultural practices or beliefs of a living community that (a) are rooted in the community's history, and (b) are important in maintaining the continuing cultural identity of the community" (National Register Bulletin 38). In addition, as identified in the DEIS, the cultural significance of South Mountain causes it to be protected under Section 106 of the National Historic Preservation Act.

Code	Issue	Response
2		Comment noted. Specific comments are addressed below.
3	**Alternatives**	Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Community (Figure 3-6 on page 3-10 of the Final Environmental Impact Statement illustrates a representation of such alternatives). Ultimately, the other alternatives (besides the E1 Alternative) were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to develop alternatives on its land (see Final Environmental Impact Statement page 3-25). The E1 Alternative when combined with the W59, W71, and W101 (and its options) Alternatives in the western section represents three distinct action alternatives from project termini to project termini, and therefore, represents a full range of reasonable alternatives for detailed study in the Draft and Final Environmental Impact Statements. Therefore, the Arizona Department of Transportation, with concurrence from the Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the western section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities The comment stating the Draft Environmental Impact Statement's failure to address many environmental resource areas is addressed by specific comments appearing below.
4	**Alternatives**	The No-Action Alternative was included in the Draft and Final Environmental Impact Statements for detailed study to compare impacts of the action alternatives with the consequences of doing nothing (impacts can result from choosing to do nothing). As stated on page 3-40 of the Final Environmental Impact Statement, the No-Action Alternative would not satisfy the purpose and need of the proposed action because it would result in further difficulty in gaining access to adjacent land uses, increased difficulty in gaining access to Interstate and regional freeway systems from the local arterial street network, increased levels of congestion-related impacts, continued degradation in performance of regional freeway-dependent transit services, increased trip times, and higher user costs. Further, the No-Action Alternative would be inconsistent with Maricopa Association of Governments' and local jurisdictions' long-range planning and policies.

Code	Comment Document

COMMENTS OF THE GILA RIVER INDIAN COMMUNITY ON THE SOUTH MOUNTAIN 202 FREEWAY DRAFT ENVIRONMENTAL IMPACT STATEMENT

July 03, 2013

The Gila River Indian Community (Community or GRIC) submits its comments on the Draft Environmental Impact Statement (DEIS) for the proposed South Mountain 202 Freeway Project (Project). The Community is a Federally-recognized Indian Nation located south of Phoenix, Arizona, with reservation lands encompassing approximately 372,000 acres and approximately 21,000 enrolled members. The Eastern Section of the proposed Project is adjacent to the Community's Reservation border.

In February 2012, the Community held a referendum to allow tribal members to vote on whether the eastern portion of the Project should be built on Community land, be built off Community land, or not be built at all. Community members voted in favor of the Arizona Department of Transportation (ADOT) not building the Project. Therefore, it is the firm position of the Community that ADOT should select the No-Action Alternative to avoid irreversible impacts to cultural resources and Traditional Cultural Properties (TCPs) and to protect the health, safety, welfare, and environment of the Community and its members.

While the Community maintains its position that ADOT should not build the Project, as discussed in more detail in sections II and III below, the Community also believes that the DEIS is deficient in several key respects. First, ADOT has failed to adequately analyze an alternative that avoids impacts to South Mountain. Second, the DEIS fails, in many environmental resource areas, to adequately analyze the impacts of the Project on the Community's Reservation and its members.

I. GRIC SUPPORTS THE NO ACTION ALTERNATIVE.

The Community has significant concerns regarding the impacts of the Eastern Section of the Project on the Community's environment, cultural resources and TCPs. Unlike the Western Section of the Project, where ADOT studied five alternative alignments, the DEIS studies only one alignment in the Project's Eastern Section. The Eastern Alignment alternative, known as E-1, travels along the northern boundary of the Community's Reservation. Because the DEIS fails to include any other build alternatives in the Eastern Section, the No Action Alternative is the only alternative evaluated in the DEIS that will provide adequate protections to the Community and its resources.

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Alternative E-1 will have an unacceptable impact on South Mountain, one of the Community's most significant and important TCPs that figures prominently in oral traditions of the Community. Traditional cultural properties are defined as historic sites that are important because of "their association with cultural practices or beliefs of a living community that (a) are rooted in the community's history, and (b) are important in maintaining the continuing cultural identity of the community" (National Register Bulletin 38). In addition, as identified in the DEIS, the cultural significance of South Mountain causes it to be protected under Section 106 of the National Historic Preservation Act.

Code	Issue	Response
5	**Cultural Resources**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in an ongoing, open dialogue with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. If feasible, avoidance of historic properties is always the Federal Highway Administration and Arizona Department of Transportation's first option. As summarized in Figure 5-2 on page 5-4 of the Final Environmental Impact Statement, numerous alignment adjustments were made to avoid use of existing and planned Section 4(f) resources such as the South Mountains Traditional Cultural Property. Additional information on the South Mountains Traditional Cultural Property (Muhadagi Doag) is provided in the Section 106 consultation letters in Appendix 2-1. This information was included in the confidential traditional cultural property technical report prepared for the study that was not made available to the public. As discussed on page 5-18 of the Final Environmental Impact Statement, many alternatives were examined to avoid the use of the South Mountains Traditional Cultural Property; however, only the E1 Alternative was deemed to be prudent and feasible by the Federal Highway Administration. The U.S. Department of the Interior reviewed the Draft Environmental Impact Statement and commented, "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources. Please note, however, that this concurrence is contingent upon successful completion of the Programmatic Agreement among the consulting parties." (See page B4 in Appendix 7, Volume III, of the Final Environmental Impact Statement.)

(Response 5 continues on next page)

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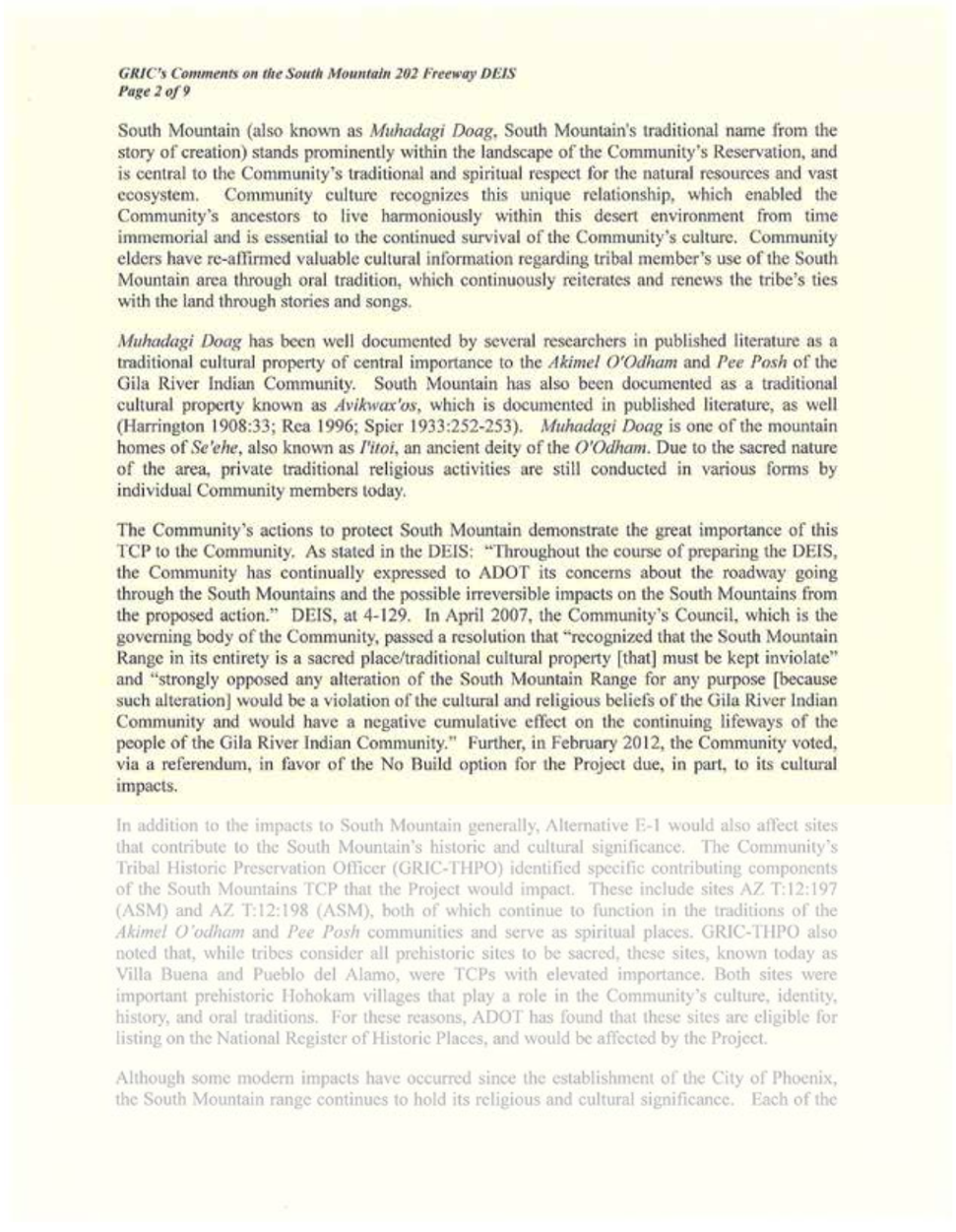
5 6	

GRIC's Comments on the South Mountain 202 Freeway DEIS
Page 2 of 9

South Mountain (also known as *Muhadagi Doag*, South Mountain's traditional name from the story of creation) stands prominently within the landscape of the Community's Reservation, and is central to the Community's traditional and spiritual respect for the natural resources and vast ecosystem. Community culture recognizes this unique relationship, which enabled the Community's ancestors to live harmoniously within this desert environment from time immemorial and is essential to the continued survival of the Community's culture. Community elders have re-affirmed valuable cultural information regarding tribal member's use of the South Mountain area through oral tradition, which continuously reiterates and renews the tribe's ties with the land through stories and songs.

Muhadagi Doag has been well documented by several researchers in published literature as a traditional cultural property of central importance to the *Akimel O'Odham* and *Pee Posh* of the Gila River Indian Community. South Mountain has also been documented as a traditional cultural property known as *Avikwax'os*, which is documented in published literature, as well (Harrington 1908:33; Rea 1996; Spier 1933:252-253). *Muhadagi Doag* is one of the mountain homes of *Se'ehe*, also known as *I'itoi*, an ancient deity of the *O'Odham*. Due to the sacred nature of the area, private traditional religious activities are still conducted in various forms by individual Community members today.

The Community's actions to protect South Mountain demonstrate the great importance of this TCP to the Community. As stated in the DEIS: "Throughout the course of preparing the DEIS, the Community has continually expressed to ADOT its concerns about the roadway going through the South Mountains and the possible irreversible impacts on the South Mountains from the proposed action." DEIS, at 4-129. In April 2007, the Community's Council, which is the governing body of the Community, passed a resolution that "recognized that the South Mountain Range in its entirety is a sacred place/traditional cultural property [that] must be kept inviolate" and "strongly opposed any alteration of the South Mountain Range for any purpose [because such alteration] would be a violation of the cultural and religious beliefs of the Gila River Indian Community and would have a negative cumulative effect on the continuing lifeways of the people of the Gila River Indian Community." Further, in February 2012, the Community voted, via a referendum, in favor of the No Build option for the Project due, in part, to its cultural impacts.

In addition to the impacts to South Mountain generally, Alternative E-1 would also affect sites that contribute to the South Mountain's historic and cultural significance. The Community's Tribal Historic Preservation Officer (GRIC-THPO) identified specific contributing components of the South Mountains TCP that the Project would impact. These include sites AZ T:12:197 (ASM) and AZ T:12:198 (ASM), both of which continue to function in the traditions of the *Akimel O'odham* and *Pee Posh* communities and serve as spiritual places. GRIC-THPO also noted that, while tribes consider all prehistoric sites to be sacred, these sites, known today as Villa Buena and Pueblo del Alamo, were TCPs with elevated importance. Both sites were important prehistoric Hohokam villages that play a role in the Community's culture, identity, history, and oral traditions. For these reasons, ADOT has found that these sites are eligible for listing on the National Register of Historic Places, and would be affected by the Project.

Although some modern impacts have occurred since the establishment of the City of Phoenix, the South Mountain range continues to hold its religious and cultural significance. Each of the

Code	Issue	Response
5 (cont.)		The physical impact on land designated as part of the South Mountains has been minimized through design, and much has already been done to mitigate that effect. Access to the mountain would be maintained and multiple other mitigation measures would be implemented due in part to suggestions made by the Gila River Indian Community itself. The proposed mitigation for the South Mountains Traditional Cultural Property is discussed in the Final Environmental Impact Statement on page 4-134, and measures to minimize harm to the South Mountains Traditional Cultural Property are discussed on page 5-27 of the Final Environmental Impact Statement.
6	**Tribal Involvement**	The Gila River Indian Community coordinated referendum and its results are described on page 2-8 of the Final Environmental Impact Statement. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The Final Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Final Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Community. As discussed on page 4-186 of the Final Environmental Impact Statement, the proposed action may contribute to cumulative cultural resources impacts. However, the proposed action and other major planned transportation projects would potentially create preservation in place (enhancement) opportunities not typically associated with private-sector development projects. The opportunity to preserve in place would be the result of federal and State regulations promoting preservation of such resources when associated with a publicly funded project; these federal and State regulations generally are not applied to privately funded projects. Although the types of impacts would be typical of those experienced in constructing and operating other parts of the region's freeway system, some of these impacts would be effectively mitigated through the implementation of enhancement and management plans and other strategies.

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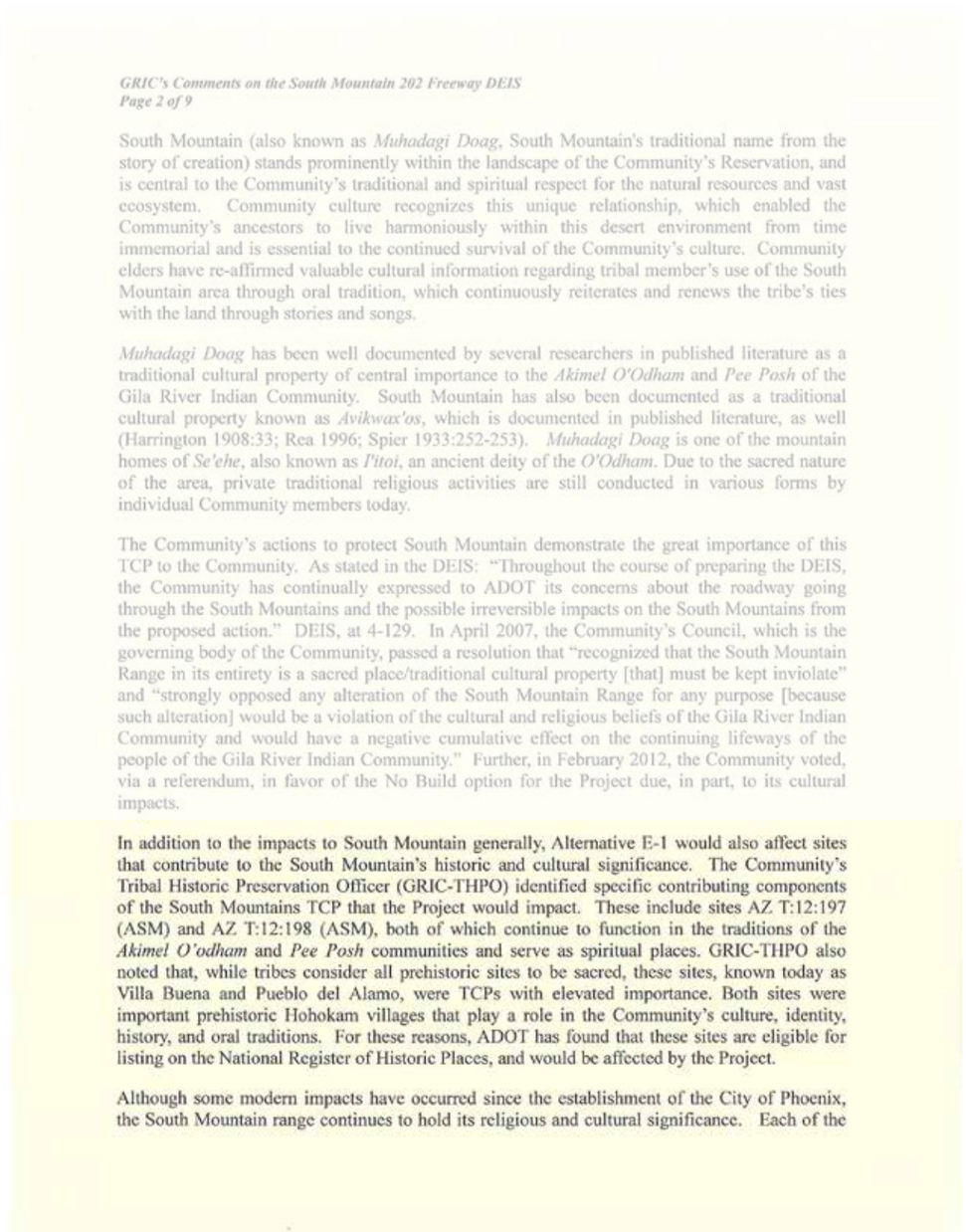

GRIC's Comments on the South Mountain 202 Freeway DEIS
Page 2 of 9

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Muhadagi Doag has been well documented by several researchers in published literature as a traditional cultural property of central importance to the *Akimel O'Odham* and *Pee Posh* of the Gila River Indian Community. South Mountain has also been documented as a traditional cultural property known as *Avikwax'os*, which is documented in published literature, as well (Harrington 1908:33; Rea 1996; Spier 1933:252-253). *Muhadagi Doag* is one of the mountain homes of *Se'ehe*, also known as *I'itoi*, an ancient deity of the *O'Odham*. Due to the sacred nature of the area, private traditional religious activities are still conducted in various forms by individual Community members today.

The Community's actions to protect South Mountain demonstrate the great importance of this TCP to the Community. As stated in the DEIS: "Throughout the course of preparing the DEIS, the Community has continually expressed to ADOT its concerns about the roadway going through the South Mountains and the possible irreversible impacts on the South Mountains from the proposed action." DEIS, at 4-129. In April 2007, the Community's Council, which is the governing body of the Community, passed a resolution that "recognized that the South Mountain Range in its entirety is a sacred place/traditional cultural property [that] must be kept inviolate" and "strongly opposed any alteration of the South Mountain Range for any purpose [because such alteration] would be a violation of the cultural and religious beliefs of the Gila River Indian Community and would have a negative cumulative effect on the continuing lifeways of the people of the Gila River Indian Community." Further, in February 2012, the Community voted, via a referendum, in favor of the No Build option for the Project due, in part, to its cultural impacts.

7

In addition to the impacts to South Mountain generally, Alternative E-1 would also affect sites that contribute to the South Mountain's historic and cultural significance. The Community's Tribal Historic Preservation Officer (GRIC-THPO) identified specific contributing components of the South Mountains TCP that the Project would impact. These include sites AZ T:12:197 (ASM) and AZ T:12:198 (ASM), both of which continue to function in the traditions of the *Akimel O'odham* and *Pee Posh* communities and serve as spiritual places. GRIC-THPO also noted that, while tribes consider all prehistoric sites to be sacred, these sites, known today as Villa Buena and Pueblo del Alamo, were TCPs with elevated importance. Both sites were important prehistoric Hohokam villages that play a role in the Community's culture, identity, history, and oral traditions. For these reasons, ADOT has found that these sites are eligible for listing on the National Register of Historic Places, and would be affected by the Project.

Although some modern impacts have occurred since the establishment of the City of Phoenix, the South Mountain range continues to hold its religious and cultural significance. Each of the

Code	Issue	Response
7	**Cultural Resources**	The Federal Highway Administration and Arizona Department of Transportation have listened closely to members of the Gila River Indian Community and their concerns. A summary of this information is provided in the Final Environmental Impact Statement on page 4-141. As acknowledged in the comment, the identification of the two prehistoric villages, Villa Buena [AZ T:12:9 (ASM)] and Pueblo del Alamo [AZ T:12:52 (ASM)], and the South Mountains Traditional Cultural Property and contributing components, the assessment of the importance of these properties to the Gila River Indian Community, and the assessment of impacts on these properties included consultation with staff from the Gila River Indian Community's Tribal Historic Preservation Office and Cultural Resource Management Program and resulted in the concurrence of the Gila River Indian Community at each of these steps (see Table 4-47 beginning on page 4-145 of the Final Environmental Impact Statement). Adverse effects on Villa Buena and Pueblo del Alamo, two traditional cultural properties in the western portion of the Study Area, would be prevented through implementation of an enhancement and management plan developed in consultation with the Gila River Indian Community's Tribal Historic Preservation Officer and Cultural Resource Management Program (see 4-143 of the Final Environmental Impact Statement). Although Villa Buena and Pueblo del Alamo would be adversely affected as archaeological sites, the National Register of Historic Properties-eligible traditional cultural property attributes of Villa Buena and Pueblo del Alamo would not be adversely affected. Impacts on prehistoric sites, including trails and shrines, are documented beginning on page 4-142 of the Final Environmental Impact Statement, while impacts on the South Mountains Traditional Cultural Property are documented on page 4-143. As acknowledged in the comment, the Draft Environmental Impact Statement noted on page 5-28 that the proposed action might be perceived as severing the Gila River Indian Community's spiritual connection to the mountains. The Arizona Department of Transportation and Federal Highway Administration have respected the Gila River Indian Community's spiritual connection with these cultural resources throughout the environmental impact statement process, as evidenced by consultation efforts, mitigation measures, and a discussion of cultural resources issues in the Final Environmental Impact Statement. Members of the Gila River Indian Community would not be prohibited from continuing to practice their beliefs should the project go forward because access to the mountain would be maintained, impacts would be mitigated based on input by the Gila River Indian Community and others, and only a small fraction of the mountains would be affected. The comment's reference to "isolate the Community" on page S-27 of the Draft Environmental Impact Statement is taken out of context. On page S-27 the "isolation of the Gila River Indian Community from culturally important places" is identified as an "impact to be mitigated." The potential isolation would be mitigated by providing access through proposed crossings under the freeway. These multifunctional crossings are proposed near the cultural resources sites and would facilitate pedestrian access to these sites. So, the E1 Alternative would not isolate the Gila River Indian Community from culturally important places.

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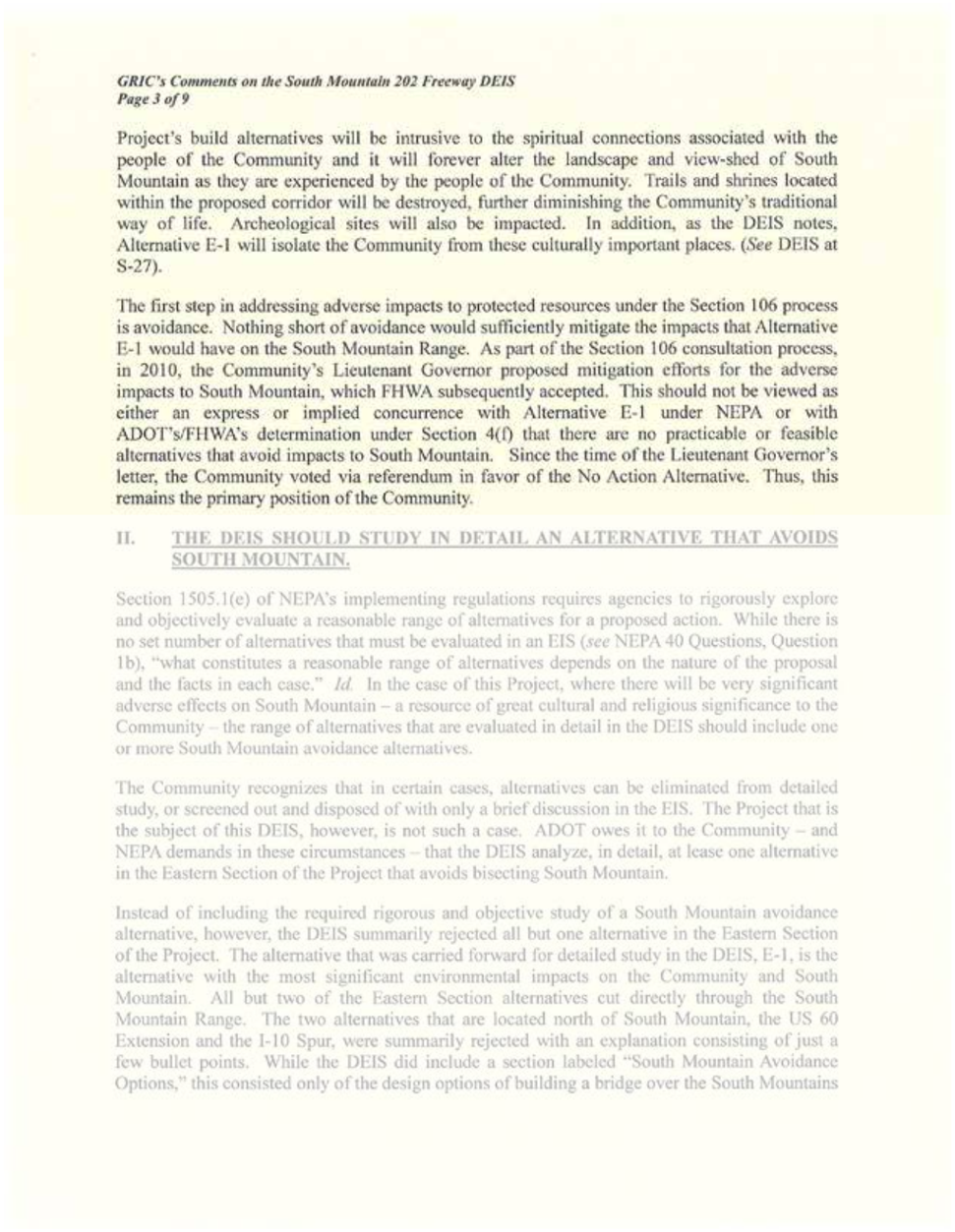
8	

GRIC's Comments on the South Mountain 202 Freeway DEIS
Page 3 of 9

Project's build alternatives will be intrusive to the spiritual connections associated with the people of the Community and it will forever alter the landscape and view-shed of South Mountain as they are experienced by the people of the Community. Trails and shrines located within the proposed corridor will be destroyed, further diminishing the Community's traditional way of life. Archeological sites will also be impacted. In addition, as the DEIS notes, Alternative E-1 will isolate the Community from these culturally important places. (*See* DEIS at S-27).

The first step in addressing adverse impacts to protected resources under the Section 106 process is avoidance. Nothing short of avoidance would sufficiently mitigate the impacts that Alternative E-1 would have on the South Mountain Range. As part of the Section 106 consultation process, in 2010, the Community's Lieutenant Governor proposed mitigation efforts for the adverse impacts to South Mountain, which FHWA subsequently accepted. This should not be viewed as either an express or implied concurrence with Alternative E-1 under NEPA or with ADOT's/FHWA's determination under Section 4(f) that there are no practicable or feasible alternatives that avoid impacts to South Mountain. Since the time of the Lieutenant Governor's letter, the Community voted via referendum in favor of the No Action Alternative. Thus, this remains the primary position of the Community.

II. THE DEIS SHOULD STUDY IN DETAIL AN ALTERNATIVE THAT AVOIDS SOUTH MOUNTAIN.

Section 1505.1(e) of NEPA's implementing regulations requires agencies to rigorously explore and objectively evaluate a reasonable range of alternatives for a proposed action. While there is no set number of alternatives that must be evaluated in an EIS (*see* NEPA 40 Questions, Question 1b), "what constitutes a reasonable range of alternatives depends on the nature of the proposal and the facts in each case." *Id.* In the case of this Project, where there will be very significant adverse effects on South Mountain – a resource of great cultural and religious significance to the Community – the range of alternatives that are evaluated in detail in the DEIS should include one or more South Mountain avoidance alternatives.

The Community recognizes that in certain cases, alternatives can be eliminated from detailed study, or screened out and disposed of with only a brief discussion in the EIS. The Project that is the subject of this DEIS, however, is not such a case. ADOT owes it to the Community – and NEPA demands in these circumstances – that the DEIS analyze, in detail, at lease one alternative in the Eastern Section of the Project that avoids bisecting South Mountain.

Instead of including the required rigorous and objective study of a South Mountain avoidance alternative, however, the DEIS summarily rejected all but one alternative in the Eastern Section of the Project. The alternative that was carried forward for detailed study in the DEIS, E-1, is the alternative with the most significant environmental impacts on the Community and South Mountain. All but two of the Eastern Section alternatives cut directly through the South Mountain Range. The two alternatives that are located north of South Mountain, the US 60 Extension and the I-10 Spur, were summarily rejected with an explanation consisting of just a few bullet points. While the DEIS did include a section labeled "South Mountain Avoidance Options," this consisted only of the design options of building a bridge over the South Mountains

Code	Issue	Response
8	**Cultural Resources**	Section 106 requires federal agencies to consider the effects of their actions on historic properties (such as the South Mountains Traditional Cultural Property) and provide the Advisory Council on Historic Preservation an opportunity to comment on federal projects prior to implementation. As outlined in Title 36 of the Code of Federal Regulations, Part 800, "Protecting Historic Properties," the National Historic Preservation Act Section 106 review process encourages, but does not mandate, protection or preservation. Sometimes there is no way for a needed project to proceed without harming historic properties (such as the South Mountains Traditional Cultural Property). As described in the Final Environmental Impact Statement in Chapters 2, 3, and 5, the examination of possible avoidance alternatives was comprehensive. Section 106 review does, however, ensure that preservation values are factored into federal agency planning and decisions. Because of Section 106, federal agencies must assume responsibility for the consequences of their actions on historic properties and be publicly accountable for their decisions. The Final Environmental Impact Statement fully discloses those consequences in Chapter 4, *Affected Environment, Environmental Consequences,* and *Mitigation,* and in Chapter 5, *Section 4(f) Evaluation*. If feasible, avoidance of historic properties is always the Federal Highway Administration and Arizona Department of Transportation's first option. As summarized in Figure 5-2 on page 5-4 of the Final Environmental Impact Statement, numerous alignment adjustments were made to avoid use of existing and planned Section 4(f) resources such as the South Mountains Traditional Cultural Property. As discussed on page 5-18 of the Final Environmental Impact Statement, many alternatives were examined to avoid the use of the South Mountains Traditional Cultural Property; however, none of these alternatives were deemed to be prudent and feasible by the Federal Highway Administration. The Department of the Interior reviewed the Draft Environmental Impact Statement and commented, "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources. Please note, however, that this concurrence is contingent upon successful completion of the Programmatic Agreement among the consulting parties." (See page B4 in Appendix 7, Volume III, of the Final Environmental Impact Statement.) The physical impact on land designated as part of the South Mountains has been minimized through design and much has already been done to mitigate that effect. Access to the mountain would be maintained and multiple other mitigation measures would be implemented due in part to suggestions made by the Gila River Indian Community itself. For example, the Federal Highway Administration and Arizona Department of Transportation made a commitment to provide funds for the Gila River Indian Community to conduct a full evaluation of the South Mountains Traditional Cultural Property (see pages 4-147 and 4-158 of the Draft and Final Environmental Impact Statements, respectively). Documentation of these efforts is in a letter from the Lieutenant Governor of the Gila River Indian Community to the Administrator of the Arizona Division of the Federal Highway Administration, dated June 23, 2010 (see page A348 of Appendix 2-1 of the Final Environmental Impact Statement). In this letter, the Gila River Indian Community submitted a proposal for the "Evaluation of Traditional Cultural Property and Adverse Effects of Transportation Corridor Development posed by the proposed construction of the current Pecos Alignment of the South Mountain Freeway." The proposed mitigation for the South Mountains Traditional Cultural Property is discussed in the Final Environmental Impact Statement on page 4-143, and measures to minimize harm to the South Mountains Traditional Cultural Property are discussed on page 5-27 of the Final Environmental Impact Statement.

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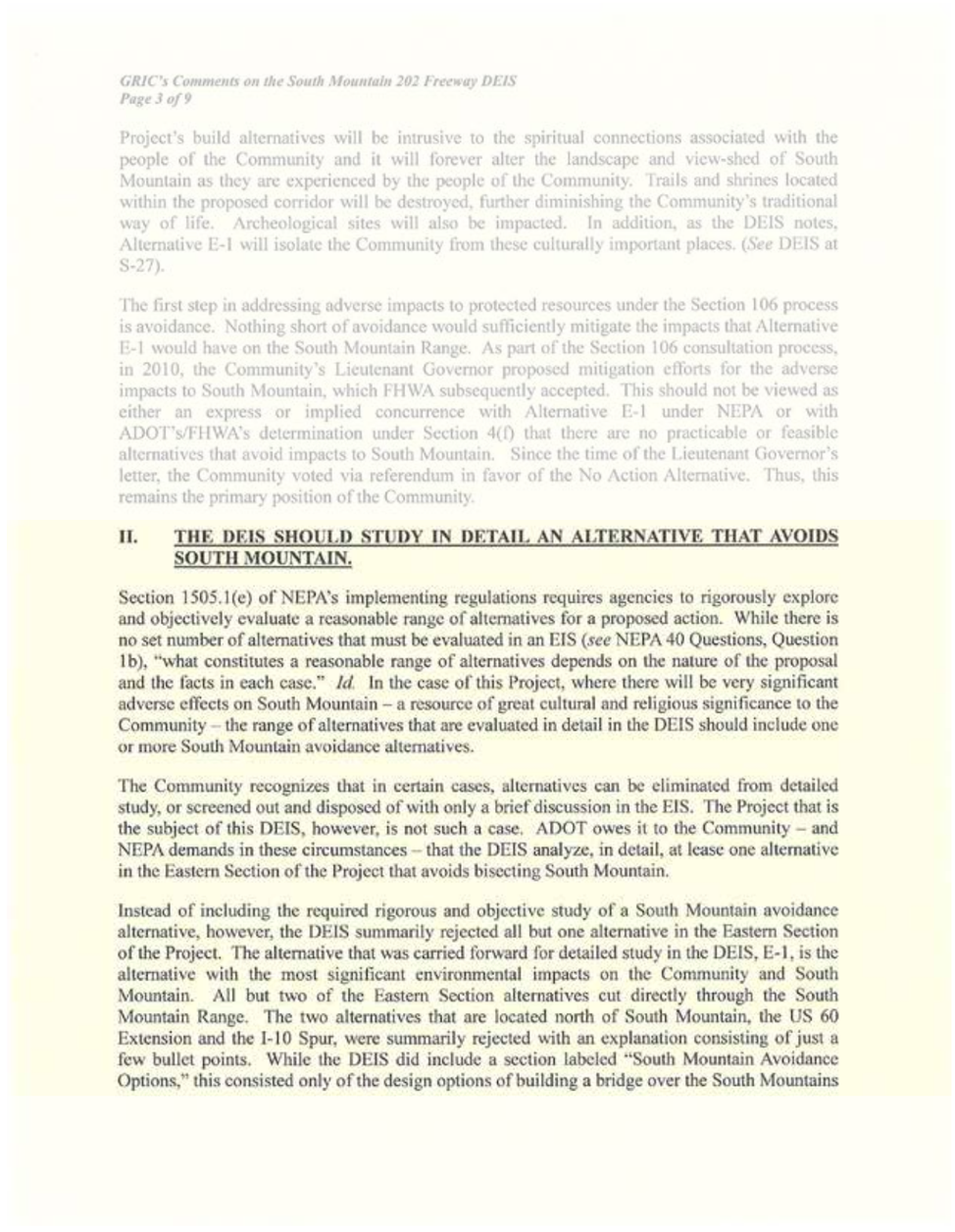

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The first step in addressing adverse impacts to protected resources under the Section 106 process is avoidance. Nothing short of avoidance would sufficiently mitigate the impacts that Alternative E-1 would have on the South Mountain Range. As part of the Section 106 consultation process, in 2010, the Community's Lieutenant Governor proposed mitigation efforts for the adverse impacts to South Mountain, which FHWA subsequently accepted. This should not be viewed as either an express or implied concurrence with Alternative E-1 under NEPA or with ADOT's/FHWA's determination under Section 4(f) that there are no practicable or feasible alternatives that avoid impacts to South Mountain. Since the time of the Lieutenant Governor's letter, the Community voted via referendum in favor of the No Action Alternative. Thus, this remains the primary position of the Community.

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(Response 9 continues on next page)

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Project's build alternatives will be intrusive to the spiritual connections associated with the people of the Community and it will forever alter the landscape and view-shed of South Mountain as they are experienced by the people of the Community. Trails and shrines located within the proposed corridor will be destroyed, further diminishing the Community's traditional way of life. Archeological sites will also be impacted. In addition, as the DEIS notes, Alternative E-1 will isolate the Community from these culturally important places. (*See* DEIS at S-27).

The first step in addressing adverse impacts to protected resources under the Section 106 process is avoidance. Nothing short of avoidance would sufficiently mitigate the impacts that Alternative E-1 would have on the South Mountain Range. As part of the Section 106 consultation process, in 2010, the Community's Lieutenant Governor proposed mitigation efforts for the adverse impacts to South Mountain, which FHWA subsequently accepted. This should not be viewed as either an express or implied concurrence with Alternative E-1 under NEPA or with ADOT's/FHWA's determination under Section 4(f) that there are no practicable or feasible alternatives that avoid impacts to South Mountain. Since the time of the Lieutenant Governor's letter, the Community voted via referendum in favor of the No Action Alternative. Thus, this remains the primary position of the Community.

II. THE DEIS SHOULD STUDY IN DETAIL AN ALTERNATIVE THAT AVOIDS SOUTH MOUNTAIN.

Section 1505.1(e) of NEPA's implementing regulations requires agencies to rigorously explore and objectively evaluate a reasonable range of alternatives for a proposed action. While there is no set number of alternatives that must be evaluated in an EIS (*see* NEPA 40 Questions, Question 1b), "what constitutes a reasonable range of alternatives depends on the nature of the proposal and the facts in each case." *Id.* In the case of this Project, where there will be very significant adverse effects on South Mountain – a resource of great cultural and religious significance to the Community – the range of alternatives that are evaluated in detail in the DEIS should include one or more South Mountain avoidance alternatives.

9

The Community recognizes that in certain cases, alternatives can be eliminated from detailed study, or screened out and disposed of with only a brief discussion in the EIS. The Project that is the subject of this DEIS, however, is not such a case. ADOT owes it to the Community – and NEPA demands in these circumstances – that the DEIS analyze, in detail, at lease one alternative in the Eastern Section of the Project that avoids bisecting South Mountain.

Instead of including the required rigorous and objective study of a South Mountain avoidance alternative, however, the DEIS summarily rejected all but one alternative in the Eastern Section of the Project. The alternative that was carried forward for detailed study in the DEIS, E-1, is the alternative with the most significant environmental impacts on the Community and South Mountain. All but two of the Eastern Section alternatives cut directly through the South Mountain Range. The two alternatives that are located north of South Mountain, the US 60 Extension and the I-10 Spur, were summarily rejected with an explanation consisting of just a few bullet points. While the DEIS did include a section labeled "South Mountain Avoidance Options," this consisted only of the design options of building a bridge over the South Mountains

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9 (cont.)		*Property and Adverse Effects of Transportation Corridor Development* posed by the proposed construction of the current Pecos Alignment of the South Mountain Freeway."The proposed mitigation for the South Mountains Traditional Cultural Property is discussed in the Final Environmental Impact Statement on page 4-143, and measures to minimize harm to the South Mountains Traditional Cultural Property are discussed on page 5-27 of the Final Environmental Impact Statement. Chapter 1, *Purpose and Need*, of the Final Environmental Impact Statement examines the purpose and need for the proposed action in terms of defining a transportation problem. In doing so, assumptions associated with the past need for the freeway were discounted as part of the environmental impact statement process. The results of the purpose and need analyses included the determination that a transportation problem (similar to the type of problem that has been represented in past Regional Transportation Plans) still exists in the area and that this problem is similar to transportation problem that existed in prior years. The alternatives analyses considered numerous modal alternatives, and it was concluded through the screening process that a road facility would be the appropriate modal choice to address the transportation problem defined. The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. While new projections based on the 2010 Census showed lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the need for the freeway has not changed. The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. Although the comment indicates that the discussion in the Draft Environmental Impact Statement is too brief, the document is a summary of a series of technical reports that provide sufficient information to convey the process of screening and reasons for elimination consistent with Federal Highway Administration for National Environmental Policy Act implementation. Technical reports are also available for public examination upon request. The alternative development and screening process as described in Chapter 3 was comprehensive in its nature. While alternatives eliminated are summarized in the chapter, the analyses as documented in the supporting project files and Appendices were appropriate and comprehensive. The complete list of avoidance alternatives for the Section 4(f) resources associated with the South Mountains includes the No-Action Alternative, Gila River Indian Community Alternatives, U.S. Route 60 Extension Alternative, Interstate 10 Spur Alternative (and Options), Riggs Road Alternative, and State Route 85/Interstate 8 Alternative in addition to the Bridge and Tunnel Alternatives. Descriptions of these can be found in the context of the alternatives development and screening process beginning on page 3-9 of the Final Environmental Impact Statement and in the context of avoidance alternatives for the Section 4(f) resources associated with the South Mountains beginning on page 5-16 of the Final Environmental Impact Statement).

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or building a tunnel under the South Mountains, both of which the DEIS rejected. *See* DEIS at 3-13 – 3-14.

ADOT attempts to justify its decision to not study in detail an alternative located north of South Mountain by claiming that such alternatives "would not meet the purpose and need of the proposed action and/or would create impacts of extraordinary magnitude." (DEIS at S-39-40). Bisecting and limiting access to one of its most important TCPs is an "impact of extraordinary magnitude," and thus ADOT must at least study an avoidance alternative in detail in the EIS.

9 In addition to the obligation under NEPA to look at avoidance alternatives, Section 4(f) of the Department of Transportation Act also requires the analysis of avoidance alternatives. Pursuant to Section 4(f), before approving a project that "uses" a Section 4(f) resource, FHWA must find that there is no prudent and feasible alternative to that use, and that the selected alternative minimizes harm to the resource. If there is a prudent and feasible alternative that completely avoids 4(f) resources, then it must be selected. As the DEIS concedes, South Mountain is a Section 4(f) resource, and locating a highway through South Mountain constitutes a "use" of South Mountain. The rejection of an avoidance alternative, without sufficient detailed study, does not demonstrate that there is no "prudent and feasible alternative" to the use of South Mountain.

10 Indeed, a glaring omission that ADOT should have studied is an alternative that followed one of the Western Section alternatives south from I-10, and then traveled east to I-10 south of Phoenix, somewhere between the US 60 Extension and the I-10 Spur alternatives and north of the South Mountains. Figure 3-5 of the DEIS appears to show such an alternative, but, again, this alternative was not evaluated in the DEIS and there is no explanation in the DEIS as to why that particular alternative was not carried forward. The DEIS does not indicate that this South Mountain avoidance alternative fails to meet the Project's purpose and need, has adverse environmental impacts, is cost prohibitive or is otherwise not feasible. As such, this is a prime example of an alternative that would have avoided South Mountain and should have been studied.

III. THE DEIS FAILS TO ADEQUATELY ASSESS ENVIRONMENTAL IMPACTS ON THE COMMUNITY'S RESERVATION

11 The DEIS also fails to adequately assess impacts from the Project that would occur on the Community's Reservation. While the proposed roadway is located outside of the Reservation boundaries, NEPA requires that ADOT identify and study on-Reservation direct impacts, indirect impacts and cumulative impacts. The most significant omissions include the failure of ADOT to identify and analyze impacts to or impacts associated with air quality, water quality, biological resources and hazardous materials.

1. Air Quality

12 The Project is being proposed for construction just north of Community lands and south of South Mountain. Since the freeway will be built on the south side of the South Mountain Range, air pollution emissions from vehicle traffic are expected to be trapped on the south side of the mountain and directly impact air quality at GRIC. This is especially true during periods o

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10	**Alternatives**	Based on the comment received, the proposed alternative is considered in the alternative screening process presented in the Final Environmental Impact Statement (see text beginning on page 3-7). The proposed alternative, named the US 60 Extension to Interstate 10 (Papago Freeway) in the Final Environmental Impact Statement, would result in similar benefits and impacts as the U.S. Route 60 Extension and Interstate 10 Spur, which were presented in the Draft Environmental Impact Statement. The project team subjected the proposed alternative to the screening process and criteria applied to other alternatives as described in beginning on page 3-3 of the Final Environmental Impact Statement. The project team found the alternative presented in the comment would cause substantial traffic performance impacts on Interstate 10 (Maricopa Freeway) and U.S. State Route 60 (Superstition Freeway), would not address the needs based on regional travel demand and existing and projected transportation system deficiencies (which were updated with Census 2010-based socioeconomic data presented in the Final Environmental Impact Statement beginning on page 1-11), would result in thousands of residential displacements and over one hundred business displacements, would adversely affect the communities in the South Mountain Village by constructing a barrier between schools, parks, and residences, and would not be consistent with local or regional planning. For these reasons, the alternative was eliminated from detailed study (see Table 3-5 on page 3-12 of the Final Environmental Impact Statement).
11	**Alternatives**	As noted in the sidebar on page 4-3 of the Final Environmental Impact Statement, impacts on the Gila River Indian Community from the proposed action as presented in the Final Environmental Impact Statement are based on data available to the general public and on field observation as appropriate. Discussions in the Final Environmental Impact Statement are limited to only those areas where impacts would occur. This condition was agreed upon by the Gila River Indian Community and is a response to the level of information made available to the project team by the Gila River Indian Community (see page 2-10 of the Final Environmental Impact Statement).
12	**Air Quality**	The Draft and Final Environmental Impact Statements present information and analyses about the proposed action and the enhanced conditions when compared against the No-Action Alternative and document that the proposed action would not cause substantial adverse air quality effects. The Draft and Final Environmental Impact Statements account for potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The Draft Environmental Impact Statement provided the results of modeling for each of the seven priority mobile source air toxics, in both the Eastern and Western Subareas, and compared relative mobile source air toxics emissions that would result

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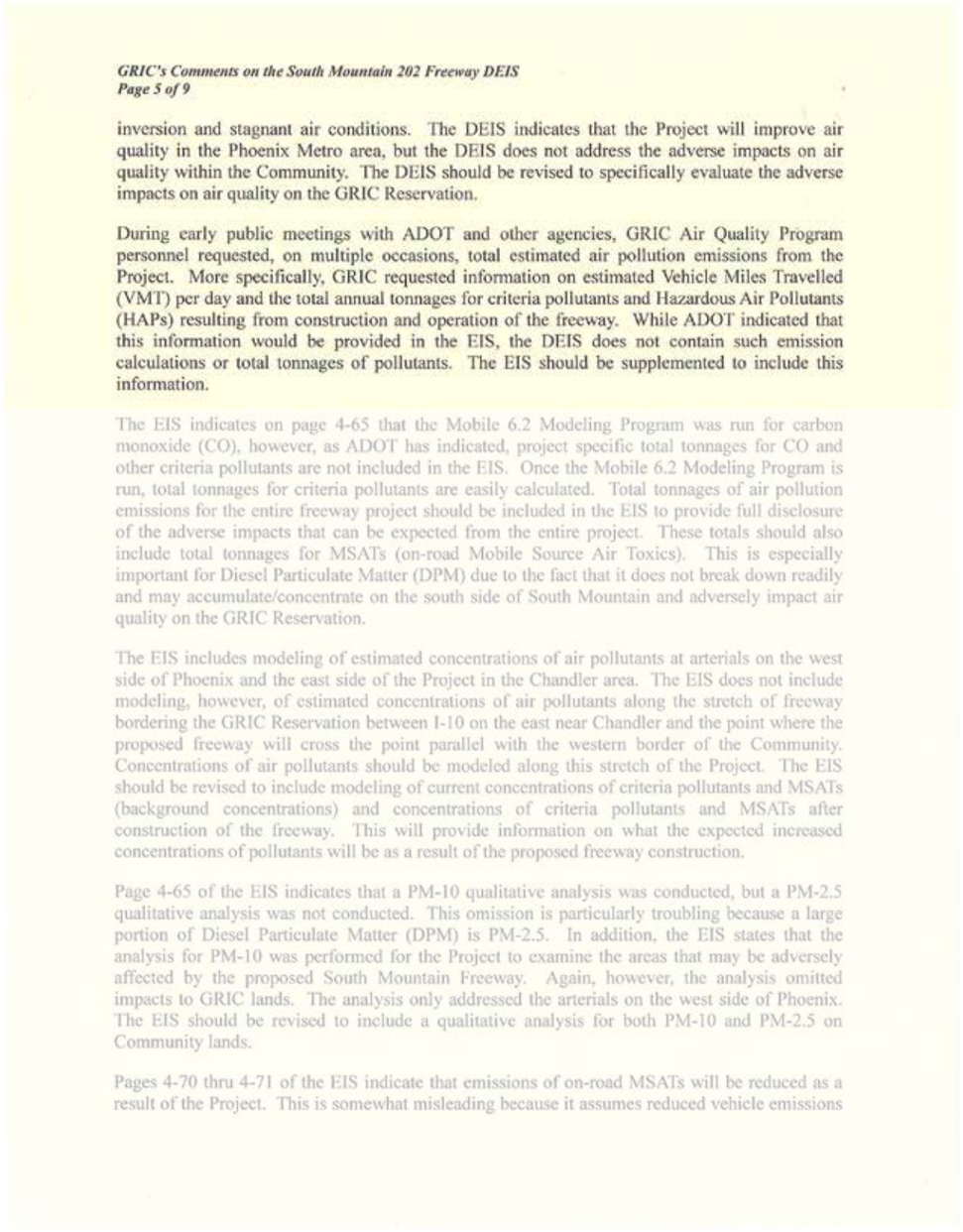
13	

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inversion and stagnant air conditions. The DEIS indicates that the Project will improve air quality in the Phoenix Metro area, but the DEIS does not address the adverse impacts on air quality within the Community. The DEIS should be revised to specifically evaluate the adverse impacts on air quality on the GRIC Reservation.

During early public meetings with ADOT and other agencies, GRIC Air Quality Program personnel requested, on multiple occasions, total estimated air pollution emissions from the Project. More specifically, GRIC requested information on estimated Vehicle Miles Travelled (VMT) per day and the total annual tonnages for criteria pollutants and Hazardous Air Pollutants (HAPs) resulting from construction and operation of the freeway. While ADOT indicated that this information would be provided in the EIS, the DEIS does not contain such emission calculations or total tonnages of pollutants. The EIS should be supplemented to include this information.

The EIS indicates on page 4-65 that the Mobile 6.2 Modeling Program was run for carbon monoxide (CO), however, as ADOT has indicated, project specific total tonnages for CO and other criteria pollutants are not included in the EIS. Once the Mobile 6.2 Modeling Program is run, total tonnages for criteria pollutants are easily calculated. Total tonnages of air pollution emissions for the entire freeway project should be included in the EIS to provide full disclosure of the adverse impacts that can be expected from the entire project. These totals should also include total tonnages for MSATs (on-road Mobile Source Air Toxics). This is especially important for Diesel Particulate Matter (DPM) due to the fact that it does not break down readily and may accumulate/concentrate on the south side of South Mountain and adversely impact air quality on the GRIC Reservation.

The EIS includes modeling of estimated concentrations of air pollutants at arterials on the west side of Phoenix and the east side of the Project in the Chandler area. The EIS does not include modeling, however, of estimated concentrations of air pollutants along the stretch of freeway bordering the GRIC Reservation between I-10 on the east near Chandler and the point where the proposed freeway will cross the point parallel with the western border of the Community. Concentrations of air pollutants should be modeled along this stretch of the Project. The EIS should be revised to include modeling of current concentrations of criteria pollutants and MSATs (background concentrations) and concentrations of criteria pollutants and MSATs after construction of the freeway. This will provide information on what the expected increased concentrations of pollutants will be as a result of the proposed freeway construction.

Page 4-65 of the EIS indicates that a PM-10 qualitative analysis was conducted, but a PM-2.5 qualitative analysis was not conducted. This omission is particularly troubling because a large portion of Diesel Particulate Matter (DPM) is PM-2.5. In addition, the EIS states that the analysis for PM-10 was performed for the Project to examine the areas that may be adversely affected by the proposed South Mountain Freeway. Again, however, the analysis omitted impacts to GRIC lands. The analysis only addressed the arterials on the west side of Phoenix. The EIS should be revised to include a qualitative analysis for both PM-10 and PM-2.5 on Community lands.

Pages 4-70 thru 4-71 of the EIS indicate that emissions of on-road MSATs will be reduced as a result of the Project. This is somewhat misleading because it assumes reduced vehicle emissions

Code	Issue	Response
12 (cont.)		from three different potential alternatives (W59, W71, W101) as compared with the No-Action Alternative. It also included modeling of mobile source air toxics emissions in the overall mobile source air toxics study area assuming the W59 Alternative (see pages 4-70 to 4-74 of the Draft Environmental Impact Statement) along with implementation of recent U.S. Environmental Protection Agency mobile source air toxics rules. This analysis was also updated beginning on page 4-77 of the Final Environmental Impact Statement. Based on the carbon monoxide, particulate matter (PM_{10}), and mobile source air toxics analyses, the Federal Highway Administration concluded that the project would not cause substantial adverse impacts on air quality. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality technical report can be reviewed on the project Web site at <southmountainfreeway.com>. Meteorological information was considered in the air quality analyses [*Air Quality Assessment: South Mountain Freeway (SR 202L)*, dated March 1, 2013] conducted for the proposed action. Data from the Maricopa County Air Quality Department and from the Gila River Indian Community monitoring station were compared with two, 1-month studies conducted during the winter of 2006 and the spring of 2007 along Pecos Road in the Study Area. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, the wind flows from the southeast and follows the Gila River channel to the north. Locations to the east of St. Johns will tend to have a flow from the easterly component as the air flows from the east to the lower elevations along the Gila River. During the warmer hours with improved mixing, the flows typically follow the river channel and come from the north and northwest toward the south and southeast. Although these warmer-hour flows would move pollutants toward the Gila River Indian Community, as noted earlier, the pollutants would be below the National Ambient Air Quality Standards at their highest concentrations and these low levels of pollutants would continue to disperse as they moved toward the Gila River Indian Community.
13	**Air Quality**	The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor and near the Gila River Indian Community. This also applies to the particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement.

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inversion and stagnant air conditions. The DEIS indicates that the Project will improve air quality in the Phoenix Metro area, but the DEIS does not address the adverse impacts on air quality within the Community. The DEIS should be revised to specifically evaluate the adverse impacts on air quality on the GRIC Reservation.

During early public meetings with ADOT and other agencies, GRIC Air Quality Program personnel requested, on multiple occasions, total estimated air pollution emissions from the Project. More specifically, GRIC requested information on estimated Vehicle Miles Travelled (VMT) per day and the total annual tonnages for criteria pollutants and Hazardous Air Pollutants (HAPs) resulting from construction and operation of the freeway. While ADOT indicated that this information would be provided in the EIS, the DEIS does not contain such emission calculations or total tonnages of pollutants. The EIS should be supplemented to include this information.

14 The EIS indicates on page 4-65 that the Mobile 6.2 Modeling Program was run for carbon monoxide (CO), however, as ADOT has indicated, project specific total tonnages for CO and other criteria pollutants are not included in the EIS. Once the Mobile 6.2 Modeling Program is run, total tonnages for criteria pollutants are easily calculated. Total tonnages of air pollution emissions for the entire freeway project should be included in the EIS to provide full disclosure of the adverse impacts that can be expected from the entire project. These totals should also include total tonnages for MSATs (on-road Mobile Source Air Toxics). This is especially important for Diesel Particulate Matter (DPM) due to the fact that it does not break down readily and may accumulate/concentrate on the south side of South Mountain and adversely impact air quality on the GRIC Reservation.

The EIS includes modeling of estimated concentrations of air pollutants at arterials on the west side of Phoenix and the east side of the Project in the Chandler area. The EIS does not include modeling, however, of estimated concentrations of air pollutants along the stretch of freeway bordering the GRIC Reservation between I-10 on the east near Chandler and the point where the proposed freeway will cross the point parallel with the western border of the Community. Concentrations of air pollutants should be modeled along this stretch of the Project. The EIS should be revised to include modeling of current concentrations of criteria pollutants and MSATs (background concentrations) and concentrations of criteria pollutants and MSATs after construction of the freeway. This will provide information on what the expected increased concentrations of pollutants will be as a result of the proposed freeway construction.

Page 4-65 of the EIS indicates that a PM-10 qualitative analysis was conducted, but a PM-2.5 qualitative analysis was not conducted. This omission is particularly troubling because a large portion of Diesel Particulate Matter (DPM) is PM-2.5. In addition, the EIS states that the analysis for PM-10 was performed for the Project to examine the areas that may be adversely affected by the proposed South Mountain Freeway. Again, however, the analysis omitted impacts to GRIC lands. The analysis only addressed the arterials on the west side of Phoenix. The EIS should be revised to include a qualitative analysis for both PM-10 and PM-2.5 on Community lands.

Pages 4-70 thru 4-71 of the EIS indicate that emissions of on-road MSATs will be reduced as a result of the Project. This is somewhat misleading because it assumes reduced vehicle emissions

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13 (cont.)		The mobile source air toxics analysis presented beginning on page 4-70 of the Draft Environmental Impact Statement and updated beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxics emissions for the entire Study Area. The requested information on vehicle miles traveled may be found in the Draft Environmental Impact Statement in Tables 4-34 and 4-35 on pages 4-72 and 4-73, respectfully. The vehicle miles traveled presented in the Draft Environmental Impact Statement were revised with traffic projections provided by the Maricopa Association of Governments in November 2013. These revised vehicle miles traveled are presented in the Final Environmental Impact Statement in Tables 4-34 through 4-36 on pages 4-80 and 4-81.
14	**Air Quality**	As discussed on page 4-76 of the Final Environmental Impact Statement, federally funded or approved transportation projects must meet applicable air quality analyses requirements of Section 176(c) of the Clean Air Act. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The analysis performed for mobile source air toxics used an inventory approach, and total tonnages for mobile source air toxics emissions (including diesel particulate matter) may be found in the Draft Environmental Impact Statement, in Tables 4-34 and 4-35 on pages 4-72 and 4-73, and in the Final Environmental Impact Statement in Tables 4-34 through 4-36 on pages 4-80 and 4-81.
15	**Air Quality**	As noted on page 4-65 of the Draft Environmental Impact Statement, over 700 locations within the Study Area were modeled at various distances from the proposed road's centerline for existing traffic conditions and roadway configurations for Interstate 10, for major arterial street intersections near the proposed action alternatives, and for areas located at the proposed action alternatives' interchanges. These locations were chosen to meet the criteria for selecting modeling locations as specified in Title 40 Code of Federal Regulations § 93.123(a) and to represent the areas of highest concentrations. The analysis demonstrated that none of the action alternatives would violate the National Ambient Air Quality Standards, including those modeled locations at proposed fully directional interchanges along the Gila River Indian Community boundary. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Despite including conservative background levels, concentrations of air pollutants violating National Ambient Air Quality Standards were not predicted. The carbon monoxide analysis results presented in Table 4-32 on page 4-76 of the Final Environmental Impact Statement and the particulate matter (PM_{10}) analysis results presented in Table 4-33 on page 4-77 of the Final Environmental Impact Statement show concentrations at the proposed freeway. Existing levels are represented by the background levels.

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inversion and stagnant air conditions. The DEIS indicates that the Project will improve air quality in the Phoenix Metro area, but the DEIS does not address the adverse impacts on air quality within the Community. The DEIS should be revised to specifically evaluate the adverse impacts on air quality on the GRIC Reservation.

During early public meetings with ADOT and other agencies, GRIC Air Quality Program personnel requested, on multiple occasions, total estimated air pollution emissions from the Project. More specifically, GRIC requested information on estimated Vehicle Miles Travelled (VMT) per day and the total annual tonnages for criteria pollutants and Hazardous Air Pollutants (HAPs) resulting from construction and operation of the freeway. While ADOT indicated that this information would be provided in the EIS, the DEIS does not contain such emission calculations or total tonnages of pollutants. The EIS should be supplemented to include this information.

The EIS indicates on page 4-65 that the Mobile 6.2 Modeling Program was run for carbon monoxide (CO), however, as ADOT has indicated, project specific total tonnages for CO and other criteria pollutants are not included in the EIS. Once the Mobile 6.2 Modeling Program is run, total tonnages for criteria pollutants are easily calculated. Total tonnages of air pollution emissions for the entire freeway project should be included in the EIS to provide full disclosure of the adverse impacts that can be expected from the entire project. These totals should also include total tonnages for MSATs (on-road Mobile Source Air Toxics). This is especially important for Diesel Particulate Matter (DPM) due to the fact that it does not break down readily and may accumulate/concentrate on the south side of South Mountain and adversely impact air quality on the GRIC Reservation.

15 The EIS includes modeling of estimated concentrations of air pollutants at arterials on the west side of Phoenix and the east side of the Project in the Chandler area. The EIS does not include modeling, however, of estimated concentrations of air pollutants along the stretch of freeway bordering the GRIC Reservation between I-10 on the east near Chandler and the point where the proposed freeway will cross the point parallel with the western border of the Community. Concentrations of air pollutants should be modeled along this stretch of the Project. The EIS should be revised to include modeling of current concentrations of criteria pollutants and MSATs (background concentrations) and concentrations of criteria pollutants and MSATs after construction of the freeway. This will provide information on what the expected increased concentrations of pollutants will be as a result of the proposed freeway construction.

16 Page 4-65 of the EIS indicates that a PM-10 qualitative analysis was conducted, but a PM-2.5 qualitative analysis was not conducted. This omission is particularly troubling because a large portion of Diesel Particulate Matter (DPM) is PM-2.5. In addition, the EIS states that the analysis for PM-10 was performed for the Project to examine the areas that may be adversely affected by the proposed South Mountain Freeway. Again, however, the analysis omitted impacts to GRIC lands. The analysis only addressed the arterials on the west side of Phoenix. The EIS should be revised to include a qualitative analysis for both PM-10 and PM-2.5 on Community lands.

Pages 4-70 thru 4-71 of the EIS indicate that emissions of on-road MSATs will be reduced as a result of the Project. This is somewhat misleading because it assumes reduced vehicle emissions

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15 (cont.)		The mobile source air toxics analysis conducted for the Final Environmental Impact Statement demonstrated that total mobile source air toxics emissions would decline by 57 percent to more than 90 percent between 2012 and 2035 even though traffic is expected to increase by 47 percent (Final Environmental Impact Statement Table 4-36 on page 4-81). The mobile source air toxics analysis results presented in Tables 4-34 through 4-36 on pages 4-80 and 4-81 of the Final Environmental Impact Statement show emissions predicted with the Preferred (W59/E1) and No-Action Alternatives.
16	**Air Quality**	As noted on page 4-62 of the Draft Environmental Impact Statement, the Maricopa County 2008 Periodic Emissions Inventory attributes only 34 percent of particulate matter ($PM_{2.5}$) emissions to on-road mobile sources. Also on page 4-62 of the Draft Environmental Impact Statement, the Federal Highway Administration attributed less than 40 percent of national diesel particulate matter emissions in 1999 to on-road sources. Although the qualitative particulate matter (PM_{10}) hot-spot analysis performed in the Draft Environmental Impact Statement met 40 Code of Federal Regulations § 93.111(c), the Arizona Department of Transportation and Federal Highway Administration have updated the qualitative analysis to a particulate matter (PM_{10}) quantitative analysis for the Final Environmental Impact Statement to ensure that a state-of-the-art analysis is completed for the proposed action. The quantitative project-level particulate matter (PM_{10}) hot-spot analysis prepared for the proposed project is summarized in the prologue to the Final Environmental Impact Statement (page xiii) and is more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. A particulate matter ($PM_{2.5}$) analysis (qualitative or quantitative) is not required and was not performed because the area is in attainment for the particulate matter ($PM_{2.5}$) National Ambient Air Quality Standards.

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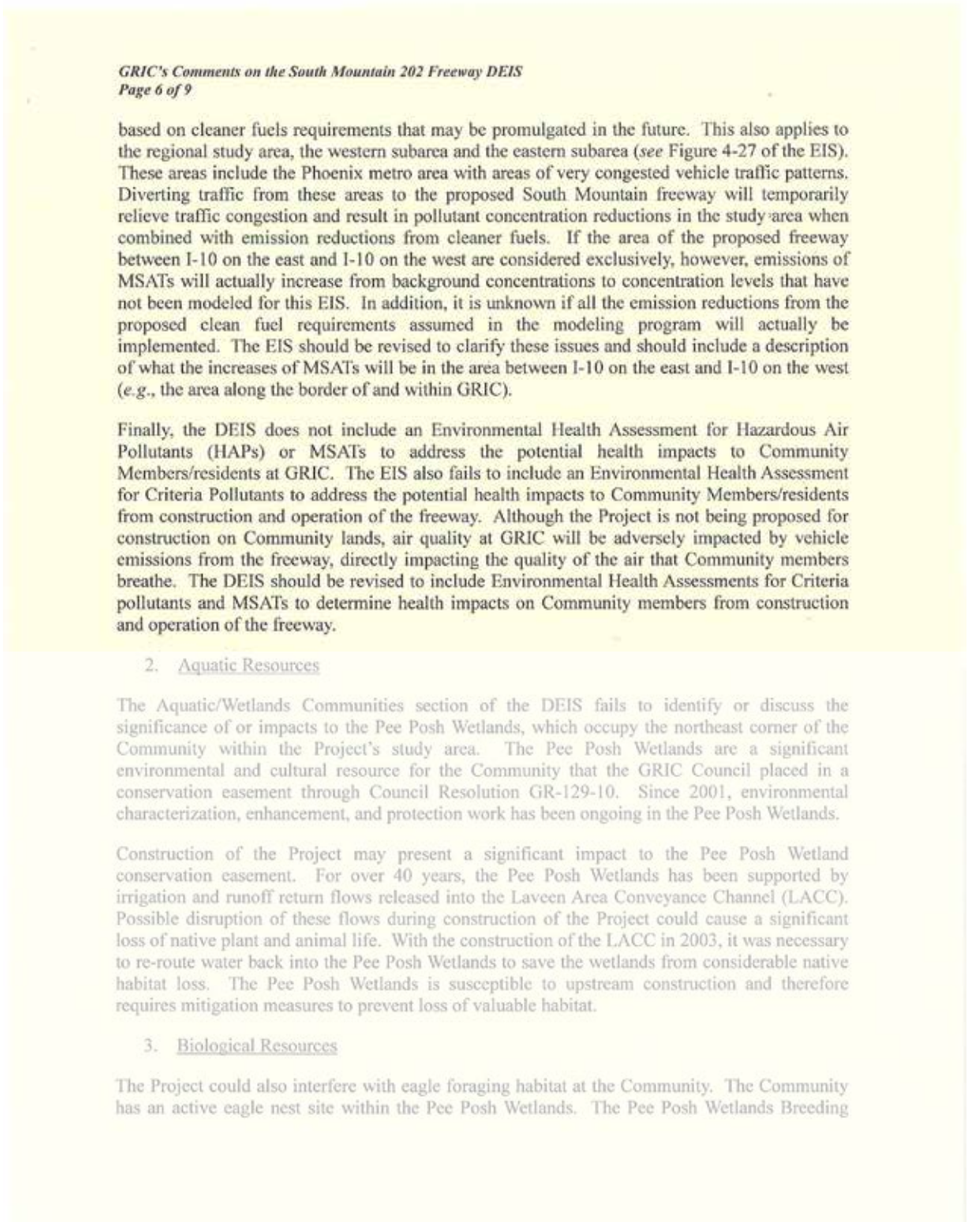
17 Pages 4-70 thru 4-71 of the EIS indicate that emissions of on-road MSATs will be reduced as a result of the Project. This is somewhat misleading because it assumes reduced vehicle emissions

Code	Issue	Response
17	**Air Quality**	The mobile source air toxics emissions information presented in the Draft and Final Environmental Impact Statements demonstrates that mobile source air toxics emissions at the Study Area level would be much lower in the future. The U.S. Environmental Protection Agency's MOVES model also predicts lower mobile source air toxics emissions in the future. This model includes the effects of various control programs in the generation of emission factors for future years that are considered "reasonably foreseeable" future actions. Because the model includes these emission control programs in the generation of emission factors, it is not possible, and would be unacceptable to the U.S. Environmental Protection Agency, to disable these control program assumptions in the model. Increases in traffic volumes attributable to a project do not necessarily result in an increase in emissions over time because the U.S. Environmental Protection Agency's emissions control regulations and fleet turnover also play a role. In the U.S. Environmental Protection Agency's MOVES model, emissions rates for mobile source air toxics drop by 80 to 90 percent between 2012 and 2025. The effects of these reductions are apparent from the mobile source air toxics analysis conducted for the Final Environmental Impact Statement; in the mobile source air toxics study area, total mobile source air toxics emissions would decline by 57 to more than 90 percent even though traffic is expected to increase by 47 percent (Final Environmental Impact Statement Table 4-36 on page 4-81). The Draft Environmental Impact Statement provided the results of modeling for each of the seven priority mobile source air toxics, in both the Eastern and Western Subareas, and compared relative mobile source air toxics emissions that would result from three different potential alternatives (W59, W71, W101) as compared with the No-Action Alternative. It also included modeling of mobile source air toxics emissions in the overall mobile source air toxics study area assuming the W59 Alternative (see pages 4-70 to 4-74 of the Draft Environmental Impact Statement) along with implementation of recent U.S. Environmental Protection Agency mobile source air toxics rules. During the period when the project has been under review, the U.S. Environmental Protection Agency has issued two rules on controlling mobile source air toxics emissions from motor vehicles (66 *Federal Register* 17229 [March 29, 2001] and 72 *Federal Register* 8427 [February 26, 2007]). In those rules, the U.S. Environmental Protection Agency examined the impacts of existing and newly promulgated mobile source control programs, including its reformulated gasoline program, its national low emission vehicle standards, its Tier 2 motor vehicle emissions standards and gasoline sulfur control requirements, and heavy duty engine and vehicle standards and on-highway diesel fuel sulfur control requirements. As a result, the U.S. Environmental Protection Agency adopted controls on gasoline and passenger vehicles that significantly reduce emissions of benzene and other mobile source air toxics such as 1,3-butadiene; formaldehyde; acetaldehyde; acrolein; and naphthalene; as well as significant reductions in emissions of particulate matter from passenger vehicles. On March 3, 2014, the U.S. Environmental Protection Agency also promulgated new "Tier 3" vehicle and fuel regulations, which will produce additional reductions of mobile source air toxics pollutants. Since these reductions have not yet been incorporated into the U.S. Environmental Protection Agency's emissions model, they are not accounted for in the South Mountain Freeway analysis. While the Federal Highway Administration did not produce stand-alone emissions estimates for the South Mountain Freeway corridor, the carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated

(Response 17 continues on next page)

Code	Comment Document



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based on cleaner fuels requirements that may be promulgated in the future. This also applies to the regional study area, the western subarea and the eastern subarea (*see* Figure 4-27 of the EIS). These areas include the Phoenix metro area with areas of very congested vehicle traffic patterns. Diverting traffic from these areas to the proposed South Mountain freeway will temporarily relieve traffic congestion and result in pollutant concentration reductions in the study area when combined with emission reductions from cleaner fuels. If the area of the proposed freeway between I-10 on the east and I-10 on the west are considered exclusively, however, emissions of MSATs will actually increase from background concentrations to concentration levels that have not been modeled for this EIS. In addition, it is unknown if all the emission reductions from the proposed clean fuel requirements assumed in the modeling program will actually be implemented. The EIS should be revised to clarify these issues and should include a description of what the increases of MSATs will be in the area between I-10 on the east and I-10 on the west (*e.g.*, the area along the border of and within GRIC).

18

Finally, the DEIS does not include an Environmental Health Assessment for Hazardous Air Pollutants (HAPs) or MSATs to address the potential health impacts to Community Members/residents at GRIC. The EIS also fails to include an Environmental Health Assessment for Criteria Pollutants to address the potential health impacts to Community Members/residents from construction and operation of the freeway. Although the Project is not being proposed for construction on Community lands, air quality at GRIC will be adversely impacted by vehicle emissions from the freeway, directly impacting the quality of the air that Community members breathe. The DEIS should be revised to include Environmental Health Assessments for Criteria pollutants and MSATs to determine health impacts on Community members from construction and operation of the freeway.

2. Aquatic Resources

The Aquatic/Wetlands Communities section of the DEIS fails to identify or discuss the significance of or impacts to the Pee Posh Wetlands, which occupy the northeast corner of the Community within the Project's study area. The Pee Posh Wetlands are a significant environmental and cultural resource for the Community that the GRIC Council placed in a conservation easement through Council Resolution GR-129-10. Since 2001, environmental characterization, enhancement, and protection work has been ongoing in the Pee Posh Wetlands.

Construction of the Project may present a significant impact to the Pee Posh Wetland conservation easement. For over 40 years, the Pee Posh Wetlands has been supported by irrigation and runoff return flows released into the Laveen Area Conveyance Channel (LACC). Possible disruption of these flows during construction of the Project could cause a significant loss of native plant and animal life. With the construction of the LACC in 2003, it was necessary to re-route water back into the Pee Posh Wetlands to save the wetlands from considerable native habitat loss. The Pee Posh Wetlands is susceptible to upstream construction and therefore requires mitigation measures to prevent loss of valuable habitat.

3. Biological Resources

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Code	Issue	Response
17 (cont.)		on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. This also applies to the particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The mobile source air toxics analysis presented beginning on page 4-70 of the Draft Environmental Impact Statement and updated beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxics emissions for the entire Study Area. Such an inventory would be incomplete without the inclusion of emissions from other Study Area roads because these roads are within the Study Area and human exposure would be a combination of the emissions from all roads in the Study Area. It is stated on page S-14 of the Final Environmental Impact Statement that "For all action alternatives, increased traffic volumes would produce elevated mobile source air toxic emissions near the proposed action. The action alternatives would reduce congestion and improve regional traffic conditions, which would reduce regional mobile source air toxic emissions. Additionally, overall mobile source air toxic levels would decline from existing levels because of compliance with strategies identified by the U.S. Environmental Protection Agency's national control programs."
18	**Health Risk Assessment**	The Federal Highway Administration's National Environmental Policy Act documents are developed under two guiding regulations: the Council on Environmental Quality's National Environmental Policy Act regulations applicable to all federal agencies (40 Code of Federal Regulations Parts 1500–1508) and the Federal Highway Administration's implementing regulations governing Federal Highway Administration National Environmental Policy Act documents (23 Code of Federal Regulations Part 771). In its mobile source air toxics guidance, the Federal Highway Administration discusses 40 Code of Federal Regulations Part 1502.22 and acknowledges that while much work has been done to assess the overall health risk of mobile source air toxics, analytical tools and techniques for assessing project-specific health outcomes as a result of lifetime exposures to mobile source air toxics remain limited. These limitations impede the ability to evaluate the potential health risks attributable to exposure to mobile source air toxics as part of the decision-making process in the National Environmental Policy Act context. However, as with any analysis that the Federal Highway Administration conducts for National Environmental Policy Act purposes, the Federal Highway Administration's approach for mobile source air toxic analysis in National Environmental Policy Act documents is informed not just by 40 Code of Federal Regulations Part 1502.22, but by all applicable Council on Environmental Quality requirements. The appropriateness of air toxics health risk assessment as an analysis method for National Environmental Policy Act documents is discussed below, in the context of Council on Environmental Quality requirements for these documents. In addition to the 40 Code of Federal Regulations Part 1502.22 provisions regarding uncertainty and limitations discussed in the Federal Highway Administration's MSAT Interim Guidance Appendix C, three other provisions of the Council on Environmental Quality regulations are particularly relevant to the topic of health risk assessment:

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18 (cont.)		*40 Code of Federal Regulations § 1500.1(b): NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.* *40 Code of Federal Regulations § 1502.1: An environmental impact statement is more than a disclosure document. It shall be used by Federal officials in conjunction with other relevant material to plan actions and make decisions.* *40 Code of Federal Regulations § 1502.2: (a) Environmental impact statements shall be analytic rather than encyclopedic. (b) Impacts shall be discussed in proportion to their significance.(c) Environmental impact statements shall be kept concise and shall be no longer than absolutely necessary to comply with NEPA and with these regulations.* Section 1500.1(b) states that information for decision making must be of high quality and based on accurate scientific analysis. Air toxics health risk assessments can involve large uncertainties. The mobile source air toxic health risk assessment uncertainty builds on itself—each step of the analysis involves uncertainties, including modeling traffic and then modeling emissions, and using this estimated output to model dispersion/concentrations, which provide information for estimating or assuming exposures to those concentrations, and finally predicting health outcomes. Major uncertainties are associated with traffic and emissions projections over a 70-year period, and dispersion models are typically held to a "factor of 2" performance standard. Health impacts of mobile source air toxics in the U.S. Environmental Protection Agency Integrated Risk Information System are based on a 70-year lifetime exposure, which introduces significant uncertainty (e.g., on average, people in the United States change residence approximately once every 8 years and change jobs once every 3). Finally, as noted above, the U.S. Environmental Protection Agency's Integrated Risk Information System provides toxicity (risk) values for various pollutants and routes of exposure; in a health risk assessment, the Federal Highway Administration would compare calculated concentrations of mobile source air toxic pollutants to the Integrated Risk Information System values to estimate health risk. In the Integrated Risk Information System, the U.S. Environmental Protection Agency states the toxicity values are believed to be accurate to within an order of magnitude (a factor of 10). The total cumulative uncertainty involved in highway project health risk assessment is much larger than the change in emissions attributable to projects (typically a few percentage points). In this context, the information would not necessarily have a strong nexus to the requirements for high-quality information and accurate scientific analysis. Section 1500.1(b) also directs agencies to focus their National Environmental Policy Act analysis and documentation on issues that are truly significant to the action in question. In the context of mobile source air toxics, the Federal Highway Administration must consider whether changes in mobile source air toxic emissions attributable to a project have the potential for significant health risk. Using cancer risk as an example, the U.S. Environmental Protection Agency estimates that the overall risk of cancer in the United States is approximately 330,000 in a million, and that air toxics (from all sources) are responsible for a risk of approximately 50 in a million. In its most recent mobile source air toxics rule-making, the U.S. Environmental Protection Agency estimated mobile source air toxic cancer risk, after implementation of emissions controls, at approximately 5 in a million

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18 (cont.)		(or 0.0015 percent of overall cancer risk from any cause). For the Preferred Alternative, the mobile source air toxic emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxic emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxic emissions would decrease by more than 80 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see the discussion beginning on page 4-77 of the Final Environmental Impact Statement). In summary, available information from the U.S. Environmental Protection Agency indicates that mobile source air toxics are a small component of overall cancer risk, and the analysis for the Final Environmental Impact Statement indicates both that the Preferred Alternative would result in a small change in the emissions contributing to this risk and that emissions will decline by a large amount regardless of alternative. As discussed above and in the air quality technical report, results from the health risk assessment would be influenced more by the uncertainty introduced into the process through assumptions and speculations rather than by genuine insight into the actual health impacts directly attributable to mobile source air toxic exposure associated with a project. Therefore, outcomes of such a health risk assessment do not provide useful information for decision makers, as required by Section 1502.1. The Federal Highway Administration emissions analysis meets the requirement to produce information that is useful for both disclosure and decision making because it allows the public and decision makers to see which alternative has less mobile source air toxic emissions, with much less uncertainty than a health risk assessment. Given the uncertainty of a mobile source air toxic health risk assessment, the Federal Highway Administration instead addresses the potential impacts of mobile source air toxics through an emissions assessment in its National Environmental Policy Act documents. For smaller projects with a lower likelihood of a meaningful impact, this discussion is qualitative. For larger projects, emissions analysis is conducted. The Federal Highway Administration approach is consistent with the Council on Environmental Quality's direction in Section 1502.2(b) to discuss impacts in proportion to their significance. The results of an emissions analysis can be summarized concisely in a National Environmental Policy Act document and provide useful information for decision makers (e.g., an alternative that has lower emissions is likely to be "better" from a mobile source air toxics health risk standpoint than one that has higher emissions). While the U.S. Environmental Protection Agency and the Federal Highway Administration both agree on the usefulness of addressing mobile source air toxics in National Environmental Policy Act documents for highway projects, the agencies disagree about the value of health risk assessment as a method for doing so.

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18 (cont.)		Another consideration with respect to health impacts is that the Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the Preferred Alternative would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the roadway network. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.

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based on cleaner fuels requirements that may be promulgated in the future. This also applies to the regional study area, the western subarea and the eastern subarea (*see* Figure 4-27 of the EIS). These areas include the Phoenix metro area with areas of very congested vehicle traffic patterns. Diverting traffic from these areas to the proposed South Mountain freeway will temporarily relieve traffic congestion and result in pollutant concentration reductions in the study area when combined with emission reductions from cleaner fuels. If the area of the proposed freeway between I-10 on the east and I-10 on the west are considered exclusively, however, emissions of MSATs will actually increase from background concentrations to concentration levels that have not been modeled for this EIS. In addition, it is unknown if all the emission reductions from the proposed clean fuel requirements assumed in the modeling program will actually be implemented. The EIS should be revised to clarify these issues and should include a description of what the increases of MSATs will be in the area between I-10 on the east and I-10 on the west (*e.g.*, the area along the border of and within GRIC).

Finally, the DEIS does not include an Environmental Health Assessment for Hazardous Air Pollutants (HAPs) or MSATs to address the potential health impacts to Community Members/residents at GRIC. The EIS also fails to include an Environmental Health Assessment for Criteria Pollutants to address the potential health impacts to Community Members/residents from construction and operation of the freeway. Although the Project is not being proposed for construction on Community lands, air quality at GRIC will be adversely impacted by vehicle emissions from the freeway, directly impacting the quality of the air that Community members breathe. The DEIS should be revised to include Environmental Health Assessments for Criteria pollutants and MSATs to determine health impacts on Community members from construction and operation of the freeway.

2. Aquatic Resources

19

The Aquatic/Wetlands Communities section of the DEIS fails to identify or discuss the significance of or impacts to the Pee Posh Wetlands, which occupy the northeast corner of the Community within the Project's study area. The Pee Posh Wetlands are a significant environmental and cultural resource for the Community that the GRIC Council placed in a conservation easement through Council Resolution GR-129-10. Since 2001, environmental characterization, enhancement, and protection work has been ongoing in the Pee Posh Wetlands.

Construction of the Project may present a significant impact to the Pee Posh Wetland conservation easement. For over 40 years, the Pee Posh Wetlands has been supported by irrigation and runoff return flows released into the Laveen Area Conveyance Channel (LACC). Possible disruption of these flows during construction of the Project could cause a significant loss of native plant and animal life. With the construction of the LACC in 2003, it was necessary to re-route water back into the Pee Posh Wetlands to save the wetlands from considerable native habitat loss. The Pee Posh Wetlands is susceptible to upstream construction and therefore requires mitigation measures to prevent loss of valuable habitat.

3. Biological Resources

20

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Code	Issue	Response
19	**Water Resources**	As described in the Final Environmental Impact Statement in Chapter 2 and elaborated on in appropriate sections of Chapter 4, evaluation of impacts on resources located on Gila River Indian Community land were limited to visual inspection as permitted and as restricted by the Gila River Indian Community. As to drainage, as noted in Chapter 3 of the Final Environmental Impact Statement, the design of the proposed action is such as to not alter drainage onto Gila River Indian Community land. Further, the Rio Salado Oeste restoration project will restore habitat and flow conditions within the Salt River channel, including beneath the freeway bridge. The Pee Posh wetland area is discussed in the Draft Environmental Impact Statement on page 4-124, but not by name. A discussion of the Pee Posh wetlands was added to the Final Environmental Impact Statement on page 4-126. The Pee Posh wetlands would not be directly affected by any of the alternatives, and the future condition of the Pee Posh wetlands is likely to improve as a result of the restoration project.
20	**Biology**	The Pee Posh bald eagle breeding area is discussed in the Draft Environmental Impact Statement on page 4-124, but not by name. The information provided in the comment was taken into consideration in the development of a Biological Evaluation that was prepared and submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality. The Biological Evaluation addresses threatened and endangered species and the breeding eagles in the Pee Posh wetlands, in conformance to the Bald and Golden Eagle Protection Act. The action alternatives are not expected to affect the eagles' nesting activities because of the project's distance from the nest. The project may affect the eagles' foraging behavior along the Salt River when foraging opportunities exist near action alternatives. The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

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Areas is listed with the Southwestern Bald Eagle Management Committee's (SWBEMC) list of state-wide eagle Breeding Areas (BA). Since 2010, the site has been cooperatively managed by the Community and the SWBEMC.

Breeding is currently occurring at the Pee Posh Wetlands BA site. Two nestling eagles were hatched in early February 2013. In late April, both nestlings successfully fledged from the nest. Currently, the fledglings are going out daily to actively forage with the adult eagles. The eagles' primary foraging areas at this time are the sand and gravel lakes immediately east of the nest site area. Community Department of Environmental Quality staff have observed eagle activity throughout the 2013 breeding season.

Field observations this year indicate that the eagles are doing a significant portion of their foraging at the sand and gravel lakes located along the Salt River and the 75th Avenue alignment. These considerably large lakes are immediately accessible for foraging in comparison to other water bodies in the area, including the Tres Rios Wetlands and downstream perennial reaches of the Salt and Gila Rivers. Observation showed that the eagles, throughout the breeding season, consistently flew in prey deliveries directly from the sand and gravel lake sources. In addition to being observed flying directly to and from these sources, the eagles were also observed flying over these areas. Although direct access to the lake areas is restricted, visual observations were made using spotting scopes and binoculars. It can be estimated through observations over the course of this year's breeding season that 40 to 60 percent of the prey deliveries made by the eagles came from the sand and gravel lake sources to the east.

The sand and gravel lakes east of the Pee Posh Wetlands BA are therefore considered to be a significant foraging source for the Pee Posh Wetlands eagles. Tres Rios and downstream perennial reaches of the Salt and Gila River confluence area represent the only other significant forging areas. However, these areas are characterized by high human activity produced by Tres Rios, PIR, and the Base and Meridian Wildlife Area, and high prey competition produced by osprey and other fish eating birds, including other eagles. Human activity and strong prey competition are known to cause stress to normal foraging activity in nesting eagle populations. Furthermore, prey delivery distance to the nest site is considerably farther from downstream foraging areas (approximately 4 miles) than it is from the sand and gravel lakes foraging areas (approximately 1.3 miles). In comparison to the downstream foraging sources, the sand and gravel lakes currently provide close accessible foraging for the eagles that is relatively free of human activity. The loss of these foraging sources due to the possible construction of the Project would significantly interfere with normal foraging activity and therefore could cause a loss of eagle productivity for the Pee Posh Wetlands BA. The Community recommends that measures be put in place to mitigate any loss of important eagle foraging habitat due to construction of the Project.

4. Hazardous Waste

21 Table 4-*50 Hazardous Materials Impacts, Action Alternatives* lists the E-1 Alignment as not impacting any Hazardous Materials Sites. The Boundary Site, a former pesticide airstrip, is located at the intersection of 51st Avenue and the Northern boundary and extends into the proposed E-1 Alignment. While the Boundary Site was remediated in 2004, it is worth noting in the DEIS, and would qualify as a low priority site.

Code	Issue	Response
21	**Hazardous Materials**	The Boundary Site was investigated and included in early drafts of the Initial Site Assessment, when the E1 Alternative and the on-Gila River Indian Community Alignment were both still under consideration. The limits of the remediated site overlapped the on-Gila River Indian Community Alignment. The E1 Alternative, however, is located farther north and east than the on-Gila River Indian Community Alignment and does not share any footprint with the Boundary Site. Given the remediated nature of the site, its distance from the Preferred Alternative, and its position downgradient (downhill) from the Preferred Alternative, the Boundary Site was not included in the final Initial Site Assessment or the Draft Environmental Impact Statement.

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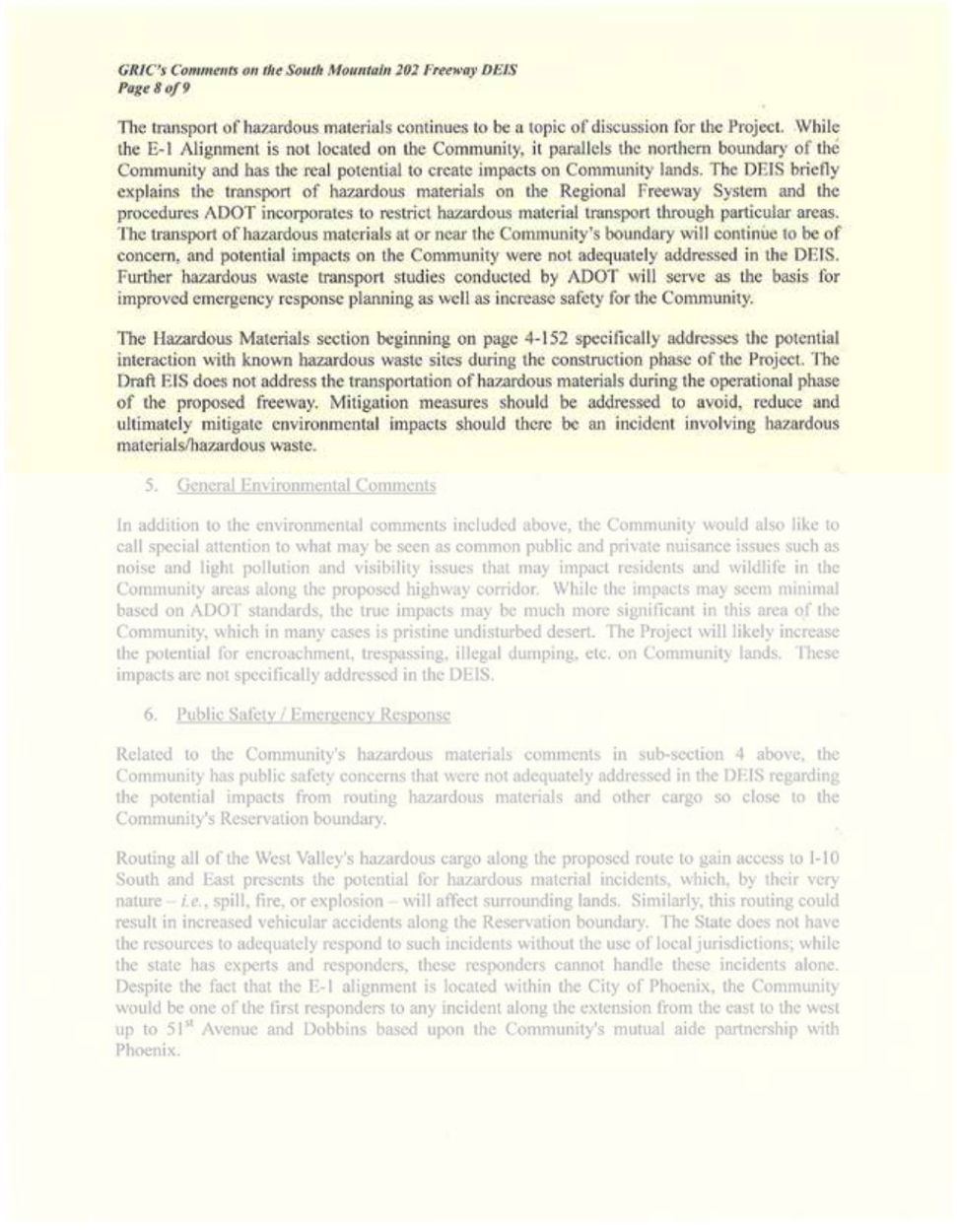
22	

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The transport of hazardous materials continues to be a topic of discussion for the Project. While the E-1 Alignment is not located on the Community, it parallels the northern boundary of the Community and has the real potential to create impacts on Community lands. The DEIS briefly explains the transport of hazardous materials on the Regional Freeway System and the procedures ADOT incorporates to restrict hazardous material transport through particular areas. The transport of hazardous materials at or near the Community's boundary will continue to be of concern, and potential impacts on the Community were not adequately addressed in the DEIS. Further hazardous waste transport studies conducted by ADOT will serve as the basis for improved emergency response planning as well as increase safety for the Community.

22

The Hazardous Materials section beginning on page 4-152 specifically addresses the potential interaction with known hazardous waste sites during the construction phase of the Project. The Draft EIS does not address the transportation of hazardous materials during the operational phase of the proposed freeway. Mitigation measures should be addressed to avoid, reduce and ultimately mitigate environmental impacts should there be an incident involving hazardous materials/hazardous waste.

5. General Environmental Comments

In addition to the environmental comments included above, the Community would also like to call special attention to what may be seen as common public and private nuisance issues such as noise and light pollution and visibility issues that may impact residents and wildlife in the Community areas along the proposed highway corridor. While the impacts may seem minimal based on ADOT standards, the true impacts may be much more significant in this area of the Community, which in many cases is pristine undisturbed desert. The Project will likely increase the potential for encroachment, trespassing, illegal dumping, etc. on Community lands. These impacts are not specifically addressed in the DEIS.

6. Public Safety / Emergency Response

Related to the Community's hazardous materials comments in sub-section 4 above, the Community has public safety concerns that were not adequately addressed in the DEIS regarding the potential impacts from routing hazardous materials and other cargo so close to the Community's Reservation boundary.

Routing all of the West Valley's hazardous cargo along the proposed route to gain access to I-10 South and East presents the potential for hazardous material incidents, which, by their very nature – *i.e.*, spill, fire, or explosion – will affect surrounding lands. Similarly, this routing could result in increased vehicular accidents along the Reservation boundary. The State does not have the resources to adequately respond to such incidents without the use of local jurisdictions; while the state has experts and responders, these responders cannot handle these incidents alone. Despite the fact that the E-1 alignment is located within the City of Phoenix, the Community would be one of the first responders to any incident along the extension from the east to the west up to 51st Avenue and Dobbins based upon the Community's mutual aide partnership with Phoenix.

Code	Issue	Response
22	**Hazardous Materials**	The Final Environmental Impact Statement discloses the context and intensity of the perceived impact noted in the comment. Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-166 of the Final Environmental Impact Statement). Hazardous materials commodity flow studies and other information are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing emergency response plans. If the plan were amended, it would be made available to the Arizona Department of Transportation. In the event of an incident with a hazardous materials issue on a State or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, which responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary.

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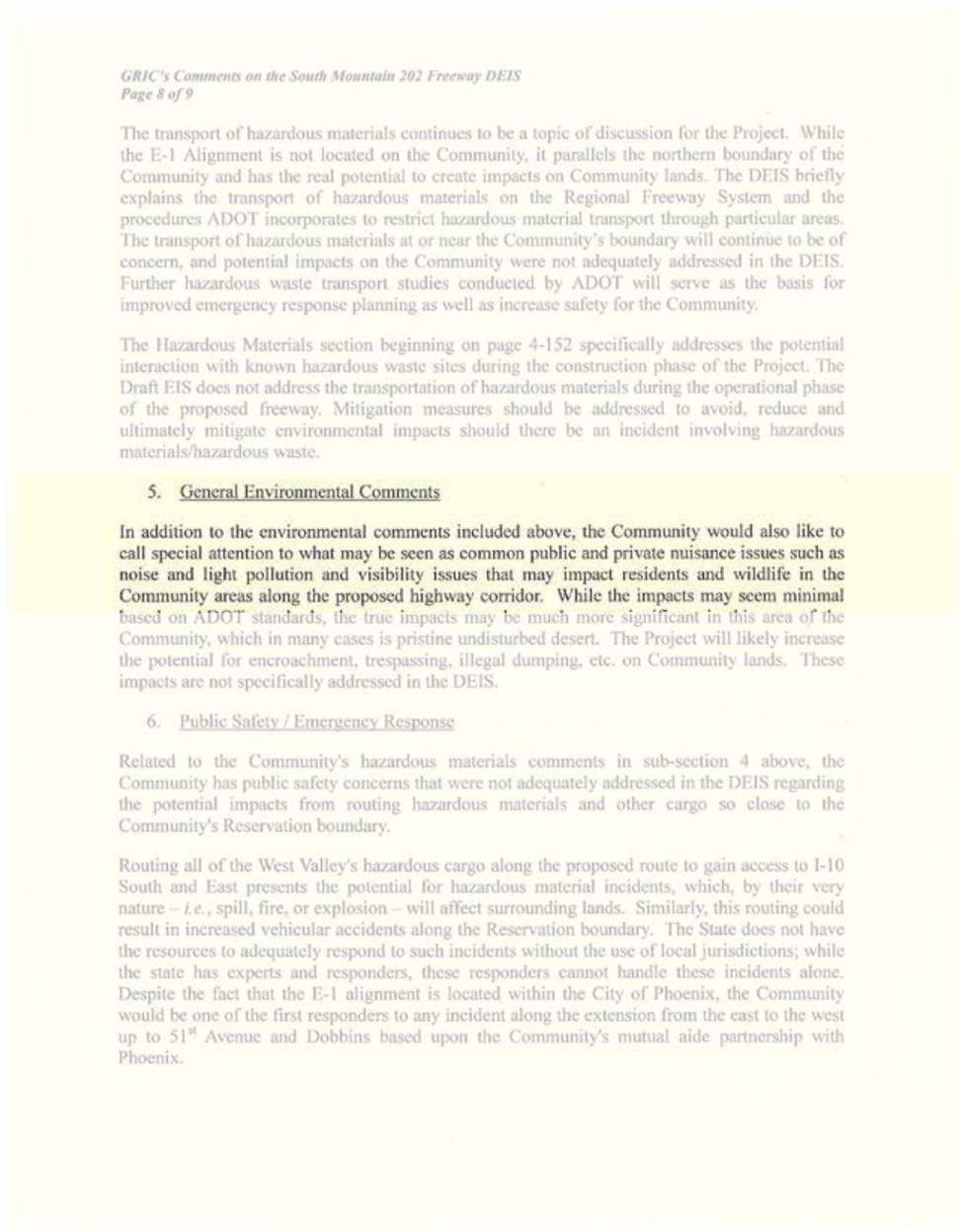

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23

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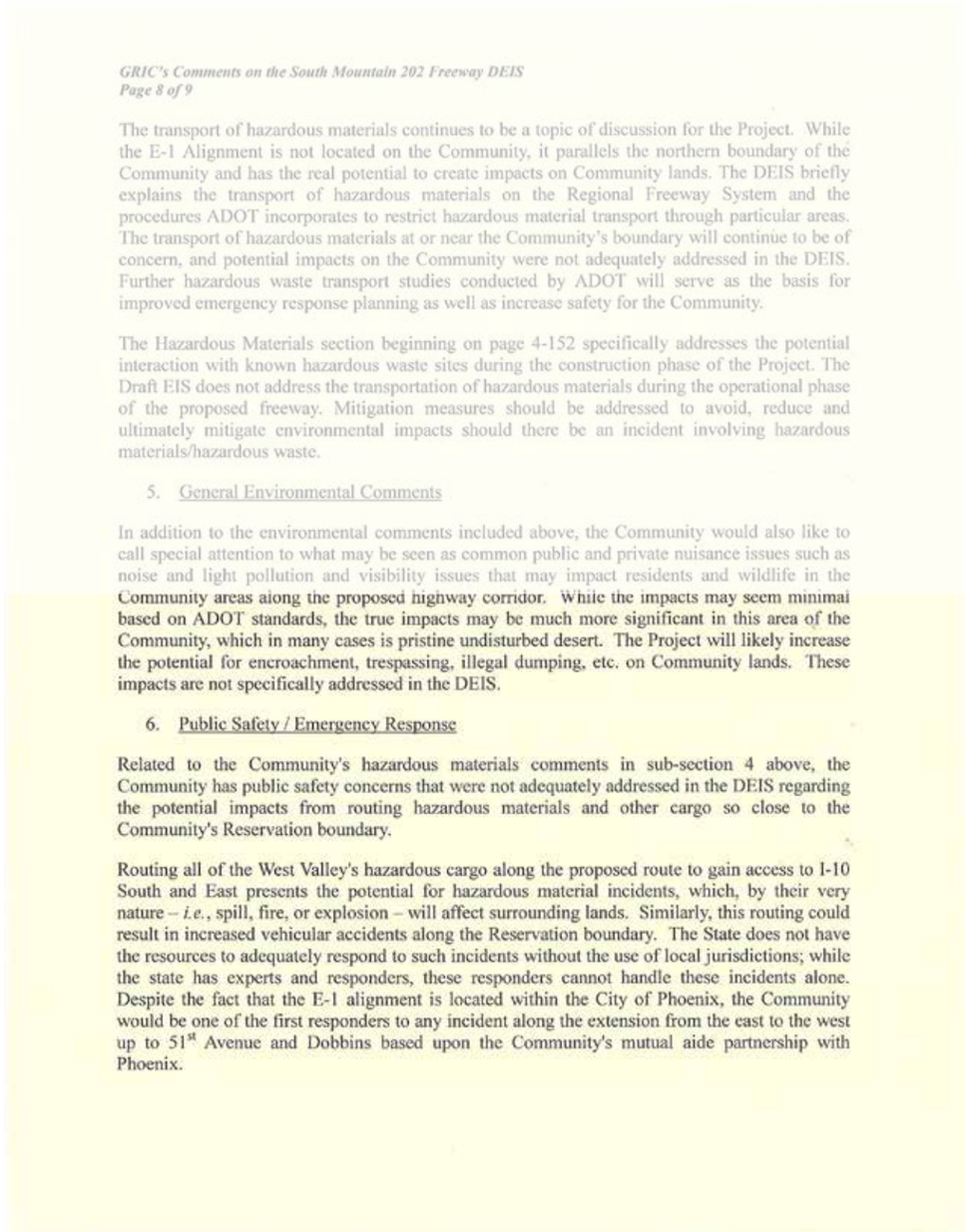
Routing all of the West Valley's hazardous cargo along the proposed route to gain access to I-10 South and East presents the potential for hazardous material incidents, which, by their very nature – *i.e.*, spill, fire, or explosion – will affect surrounding lands. Similarly, this routing could result in increased vehicular accidents along the Reservation boundary. The State does not have the resources to adequately respond to such incidents without the use of local jurisdictions; while the state has experts and responders, these responders cannot handle these incidents alone. Despite the fact that the E-1 alignment is located within the City of Phoenix, the Community would be one of the first responders to any incident along the extension from the east to the west up to 51st Avenue and Dobbins based upon the Community's mutual aide partnership with Phoenix.

Code	Issue	Response
23	**Noise**	Noise and visual resources are addressed in the *Noise* and *Visual Resources* sections of Chapter 4 of the Draft Environmental Impact Statement on pages 4-80 and 4-155, respectively, and on pages 4-88 and 4-167 of the Final Environmental Impact Statement, respectively. The noise analysis conducted for and documented in the Draft and Final Environmental Impact Statements complied with the Federal Highway Administration's regulations for conducting noise analyses in 23 Code of Federal Regulations § 772. The noise analysis was updated for the Final Environmental Impact Statement using the most recent Federal Highway Administration and Arizona Department of Transportation policy and traffic projections provided by the Maricopa Association of Governments. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted. This report may also be found on the project Web site at <azdot.gov/southmountainfreeway>. Without noise mitigation, noise levels from the proposed South Mountain Freeway are predicted to range from 61 A-weighted decibels to 78 A-weighted decibels at the nearest homes, depending on the distance from the freeway. Noise mitigation was estimated to reduce those noise levels to a range of 55 A-weighted decibels to 64 A-weighted decibels for most of the areas (see Final Environmental Impact Statement beginning on page 4-91). Because of topography, local street traffic, or other engineering constraints in a few areas, estimated noise levels would not be reduced as much and would be as high as 64 A-weighted decibels to 70 A-weighted decibels in those areas. As discussed on page 4-136 of the Final Environmental Impact Statement, most impacts on wildlife would occur in the Eastern Section of the Study Area where there is more undeveloped land and more natural habitat. During construction activities, noise disturbance would represent a short-term impact on wildlife that would vary by location and intensity and that may affect bird and mammal activities such as nesting and foraging. During freeway operation, the increase in traffic noise would be a long-term impact on wildlife that would vary in intensity depending on factors such as time of day and day of the week. The long-term increase in traffic noise may affect the ability of some animals to avoid predators, communicate, and find food when near the proposed action. Impacts on biological resources during operation of the proposed freeway would also include vehicle-wildlife collisions and an increase in the effects of habitat fragmentation attributable to wildlife avoidance of activity associated with the freeway. Although not recognized by the Federal Highway Administration as mitigation, rubberized asphalt would be used as the top level of paving; it is discussed on Final Environmental Impact Statement beginning on page 4-91. As discussed on page 4-169 of the Final Environmental Impact Statement, in determining visual impacts of the proposed freeway, attention was given to sensitive views along the E1 Alternative, including views from Phoenix South Mountain Park/Preserve, views from residential areas in Ahwatukee Foothills Village, views from the Gila River Indian Community, and views of the major road cuts at the western end of Phoenix South Mountain Park/Preserve. Page 4-170 of the Final Environmental Impact Statement discusses a host of mitigation measures that the Arizona Department of Transportation might employ to avoid creating visual impacts, reduce such impacts, or otherwise mitigate visual impacts associated with the proposed project.

Code	Comment Document



GRIC's Comments on the South Mountain 202 Freeway DEIS
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The transport of hazardous materials continues to be a topic of discussion for the Project. While the E-1 Alignment is not located on the Community, it parallels the northern boundary of the Community and has the real potential to create impacts on Community lands. The DEIS briefly explains the transport of hazardous materials on the Regional Freeway System and the procedures ADOT incorporates to restrict hazardous material transport through particular areas. The transport of hazardous materials at or near the Community's boundary will continue to be of concern, and potential impacts on the Community were not adequately addressed in the DEIS. Further hazardous waste transport studies conducted by ADOT will serve as the basis for improved emergency response planning as well as increase safety for the Community.

The Hazardous Materials section beginning on page 4-152 specifically addresses the potential interaction with known hazardous waste sites during the construction phase of the Project. The Draft EIS does not address the transportation of hazardous materials during the operational phase of the proposed freeway. Mitigation measures should be addressed to avoid, reduce and ultimately mitigate environmental impacts should there be an incident involving hazardous materials/hazardous waste.

5. General Environmental Comments

In addition to the environmental comments included above, the Community would also like to call special attention to what may be seen as common public and private nuisance issues such as noise and light pollution and visibility issues that may impact residents and wildlife in the Community areas along the proposed highway corridor. While the impacts may seem minimal based on ADOT standards, the true impacts may be much more significant in this area of the Community, which in many cases is pristine undisturbed desert. The Project will likely increase the potential for encroachment, trespassing, illegal dumping, etc. on Community lands. These impacts are not specifically addressed in the DEIS.

24

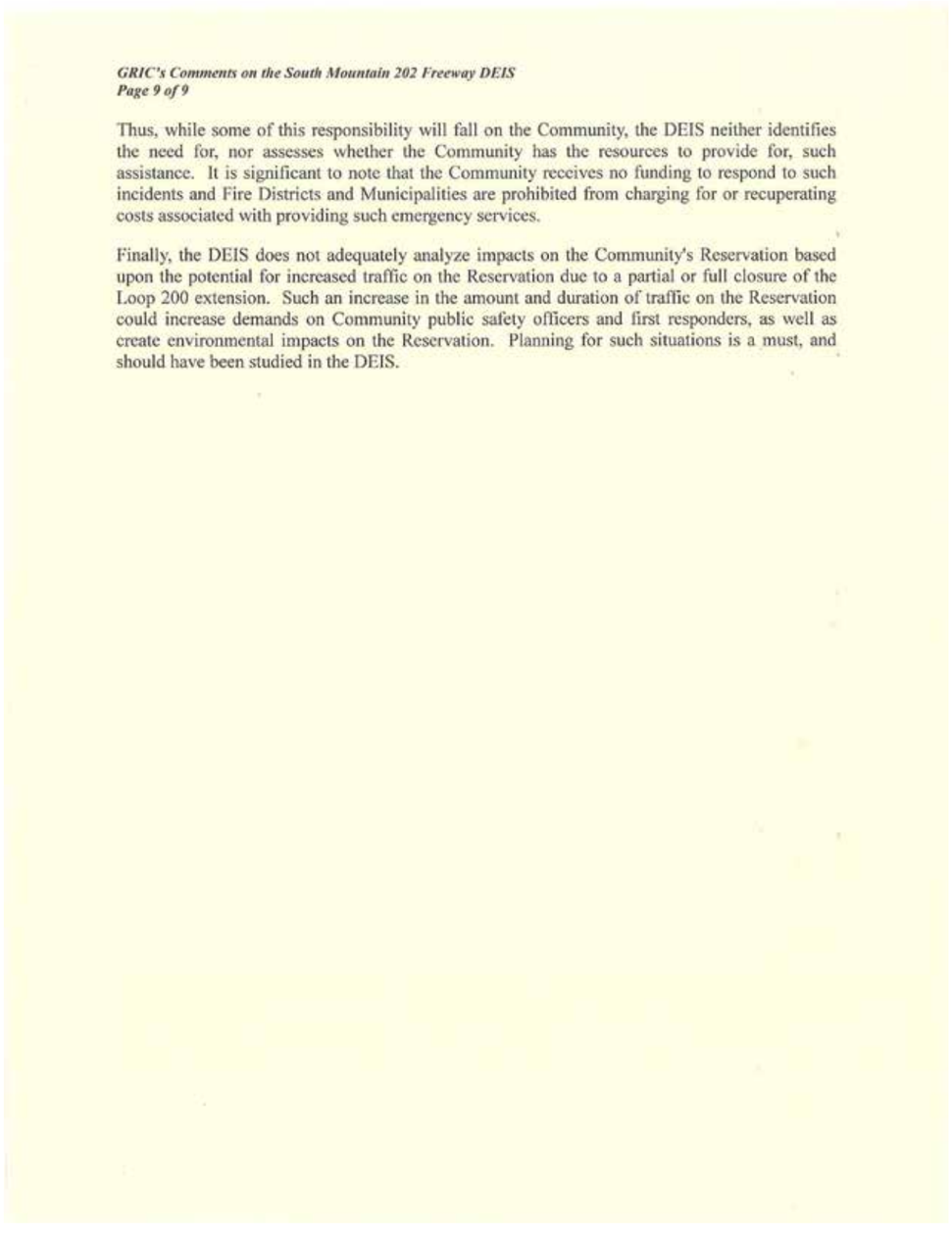
6. Public Safety / Emergency Response

Related to the Community's hazardous materials comments in sub-section 4 above, the Community has public safety concerns that were not adequately addressed in the DEIS regarding the potential impacts from routing hazardous materials and other cargo so close to the Community's Reservation boundary.

25

Routing all of the West Valley's hazardous cargo along the proposed route to gain access to I-10 South and East presents the potential for hazardous material incidents, which, by their very nature – *i.e.*, spill, fire, or explosion – will affect surrounding lands. Similarly, this routing could result in increased vehicular accidents along the Reservation boundary. The State does not have the resources to adequately respond to such incidents without the use of local jurisdictions; while the state has experts and responders, these responders cannot handle these incidents alone. Despite the fact that the E-1 alignment is located within the City of Phoenix, the Community would be one of the first responders to any incident along the extension from the east to the west up to 51st Avenue and Dobbins based upon the Community's mutual aide partnership with Phoenix.

Code	Issue	Response
24	**Design**	As discussed in several locations within the Final Environmental Impact Statement (see, for example, page 4-178), the Arizona Department of Transportation would provide and maintain right-of-way fencing between the proposed freeway and the Gila River Indian Community boundary. This fencing would likely minimize any encroachment, trespassing, and illegal dumping on Gila River Indian Community land.
25	**Traffic**	Creating a truck bypass is not a goal of the proposed action. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary user vehicles of the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed freeway, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85 (see page 3-64 of the Final Environmental Impact Statement). Hazardous materials commodity flow studies and other information are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing emergency response plans. If the plan were amended, it would be made available to the Arizona Department of Transportation. In the event of an incident with a hazardous materials issue on a State or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, which responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary. If the Gila River Indian Community were unprepared to respond to emergency situations on the proposed facility, the Arizona State Emergency Response Commission could coordinate regional responses from other Local Emergency Planning Commissions in the region that may have more resources.

Code	Comment Document
26	

GRIC's Comments on the South Mountain 202 Freeway DEIS
Page 9 of 9

Thus, while some of this responsibility will fall on the Community, the DEIS neither identifies the need for, nor assesses whether the Community has the resources to provide for, such assistance. It is significant to note that the Community receives no funding to respond to such incidents and Fire Districts and Municipalities are prohibited from charging for or recuperating costs associated with providing such emergency services.

Finally, the DEIS does not adequately analyze impacts on the Community's Reservation based upon the potential for increased traffic on the Reservation due to a partial or full closure of the Loop 200 extension. Such an increase in the amount and duration of traffic on the Reservation could increase demands on Community public safety officers and first responders, as well as create environmental impacts on the Reservation. Planning for such situations is a must, and should have been studied in the DEIS.

Code	Issue	Response
26	**Traffic**	The Arizona Department of Transportation has developed an "Alternate Route Plan" for all State-operated roads, including highways, freeways, and Interstate highways. The plan is amended prior to opening of a new facility to include alternate routes for incidents on the new facility as well as conditions in which the new facility would be the alternate route for incidents on other State-operated roads. The alternate route plan is reviewed by Arizona Department of Public Safety, Arizona Department of Transportation, and local agencies. The Arizona Department of Transportation is not permitted to identify a local road as an alternate route on a dynamic message sign without an agreement from the agency that operates that road. At this time, there are no agreements in place with any local agencies. However, the use of local roads to avoid an incident is permitted and occurs regularly at the discretion of the motorist. If a local agency would like to encourage the use of a specific road during an incident on a State road, it would need to provide this information to the Arizona Department of Transportation and formally agree to allow the Arizona Department of Transportation to display the local road as an alternate route on a dynamic message sign. The primary goal of the Arizona Department of Transportation and the Arizona Department of Public Safety is to clear the road and open it back to normal traffic operation as soon as possible. The South Mountain Freeway project includes funding for the full array of intelligent transportation system infrastructure (cameras, loop detectors, ramp meters, etc.). This would allow the Arizona Department of Transportation to quickly respond to incidents and notify members of the traveling public of downstream conditions so they can use an alternate State road to avoid the incident. The effects of the proposed action on the local roadway network are accounted for in Chapters 1 and 3 of the Draft Environmental Impact Statement. Cut-line analysis was undertaken to assess the effects of the action and No-Action alternatives on the existing and reasonably foreseeable future road network (as conveyed in jurisdictional long-range plans). The Gila River Indian Community opted not to disclose plans for any roadway network plans now or in the future.

Code	Comment Document

SALT RIVER
PIMA-MARICOPA INDIAN COMMUNITY

10005 East Osborn Road / Scottsdale, Arizona 85256-9722 / Phone (480) 362-7400 / Fax (480) 362-7593

June 12, 2013

RECEIVED

JUL 20 2013

AZ Department of Transportation
Director's Office

Mr. John Halikowski
Director
Arizona Department of Transportation
206 South 17th Avenue, Mail Drop 100A Room 135
Phoenix, Arizona 85007

Re: Salt River Pima-Maricopa Indian Community comments for the Loop 202 South Mountain Freeway Study Draft Environmental Impact Study (EIS)

Dear Mr. Halikowski,

The Salt River Pima-Maricopa Indian Community (the "Community"), a federally recognized Indian tribe, has a longstanding relationship with the Arizona Department of Transportation (ADOT) that originated because of transportation planning and development in the East Valley that affected lands within and adjacent to the Community's borders. As a business and land owner in the West Valley, we are aware of the changes in the region that require additional transportation planning and development. Although we support ADOT's long range transportation planning with the Loop 202 South Mountain project the Community is aware that such plans and decisions will have impacts to one of our businesses and lands in the West valley and that it is necessary to express our views.

1

The Community owns and operates the Phoenix Cement Company ("PCC") which has operated a facility at 67th Avenue and Southern Avenue since 1987. PCC is a division of tribal government and the Community directly benefits from its business operations. We have a full scale mining operation at this location, inclusive of aggregates crushing, screening, washing operations as well as scale facilities and ready mixed concrete batching and mixing plants. This operation is PCC's sole operation for servicing its west side customer base. Importantly, revenue generated from PCC helps to provide for the welfare of our members.

The Community has reviewed the Loop 202 South Mountain Freeway Study Draft EIS with interest and we would like to share our comments to be included in the public record and to be given consideration by ADOT before any final decision is issued.

2

First, the Community recognizes that the W59 Alternative, designated as the Preferred Alternative, will directly impact all or a portion of our business operations at 67th Avenue and Southern Avenue. As a result, the Community would like the opportunity to communicate more directly with you,

Code	Issue	Response
1	**Acquisitions and Relocations**	Property acquisition and relocation assistance to displaced individuals and businesses is governed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. This process outlines determination of property values through the acquisition process. The process requires government agencies to provide just compensation (fair market value) for any acquired property. The acquisition process includes consideration of impacts to access, partial acquisitions, determining values of remaining parcels, and special needs of relocated businesses or individuals (e.g., elderly or disabled). For example, if a relocated business required specific zoning, approvals or permits, permit fees, or closure or abandonment processes, these would be considered in property negotiations. Property acquisition procedures are described in detail on the Arizona Department of Transportation's Web site, in the Right-of-Way Group Acquisition Section, at <azdot.gov>. This section of the Arizona Department of Transportation Web site includes a link to the Arizona Department of Transportation's *Right-of-Way Procedures Manual*, which has an extensive discussion of the whole process. For further discussion, see page 4-51 of the Final Environmental Impact Statement. For questions on specific properties, contact the Arizona Department of Transportation Right-of-Way Group at (602) 712-6922.
2	**Alternatives**	The Arizona Department of Transportation has designated the 59th Avenue connection (W59 Alternative) with Interstate 10 (Papago Freeway) as the Preferred Alternative for the proposed freeway in the Western Section of the Study Area. The project team considered the input of all stakeholders—including regional leaders, municipalities, members of the public, and members of the South Mountain Citizen's Advisory Team—before identifying the W59 Alternative as the Preferred Alternative (see pages 3-65 and 3-68 of the Final Environmental Impact Statement). The W59 Alternative was seen as the best option to balance fiscal responsibility, regional mobility needs, community sensitivity, and additional considerations such as consistency with long-range planning goals, economic and environmental impacts, and public and agency input. Precise areas of impacts would be determined as the project design progresses, if an action alternative were to be the Selected Alternative. The Arizona Department of Transportation has met with the Salt River Pima-Maricopa Indian Community to discuss its concerns, and these meetings would continue.

Code	Comment Document

as an impacted stakeholder, on the specific land acquisition along 59th Avenue for the W59 Alternative to better understand the direct impacts to our business. Based on the information we have to date, we are not opposed to the W59 Alternative as long as we are given the opportunity to consult with you about this preferred route and consider options, including whether a soil cement berm in the river bed could allow us to salvage a portion of our operations.

Second, the Community supports the W71 Alternative as our most favored route. Due to the potential impact the W59 may have on the operations of PCC we believe this route to be more suitable while still providing a viable option for a southern corridor.

Third, the Community would support the W101 Alternative Route as our second choice.

These brief comments are intended to give the general position of the Salt River Pima-Maricopa Indian Community during this 90-day public comment period to review the Draft EIS of the Loop 202 South Mountain Freeway Study and we look forward to working with you to achieve a mutually beneficial solution.

Sincerely,

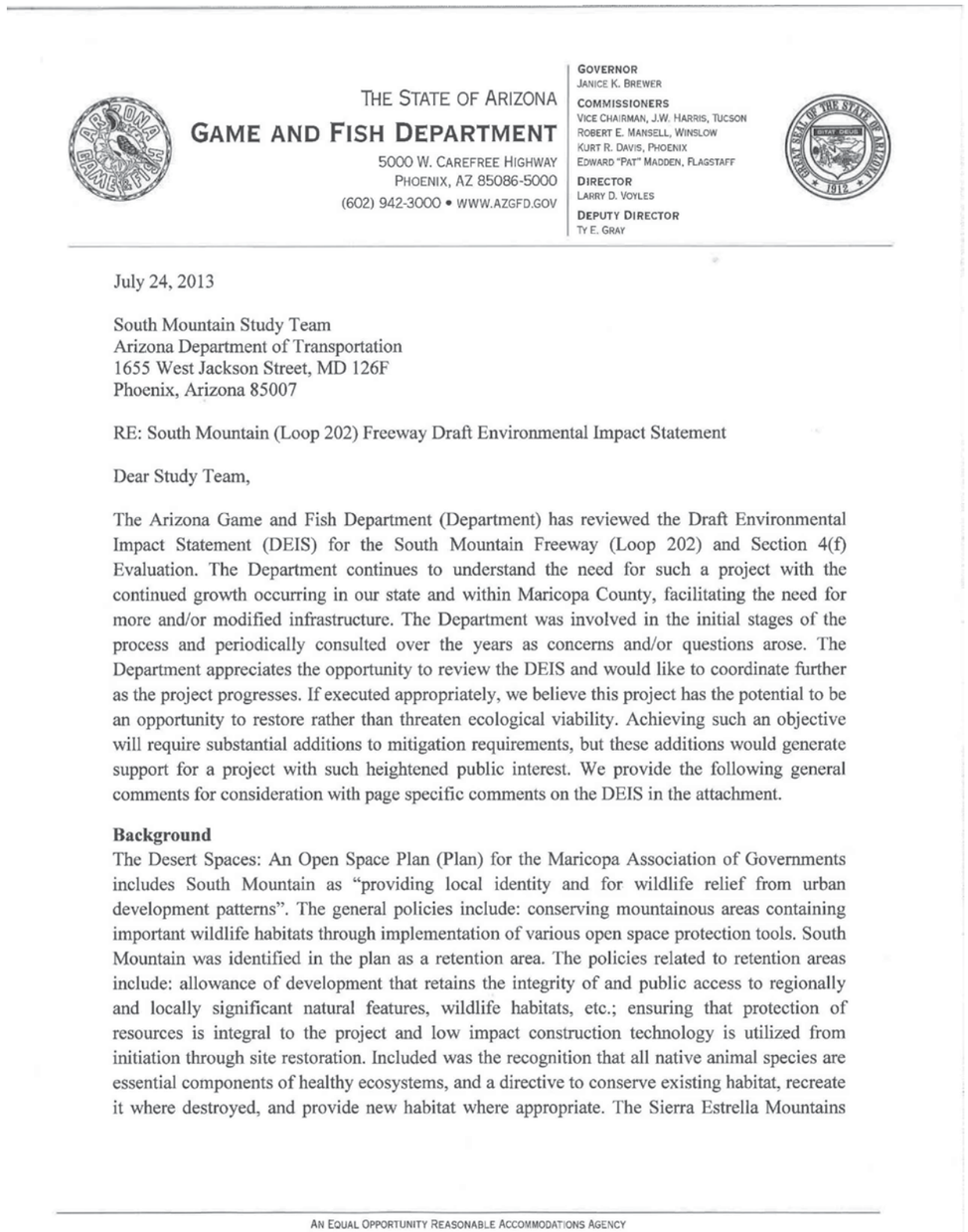
Diane Enos

Diane Enos
President

Code	Issue	Response

STATE AGENCY AND ELECTED OFFICIALS COMMENTS AND RESPONSES

Code	Comment Document



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LARRY D. VOYLES
DEPUTY DIRECTOR
TY E. GRAY

July 24, 2013

South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

RE: South Mountain (Loop 202) Freeway Draft Environmental Impact Statement

Dear Study Team,

1

The Arizona Game and Fish Department (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the South Mountain Freeway (Loop 202) and Section 4(f) Evaluation. The Department continues to understand the need for such a project with the continued growth occurring in our state and within Maricopa County, facilitating the need for more and/or modified infrastructure. The Department was involved in the initial stages of the process and periodically consulted over the years as concerns and/or questions arose. The Department appreciates the opportunity to review the DEIS and would like to coordinate further as the project progresses. If executed appropriately, we believe this project has the potential to be an opportunity to restore rather than threaten ecological viability. Achieving such an objective will require substantial additions to mitigation requirements, but these additions would generate support for a project with such heightened public interest. We provide the following general comments for consideration with page specific comments on the DEIS in the attachment.

Background

2

The Desert Spaces: An Open Space Plan (Plan) for the Maricopa Association of Governments includes South Mountain as "providing local identity and for wildlife relief from urban development patterns". The general policies include: conserving mountainous areas containing important wildlife habitats through implementation of various open space protection tools. South Mountain was identified in the plan as a retention area. The policies related to retention areas include: allowance of development that retains the integrity of and public access to regionally and locally significant natural features, wildlife habitats, etc.; ensuring that protection of resources is integral to the project and low impact construction technology is utilized from initiation through site restoration. Included was the recognition that all native animal species are essential components of healthy ecosystems, and a directive to conserve existing habitat, recreate it where destroyed, and provide new habitat where appropriate. The Sierra Estrella Mountains

AN EQUAL OPPORTUNITY REASONABLE ACCOMMODATIONS AGENCY

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	As noted on page 4-1 of the Final Environmental Impact Statement, during the design stage of project development, changes in regulatory requirements may occur or changes to previously assessed resource impacts could be discovered that would require modifications to mitigation. Final commitment to mitigation measures would be made in a record of decision and would include the commitment for the Arizona Department of Transportation and Federal Highway Administration to continue to coordinate with the Arizona Game and Fish Department during the design phase to develop appropriate measures to mitigate potential impacts related to the project; however, any additional efforts would be beyond the scope of the National Environmental Policy Act.
2	**Biology, Plants, and Wildlife**	The proposed freeway is consistent with maps included in the referenced Maricopa Association of Governments *Desert Spaces: An Open Space Plan for the Maricopa Association of Governments* and with regional planning efforts, as discussed in Chapter 5 of the Final Environmental Impact Statement (see Phoenix South Mountain Park/Preserve section beginning on page 5-14 of the Final Environmental Impact Statement). We perceive the comment to mean that the project does not conform to the goals stated in the Maricopa Association of Governments *Desert Spaces: An Open Space Plan for the Maricopa Association of Governments*, such as the use of low-impact construction technology in the South Mountains area and maintaining wildlife connectivity across the network of identified open spaces. The Arizona Game and Fish Department requests that additional mitigation considerations be given to habitat loss and/or degradation resulting from the project. It is also important to understand that the City of Phoenix planning efforts since the mid-1980s illustrate an awareness of the potential for the proposed South Mountain Freeway to affect Phoenix South Mountain Park/Preserve. In 1989, the South Mountain Park Master Plan was adopted by the Phoenix City Council. The master plan shows the freeway alignment as adopted by the State Transportation Board in 1988. In 1990, the South Mountain Preserve Act was ratified by the Arizona Legislature. The Act did not apply to roadways through a designated mountain preserve if the roadway was in the State Highway System prior to August 15, 1990. The proposed South Mountain Freeway was in the State Highway System prior to 1990. Records prior to the Act suggest a primary reason for the exception was to allow the proposed freeway to go through Phoenix South Mountain Park/Preserve (see Final Environmental Impact Statement page 5-14). The project team examined alternatives to avoid the Phoenix South Mountain Park/Preserve, but did not identify any feasible and prudent alternatives to avoid the use of the park. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-38 and 5-31). The Arizona Department of Transportation continues to work with park stakeholders to minimize use of park resources. The *Measures to Minimize Harm* section beginning on page 5-23 of the Final Environmental Impact Statement includes measures addressing concerns raised in the comment. The Arizona Department of Transportation and Federal Highway Administration would continue to work with partners including the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community's Department of Environmental Quality, during the design phase to continue to develop these measures (including the provision of replacement lands and the design of multifunctional crossings that would allow wildlife passage across the proposed freeway alignment at natural drainages and that would allow Gila River Indian Community members to gain access to important traditional locations within the South Mountains). Given these considerations, the proposed freeway is consistent with regional planning efforts.

Code	Comment Document

were identified as conservation areas within the Plan. The policies associated with those areas consider species diversity and states that overall populations of wildlife should not be reduced. If connections from South Mountain to the Sierra Estrella Mountains are cut off, populations would be impacted. In addition, a number of drainage features coming off South Mountain serve as wildlife corridors. Washes are identified in the plan with policies to include: development of roads and utility corridors parallel to but not in the washes. Community buffer zones are addressed with policies including: protection of lands containing natural resources, nearly pristine desert vegetation, agricultural land and wildlife habitat that lie between rural communities, unincorporated areas and expanding urbanizing areas. South Mountain provides a good example of where this is occurring with the Gila River Indian Community lands (GRIC), agriculture to the south and urbanization to the north and east. The agriculture use on GRIC lands and desert vegetation on the west/north side of the mountain provide vital components for wildlife. Benefits of regional planning that were identified included interconnected systems and wildlife corridors; thus avoiding preserved islands of habitat and low biodiversity. The proposed freeway is not consistent with this regional planning effort. Additional mitigation considerations should be given to habitat loss/degradation resulting from the project.

Wildlife and Connectivity

South Mountain and the surrounding study area contain a diversity of species (please refer to the extensive lists in the attachments) likely to include, but not limited to: Harris's hawk, northern harrier, peregrine falcon, bald eagle, western burrowing owl, Gambel's quail, greater road runner, black-tailed jackrabbit, javelina, mule deer, desert bighorn sheep, coyote, gray fox, badger, bobcat, mountain lion, western yellow bat, western red bat, Sonoran desert toad, Sonoran Desert Tortoise, Gila monster, desert iguana, chuckwalla, Sonoran Whipsnake, western lyresnake, Tucson shovel-nosed snake, tiger, black-tailed and western diamond-backed rattlesnakes. South Mountain in particular contains one of the largest known populations of chuckwallas in the state. The DEIS addressed special status species: desert tortoise, bald eagle, Yuma clapper rail, Tucson shovel-nosed snake and others. We recommend inclusion of the Species of Greatest Conservation Need (SGCN) (see attachment) along with preserving connectivity to the Sierra Estrella Mountains in order to preserve biodiversity on South Mountain.

3

The Department is primarily concerned with wildlife connectivity opportunities between South Mountain and the Sierra Estrella Mountains, and maintaining and enhancing the crossing at the Salt River. These wildlife linkages have been identified within the 2006 Statewide Linkages Assessment and the Maricopa County Stakeholders Assessment 2012. The recommended E1 eastern alignment would cut-off the movement corridors between South Mountain and the Sierra Estrella Mountains, impacting the long-term diversity on South Mountain. This alternative would cut through the mountain across two ridgelines. This may create an island effect as the project area is the last remaining connection for wildlife to move between South Mountain park and GRIC, agricultural lands and ultimately the Sierra Estrella Mountains. The western portions of

4

Code	Issue	Response
3	**Biology, Plants, and Wildlife**	The section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-136 of the Final Environmental Impact Statement, respectively, discloses the effects of the proposed action and its alternatives on vegetation, wildlife, and wildlife habitat. The conclusion for diminished wildlife resources accounts for general effects that would also apply to species of greatest conservation need. Those species of greatest conservation need that have the potential to occur in the Study Area have been added to Table 4-43 that begins on page 4-129 of the Final Environmental Impact Statement. These species were also addressed in a Biological Evaluation that was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). Connectivity is planned to allow wildlife movement beneath the freeway in multiuse crossings (see page 4-137 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
4	**Biology, Plants, and Wildlife**	Connectivity is planned to allow wildlife movement beneath the freeway. This is described in the text box, "*Habitat Connectivity and the Proposed Action*," on page 4-125 and in the section, *Habitat Connectivity*, on page 4-137 of the Final Environmental Impact Statement. Crossing structures are planned along major movement corridors (see Figure 4-38, on page 4-126, and the discussion on page 4-137 of the Final Environmental Impact Statement) and would maintain connectivity between the South Mountains and the Sierra Estrella. The comments on the Draft Environmental Impact Statement contradict previous communication with the Arizona Game and Fish Department for the project. The last formal communication received from the Arizona Game and Fish Department in 2006 (see page A139 in Appendix 1-1 of the Final Environmental Impact Statement) stated that the movement corridor between the South Mountains and the Sierra Estrella is degraded by the 51st Avenue travel corridor as well as by planned development in that area. Data presented in the Draft and Final Environmental Impact Statements corroborate this statement (see the sidebar, "*Existing versus planned land use,*" on page 4-3 of both documents); a large percentage of the land in the Study Area is projected to be converted to nonagricultural uses in the foreseeable future. The above-referenced 2006 letter from the Arizona Game and Fish Department also stated that mule deer are believed to have been extirpated from the area. There was no mention of concerns regarding bighorn sheep. The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife such as mule deer and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species.

Code	Comment Document

South Mountain are mostly undisturbed as opposed to the eastern portions and provide habitat for larger species like mule deer and bighorn sheep. Bighorn sheep are historic to this area and are currently found in the adjacent Sierra Estrella Mountains. This is a potential opportunity where the project could actually restore diversity by taking measures to preserve and improve connectivity between these mountain ranges, promoting mule deer movement and helping return bighorn sheep to historic habitat and providing watchable wildlife opportunities that would have tremendous support from the viewing public.

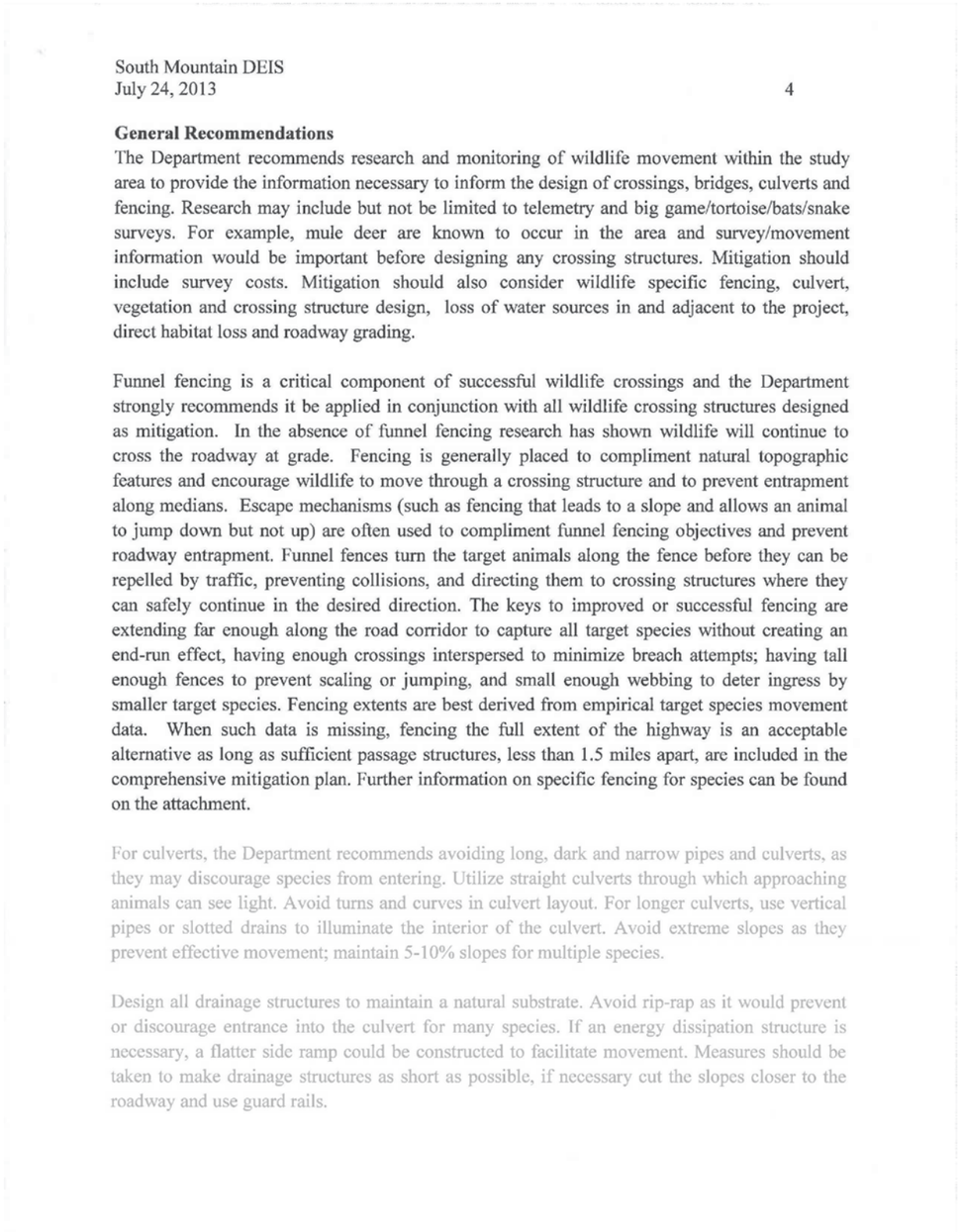
5

The DEIS presents plans for multi-functional crossings using underpasses; however, "multi-functional" crossings fail to facilitate movement for many wildlife species. Previous (Arizona State Route 68, ADOT SPR588: http://www.azdot.gov/TPD/ATRC/publications/project_reports/PDF/AZ588.pdf) and current studies (U.S. Highway 93, Twin Peaks) on Arizona highways show that high human use of underpasses inhibit the realization of intended wildlife connectivity and permeability. A 2011 study in the Netherlands had limited success with overpasses designed specifically with segregated pedestrian and wildlife channels. However there was clear indication that human use was inhibiting wildlife utilization of monitored overpasses and significantly impacting behavior of target species. The Department supports placing crossing underpasses in the drainage areas (washes, etc.) for facilitating movement for wildlife only, not constructing multi-use crossings. Underpasses may accommodate a diversity of species; however, allowing or promoting human, equestrian, and/or OHV use would severely limit wildlife connectivity. The crossings (and crossing approaches) for hiking, equestrian, and mountain bicyclists should be located in a different area or separated from the wildlife crossing and crossing approach areas.

6

The Department recommends overpasses where the proposed alignment intersects the major ridgelines of South Mountain to allow for movement of larger game and other species, while decreasing risk to public safety. Overpasses are proving to be successful in moving larger species, as documented in the US Highway 93 study. Single span bridges have been shown to improve connectivity for deer in Arizona (SR 260: http://ntl.bts.gov/lib/46000/46600/46644/AZ603.pdf), but fall short of mitigating the fragmentation effects that roads have on the deer. Underpasses improved the deer passage rate on SR 260 from 3% to 16%, but 84% of crossing attempts remained unsuccessful. Bighorn sheep have been documented using underpasses opportunistically, but again they do not alleviate the barrier effects of roads on bighorn sheep. . On SR 68, 20 months of monitoring 3 underpasses revealed only 32 bighorn sheep ram crossings (none by ewes or lambs). Over 1200 crossings by rams, ewes, and lambs were documented on the US 93 overpasses during a similar 20 month period. Such functionality falls far short of movement requirements to maintain viable bighorn sheep and mule deer populations in the South Mountain area. Overpasses in Arizona have been shown to pass large numbers of bighorn sheep and deer, along with other species, safely across highways thereby maintaining a permeable landscape.

Code	Issue	Response
5	**Biology, Plants, and Wildlife**	The intended uses of the multifunctional crossings would vary by location within the Study Area. If the crossings were near existing recreational features or trails, more human use would be expected. However, multifunctional crossings in remote areas through the South Mountains would allow limited use by people. Use of the crossings by people in this area is proposed solely to accommodate those members of the Gila River Indian Community who wish to gain access to areas of the South Mountains for ceremonies important for their culture (see Final Environmental Impact Statement page 4-151). A right-of-way fence would limit access to these areas by freeway users, but would allow Gila River Indian Community members to gain access to the area (see page 5-27 of the Final Environmental Impact Statement). The underpasses would not be associated with trailheads into the park and would not be designated as such for pedestrian, equestrian, off-highway vehicle, or bicyclist use. Other use of the underpasses by humans would be neither actively promoted nor encouraged through the signs posted. The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife such as mule deer and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
6	**Biology, Plants, and Wildlife**	Wildlife connectivity across the proposed project corridor is a concern, and multifunctional crossing structures are planned at locations where natural movement corridors occur along major drainages. The U.S. Route 93 study area is not similar to the South Mountains in that the undeveloped land along U.S. Route 93 provided habitat for an existing population of large mammals. For the U.S. Route 93 project, the largest remaining population of desert bighorn sheep in the Southwest occurred in the area and would have been adversely affected by the highway unless mitigation measures were in place. In that instance, the overpass mitigation was in direct response to a known large mammal population that would be adversely affected. The mitigation was justified in terms of the degree of impact that would have resulted from the highway's construction and operation. In the case of the South Mountains, communication from the Arizona Game and Fish Department in 2006 (see page A139 in Appendix 1-1 of the Final Environmental Impact Statement) states that mule deer are believed to have been extirpated from the area; bighorn sheep are not mentioned and are known to not occur in Phoenix South Mountain Park/Preserve. Further, historic habitat has already been adversely affected in the area; therefore, the current state of habitat limits the baseline condition under consideration. The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife such as mule deer and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

Code	Comment Document
7 8	

South Mountain DEIS
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General Recommendations

The Department recommends research and monitoring of wildlife movement within the study area to provide the information necessary to inform the design of crossings, bridges, culverts and fencing. Research may include but not be limited to telemetry and big game/tortoise/bats/snake surveys. For example, mule deer are known to occur in the area and survey/movement information would be important before designing any crossing structures. Mitigation should include survey costs. Mitigation should also consider wildlife specific fencing, culvert, vegetation and crossing structure design, loss of water sources in and adjacent to the project, direct habitat loss and roadway grading.

Funnel fencing is a critical component of successful wildlife crossings and the Department strongly recommends it be applied in conjunction with all wildlife crossing structures designed as mitigation. In the absence of funnel fencing research has shown wildlife will continue to cross the roadway at grade. Fencing is generally placed to compliment natural topographic features and encourage wildlife to move through a crossing structure and to prevent entrapment along medians. Escape mechanisms (such as fencing that leads to a slope and allows an animal to jump down but not up) are often used to compliment funnel fencing objectives and prevent roadway entrapment. Funnel fences turn the target animals along the fence before they can be repelled by traffic, preventing collisions, and directing them to crossing structures where they can safely continue in the desired direction. The keys to improved or successful fencing are extending far enough along the road corridor to capture all target species without creating an end-run effect, having enough crossings interspersed to minimize breach attempts; having tall enough fences to prevent scaling or jumping, and small enough webbing to deter ingress by smaller target species. Fencing extents are best derived from empirical target species movement data. When such data is missing, fencing the full extent of the highway is an acceptable alternative as long as sufficient passage structures, less than 1.5 miles apart, are included in the comprehensive mitigation plan. Further information on specific fencing for species can be found on the attachment.

For culverts, the Department recommends avoiding long, dark and narrow pipes and culverts, as they may discourage species from entering. Utilize straight culverts through which approaching animals can see light. Avoid turns and curves in culvert layout. For longer culverts, use vertical pipes or slotted drains to illuminate the interior of the culvert. Avoid extreme slopes as they prevent effective movement; maintain 5-10% slopes for multiple species.

Design all drainage structures to maintain a natural substrate. Avoid rip-rap as it would prevent or discourage entrance into the culvert for many species. If an energy dissipation structure is necessary, a flatter side ramp could be constructed to facilitate movement. Measures should be taken to make drainage structures as short as possible, if necessary cut the slopes closer to the roadway and use guard rails.

Code	Issue	Response
7	**Biology, Plants, and Wildlife**	We do not dispute the potential benefit of conducting a "multi-year" study to locate wildlife mitigation measures. However, it is also important to recognize that such studies need to be conducted in areas exhibiting priority wildlife-related highway safety and connectivity issues; the section of the highway corridor proposed parallel to Pecos Road was not identified as a linkage zone within the 2006 Arizona Wildlife Linkages Assessment or the 2012 Maricopa County Wildlife Connectivity Assessment. It would likely exhibit relatively low wildlife-vehicle collision incidence in the future given the low wildlife densities found within this portion of the corridor. The 2012 Maricopa County Wildlife Connectivity Assessment did identify a movement corridor at the southwestern end of Phoenix South Mountain Park/Preserve. Multifunctional crossing structures proposed in this area would allow continued wildlife connectivity in this area. Wildlife species in the Study Area (including mule deer, mountain lion, and javelina) are commonly found in the urban interface. They are generally not reluctant to use structures crossing beneath roadways; this is partially attributable to the fact that the most common times of use for humans and wildlife tend to occur at different times of the day. The proposed crossings would be located at washes, which are the most likely wildlife movement corridors given topography and resources. In addition to these larger crossings, culverts at smaller washes would serve as connection points for smaller wildlife. Culverts would generally be placed in natural drainage areas that are not heavily used by humans. Some past research indicates that human use of wildlife passages may affect wildlife use to varying degrees. The most well-known example of this research focused on crossings of the Trans-Canada Highway in Banff National Park. The results of the extensive research on the Trans-Canada Highway did not show that human use has a dramatic impact on wildlife use of the Banff structures, which has been substantial and continues to increase. In Arizona, research by the Arizona Game and Fish Department along State Route 260 found highly compatible use of a dual-use (multifunctional) underpass that linked the communities of Christopher Creek and Hunter Creek. This particular underpass exhibited some of the most diverse and substantial wildlife use of the underpasses monitored during the long-term project (Dodd et al. 2012). Along State Route 77, a Wildlife Technical Advisory Committee closely scrutinized this issue for the two planned wildlife passages that will be built within a similar urban-influenced landscape in and adjacent to Oro Valley. The Wildlife Technical Advisory Committee evaluated all available information and determined that the temporal patterns of human (daytime) versus wildlife (crepuscular and nocturnal) use are not expected to result in a significant degree of incompatibility. Furthermore, such dual-use, multifunctional structures situated within urban-influenced landscapes, in this instance adjacent to Phoenix South Mountain Park/Preserve with its extensive trail network, offer effective and efficient use of limited taxpayer funds.
8	**Biology, Plants, and Wildlife**	Specific design features of the proposed action would be established during the final design process. The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife such as mule deer and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

Code	Comment Document

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The Department recommends research and monitoring of wildlife movement within the study area to provide the information necessary to inform the design of crossings, bridges, culverts and fencing. Research may include but not be limited to telemetry and big game/tortoise/bats/snake surveys. For example, mule deer are known to occur in the area and survey/movement information would be important before designing any crossing structures. Mitigation should include survey costs. Mitigation should also consider wildlife specific fencing, culvert, vegetation and crossing structure design, loss of water sources in and adjacent to the project, direct habitat loss and roadway grading.

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9

Design all drainage structures to maintain a natural substrate. Avoid rip-rap as it would prevent or discourage entrance into the culvert for many species. If an energy dissipation structure is necessary, a flatter side ramp could be constructed to facilitate movement. Measures should be taken to make drainage structures as short as possible, if necessary cut the slopes closer to the roadway and use guard rails.

Code	Issue	Response
9	**Biology, Plants, and Wildlife**	The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

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July 24, 2013 5

In Closing
The Department appreciates the opportunity to provide comment on the DEIS. We look forward to working closely with the project team for further discussion on comprehensive mitigation and design plans for the structures necessary to facilitate connectivity and permeability for wildlife. If you have questions about this letter, please contact Kelly Wolff-Krauter @ 480-324-3550 or kwolff-krauter@azgfd.gov.

Sincerely,

Joyce M. Francis

Joyce Francis
Habitat Branch Chief

Cc: Rod Lucas, Regional Supervisor
Laura Canaca, Project Evaluation Program Supervisor
Ray Schweinsburg, Wildlife Contract Research Supervisor
Clifton Meek, US EPA

M13-04265313

Code	Issue	Response
10	**Biology, Plants, and Wildlife**	The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

Code	Comment Document

Arthropods at South Mountain Park/Preserve

1. Giant Desert Hairy Scorpion	Hadrurus arizonensis
2. Bark Scorpion	Centruroides sculpturatus
3. Tarantula	Aphonopelma sp.
4. Desert Millipede	Orthoporus ornatus
5. Tarantula Hawks	Pepsis spp.
6. Honey Bee	Apis mellifera
7. Carpenter Bee	Xylocopa californica arizonensis
8. Ants	Family Formicidae
9. Palo Verde Borer Beetles	Derobrachus geminatus
10.Cactus Longhorn Beetles	Moneilema gigas
11.Ladybird Beetles	Family Coccinellidae
12.Desert Cicada	Diceroprocta apache
13.Milkweed Bug	Lygaeus kalmii
14.Southern Dogface Butterfly	Zerene cesonia
15. Queen Butterfly	Danaus gilipus
16. Monarch Butterfly	Danaus plexippus
17. Sphinx Moth	Sphingidae

11

Birds at South Mountain Park/Preserve

Brown-headed Cowbird	Molothrus ater
Dove	Colombina inca
Flammulated Owl	Otus flammeolus
Canyon Wren	Catherpes mexicanus
Western Screech-Owl	Megascops kennicottii
Rock Pidgeon	Columba livia
Dove, Mourning	Zenaida macroura
Dove, White-winged	Zenaida asitica
House Finch	Carpodacus mexicanus
Crackle, Great-tailed	Quiscalus mexicanus
Gilded Flicker	Colaptes chrysoides
Hawk, Harris's	Parabuteo unicinctus
Hawk, Red-tailed	Buteo jamaicensis
Hummingbird, Anna's	Calypte Anna's
Hummingbird, Black-chinned	Archilochus alexandri
Kestrel, American	Falco sparverius
Mockingbird, Northern	Mimus polyglottos
Owl, Elf	Micrathene whitneyi
Owl, Great horned	Bubo virginianus
Phainopepla	Phainopepla nitens
Quail, Gambel's	Callipepla gambelii
Raven, Common	Corvus corax
Roadrunner, Greater	Geococcyx californianus
Sparrow, House	Passer domesticus

Code	Issue	Response
11	**Biology, Plants, and Wildlife**	Information noted.

Code	Comment Document

11

Starling, European	Sturnus vulgaris
Thrasher, Curve-billed	Toxostoma curvirstre
Verdin	Auriparus flaviceps
Vulture, Turkey	Cathartes aura
Woodpecker, Gila	Melanerpes uropygialis
Wren, Cactus	Campylorhyncus brunneicapillus
Hawk, Copper's	Accipiter Cooperii
Harrier, Northern	Circus Cyaneus
Falcon, Peregrine	Falco peregrinus
Black Hawk	Buteogallus anthracinus
Common Poor-will	Phalaenoptilus nuttallii
Nighthawk, Lesser	Chordeiles acutipennis
Hawk, Sharp-shinned	Accipiter striaus

Mammals at South Mountain Park/Preserve

Badger	Taxidea taxus
Mexican Free-tailed Bat	Tadarida brasiliensis
Pallid Bat	Antrozous pallidus
Beaver	Castor Canadensis
Bobcat	Felis rufus
Desert Cottontail	Sylvilagus audubonii
Coyote	Canis latrans
Gray Fox	Urocyon cinereoargenteus
Kit Fox	Vulpes macrotis
Round-tailed Ground Squirrel	Spermophilus tereticaudus
Jackrabbit	Lepus californicus
Collared Peccary- Javelina	Pecari tajacu
Kangroo Rat	Dipodomys
Mountain Lion	Felis concolor
Porcupine	Erethizon dorsatam
Raccoon	Procyon lotor
Ringtail	Bassariscus astutus
Skunk Striped	Mephitis mephitis
Skunk Spotted	Spilogole gracilis
White-throated Wood Rat	Neotoma albigula
Harris' Antelope Squirrel	Ammospermophilus harrisii
Rock Squirrel	Spermophilus variegates
Silky Pocket Mouse	Perognathus flavus
Desert Pocket Mouse	Perognathus penicillatus
Western Harvest Mouse	Reithrodontomys megalotis
Cactus Mouse	Peromyscus eremicus
Southern Grasshopper Mouse	Onychomys torridus

Code	Issue	Response

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11

House Mouse	Mus musculus
California Leaf-nosed Bat	Macrotus californicus
Western Pipistrelle	Pipistrellus Hesperus
Big Brown Bat	Eptesicus fuscus
Brazilian Free-tailed Bat	Tadarida brasilien

Reptiles and Amphibians at South Mountain Park/Preserve

Desert Tortoise	Gopherus agassizii
Regal Horned Lizard	Phrynosoma solare
Short-horned Lizard	Phrynosona douglassi
Side-blotched Lizard	Uta stansburiana
Zebra tailed Lizard	Callisaurus draconoides
Desert Iguana	Dipsosaurus dorsalis
Desert Spiny Lizard	Sceloporus magister
Collared lizard	Crotaphytus spp.
Western Banded Gecko	Coleonyx variegatus
Chuckwalla	Sauromalus obesus
Gila Monster	Heloderma suspectum
Western Banded Gecko	Coleonyx variegates
Western Whiptail	Cnemidophorus tigris
Common Kingsnake	Lampropeltis getulus
Arizona Coral Snake	Micruroides euryxanthus
Gopher Snake	Pituophis melanoleucus
Arizona Ridge-nosed Rattlesnake	Crotalus willardi
Black-necked Garter Snake	Thamnophis cyrtopsis
Western Terrestrial Garter Snake	Thamnophis elegans
Western Rattlesnake	Crotalus viridis
Western Diamondback Rattlesnake	Crotalus atrox
Mohave Rattlesnake	Crotalus scutulatus
Sidewinder Rattlesnake	Crotalus cerastes
Speckled Rattlesnake	Crotalus mitchelli
Tiger Rattlesnake	Crotalus tigris
Blacktailed Rattlesnake	Crotalus molossus
Western Spadefoot toad	Pelobatidae scaphiopus
American Bullfrog	Rana catesbeiana
King Snake	Lampropeltis getula

Code	Issue	Response

Code	Comment Document

Attachment
South Mountain (Loop 202) July 11, 2013

General

We recommend consideration be provided for the "Arizona's Species of Greatest Conservation Need (SGCN)" (see below table). These species have historic, present, or potential distributions within the project area. The SGCN are species that the State has identified as most in need of conservation actions in Arizona's State Wildlife Action Plan: 2012-2022 (SWAP), and those that are indicative of the diversity and health of the State's wildlife (AGFD 2012). Many of these species are currently listed as Threatened or Endangered under the ESA, and many have low and declining populations. We recommend consideration of the SWAP as part of the DEIS and analysis. Additional information related to the stressors affecting wildlife, conservation actions, and each SGCN vulnerability ratings can be found in the plan. Please refer to the SWAP document for additional information.

12

The Department's newest tool, the HabiMap (http://www.azgfd.gov/w_c/WildlifePlanning.shtml) is intended to display the spatial components of the SWAP and can be used to view the potential habitat distributions of SGCN, as well as economically important game species, and information from Arizona's Breeding Bird Atlas. Within HabiMap you can also view the Species and Habitat Conservation Guide (SHCG) (see below screenshot of project area). The guide can be used to visually explore how wildlife is distributed throughout the State and where conservation can have the greatest impact. Areas categorized 5 and 6, as areas of the "highest conservation potential" (darker blue); mean the importance of the landscape for maintaining biodiversity is highest at the statewide scale.

Abert's Towhee	Melozone aberti	1b
American Beaver	Castor canadensis	1b
American Bittern	Botaurus lentiginosus	1b
American Peregrine Falcon	Falco peregrinus anatum	1a
Antelope Jackrabbit	Lepus alleni	1b
Arizona Bell's Vireo	Vireo bellii arizonae	1b
Arizona Myotis	Myotis occultus	1b
Arizona Pocket Mouse	Perognathus amplus	1b
Bald Eagle	Haliaeetus leucocephalus	1a
Banner-tailed Kangaroo Rat	Dipodomys spectabilis	1b
California Leaf-nosed Bat	Macrotus californicus	1b
Cave Myotis	Myotis velifer	1b
Ferruginous Hawk	Buteo regalis	1b
Gila Monster	Heloderma suspectum	1a
Gila Woodpecker	Melanerpes uropygialis	1b
Gilded Flicker	Colaptes chrysoides	1b
Golden Eagle	Aquila chrysaetos	1b
Goode's Horned Lizard	Phrynosoma goodei	1b
Greater Western Mastiff Bat	Eumops perotis californicus	1b
Harris' Antelope Squirrel	Ammospermophilus harrisii	1b
Jaguar	Panthera onca	1a
Kit Fox	Vulpes macrotis	1b
Le Conte's Thrasher	Toxostoma lecontei	1b
Lesser Long-nosed Bat	Leptonycteris yerbabuenae	1a

Code	Issue	Response
12	**Biology, Plants, and Wildlife**	The section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-136 of the Final Environmental Impact Statement, explains that the project would result in a decrease in resources for species that occur in and adjacent to the Study Area. It also describes additional short-term impacts related to construction. The analysis generally describes the effects on species of greatest conservation need that may occur in the vicinity. Most of the Study Area has a moderate-to-low value for species of greatest conservation need on HabiMap, including the western end of the South Mountains. The exception is the area along the Salt River corridor, where there are higher values for riparian species. The project is designed with a bridge over the Salt River to minimize effects on riparian habitat. Those species of greatest conservation need that have the potential to occur in the Study Area have been added to Table 4-43 that begins on page 4-129 of the Final Environmental Impact Statement. These species were also addressed in a Biological Evaluation that was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community's Department of Environmental Quality. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement).

Code	Comment Document

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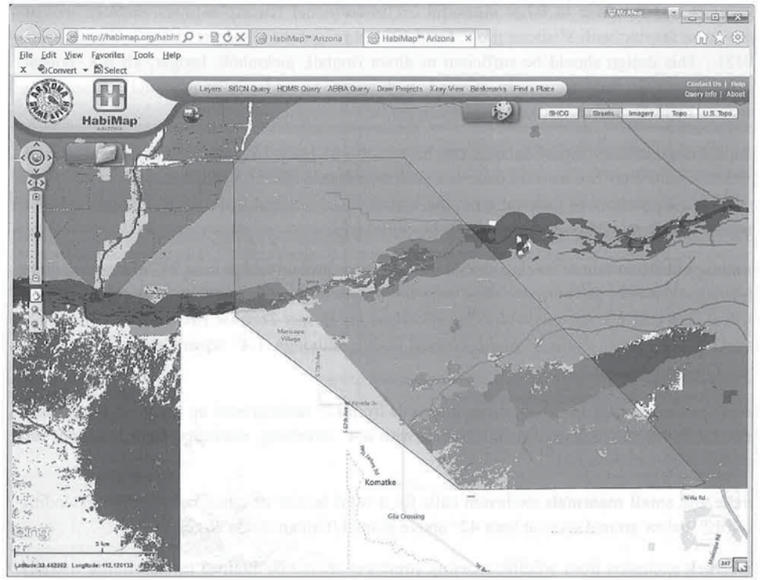
Attachment
South Mountain (Loop 202) July 11, 2013

Lincoln's Sparrow	Melospiza lincolnii	1b
Lowland Leopard Frog	Rana yavapaiensis	1a
Mexican Free-tailed Bat	Tadarida brasiliensis	1b
Pacific Wren	Troglodytes pacificu	1b
Pale Townsend's Big-eared Bat	Corynorhinus townsendii pallescens	1b
Pocketed Free-tailed Bat	Nyctinomops femorosaccus	1b
Regal Horned Lizard	Phrynosoma solare	1b
Sonora Mud Turtle	Kinosternon sonoriense sonoriense	1b
Saddled Leaf-nosed Snake	Phyllorhynchus browni	1b
Savannah Sparrow	Passerculus sandwichensis	1b
Sonoran Coralsnake	Micruroides euryxanthus	1b
Sonoran Desert Toad	Bufo alvarius	1b
Sonoran Desert Tortoise	Gopherus agassizii	1a
Sonoran Whipsnake	Masticophis bilineatus	1b
Spotted Bat	Euderma maculatum	1b
Tiger Rattlesnake	Crotalus tigris	1b
Tucson Shovel-nosed Snake	Chionactis occipitalis klauberi	1a
Variable Sandsnake	Chilomeniscus stramineus	1b
Western Burrowing Owl	Athene cunicularia hypugaea	1b
Western Red Bat	Lasiurus blossevillii	1b
Western Yellow Bat	Lasiurus xanthinus	1b
Wood Duck	Aix sponsa	1b
Yellow Warbler	Dendroica petechia	1b
Yuma Clapper Rail	Rallus longirostris yumanensis	1a
Yuma Myotis	Myotis yumanensis	1b

Code	Issue	Response

Code	Comment Document
12	Attachment South Mountain (Loop 202) July 11, 2013 
13	**Barriers and Fencing** The only viable wildlife option for a road with a projected Average Annual Daily Traffic (AADT) volume exceeding 10,000 is to prevent wildlife access to the corridor while maintaining permeability across it, and the DEIS suggests that the AADT for the proposed highway is expected to surpass 50,000 by the year 2035. This means exclusion fencing with crossing structures interspersed at appropriate intervals. While the specifications required to achieve such mitigation are not as numerous and varied as the full range of species present, there are different mitigation components and/or characteristics that are vital for success with different clades or taxa of wildlife species. Given the potential for intentional vehicle-reptile collisions (Ashley *et al* 2007) and the looming potential of Tucson shovel-nosed snake and Sonoran Desert tortoise Federal status upgrades to Threatened or Endangered, snake and tortoise mitigations should be given a high priority by the design team. Incorporating appropriate connectivity mitigation would preclude the need for redesign if/when these candidate species are listed. **Fence/Barrier Design Requirements for various taxa**

Code	Issue	Response
13	**Biology, Plants, and Wildlife**	As noted on page 4-138 of the Final Environmental Impact Statement, during the design phase, if an action alternative were to become the Selected Alternative, the threatened and endangered species list would be reviewed to determine whether an update to address species would be needed. The wildlife connectivity is recognized (see "*Habitat Connectivity and the Proposed Action*" text box and *Habitat Connectivity section* on page 4-137 as well as the *Mitigation* section beginning on page 4-138 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement). The Sonoran desert tortoise and Tucson shovel-nosed snake were analyzed in the Biological Evaluation and coordination on mitigation of impacts would occur during the design phase. Discussion of the Tucson shovel-nosed snake is included on page 4-135 in the Final Environmental Impact Statement.

Code	Comment Document
14	Attachment South Mountain (Loop 202) July 11, 2013 **Ungulate** and **medium to large mammal** exclusion/funnel fencing requires standard woven-wire game fencing with 8' above ground and 12" below ground (Dodd *et al* 2007, Grandmaison 2012). This design should be sufficient to direct ringtail, jackrabbit, badger, kit fox, bobcat, coyote, mountain lion, mule deer, javelina, bighorn sheep, and similar mammal species away from the highway and toward crossing structures. **Amphibian** exclusion/funnel barriers can be fine mesh (1/4") 16-guage or heavier galvanized, welded wire, or they can be solid materials such as concrete barrier, rusticated steel, or guard rail materials. Regardless of material type, the barrier should extend from 12" below ground to at least 36" above ground (Grandmaison 2012). **Tortoise** exclusion/funnel fencing should be 12" below ground and at least 24" above ground of 16-guage or heavier galvanized welded wire mesh with holes no larger than 1" horizontal by 2" vertical (see USFWS *Recommended Specifications for Desert Tortoise Exclusion Fencing* 2005 and USFWS *Desert Tortoise Field Manual* 2009), although 1/4" square mesh is preferred (Grandmaison 2012). **Lizard** exclusion calls for solid barrier materials from 12" underground up to 42" above ground. Acceptable designs include concrete barrier with a 4" overhang, rusticated steel, or guard rail material (Grandmaison 2012). **Snake** and **small mammals** exclusion calls for a solid barrier of guard rail material extending from 12" below ground up to at least 42" above ground (Grandmaison 2012). **Livestock** exclusion from wildlife crossing structures should be attained using wildlife friendly right-of-way (ROW) fencing (http://www.azgfd.gov/hgis/pdfs/FencingGuidelines.pdf). This should be set back at least 50 yards from the entrance to the crossing structure and comprised of 3 or 4 wire strands with a total height of no more than 42". The bottom strand should be smooth wire between 16" and 20" off the ground. There should be one or two barbed wire strands above the bottom wire with 5" to 8" separating each of these strands. The top wire should be smooth with at least 12" between in and the next highest strand, but not more than 42" above the ground. PVC-pipe "jumps" should be installed across the top and bottom strands of these fences to promote wildlife crossings. Due to anticipated traffic volume, no ROW fence should be constructed with the intention of encouraging wildlife ingress into the freeway corridor. Any sections of freeway where wildlife barriers are deemed unnecessary (movement data shows avoidance by all target species) but livestock are present should be fenced according to standard ADOT ROW fence specifications (not wildlife-friendly game fence). **Combination and extent of Fence/Barrier Designs** Effective mitigation must combine the most restrictive funnel fence/barrier requirements for all of the taxa present or potentially present in a given area. Barrier extents and spatial distribution of taxa-specific design characteristics should be derived from empirical resident target species

Code	Issue	Response
14	**Biology, Plants, and Wildlife**	The need for maintaining wildlife connectivity is recognized (see "*Habitat Connectivity and the Proposed Action*" text box and *Habitat Connectivity section* on page 4-137 as well as the *Mitigation* section beginning on page 4-138 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

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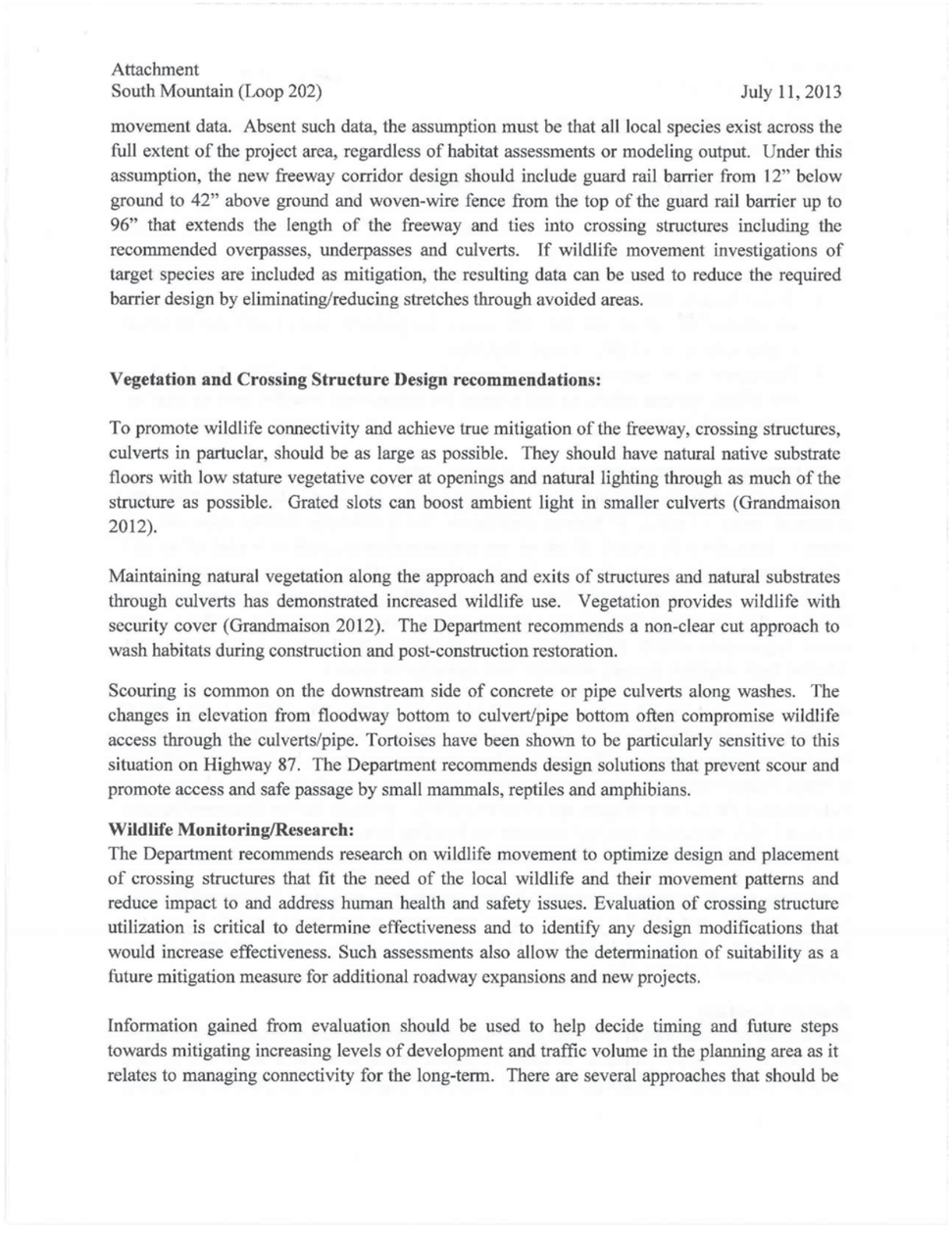

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movement data. Absent such data, the assumption must be that all local species exist across the full extent of the project area, regardless of habitat assessments or modeling output. Under this assumption, the new freeway corridor design should include guard rail barrier from 12" below ground to 42" above ground and woven-wire fence from the top of the guard rail barrier up to 96" that extends the length of the freeway and ties into crossing structures including the recommended overpasses, underpasses and culverts. If wildlife movement investigations of target species are included as mitigation, the resulting data can be used to reduce the required barrier design by eliminating/reducing stretches through avoided areas.

Vegetation and Crossing Structure Design recommendations:

To promote wildlife connectivity and achieve true mitigation of the freeway, crossing structures, culverts in partuclar, should be as large as possible. They should have natural native substrate floors with low stature vegetative cover at openings and natural lighting through as much of the structure as possible. Grated slots can boost ambient light in smaller culverts (Grandmaison 2012).

Maintaining natural vegetation along the approach and exits of structures and natural substrates through culverts has demonstrated increased wildlife use. Vegetation provides wildlife with security cover (Grandmaison 2012). The Department recommends a non-clear cut approach to wash habitats during construction and post-construction restoration.

Scouring is common on the downstream side of concrete or pipe culverts along washes. The changes in elevation from floodway bottom to culvert/pipe bottom often compromise wildlife access through the culverts/pipe. Tortoises have been shown to be particularly sensitive to this situation on Highway 87. The Department recommends design solutions that prevent scour and promote access and safe passage by small mammals, reptiles and amphibians.

Wildlife Monitoring/Research:
The Department recommends research on wildlife movement to optimize design and placement of crossing structures that fit the need of the local wildlife and their movement patterns and reduce impact to and address human health and safety issues. Evaluation of crossing structure utilization is critical to determine effectiveness and to identify any design modifications that would increase effectiveness. Such assessments also allow the determination of suitability as a future mitigation measure for additional roadway expansions and new projects.

Information gained from evaluation should be used to help decide timing and future steps towards mitigating increasing levels of development and traffic volume in the planning area as it relates to managing connectivity for the long-term. There are several approaches that should be

Code	Issue	Response
15	**Biology, Plants, and Wildlife**	The issue of wildlife connectivity is recognized (see "*v*" text box and *Habitat Connectivity section* on page 4-137 as well as the *Mitigation* section beginning on page 4-138 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway.
16	**Biology, Plants, and Wildlife**	We do not dispute the potential benefit of conducting a "multi-year" study to locate wildlife mitigation measures. However, it is also important to recognize that such studies need to be conducted in areas exhibiting priority wildlife-related highway safety and connectivity issues. The section of the highway corridor where the multiuse crossings are proposed was not identified as a linkage zone within the 2006 Arizona Wildlife Linkages Assessment; however, it was identified as a movement corridor in the 2012 Maricopa County Wildlife Connectivity Assessment. Wildlife species in the Study Area (including mule deer, mountain lion, and javelina) are commonly found in the urban interface and are generally not reluctant to use structures crossing beneath roadways. This is partially attributable to the fact that the most common times of use for humans and wildlife tend to occur at different times of the day. The proposed crossings are located at washes, which are the most likely wildlife movement corridors given topography and resources. In addition to these larger crossings, culverts at smaller washes would serve as connection points for smaller wildlife. Culverts would generally be placed in natural drainage areas that are not heavily used by humans. Some past research indicates that human use of wildlife passages may affect wildlife use to varying degrees. The most well-known example of this research focused on crossings of the Trans-Canada Highway in Banff National Park. The results of the extensive research on the Trans-Canada Highway did not show that human use has a dramatic impact on wildlife use of the Banff structures, which has been substantial and continues to increase. In Arizona, research by the Arizona Game and Fish Department along State Route 260 found highly compatible use of a dual-use (multifunctional) underpass that linked the communities of Christopher Creek and Hunter Creek. This particular underpass exhibited some of the most diverse and substantial wildlife use of the underpasses monitored in the long-term project (Dodd et al. 2012). Along State Route 77, a Wildlife Technical Advisory Committee closely scrutinized this issue for the two planned wildlife passages that will be built within a similar urban-influenced landscape in and adjacent to Oro Valley. The Wildlife Technical Advisory Committee evaluated all available information and determined that the temporal patterns of human (daytime) versus wildlife (crepuscular and nocturnal) use are not expected to result in a significant degree of incompatibility. Furthermore, such dual-use, multifunctional structures situated within urban-influenced landscapes, in this instance adjacent to Phoenix South Mountain Park/ Preserve with its extensive trail network, offer effective and efficient use of limited taxpayer funds.

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explored and partnerships should be developed to find the resources to accomplish this through shared commitments.

Approaches to consider for citing and evaluation of mitigation components:

- Track, Scat and road-kill surveys to identify "hot spots" for mortality and vehicle collisions
- Wildlife movement studies (telemetry) to identify movement patterns
- Traffic Volume using traffic counters to examine the potential influence of traffic volume on wildlife movement and mortality across the parkway and in response to phase implementation of wildlife crossing structures
- Post-construction monitor of crossing structures using integrated digital video surveillance systems and digital trail cameras to evaluate success and/or need for adaptive management measures.

Loss of Water Sources/Riparian Habitat (or access to them):

17

Local wildlife is extremely dependent on stock tanks in the area as an ephemeral and/or semi-permanent source of water. If freeway construction would eliminate existing stock tanks or access to them, along the project alignment, we recommend replacement of in-kind values and redevelopment at the nearest alternate location. Currently, there is a not a comprehensive knowledge of water sources available to wildlife on GRIC lands adjacent to the project area. However, the agricultural land adjacent to the project area contains and/or produces water sources important to wildlife. For example, just south of Pecos Road there is a large agricultural field that feeds a riparian corridor utilized by a diverse array of species.

Any loss of riparian habitat, including changes to the gravel pit ponds or other water sources within or around the Salt River, may impact the occupancy and productivity of the adjacent Pee Posh bald eagle breeding area. The Pee Posh breeding area has been highly successful with five nestlings fledged in the four years since its discovery in 2010. The only failure was due to a fire that consumed the two near-fledging age nestlings in 2011. Although the Pee Posh breeding area has been highly successful, foraging areas for the breeding birds have been very limited. Any anticipated loss to riparian/wetland habitats due to this project should be replaced.

In addition, the Department recommends further consultation with the US Fish and Wildlife Service (USFWS) and AGFD over the potential for impacts to bald eagle productivity and the possible need for a Bald and Golden Eagle Protection Act permit with an associated impact reducing eagle conservation plan.

Roadway Grading:

18

Research suggests that road-kill of small terrestrial vertebrate species decreased by 93% on roads raised on embankments compared to roads at natural grades (Clevenger et al. 2003). This roadway design may be beneficial to small mammals, reptiles and amphibians throughout

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17	**Biology, Plants, and Wildlife**	No stock tanks have been identified near the action alternative corridors; therefore, none would be removed nor would access to stock tanks be affected by the proposed action. The Draft Environmental Impact Statement addressed the Pee Posh eagles, although not by name, on page 4-124. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community Department of Environmental Quality that addressed threatened and endangered species. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). The Biological Evaluation also addressed the breeding eagles in the Pee Posh wetlands in conformance to the Bald and Golden Eagle Protection Act.
18	**Biology, Plants, and Wildlife**	As noted on page 3-41 of the Final Environmental Impact Statement, a rolling profile would be used for the proposed freeway. Page 3-47 of the Final Environmental Impact Statement shows the proposed profile for the E1 Alternative. The proposed profile would be elevated above the existing ground level throughout most of this section of the proposed project. A rolling profile is preferable economically for balancing construction cut and fill material. It provides operational benefits because it is the type of freeway drivers are familiar with and it also permits efficient drainage solutions, thereby reducing the amount of land needed. The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife such as mule deer and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

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Rainbow Valley and through the Linkage Zone. Used in combination with wildlife friendly bridge and culvert designs, this design strategy may be an effective way to minimize impacts, while enhancing permeability.

Page Specific Comments

Chapter 4: Affected Environment, Environmental Consequences and Mitigation

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19

The Rio Salado Oeste project is one in a chain of major river restoration projects that would result in continuous riparian corridor that would connect riparian and wetland habitats downstream with similar areas upstream. This would also result in connectivity in habitats creating a synergism in habitat values and wildlife populations where each of the projects would add to the other. The Department strongly supported this concept of recycled or conserved water and the Rio Salado Oeste project within the larger context of these other projects and connectivity that would result from their implementation. Several of the other projects have been completed and/or are still in implementation. The Department would like to see any actions involving this project contribute to its progress rather than detract from the potential landscape level connectivity that could result. Effects of actions within this area should be minimized with the least invasive structures possible (large open span bridges carrying traffic far above the wildlife habitat in the riverbed below) and offset with contributions to the restoration of this area and connecting lands.

Page 4-19

Conclusions

20

The E1 Alternative was found to be incompatible with the natural land and primarily residential areas immediately north of the alignment. This conclusion seems contradictory and may require clarification.

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Conclusions

21

The E1 Alternative would alter the drainage patterns through use of a series of drainage detention basis directing runoff to community lands. It is not disclosed as to how this runoff would impact those adjacent lands.

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19	**Biology, Plants, and Wildlife**	As noted on page 4-15 of the Final Environmental Impact Statement, the City of Phoenix is aware of, has planned for, and has incorporated the proposed South Mountain Freeway in the City of Phoenix General Plan and in conceptual plans for the Rio Salado Oeste project (see Project Features Map in Appendix 4-8 of the Final Environmental Impact Statement). As noted on page 4-15 of the Final Environmental Impact Statement and as agreed upon by the Bureau of Land Management, U.S. Army Corps of Engineers, and City of Phoenix, the project team would continue to consult with those entities to coordinate design efforts with the Rio Salado Oeste project.
20	**Biology, Plants, and Wildlife**	As noted on page 4-16 of the Final Environmental Impact Statement, single-family residential uses were generally not considered compatible with transportation corridors because the action alternatives would introduce visual, air quality, noise, and other intensive impacts on a comparatively sensitive land use; may isolate portions of planned communities; or may limit access to infrastructure and services. Undeveloped land near a transportation corridor was deemed compatible or incompatible largely based on its planned land use, determined by zoning and the jurisdiction's adopted general plan.
21	**Biology, Plants, and Wildlife**	Drainage patterns would not be diverted from their downstream connection on the Gila River Indian Community. The drainage features of the E1 Alternative would be designed such that drainage basins and channels on the north side of the freeway would collect runoff from the freeway and allow suspended sediment to settle. As the system continues to receive runoff, the basins and channels would overflow into channels that would direct flows under the freeway and onto Gila River Indian Community land in the same location as existing drainages from the South Mountains (see page 4-106 of the Final Environmental Impact Statement).

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Aquatic/Wetland Communities

Please cite literature that supports the claim that concrete-lined irrigation canals do not offer significant value to wildlife. Without empirical data and targeted research, this is not a sound assumption. Aquatic species (vertebrates and invertebrates) may inhabit the irrigation canals. They may also sustain insect populations that in turn support bird, bat, and other mammal populations. Bats and birds may also rely heavily on these canals as a water source.

Wildlife Resources

22 There is an underlying implication that wildlife diversity outside of SMPP is low due to the few observations of the project team. Incidental observations are a valid record of presence, but not of absence. Unless targeted surveys for various clades are undertaken, there should be no implication of low diversity.

The Department recommends including the additional species mentioned in our letter above. In addition, clarification in use of the agricultural fields should include that they not only provide habitat, but also provide forage for larger game species, such as mule deer and habitat for predators such as coyotes.

Please clarify the distinction between "riparian vegetation" in this Wildlife Resources section versus the "wetland vegetation" referenced in the Aquatic/Wetland Community section relative to the gravel pits in question.

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23 The Department has more recent information on predators adjacent to the study area and recommends further discussion. As a point of clarification, the potential for mountain lions to occur within South Mountain is a factor of the potential for South Mountain to represent a portion of a mountain lion home range. It is unlikely that SMPP is large enough to alone sustain a mountain lion and so there are likely no resident lions that remain within the SMPP boundary. In addition, wild horses and burros occur on the GRIC lands adjacent to the study area. These animals would be of concern for potential wildlife collisions within the proposed freeway corridor. Table 4-44

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24 There is strong evidence that forage habitat critical to the success of a nearby bald eagle nest exists within the study area in close proximity to some action alternatives, including but not limited to the gravel operation ponds. Any alteration of this riparian forage habitat should be addressed appropriately as outlined above.

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Code	Issue	Response
22	**Biology, Plants, and Wildlife**	The concrete-lined irrigation canals in the Study Area are typically narrow and steep-sided and contain water for only short periods during field irrigation. The water velocity, steep sides, and short duration of water delivery in the concrete-lined canals do not constitute a reliable or appropriate water source for wildlife compared with unlined canals or standing water sources that may be available. The steep canal sides and velocities can be a danger to wildlife. This was clarified in the Final Environmental Impact Statement on page 4-127. We agree that a lack of observations does not equate to absence. The Draft Environmental Impact Statement lists numerous species and habitat types found in the Study Area and also states that wildlife abundance and diversity are related to the extent and variety of habitats in the area, implying that habitat variability in the area outside of Phoenix South Mountain Park/Preserve could support species diversity. The list of species was expanded in the Final Environmental Impact Statement and text was added to reflect that agricultural fields provide habitat for additional species (see pages 4-127 and 4-128, respectively).
23	**Biology, Plants, and Wildlife**	The description of the mountain lion was changed in the Final Environmental Impact Statement on page 4-127 to read, "AGFD has stated that lions should be considered an animal with the potential to occur in SMPP, which could represent a portion of its home range, but not a resident animal." As noted on page 4-128 of the Final Environmental Impact Statement, although wild horses are present on Gila River Indian Community land, the habitat assessment concluded no suitable habitat for wild horses exists within the Study Area. However, like Interstate 10, which passes through the Gila River Indian Community and where wild horses are known to occur, the proposed freeway would be lined with right-of-way fencing that would prevent vehicular collisions with wild horses and burros.
24	**Biology, Plants, and Wildlife**	The Draft Environmental Impact Statement addressed the Pee Posh eagles, but not by name, on page 4-124. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community Department of Environmental Quality that addressed threatened and endangered species. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). The Biological Evaluation also addressed the breeding eagles in the Pee Posh wetlands in conformance with the Bald and Golden Eagle Protection Act.

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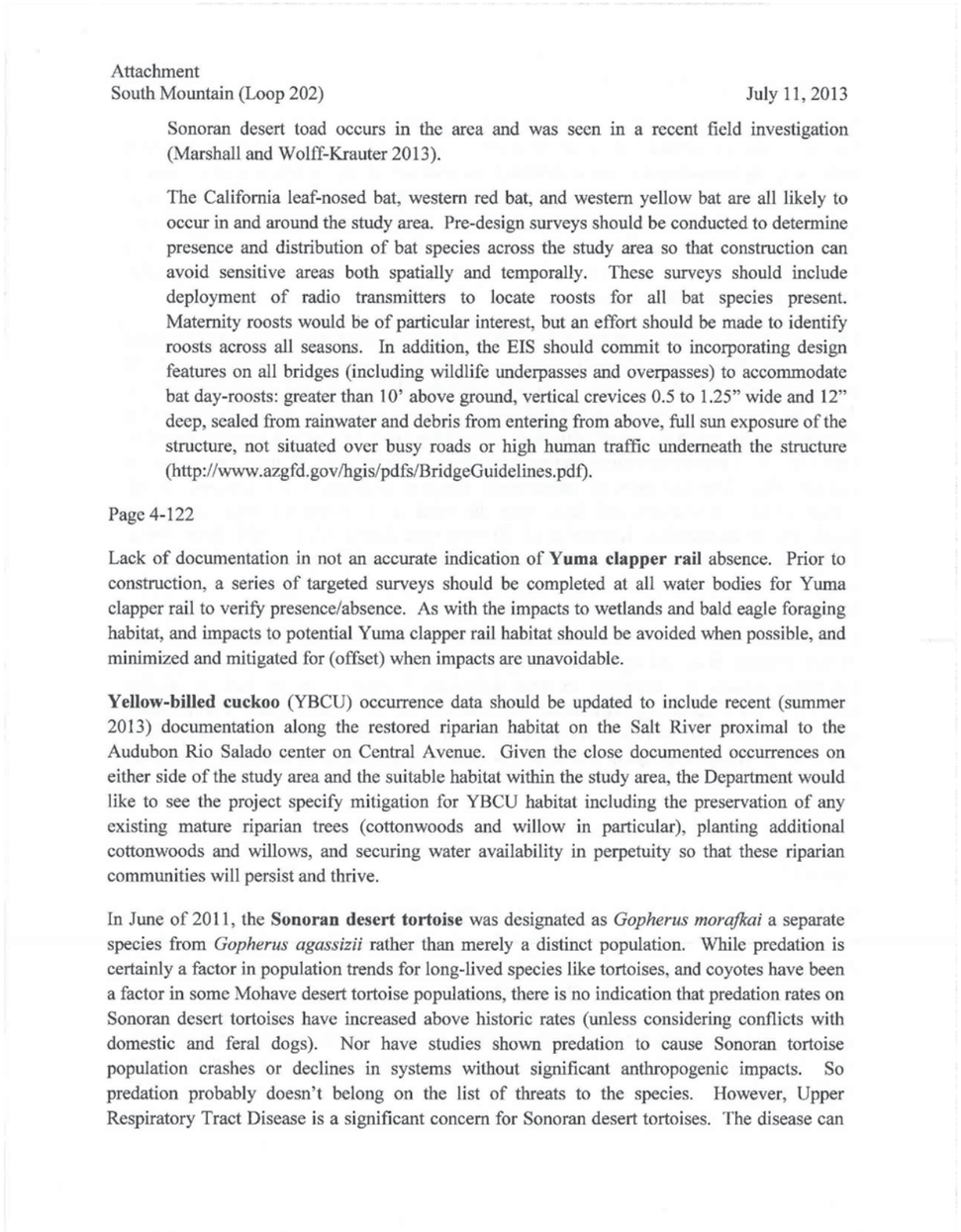

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Sonoran desert toad occurs in the area and was seen in a recent field investigation (Marshall and Wolff-Krauter 2013).

25

The California leaf-nosed bat, western red bat, and western yellow bat are all likely to occur in and around the study area. Pre-design surveys should be conducted to determine presence and distribution of bat species across the study area so that construction can avoid sensitive areas both spatially and temporally. These surveys should include deployment of radio transmitters to locate roosts for all bat species present. Maternity roosts would be of particular interest, but an effort should be made to identify roosts across all seasons. In addition, the EIS should commit to incorporating design features on all bridges (including wildlife underpasses and overpasses) to accommodate bat day-roosts: greater than 10' above ground, vertical crevices 0.5 to 1.25" wide and 12" deep, sealed from rainwater and debris from entering from above, full sun exposure of the structure, not situated over busy roads or high human traffic underneath the structure (http://www.azgfd.gov/hgis/pdfs/BridgeGuidelines.pdf).

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26

Lack of documentation in not an accurate indication of **Yuma clapper rail** absence. Prior to construction, a series of targeted surveys should be completed at all water bodies for Yuma clapper rail to verify presence/absence. As with the impacts to wetlands and bald eagle foraging habitat, and impacts to potential Yuma clapper rail habitat should be avoided when possible, and minimized and mitigated for (offset) when impacts are unavoidable.

27

Yellow-billed cuckoo (YBCU) occurrence data should be updated to include recent (summer 2013) documentation along the restored riparian habitat on the Salt River proximal to the Audubon Rio Salado center on Central Avenue. Given the close documented occurrences on either side of the study area and the suitable habitat within the study area, the Department would like to see the project specify mitigation for YBCU habitat including the preservation of any existing mature riparian trees (cottonwoods and willow in particular), planting additional cottonwoods and willows, and securing water availability in perpetuity so that these riparian communities will persist and thrive.

28

In June of 2011, the **Sonoran desert tortoise** was designated as *Gopherus morafkai* a separate species from *Gopherus agassizii* rather than merely a distinct population. While predation is certainly a factor in population trends for long-lived species like tortoises, and coyotes have been a factor in some Mohave desert tortoise populations, there is no indication that predation rates on Sonoran desert tortoises have increased above historic rates (unless considering conflicts with domestic and feral dogs). Nor have studies shown predation to cause Sonoran tortoise population crashes or declines in systems without significant anthropogenic impacts. So predation probably doesn't belong on the list of threats to the species. However, Upper Respiratory Tract Disease is a significant concern for Sonoran desert tortoises. The disease can

Code	Issue	Response
25	**Biology, Plants, and Wildlife**	The Sonoran Desert toad was added to the list of species occurring in the Study Area in the Biological Evaluation. Table 4-44 of the Draft Environmental Impact Statement indicates that these bat species may occur throughout the Study Area; this was updated to "may occur" in the Final Environmental Impact Statement (see Table 4-43 on pages 4-129 to 4-132). Surveys to determine the presence and distribution of the wide range of species, including bat species, is beyond the scope of the proposed project. Designing bridges for bat habitat is not a standard accommodation that the Arizona Department of Transportation currently provides. The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department through the design process (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
26	**Biology, Plants, and Wildlife**	As noted on page 4-126 of the Final Environmental Impact Statement, suitable habitat did not exist within the right-of-way of or immediately adjacent to any action alternative at the time the study was completed. If conditions change over time and suitable habitat for the Yuma clapper rail were to exist within the right-of-way of or immediately adjacent to a Selected Alternative—should it be an action alternative—surveys would be completed and, if appropriate, consultation with the U.S. Fish and Wildlife Service would occur. The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service through the design process (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
27	**Biology, Plants, and Wildlife**	A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the yellow-billed cuckoo. The potential for impacts on suitable habitat for the yellow-billed cuckoo within the right-of-way of the Preferred Alternative was addressed in the Biological Evaluation. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). If appropriate, surveys would be completed and consultation with the U.S. Fish and Wildlife Service would occur as the project progresses through design. The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service through the design process (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
28	**Biology, Plants, and Wildlife**	A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the Sonoran desert tortoise. The information used to prepare the analysis in the Draft Environmental Impact Statement (page 4-122) was based on 2011 information retrieved from the Arizona Game and Fish Department (*Gopherus agassizii*, draft unpublished abstract compiled and edited by the Heritage Data Management System, Phoenix). Current information

(Response 28 continues on next page)

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be introduced into a population via interaction with humans. So, an increase in the frequency of human-tortoise interactions will raise the potential for both disease introduction and illegal collection. Multi-functional crossing structures intended for use by both humans and tortoises (along with other wildlife) could pose significant risks to the local tortoise population through such increased potential. Grandmaison, et. al (2010) provided results with insight into the habitat components important for considerations in maintaining habitat connectivity for desert tortoise. The maintaining of desert washes for providing shelter sites and natural vegetation important for preservation of a linkage.

Desert tortoises are known to occur in the study area. It is recommended surveys be performed prior to construction and long-term measures to prevent road mortality while maintaining permeability should be implemented to prevent population declines in such a long-lived species. These measures should include further analyses of all types of crossing structures and fencing since limited desert tortoise use of retro-fitted culverts has been documented. Fencing should be implemented to keep as many small reptiles, amphibians, and mammals off of the road surface as possible while funneling them to appropriately designed underpasses and culverts. Roads impede tortoise movements and have been identified as a significant threat to tortoise populations throughout their distribution (AGFD unpublished data, AIDTT 2000, Berry 1986a, Berry 1986b, Boarman 1991, Boarman et al. 1993, Nicholson 1979, von Seckendorff Hoff and Marlow 2002). Desert tortoises occur at relatively low density, have low reproductive rates, and low mobility, three characteristics that heighten their sensitivity to road-induced habitat loss (Trombulak and Frissell 2000, Gibbs and Shriver 2002). Culverts should be large, lighted, with a natural substrate floor and approach (not rip rap which will preclude use by most species). Innovative designs are emerging to meet hydrological scour needs as well as wildlife connectivity for structure approach areas. These designs should be investigated and eventually incorporated into standard design specifications. During construction a trained biologist from ADOT or the Department should also be on site to oversee any potential tortoise encounters and relocations.

Table 4-45

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While no suitable habitat for the **southwestern willow flycatcher** currently exists, it is likely that they historically nested along both the Gila and Salt Rivers when perennial water supply sustained more robust riparian habitat. The Department is excited that the project has this opportunity to improve habitat conditions rather than merely trying to avoid, minimize, and mitigate the threats that transportation infrastructure poses to wildlife. The Department would like to see the project commit to restoring sections of former riparian habitat within the study area. Such efforts would gain ADOT substantial public support on a project with very high public interest.

29

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28 (cont.)		on threats and connectivity strategies was included in the Biological Evaluation. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). The intended uses of the multifunctional crossings would vary by location within the Study Area. If the crossings were near existing recreational features or trails, more human use would be expected. However, multifunctional crossings in remote areas through the South Mountains would allow limited use by people. Use of the crossings by people in this area is proposed solely to accommodate those members of the Gila River Indian Community who wish to gain access to areas of the South Mountains for ceremonies important for their culture (see Final Environmental Impact Statement page 4-151). A right-of-way fence would limit access to these areas by freeway users, but would allow Gila River Indian Community members to gain access to the area (see page 5-27 of the Final Environmental Impact Statement). The underpasses would not be associated with trailheads into the park and would not be designated as such for pedestrian, equestrian, off-highway vehicle, or bicyclist use. Other use of the underpasses by humans would be neither actively promoted nor encouraged through the signs posted. The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement). A mitigation measure to conduct a preconstruction survey for the Sonoran desert tortoise, where appropriate and according to the most recent guidelines from the Arizona Game and Fish Department or U.S. Fish and Wildlife Service, has been added to the Final Environmental Impact Statement on page 4-138.
29	**Biology, Plants, and Wildlife**	If an action alternative were to be selected that includes a bridge within the limits of the Rio Salado Oeste restoration project (between 19th and 83rd avenues), the project team would continue to consult with the Bureau of Land Management, U.S. Army Corps of Engineers, and City of Phoenix to coordinate design efforts (see page 4-15 of the Final Environmental Impact Statement). However, it is important to note that it is not the obligation of the proposed action to mitigate impacts caused by other unrelated actions. The need for mitigation related to impacts on waters of the United States has not been determined, but could involve payment of in-lieu fees for use in restoration of habitat within the Salt River.

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See above comments regarding **yellow-billed cuckoo** and **Sonoran desert tortoise**.

In addition, clarification is needed for the **Tucson shovel-nosed snake** (TSNS). as the habitat description in the DEIS:

30

The Tucson shovel-nosed snake is known in all directions of South Mountain. The absence of documented occurrences within the project area is likely due to the lack of surveys and the difficulty associated with surveying and documenting these snakes. However the Department's HabiMap tool (http://www.habimap.org/habimap/) shows swaths of modeled TSNS habitat traversing the project area in several locations with large patches immediately adjacent to the project area. This is inconsistent with the DEIS implication that no TSNS habitat exists in the study area: TSNS habitat is described as "sonoran desertscrub; soft sandy soils with sparse gravel; creosotebush-mesquite floodplains;" and TSNS occurrence is described as "No soft, sandy soils with sparse gravel within the floodplains in the study area." This purported habitat requirement is inaccurate, and reflects a widely perpetuated misconception that the soils are always soft and sandy where this species occurs. Shovel-nosed snakes also occur on firm soils in creosote bush flats, where they apparently use small mammal burrows frequently, rather than "swimming" through sand, for which they are well known. They don't appear to be completely restricted to creosote flats, either, so it would be reasonable to assume they might also occupy habitats adjacent to major flood plains (e.g., sandy soils associated with the inactive floodplain). If there are *any* creosote flats within the project area, there is the potential for Tucson shovel-nosed snakes.. The study area is traversed by large swaths of flat creosote – bursage communities, so there is a distinct possibility that TSNS occur within these areas of overlap. Since there is potential for TSNS within the study area and survey methods are unproven, ADOT mitigation should include working with the Department to establish appropriate pre-construction survey methods and road-mortality prevention measures such as funneling barrier, culvert lighting, underpass and culvert substrate, and structure approach substrate.

Page 4-124

Bald and Golden Eagle Protection Act

31

See above comments regarding nesting bald eagle forage habitat and updated fledging statistics for the Pee Posh nest. Also, one photo in the June (the driest month of the year) does not sufficiently indicate typical availability of water during January – May which are most critical for nesting eagles.

Environmental Consequences

The Tucson shovel-nosed snake has been documented north, south, east and west of the study area. The yellow-billed cuckoo has now been documented to the east and west of the study area.

Code	Issue	Response
30	**Biology, Plants, and Wildlife**	A summary of potential impacts to the Tucson shovel-nosed snake has been added to the Final Environmental Impact Statement on page 4-135. Table 4-44 has been updated, and a mitigation measure to conduct a preconstruction survey for the Tucson shovel-nosed snake has been added to the Final Environmental Impact Statement on page 4-138. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the Tucson shovel-nosed snake. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation. Wildlife-friendly design information would be considered during the design of the drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
31	**Biology, Plants, and Wildlife**	A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). The Biological Evaluation also addressed the breeding eagles in the Pee Posh Wetlands in conformance with the Bald and Golden Eagle Protection Act. During the design phase, surveys for listed species may be undertaken if suitable habitat were to be located within or immediately adjacent to right-of-way of the Selected Alternative (if it were an action alternative). A description of riparian plant communities was added in the *Plant Community* section of the Final Environmental Impact Statement (see page 4-126). The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service through the design process (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

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The assumption should be reflected in the document of the potential suitable habitat and potential for occurrences. The assumption that the project would not affect candidate species other than Sonoran desert tortoises is flawed because it is based on opportunistically gathered occurrence data and faulty habitat parameter assumptions. A series of targeted surveys should be conducted for each candidate species (Tucson shovel-nosed snake, yellow-billed cuckoo, Yuma clapper rail) along with validation of survey methods in areas with known populations of these species before arriving at this conclusion.

The Department agrees that the project has the potential to impact foraging for nesting bald eagles since foraging opportunities exist in and adjacent to the study area. Please specify the mitigation actions to be taken relative to potential impacts to foraging bald eagle behavior.

When discussing the areas adjacent to the study area, please include agricultural fields and riparian corridors.

Page 4-125

Text box – Habitat Connectivity and the Proposed Action

The Department recommends further discussion of the movement between the Sierra Estella's and South Mountain. As the Maricopa County report indicated the need for additional expert input and research for assessing wildlife movement, the Department does have recent data for the area of the Estrella's, including mountain lion and bighorn sheep. The Department would like to see a stronger commitment in the EIS, including funding of needed research to ensure that connectivity mitigations are appropriately and effectively implemented.

32

The discussion regarding potential wildlife crossings should reflect our above discussion in the letter about the different requirements based on the species. For example, underpasses may not facilitate movement for large game species like big horn sheep and mule deer.

Runoff directed from bridges over the Salt River would amount to approximately the same amount of water that would have fallen to the habitat if the bridges were not present. Runoff from highways often contains oil, antifreeze, and other chemical pollutants that can compromise the quality or even completely eliminate surrounding habitat (Forman et al 2003). Diverting runoff directly to riparian systems as a source of additional water could actually result in the complete loss of that habitat from the pollutants that the water carries. Direct application of this water should be avoided, and unless treatment is possible, this water should be diverted away from habitat.

The picture of the "typical large-animal crossing" is misleading because it shows a bus present in a location that renders the structure completely ineffective. This bus was part of a tour and

Code	Issue	Response
32	**Biology, Plants, and Wildlife**	We do not dispute the potential benefit of conducting a "multi-year" study to locate wildlife mitigation measures. However, it is also important to recognize that such studies need to be conducted in areas exhibiting priority wildlife-related highway safety and connectivity issues. The section of the highway corridor where the multiuse crossings are proposed was not identified as a linkage zone within the 2006 Arizona Wildlife Linkages Assessment or the 2012 Maricopa County Wildlife Connectivity Assessment, and likely would exhibit relatively low wildlife-vehicle collision incidence in the future given low wildlife densities found within this portion of the corridor. The 2012 Maricopa County Wildlife Connectivity Assessment did identify a movement corridor at the southwestern end of Phoenix South Mountain Park/Preserve. A large bridge proposed for the roadway in this area would allow continued wildlife connectivity in this area. Depending on the design of the proposed road drainage system, the amount of water entering the Salt River can be greater using roadside channels that collect and direct water that would otherwise infiltrate soils or collect in natural depressions. Highway runoff is generally not harmful compared with general urban runoff (Federal Highway Administration 2012) that also flows into the Salt River; however, there can still be a potential threat to the surrounding ecosystem. With proper treatments such as detention and vegetated treatments, runoff has the potential to benefit habitat in the Salt River. The picture of the "typical large-animal crossing" was replaced in the Final Environmental Impact Statement (see page 4-137). A noise wall along the entire length of the project would not be feasible. The impact on wildlife hearing would be similar to other freeway facilities in the Phoenix metropolitan area.

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allowed special access for a very limited time. AGFD would gladly provide a more appropriate picture of this or another crossing structure for inclusion in the EIS if desired.

General Impacts on Wildlife and Wildlife Habitat

Noise retention walls along the length of the freeway could mitigate the deafening effects on wildlife and double as exclusion barrier to funnel wildlife to appropriate crossing structures.

Page 4-126

The discussion regarding modification to former gravel pits, specifically the water sources associated with these ponds, would also impact potential foraging by bald eagles. Therefore, further down in paragraph 5, the project would potentially impact foraging behavior of bald eagles. Please see previous comments regarding recommendations for Bald Eagle considerations including consultation with USFWS.

33

There is some inconsistency about the presence of suitable habitat for Yuma clapper rail and yellow-billed cuckoo in and around the study area. There is an indication that breeding Yuma clapper rails were documented from 91st avenue west along the Salt River. And it was also indicated that there was suitable habitat for the yellow-billed cuckoo in and adjacent to the study area. Please clarify these apparent contradictions.

Please provide additional information regarding the impacts of highway noise. Lack of occurrence records does not conclusively indicate absence (from a given area) without extensive survey efforts or additional information on precluding factors. Also, what is the maximum decibel level at the cited distances of occurrence? Please indicate if there is empirical evidence to suggest that these sound levels do not impact wildlife species.

Given the planned habitat restoration projects along the Salt River from 91st avenue to the west (Tres Rios demonstration wetlands project) and 83rd avenue to the east (Rio Salado Oeste), the stretch of 91st avenue to 83rd avenue becomes substantial value. This are now becomes a vital connection between these two restoration efforts and should be considered a priority for maintaining wildlife connectivity.

Habitat Connectivity

Impacts on biological resources during freeway operation would not be mostly limited to vehicle collisions and noise disturbance, but would also include reduced permeability and habitat fragmentation for many species (unless cost-prohibitive measures such as elevated or subterranean grades were utilized for virtually the enitre extent of the freeway). These effects may be reduced by appropriate mitigation measures, and might help protect against more

Code	Issue	Response
33	**Biology, Plants, and Wildlife**	The reference to "former gravel pits" was changed to "gravel pits" on page 4-127 in the Final Environmental Impact Statement because these are still in operation with active mining permits. Since the final design of the proposed freeway has not begun, it is not known what specific modifications would be made to a particular gravel pit; however, it is anticipated that modifications could include partial filling if the pit is not bridged or avoided. The text on page 4-126 of the Draft Environmental Impact Statement regarding use of the pits by birds refers to the pits being used as a water source, not to potential modification of the water source for the pits or channel of the Salt River. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the Yuma clapper rail and yellow-billed cuckoo. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). The Biological Evaluation also addressed the breeding eagles in the Pee Posh wetlands in conformance to the Bald and Golden Eagle Protection Act. While there is suitable habitat for the Yuma clapper rail and yellow-billed cuckoo in the Study Area, no suitable habitat was identified within or immediately adjacent to the anticipated right-of-way for any of the action alternatives. This discrepancy was corrected in the Final Environmental Impact Statement on page 4-134. Limited research has been conducted on the relationships of highways, traffic volume, noise, and impacts on wildlife. Some studies have alluded to noise as being harmful to wildlife populations, but most information to date has documented impacts on songbirds (Reijnen et al. 1995a, 1996) where densities next to highways were lower for 60 percent of the species, and species richness was a third lower. The "noise effect zone" adjacent to highways varied greatly by vegetative type (Reijnen et al. 1995b) as well as traffic volume (Reijnen et al. 1995a). These factors then relate to the noise impact distance on wildlife, extending 0.25 mile (1,320 feet) with 8,000 to 15,000 vehicles per day, 0.40 mile (2,112 feet) with 15,000 to 30,000 vehicles per day, and 0.75 mile (3,960 feet) with greater than 30,000 vehicles per day (Forman and Deblinger 2000; Forman et al. 1997). As such, with the projected high use of the corridor, noise impacts from traffic are anticipated to have a considerable effect on all species of wildlife, ranging from song birds to eagles to large mammals including mule deer, and may limit their use of adjacent habitats. As noted above, potential impacts on habitat in the Salt River channel would be associated with construction of a bridge if an action alternative were to become the Selected Alternative. There would be short-term impacts associated with construction, but long-term impacts on connectivity are unlikely because the bridge design would be similar to existing bridges constructed across the Salt River channel in terms of a high openness ratio and natural substrate.

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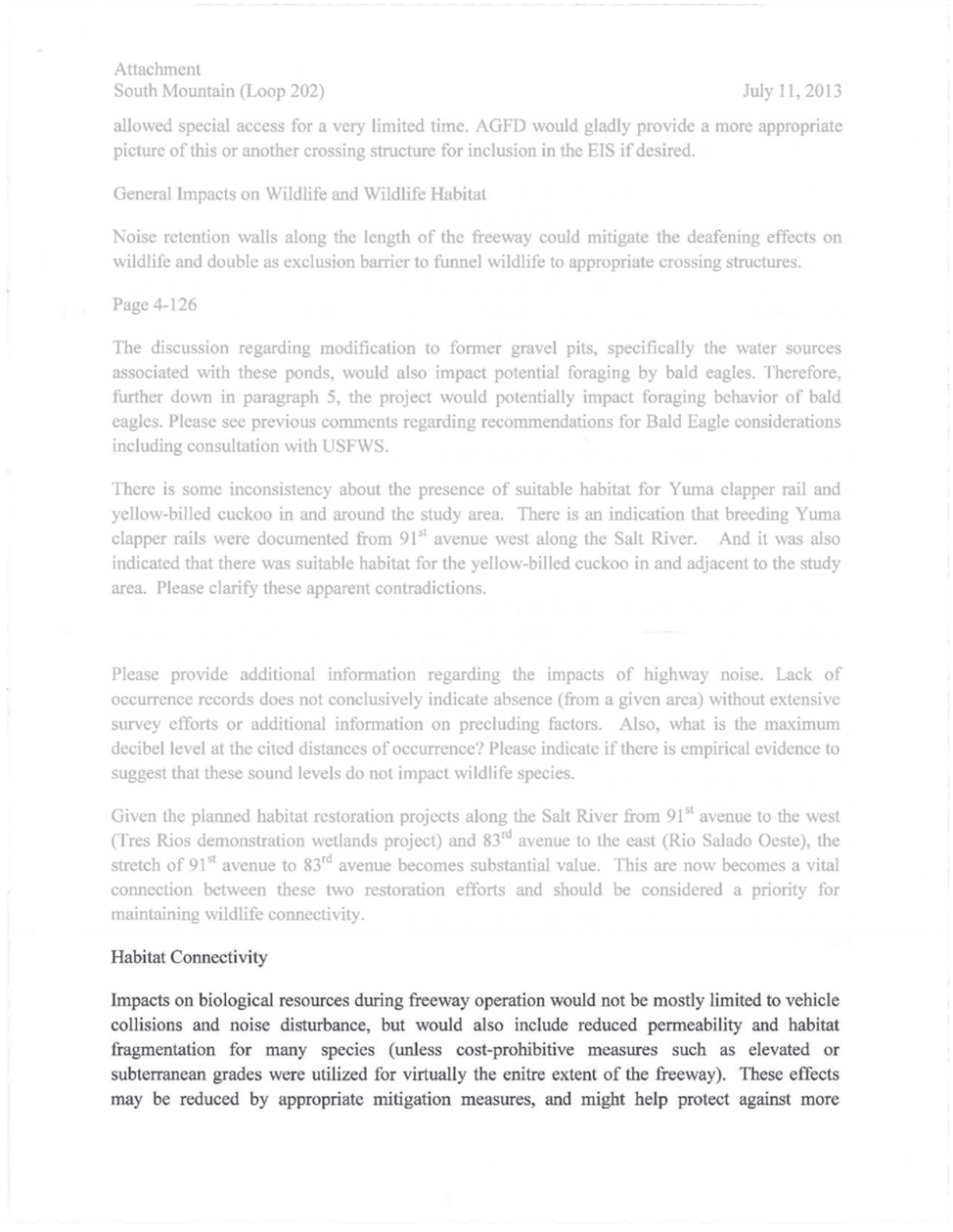

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allowed special access for a very limited time. AGFD would gladly provide a more appropriate picture of this or another crossing structure for inclusion in the EIS if desired.

General Impacts on Wildlife and Wildlife Habitat

Noise retention walls along the length of the freeway could mitigate the deafening effects on wildlife and double as exclusion barrier to funnel wildlife to appropriate crossing structures.

Page 4-126

The discussion regarding modification to former gravel pits, specifically the water sources associated with these ponds, would also impact potential foraging by bald eagles. Therefore, further down in paragraph 5, the project would potentially impact foraging behavior of bald eagles. Please see previous comments regarding recommendations for Bald Eagle considerations including consultation with USFWS.

There is some inconsistency about the presence of suitable habitat for Yuma clapper rail and yellow-billed cuckoo in and around the study area. There is an indication that breeding Yuma clapper rails were documented from 91st avenue west along the Salt River. And it was also indicated that there was suitable habitat for the yellow-billed cuckoo in and adjacent to the study area. Please clarify these apparent contradictions.

Please provide additional information regarding the impacts of highway noise. Lack of occurrence records does not conclusively indicate absence (from a given area) without extensive survey efforts or additional information on precluding factors. Also, what is the maximum decibel level at the cited distances of occurrence? Please indicate if there is empirical evidence to suggest that these sound levels do not impact wildlife species.

Given the planned habitat restoration projects along the Salt River from 91st avenue to the west (Tres Rios demonstration wetlands project) and 83rd avenue to the east (Rio Salado Oeste), the stretch of 91st avenue to 83rd avenue becomes substantial value. This are now becomes a vital connection between these two restoration efforts and should be considered a priority for maintaining wildlife connectivity.

Habitat Connectivity

Impacts on biological resources during freeway operation would not be mostly limited to vehicle collisions and noise disturbance, but would also include reduced permeability and habitat fragmentation for many species (unless cost-prohibitive measures such as elevated or subterranean grades were utilized for virtually the enitre extent of the freeway). These effects may be reduced by appropriate mitigation measures, and might help protect against more

34

Code	Issue	Response
34	**Biology, Plants, and Wildlife**	The text box on page 4-137 of the Final Environmental Impact Statement has been updated to include discussion of reduced permeability and habitat fragmentation. The comments on the Draft Environmental Impact Statement contradict previous communication with the Arizona Game and Fish Department for the project. The last formal communication from the Arizona Game and Fish Department in 2006 (see page A139 in Appendix 1-1 of the Final Environmental Impact Statement) stated that the movement corridor between the South Mountains and the Sierra Estrella is degraded by the 51st Avenue travel corridor and planned development in the Study Area. Data presented in the Draft and Final Environmental Impact Statements corroborate this statement (see the sidebar, "*Existing versus planned land use*," on page 4-3 of both documents). A large percentage of the land in the Study Area is projected to be converted to nonagricultural uses in the foreseeable future. The above-referenced 2006 letter from the Arizona Game and Fish Department also stated that mule deer are believed to have been extirpated from the area. There was no mention of concerns with bighorn sheep. The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife such as mule deer and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species. The intent of the term "migration" was to make the distinction between true seasonal migration versus dispersal or movement within a home range, for which there was public confusion early in the study process. However, the sentence, "With respect to vehicle-wildlife collisions, no major migration corridors were documented in the Study Area" which appears on page 4-126 of the Draft Environmental Impact Statement was removed from the Final Environmental Impact Statement. See Figure 3-25 on page 3-47 of the Draft Environmental Impact Statement for the location of the structures. Figure 4-38 on page 4-126 of the Final Environmental Impact Statement also includes the multifunctional structures. The intended uses of the multifunctional crossings would vary by location within the Study Area. If the crossings were near existing recreational features or trails, more human use would be expected. However, multifunctional crossings in remote areas through the South Mountains would allow limited use by people. Use of crossings by people in this area is proposed solely to accommodate those members of the Gila River Indian Community who wish to gain access to areas of the South Mountains for ceremonies important for their culture (see Final Environmental Impact Statement page 4-151). A right-of-way fence would limit access to these areas by freeway users, but would allow Gila River Indian Community members to gain access to the area (see page 5-27 of the Final Environmental Impact Statement). The underpasses would not be associated with trailheads into the park and would not be designated as such for pedestrian, equestrian, off-highway vehicle, or bicyclist use. Other use of the underpasses by humans would be neither actively promoted nor encouraged through signs posted.

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substantial fragmentation under other scenarios, but they will still substantially reduce the ability of many species to move freely across the landscape.

, etc.Historic data provides information for bighorn sheep and mule deer utilizing the area. South Mountain has the potential to provide seasonal habitat for mule deer and possibly bighorn sheep. Migration of species such as bats is largely unknown in the state. The claim that "no important migration corridors were documented" carries an implication that movements across this area are not important. And while seasonal migrations are indeed critical to many species, daily and opportunistic movements among various blocks of habitat to avoid isolated climatic events, predation pressure, and availability of localized food resources are just as essential to population viability. So the term migration corridor should be clarified and phrasing should be selected that avoids the implication of prioritizing migratory movements over access among vital resources and habitat blocks.

Please include identified tentative mitigation structure locations in EIS figures.

Please see above comments for information on why referenced crossings should exclusively target wildlife and not be multifunctional/multiuse.

No-Action Alternative

While the projections of increased urban development under the No-Action Alternative are possible, the potential for increased development pressure on GRIC lands under one or more of the Action Alternatives is equally possible unless no interchanges are included on the freeway within several miles of the critical linkage pathway. So it is concevable that the No-Action Alternative could retain existing connectivity for a longer duration. Given the uncertainty of these predictions, the Department feels that the most responsible approach is to avoid speculation on the degree of fragmentation due to factors beyond the scope of this project and therefore remove the suggestion that the No-Action Alternative will result in greater fragmentation, habitat loss, and animal-vehicle collisions.

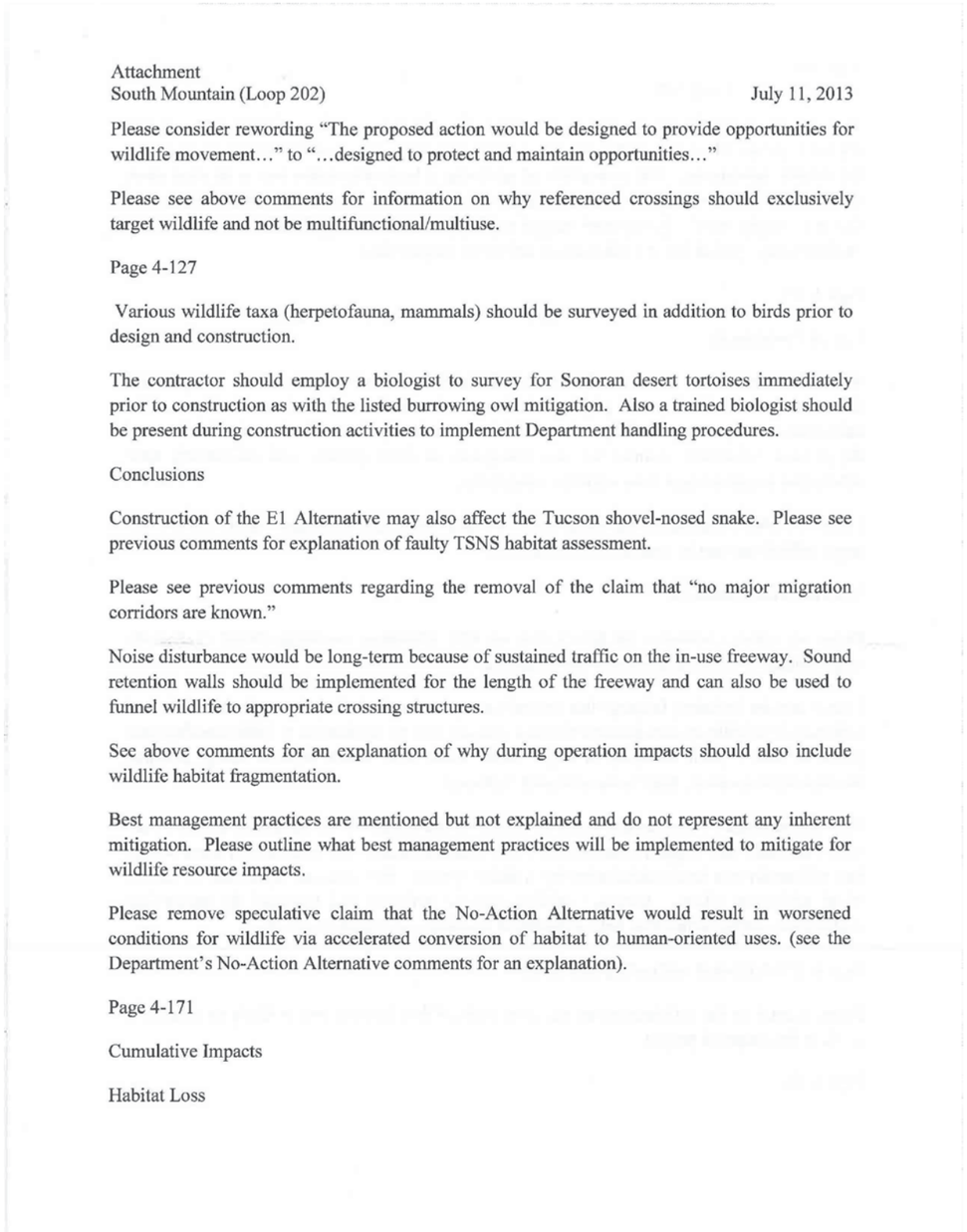
Mitigation

The Department appreciates mention of further coordination and looks forward to expanding and/or providing additional specific measures, some of which were mentioned in the attached letter.

Design Responsibilities

The Department appreciates mention of further coordination. Please also refer to our previous discussion in the letter regarding multi-functional crossing.

Code	Issue	Response
35	**Biology, Plants, and Wildlife**	The statement regarding the potential for the No-Action Alternative to result in greater fragmentation, habitat loss, and animal-vehicle collisions was removed from the text of the Final Environmental Impact Statement.
36	**Biology, Plants, and Wildlife**	Comment noted.
37	**Biology, Plants, and Wildlife**	Comment noted and discussed earlier. Wording was changed as suggested (see page 4-138 of the Final Environmental Impact Statement). The intended uses of the multifunctional crossings would vary by location within the Study Area. If the crossings were near existing recreational features or trails, more human use would be expected. However, multifunctional crossings in remote areas through the South Mountains would allow limited use by people. Use of crossings by people in this area is proposed solely to accommodate those members of the Gila River Indian Community who wish to gain access to areas of the South Mountains for ceremonies important for their culture (see Final Environmental Impact Statement page 4-151). A right-of-way fence would limit access to these areas by freeway users, but would allow Gila River Indian Community members to gain access to the area (see page 5-27 of Final Environmental Impact Statement). The underpasses would not be associated with trailheads into the park and would not be designated as such for pedestrian, equestrian, off-highway vehicle, or bicyclist use. Other use of the underpasses by humans would be neither actively promoted nor encouraged through signs posted. The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation. Wildlife-friendly design information would be considered during the design of the drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

Code	Comment Document
37 37 38 39	

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Please consider rewording "The proposed action would be designed to provide opportunities for wildlife movement…" to "…designed to protect and maintain opportunities…"

Please see above comments for information on why referenced crossings should exclusively target wildlife and not be multifunctional/multiuse.

Page 4-127

Various wildlife taxa (herpetofauna, mammals) should be surveyed in addition to birds prior to design and construction.

The contractor should employ a biologist to survey for Sonoran desert tortoises immediately prior to construction as with the listed burrowing owl mitigation. Also a trained biologist should be present during construction activities to implement Department handling procedures.

Conclusions

Construction of the E1 Alternative may also affect the Tucson shovel-nosed snake. Please see previous comments for explanation of faulty TSNS habitat assessment.

Please see previous comments regarding the removal of the claim that "no major migration corridors are known."

Noise disturbance would be long-term because of sustained traffic on the in-use freeway. Sound retention walls should be implemented for the length of the freeway and can also be used to funnel wildlife to appropriate crossing structures.

See above comments for an explanation of why during operation impacts should also include wildlife habitat fragmentation.

Best management practices are mentioned but not explained and do not represent any inherent mitigation. Please outline what best management practices will be implemented to mitigate for wildlife resource impacts.

Please remove speculative claim that the No-Action Alternative would result in worsened conditions for wildlife via accelerated conversion of habitat to human-oriented uses. (see the Department's No-Action Alternative comments for an explanation).

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Cumulative Impacts

Habitat Loss

Code	Issue	Response
38	**Biology, Plants, and Wildlife**	A mitigation measure to conduct a preconstruction survey for the Tucson shovel-nosed snake and Sonoran desert tortoise, where appropriate and according to the most recent guidelines from the Arizona Game and Fish Department or U.S. Fish and Wildlife Service, was added to the Final Environmental Impact Statement on page 4-138. The Federal Highway Administration and Arizona Department of Transportation are committed to continuing coordination during the design process with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns related to the proposed project (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement). Specific mitigation measures related to treatment of Sonoran desert tortoises during construction would be developed during the design phase of the project as more became known about likely construction methods and the likely frequency of encountering tortoises and other species during construction.
39	**Biology, Plants, and Wildlife**	A mitigation measure to conduct a preconstruction survey for the Tucson shovel-nosed snake, where appropriate and after consultation with the Arizona Game and Fish Department, was added to the Final Environmental Impact Statement on page 4-138. The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement). The intent of the term "migration" was to make the distinction between true seasonal migration versus dispersal or movement within a home range, for which there was public confusion early in the study process. However, the sentence, "With respect to vehicle-wildlife collisions, no major migration corridors were documented in the Study Area" that appears on page 4-126 of the Draft Environmental Impact Statement was removed from the Final Environmental Impact Statement. The *Conclusions* section, on page 4-127 of the Draft Environmental Impact Statement, included the statement that "construction" would cause short-term noise disturbance. The following sentence indicated that "operation" of the freeway would cause noise disturbance to wildlife. A noise wall along the entire length of the project would not be feasible. The impact on wildlife hearing would be similar to that of other freeway facilities in the Phoenix metropolitan area. No justification for this request is provided in the comment. The *Conclusions* section, on page 4-127 of the Draft Environmental Impact Statement, included habitat fragmentation as an impact that would result from operation of the freeway. The Arizona Department of Transportation's best management practices for erosion and pollution control such as revegetation, which are part of the Arizona Department of Transportation's standard practices, affect all levels of biological concern in general, not just wildlife.

(Response 39 continues on next page)

Code	Comment Document
40 41 41	Attachment South Mountain (Loop 202) July 11, 2013 The category of land in human-related does not define the wildlife value of those lands. While natural lands are ideal for wildlife habitat, agricultural lands also provide significant resources for wildlife persistence. The conversion of agricultural lands into urban use is an even more significant loss for some species than conversion from natural to agricultural. So the implication that the "pre-freeway" development period resulted in greater wildlife habitat loss than the "with-freeway" period in not valid without additional support data. Page 4-172 Habitat Connectivity While the Department is very supportive of the project's consideration of the compounded effects of multiple development projects which are substantially greater than the effects of the individual developments, the Department would like to clarify that without mitigation most of the planned residential, commercial, and transportation developments will individually have substantive negative impacts on wildlife connectivity. Please see above comments for information on why referenced crossings should exclusively target wildlife and not be multifunctional/multiuse. Vehicle-animal Collisions Please see above comments for information on why referenced crossings should exclusively target wildlife and not be multifunctional/multiuse. Please consider including language that commits the project to including funnel fence/barrier that will exclude wildlife species from the freeway corridor and funnel them to wildlife crossings and please include explicit reference to target fauna: mule deer, desert bighorn sheep, javelina, Sonoran desert tortoise, Tucson shovel-nosed snake, etc. The final sentence of this section seems to contradict the claims of the mitigation efforts of the rest of the DEIS as it suggests that collisions will decrease because the fragmentation and habitat loss will render this land uninhabitable by wildlife species. This outcome represents the failure of all mitigation efforts. Instead, collisions can be mitigated and managed by appropriate exclusionary infrastructure that links appropriate crossings at adequate intervals. Page 4-173Threatened and Endangered Species Please expand on the anticipated cumulative impacts of development that is likely to occur as a result of the proposed project. Page 4-176

Code	Issue	Response
39 (cont.)		The No-Action Alternative discussion on page 4-126 of the Draft Environmental Impact Statement referred to private property (non-Gila River Indian Community land). All property along the E1 Alternative is private property with the exception of an approximately 0.3-mile segment of Phoenix South Mountain Park/Preserve that borders the Gila River Indian Community along a section of creosote flats. These private properties, including the ridges on the western end of the South Mountains, are zoned for residential land use. Recent development history in this area of the South Mountains strongly suggests a potential for the trend to continue and the possibility of greater wildlife impacts.
40	**Biology, Plants, and Wildlife**	The Draft Environmental Impact Statement does not conclude that the "pre-freeway" development period resulted in greater habitat loss than would be the case in the "with-freeway" period. The text indicated when the greatest loss occurred during the "pre-freeway" period, implying that this loss continued in the "with-freeway" period. The text in the Final Environmental Impact Statement has been revised to clarify this point (see page 4-183).
41	**Biology, Plants, and Wildlife**	The intended uses of the multifunctional crossings would vary by location within the Study Area. If the crossings were near existing recreational features or trails, more human use would be expected. However, multifunctional crossings in remote areas through the South Mountains would allow limited use by people. Use of crossings by people in this area is proposed solely to accommodate those members of the Gila River Indian Community who wish to gain access to areas of the South Mountains for ceremonies important for their culture (see Final Environmental Impact Statement page 4-151). A right-of-way fence would limit access to these areas by freeway users, but would allow Gila River Indian Community members to gain access to the area (see page 5-27 of the Final Environmental Impact Statement). The underpasses would not be associated with trailheads into the park and would not be designated as such for pedestrian, equestrian, off-highway vehicle, or bicyclist use. Other use of the underpasses by humans would be neither actively promoted nor encouraged through signs posted. The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement). As suggested in an earlier comment by the Arizona Game and Fish Department, "... the Department would like to clarify that without mitigation, most of the planned residential, commercial, and transportation developments will individually have substantive negative impacts on wildlife connectivity." Because this mitigation is not guaranteed, and because of development trends noted in earlier responses, it is reasonable to assume that continued development of this urban landscape will result in reduced wildlife populations.

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The category of land in human-related does not define the wildlife value of those lands. While natural lands are ideal for wildlife habitat, agricultural lands also provide significant resources for wildlife persistence. The conversion of agricultural lands into urban use is an even more significant loss for some species than conversion from natural to agricultural. So the implication that the "pre-freeway" development period resulted in greater wildlife habitat loss than the "with-freeway" period in not valid without additional support data.

Page 4-172

Habitat Connectivity

While the Department is very supportive of the project's consideration of the compounded effects of multiple development projects which are substantially greater than the effects of the individual developments, the Department would like to clarify that without mitigation most of the planned residential, commercial, and transportation developments will individually have substantive negative impacts on wildlife connectivity.

Please see above comments for information on why referenced crossings should exclusively target wildlife and not be multifunctional/multiuse.

Vehicle-animal Collisions

Please see above comments for information on why referenced crossings should exclusively target wildlife and not be multifunctional/multiuse.

Please consider including language that commits the project to including funnel fence/barrier that will exclude wildlife species from the freeway corridor and funnel them to wildlife crossings and please include explicit reference to target fauna: mule deer, desert bighorn sheep, javelina, Sonoran desert tortoise, Tucson shovel-nosed snake, etc.

The final sentence of this section seems to contradict the claims of the mitigation efforts of the rest of the DEIS as it suggests that collisions will decrease because the fragmentation and habitat loss will render this land uninhabitable by wildlife species. This outcome represents the failure of all mitigation efforts. Instead, collisions can be mitigated and managed by appropriate exclusionary infrastructure that links appropriate crossings at adequate intervals.

Page 4-173Threatened and Endangered Species

42 Please expand on the anticipated cumulative impacts of development that is likely to occur as a result of the proposed project.

Page 4-176

Code	Issue	Response
42	**Biology, Plants, and Wildlife**	Cumulative impacts on wildlife are discussed beginning on page 4-174 of the Final Environmental Impact Statement. Induced growth is discussed as a secondary impact on page 4-173. The discussion concludes that the proposed action would occur in an area planned for urban growth as established in local jurisdictions' land use planning activities for the last 25 years. As such, the proposed action would not provide new or substantially improved access to a large, undeveloped geographic area. Therefore, the action alternatives are not expected to induce growth in the region.

Code	Comment Document

Attachment
South Mountain (Loop 202) July 11, 2013

Table 4-58

Please include the following in the Biological resources Mitigation Measures box:

43

1) ungulate/ tortoise/snake funnel/exclusion barrier
2) Pre-design wildlife movement investigations
3) Pre-design & pre-construction surveys for listed, candidate, SGCN, & SERI with potential habitat in or around the study area.
4) Inclusion of bat day roost design parameters in all bridge structures.

Page 4-177

Conclusions

44

Unless the proposed freeway does not include any transportation interchanges or exits, it would seem by basic definition that the freeway will substantially improve access to undeveloped and agricultural areas to the south and southwest of the proposed project. This is in conflict with the claim in the Cumulative Effects Conclusions.

Please elucidate expected positive consequences for wildlife of contribution to overall traffic use by induced travel.

Page 4-178

CONCLUSIONS

45

Please see previous comments regarding the potential for this project to promote development in and around the study area.

The Western Section alternatives do not appear to be equal in terms of disruption to nesting bald eagle foraging. Please include this summary in the Chapter 4 CONCLUSIONS.

The alteration of drainage patterns on the Eastern Section may substantially impact wildlife habitat and wildlife access to water resources. This was not addressed in terms of wildlife impacts. Please expand the EIS to include such discussion.

Literature Cited

Ashley, P. E., A. Kosloski, and S. A. Petrie. 2007. Incidence of intentional vehicle-reptile collision. Human Dimensions of Wildlife 12:137-143.

Code	Issue	Response
43	**Biology, Plants, and Wildlife**	The mitigation measures for biological resources are presented in greater detail beginning on page 4-138 of the Final Environmental Impact Statement. Additional mitigation measures for the Sonoran desert tortoise and the Tucson shovel-nosed snake have been included. More detailed mitigation measures would be developed during the design process in coordination with agency partners, including the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community's Department of Environmental Quality, as described in the mitigation measures. Regarding wildlife concerns as a result of the freeway's potential implementation, the Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service through the design process (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
44	**Biology, Plants, and Wildlife**	It may seem counter intuitive that constructing a new freeway in an area would not provide substantially improved access to areas along the freeway. However, when the area where the freeway and interchanges would be constructed is in an area that is already planned for development and the existing road network is established, the access conditions would be similar since the land use plan directs the opportunity for access. In this case, the City of Phoenix General Plan has defined the future land uses and roadway system in the Study Area adjacent to the action alternatives outside Gila River Indian Community land. The Gila River Indian Community also has a development plan that identifies development along the northern border of the Gila River Indian Community, regardless of the proposed freeway. The *Cumulative Impacts* section on page 4-183 of the Final Environmental Impact Statement reiterates the finding that the freeway would not substantially improve access to the geographic area as substantiated in those future development plans. The text of the Draft Environmental Impact Statement does not state or infer that there would be positive consequences for wildlife from overall traffic use by induced travel.
45	**Biology, Plants, and Wildlife**	As the previous comment response on potential induced development described, the existing future plans for development from the City of Phoenix and the Gila River Indian Community will guide the future development of the Study Area. Each of the Western Section action alternatives would cross the dry Salt River where mining pits are located. Some of these pits are in active mining areas and have changed over time, including becoming completely dewatered, and it is therefore difficult to assess the existence and value of those pits for bald eagle foraging. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). The Biological Evaluation also addressed the breeding eagles in the Pee Posh wetlands in conformance to the Bald and Golden Eagle Protection Act. Drainage patterns would not be diverted from their downstream connection on the Gila River Indian Community. The drainage features of the E1 Alternative would be designed such that drainage basins and channels on the north side of the freeway would collect runoff from the freeway and allow suspended sediment to settle. As the system continues to receive runoff, the basins and channels would overflow into channels that would direct flows under the freeway and onto Gila River Indian Community land in the same location as existing drainages from the South Mountains are occurring (see page 4-98 of the Final Environmental Impact Statement).

Code	Comment Document

Attachment
South Mountain (Loop 202) July 11, 2013

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4405

forum open, so no build. Do not build Loop 202. Thank you.

THE FACILITATOR: Thank you.

If there's anyone in the auditorium that would like to speak, please make sure you're registered at the front desk. Your name will appear on the screen and we'll call you up in the order that you register.

Again, if there's anyone in the ballroom who would like to speak, please make sure you register at the front desk. Thank you.

Ruben Gallego.

MR. GALLEGO: Hello.

THE FACILITATOR: Mr. Gallego, you have three minutes, here's the timer. Please begin.

MR. GALLEGO: Thank you. My name is Ruben Gallego, I'm a resident of South Mountain, I live right next to the mountain, I'm also the state representative for the area that would be impacted by this freeway. I represent the Laveen area, South Mountain, Gila River Indian Community, as well as portions of the west side of Phoenix. I'm here in support of the 202 highway, not only as a resident, but also as a representative of the people in the district. For years I've been hearing about complaints in terms of traffic and traffic congestion. A lot of the jobs that are currently being

1

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1		Comment noted.

Code	Comment Document

created in this area -- I'm sorry, that are currently being created in Arizona, especially in Maricopa County, are not in this area and a lot of my families have to drive long ways to get to work, and right now the way to do that is through surface streets and a lot that is taking up a lot of their time in stop-and-go traffic. This highway would make it a lot more convenient for them to actually get to the places of work, employment, as well as healthcare opportunities, which aren't available in this -- right currently in this area.

I have ran for office twice and have always talked about the highway and from my understanding of at least the electorate, they are in the positive manner for the construction of this highway. And my personal experience just living down there, we do need the highway to, you know, for one, just for me trying to get in and out of this area is very difficult. If there is any kind of car accident on the I-10 to I-17, a lot of times those state troopers or police will send traffic -- will end up using our roads as traffic relievers, so our roads end up getting congested every time something does happen and, you know, that's not very fair to us. We're trying to live normal lives, but it'll happen at least once a week that if there's a rollover by a truck or something else of that nature, they will be using our surface streets to

Code	Issue	Response

Code	Comment Document

be moving east to west, which would not happen if we had another reliever such as the Loop 202 around the mountain. With that, again, I strongly speak in support of the South Mountain freeway and I hope that we can get it done as soon as possible. Thank you.

THE FACILITATOR: Thank you.

Rohno Geppert.

Mr. Geppert, you have three minutes, here's the timer.

MR. GEPPERT: Hello. Thank you for allowing public comment. I appreciate the opportunity to speak. I am in favor of the alternative that connects to the west 101, any of those three alternatives just from a traffic flow perspective. The preferred alternative goes directly into where everything gridlocks at both rush hours, so I would appreciate if it could be moved as far west as possible so that trucks needing to bypass the downtown area won't be a part of the congestion so much as the ones that are currently going to bottleneck if it goes through the 51 corridor. Thank you for the time and I appreciate you taking those thoughts into consideration.

THE FACILITATOR: Thank you, sir.

Arthur Bivvins.

Mr. Bivvins, you have three minutes, here's the

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LOCAL AGENCY AND ELECTED OFFICIALS COMMENTS AND RESPONSES

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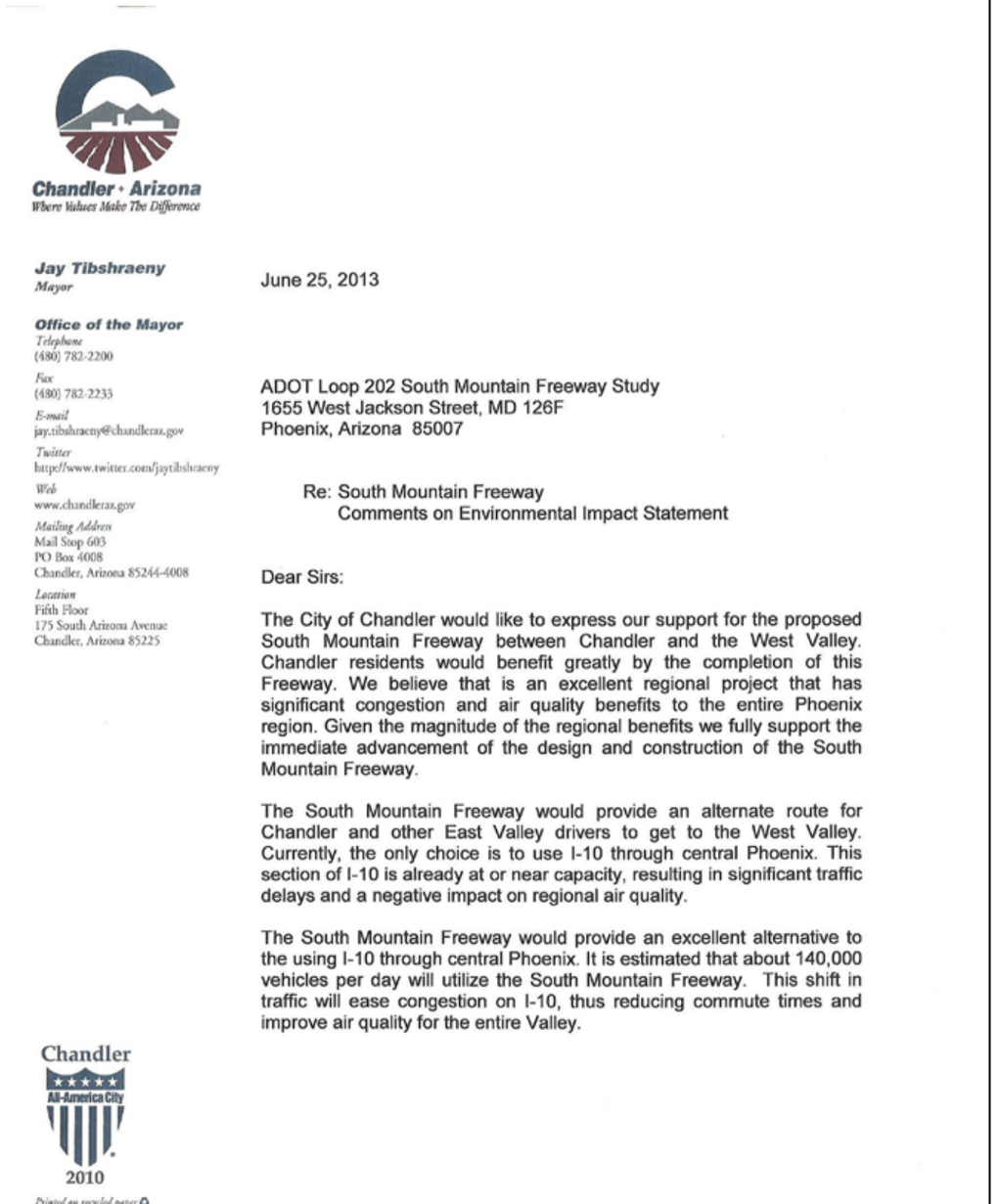

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Where Values Make The Difference

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June 25, 2013

ADOT Loop 202 South Mountain Freeway Study
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

Re: South Mountain Freeway
Comments on Environmental Impact Statement

Dear Sirs:

1

The City of Chandler would like to express our support for the proposed South Mountain Freeway between Chandler and the West Valley. Chandler residents would benefit greatly by the completion of this Freeway. We believe that is an excellent regional project that has significant congestion and air quality benefits to the entire Phoenix region. Given the magnitude of the regional benefits we fully support the immediate advancement of the design and construction of the South Mountain Freeway.

The South Mountain Freeway would provide an alternate route for Chandler and other East Valley drivers to get to the West Valley. Currently, the only choice is to use I-10 through central Phoenix. This section of I-10 is already at or near capacity, resulting in significant traffic delays and a negative impact on regional air quality.

The South Mountain Freeway would provide an excellent alternative to the using I-10 through central Phoenix. It is estimated that about 140,000 vehicles per day will utilize the South Mountain Freeway. This shift in traffic will ease congestion on I-10, thus reducing commute times and improve air quality for the entire Valley.

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1		Comment noted.

Code	Comment Document

June 25, 2013
Page 2

This project was approved by the voters in Maricopa County in 1985 and again in 2004, and has been studied for several years. This construction will create over 10,000 jobs and have $2 billion investment in the local economy.

With the environmental documents concluding that this project benefits the region, it is now time to build the South Mountain Freeway.

Respectfully,

Jay Tibshraeny
Mayor

Code	Issue	Response

Code	Comment Document

THE CITY OF
Litchfield Park

Office of the Mayor

RECEIVED
JUN 14 2013
AZ Dept of Transportation
Director's Office

June 13, 2013

Mr. John Halikowski
ADOT Director
206 South 17th Avenue, MD 100A
Phoenix, Arizona 85007-3213

Dear Mr. Halikowski:

Please accept this letter and the attached resolution as the City of Litchfield Park's participation in the public comment of the South Mountain review process.

1 On May 15, 2013, the City of Litchfield Park City Council adopted Resolution 13-345 to support the citizens of Maricopa County and the passage of Prop 300 and Prop 400 for construction of the South Mountain Freeway. As stated in the Resolution, the Litchfield Park City Council supports the construction of the South Mountain Freeway for the mobility and economic development of the region for future generations. As a personal note, I support the W59 Alternative (Preliminary Preferred) route as the location of the South Mountain Freeway.

Thank you for the opportunity to express the views of the Litchfield Park City Council and that of mine as Mayor of Litchfield Park.

Sincerely,

Thomas L. Schoaf
Mayor

cc: Members of Council

Enclosure: Resolution 13-345

214 W. Wigwam Boulevard, Litchfield Park, AZ 85340 P 623.935.5033 F 623.935.5427
litchfield-park.org TDD 1.800.367.8939

Code	Issue	Response
1		Comment noted.

Code	Comment Document

CITY OF LITCHFIELD PARK
RESOLUTION NO. 13-345

A RESOLUTION OF THE MAYOR AND COMMON COUNCIL OF THE CITY OF LITCHFIELD PARK, ARIZONA, SUPPORTING THE CITIZENS OF MARICOPA COUNTY AND THE PASSAGE OF PROP 300 AND PROP 400 FOR CONSTRUCTION OF THE SOUTH MOUNTAIN FREEWAY.

WHEREAS, the South Mountain Freeway has received overwhelming support by the citizens of Maricopa County as part of two regional elections; the Proposition 300 election in 1985 and the Proposition 400 election in 2001, and

WHEREAS, the South Mountain Freeway is a legacy project in the Regional Transportation Plan with identified funding in the Transportation Improvement Program, and

WHEREAS, a design concept report was completed by the Arizona Department of Transportation (ADOT) in 1988 defining the alignment for the freeway, and

WHEREAS, in 2001, the Federal Highway Administration and ADOT embarked on an Environmental Impact Statement to analyze the purpose and need for the proposed freeway and to study alignments and associated environmental impacts for the freeway and the Draft EIS is now complete for public review and comment; and

WHEREAS, the Draft EIS indicates that the freeway will carry traffic in the range of 137,000 to 142,000 vehicles per day by 2030, which is comparable to current use on the Loop 101 and existing segments of the Loop 202, and

WHEREAS, the South Mountain Freeway will provide an important link for the Southeast and Southwest Valleys, promoting commerce in both regions of the Valley and helping to avoid the current bottleneck at the Broadway curve on Interstate 10, and

WHEREAS, many West Valley local municipalities, businesses, and residents have been proactive participants and supporters of the South Mountain Freeway project which will mitigate traffic congestion and stimulate economic growth in the Region, and

WHEREAS, not building the South Mountain Freeway will contribute to increased congestion on local arterial roadways such as Baseline, Southern and Broadway Roads, and

WHEREAS, an alternative route is needed to Interstate 10 when accidents occur which occasionally close Interstate 10 for several hours at a time,

NOW THEREFORE, BE IT RESOLVED THAT THE CITY OF LITCHFIELD PARK supports the construction of the South Mountain Freeway for the mobility and economic development of the region for future generations.

PASSED AND ADOPTED by the Common Council of the City of Litchfield Park, Maricopa County, Arizona, this 15th day of MAY, 2013.

Thomas L. Schoaf, Mayor

ATTEST:

Mary Rose Evans, MMC, City Clerk

APPROVED AS TO FORM:

Curtis, Goodwin, Sullivan, Udall & Schwab, PLC
City Attorneys
By: Susan D. Goodwin

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Code	Comment Document

THE CITY OF
Litchfield Park

Office of the City Manager

RECEIVED
JUN 14 2013
AZ Dept of Transportation
Director's Office

June 13, 2013

Mr. John Halikowski
ADOT Director
206 South 17th Avenue, MD 100A
Phoenix, Arizona 85007-3213

Dear Mr. Halikowski:

As City Manager for the City of Litchfield Park, I want to express my appreciation for the opportunity to participate in the public comment for the support of the South Mountain Freeway.

1 The South Mountain Freeway will provide an important link for the Southeast and Southwest Valleys, promoting commerce in both regions of the Valley and help to resolve the current bottleneck at the Broadway curve and Interstate 10. Upon reviewing the proposed alternations for the South Mountain Freeway, I believe that the W59 Alternative (Preliminary Preferred) best suits the needs of the region and is the best alignment when considering all the contributing factors.

Thank you for the opportunity to participate in the public comment for the support of the South Mountain Freeway.

Sincerely,

Darryl H. Crossman

Darryl H. Crossman
City Manager

cc: Mayor Thomas L. Schoaf
Members of Council

214 W. Wigwam Boulevard, Litchfield Park, AZ 85340 P 623.935.5033 F 623.935.5427
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1		Comment noted.

Code	Comment Document

City of Phoenix

Street Transportation Department, 200 W. Washington St., Phoenix, AZ 85003
Phone: (602) 262-6284 Fax: (602) 495-2016

To: South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

Date: June 12, 2013

From: Ray Dovalina, P.E.
Assistant Director
Street Transportation Department
200 W. Washington Street Fifth Floor
Phoenix, AZ 85003

Subject: REVIEW OF THE LOCATION/DCR AND EIS FOR THE SR LOOP 202 (SOUTH MOUNTAIN FREEWAY)

The City of Phoenix has reviewed the Initial Location/Design Concept Report (DCR) and Draft Environmental Impact Statement (EIS) for State Route Loop 202 (South Mountain Freeway) Interstate 10 (Maricopa Freeway) to Interstate 10 (Papago Freeway) and has prepared a list of questions, comments and concerns that address public transportation and development of this freeway.

1

In general, the City of Phoenix concurs with the overall findings in the Initial DCR and Draft EIS and fully supports the recommended Preferred Alternative W59 Alignment for the proposed SR Loop 202. There are, however, specific areas of concern along the preferred alignment that impact various upcoming City funded projects and Phoenix area residents that should be considered and factored into the project as the final reports are developed. These include the following:

SR Loop 202 (South Mountain Freeway): Location/Design Concept Report
Street Transportation Department

General Comments

2

- Proposed traffic interchanges should be consistant with the most current City Street Classification Map, lane assignments, and cross sections.

3

- Procurement of the overall project, should consider possible City interaction for planning, designing and constructing cross roads to accommodate new traffic

RECEIVED
JUL 18 2013
URBAN PROJECT MANAGEMENT GROUP

Code	Issue	Response
1	**Design**	Comments received that are specific to the South Mountain Freeway Location/ Design Concept Report have been forwarded to the design team for response in the South Mountain Freeway Location/Design Concept Report comment resolution process. As appropriate, responses to these comments are included in this document. Draft Environmental Impact Statement comments are addressed below.
2	**Design**	Page 3-51 of the Final Environmental Impact Statement includes information related to proposed traffic interchanges. Coordination with the City would continue through final design to ensure consistency between the proposed freeway and City road network.
3	**Design**	Coordination with the City would continue through final design to ensure consistency between the proposed freeway and City road network. Enhancement opportunities are discussed on page 3-60 of the Final Environmental Impact Statement.

Code	Comment Document

Review of Initial Location/DCR and DEIS for State Route 202L
(South Mountain Freeway) Interstate 10 (Maricopa Freeway)
to Interstate 10 (Papago Freeway)

Page 2

interchanges. City would coordinate with ADOT and the selected project delivery team to accommodate cross street improvements at the proposed interchanges.

4 • Provide pedestrian connectivity where possible across the proposed freewway.
1) Area Bounded By: 63rd Ave and 59th Ave, and Broadway Rd to Elwood St
2) Pedestrian/Bicycle connection to the Laveen Convenyance Channel (LACC)

Street Transportation – Design and Construction Management Division

5 The City has a programmed construction project FY 2014/2015 at Baseline and Buckeye Road that may conflict with the SR Loop 202 alignnment at 56th Avenue. At Baseline Road, there may be some encroachment in the ADOT Right of Way. At Buckeye Road, there are utility conflicts with Maricopa County land and Salt River Project and close coordination will be needed to construct these projects.

SR Loop 202 (South Mountain Freeway): Location/Design Concept Report
Public Transit Department

6 • (Page ES-3) DHOV flyover ramps at the I-10 Papago Freeway) will provide direct HOV access to Downtown Phoenix and the Capitol for buses, carpools, and vanpools.

7 • (Plan Sheet, I-10 Sta. 7284+00 to 7340+00) It appears that access to a future station and park-and-ride for the Capitol/I-10 West LRT line at 59th Avenue/I-10 can be achieved by using the small off-ramp at Roosevelt to connect with Roosevelt Street and NB 59th Avenue. Please verify.

8 • (Page 2-16) Develop a DHOV ramp at 40th Street to provide a stronger, more convenient connection to SR Loop 202 and I-10 NB for RAPID I-10 East buses traveling from the Pecos/40th Street Park-and-Ride. In addition, if spacing does not permit a DHOV ramp, provide a bus-only bypass through any on-ramp metering.

9 • A future park-and-ride at Baseline Road and SR Loop 202 is a key component of future commuter service in this part of Phoenix. The facility is currently in the Transportation Improvement Plan and the City of Phoenix Capital Improvement Plan. Close coordination should occur between City of Phoenix Street Transportation and Public Transit departments and ADOT to secure land as part of this project. This park-and-ride would service the far western leg of the South Mountain RAPID bus rapid transit corridor. It could also provide connections to local bus service as well as a connector route to the future 59th Avenue/I-10 LRT station. A DHOV connection to NB SR Loop 202 should augment the development of this facility to provide a convenient route for buses and eliminate the need to weave through traffic into the HOV lane.

Code	Issue	Response
4	**Design**	Coordination with the City would continue through final design to ensure consistency between the proposed freeway and City road network. Enhancement opportunities are discussed on page 3-60 of the Final Environmental Impact Statement.
5	**Design**	Coordination with the City would continue through final design to ensure consistency between the proposed freeway and City road network. Potential utility impacts are discussed beginning on page 4-175 of the Final Environmental Impact Statement.
6	**Design**	Yes, more information related to the system traffic interchange is provided beginning on page 3-48 of the Final Environmental Impact Statement.
7	**Design**	Currently, no off-ramps are planned at Roosevelt Street. Coordination with the City and Valley Metro would continue through final design. Enhancement opportunities are discussed on page 3-60 of the Final Environmental Impact Statement.
8	**Design**	Currently, there are not plans for direct high-occupancy vehicle ramps connecting to the 40th Street park-and-ride lot due to right-of-way constraints. There is a planned connection from the westbound on-ramp to the south entrance. Coordination with the City and Valley Metro would continue through final design to identify opportunities for integrating transit facilities. Enhancement opportunities are discussed on page 3-60 of the Final Environmental Impact Statement.
9	**Design**	Currently, there are not plans for direct high-occupancy vehicle ramps connecting to the future Baseline Road park-and-ride lot. Coordination with the City and Valley Metro would continue through final design to identify opportunities for coordinating land acquisition and integrating transit facilities. Enhancement opportunities are discussed on page 3-60 of the Final Environmental Impact Statement.

Code	Comment Document

Review of Initial Location/DCR and DEIS for State Route 202L
(South Mountain Freeway) Interstate 10 (Maricopa Freeway)
to Interstate 10 (Papago Freeway)

Page 3

10
- (Page 3-14) Provisions should be made for a DHOV connection to link SR Loop 202 with I-10 (Maricopa Freeway). These improvements should be made all at once to minimize disruption and address community concerns (Page 1-1).

11
- (Page 3-14) Provide more description, location and results of the coordination activity between ADOT and METRO in the I-10 (Papago Freeway) corridor.

11
- (Page 3-15) Proposed system interchange modification should correspond with future Capitol/I-10LRT improvements to the interchanges (67th, 59th and 51st avenues) to minimize future disruption. This would impact the north portion of the interchanges and potentially bridges.

9
- Develop a DHOV ramp at Baseline Road to provide a stronger, more convenient connection to NB SR Loop 202 for buses traveling from the future 59th Avenue Park-and-Ride. In addition, if spacing does not permit a DHOV ramp, provide a bus-only bypass through any on-ramp metering for NB buses.

12
- (Guide Signing Plan) Provide appropriate overhead structure and way finding signage for the Pecos/40th Street Park-and-Ride (existing) and the future Baseline Road/SR Loop 202 Park-and-Ride. The overhead would be placed in the freeway and the smaller green way finding signs would be located on the off ramps and adjacent major streets. This is a similar scenario found in other areas of Phoenix.

SR Loop 202 (South Mountain Freeway): Draft Environmental Impact Statement and Section 4(f) Evaluation

13
- Pg. 1-14, Will this be a truck bypass route in lieu of all the truck accidents in the Central City? Could this section reference 3-64 "Trucking in the MAG region".

14
- Pg. 3-6, Regarding the light rail being eliminated from further study. With savings from the W59 Alternate (Pg. 3-69 Estimated Costs) can this study be furthered due to the public comments on Pg. 6-22, multimodal options, Consideration of multimodal alternatives, to include Bus Rapid Transit (bus only lane) and other options?
- Pg. 3-23, Regarding W59 Alternate frontage road sections. How would business access on the frontage roads be determined? Is an Access Control determination required?
- Pg. 4-28, "The ADOT Right-of-Way Group would coordinate the design phase to designate necessary utility corridors…" Is there potential to designate excess land in utility corridors for transit uses? (Example: Happy Valley Road/I-17 Park and Ride).

Code	Issue	Response
10	**Design**	Currently, there are not plans for direct high-occupancy vehicle ramps connecting the South Mountain Freeway to Interstate 10 (Maricopa Freeway). There are direct ramps from the Santan Freeway to Interstate 10, as planned in the *Regional Transportation Plan*. Coordination with the City and Valley Metro would continue through final design to identify opportunities for integrating transit facilities. Enhancement opportunities are discussed on page 3-60 of the Final Environmental Impact Statement.
11	**Agency Coordination**	Coordination has included attendance at agency progress meetings, review and comment on planning documents, and sharing of design layouts. Coordination is ongoing and would continue through final design to identify opportunities for integrating transit facilities. However, no high occupancy vehicle lane connections are planned at 67th, 59th, and 51st avenues.
12	**Agency Coordination**	As design progresses, details such as these would be finalized in coordination with local and regional agencies. Information related to signs is provided on page 3-58 of the Final Environmental Impact Statement.
13	**Trucks**	As pointed out on page 3-64 of the Draft and Final Environmental Impact Statements, in the section entitled, *Trucking in the MAG Region*, and supported by conclusions throughout Chapter 1, *Purpose and Need*, the proposed action is needed to address regional traffic congestion attributable to all vehicular types using the regional travel network. As noted on page 3-64 of the Draft and Final Environmental Impact Statements, it is recognized that trucks would use the proposed action to move the goods and services necessary for the region's economy. As described, a truck bypass route of the metropolitan area is signed and posted using Interstate 8, State Route 85, and Interstate 10.
14	**Alternatives**	Public comment pertinent to multimodal options as referenced on page 6-22 of the Draft and Final Environmental Impact Statements does not reference specific consideration of bus rapid transit (bus-only lane) and other options as implied in the comment. The text actually references light rail as a consideration. The reasons for elimination of this option as well as other modal alternatives are presented in Table 3-2, *Nonfreeway Alternatives Considered and Reasons for their Elimination from Further Study*, on page 3-5 of the Draft and Final Environmental Impact Statements, in related text on pages 3-5 and 3-6, and in supporting appendices. The transit alternatives accounted for expanded services beyond those provided under programmed funding in the *Regional Transportation Plan* to account for consideration of best-case transit scenarios. Alternative represented a range of reasonable alternatives that were the subject of detailed study in the Draft Environmental Impact Statement and subsequent Final Environmental Impact Statement. The new Maricopa Association of Governments socioeconomic and traffic projections for Maricopa County were used to determine whether the proposed freeway was still the type and mode of transportation improvement that would best meet the purpose and need criteria for the proposed action. The modeling analysis conducted for the Draft Environmental Impact Statement was updated using 2013 Maricopa Association of Governments projections for 2035. Traffic volumes, traffic conditions, travel distribution, capacity deficiencies, and travel time were reanalyzed to evaluate the alternatives considered in terms of responsiveness to purpose and need criteria. The new socioeconomic and traffic projections, while generally lower than what was previously predicted, still support

(Response 14 continues on next page)

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Page 3

- (Page 3-14) Provisions should be made for a DHOV connection to link SR Loop 202 with I-10 (Maricopa Freeway). These improvements should be made all at once to minimize disruption and address community concerns (Page 1-1).
- (Page 3-14) Provide more description, location and results of the coordination activity between ADOT and METRO in the I-10 (Papago Freeway) corridor.
- (Page 3-15) Proposed system interchange modification should correspond with future Capitol/I-10LRT improvements to the interchanges (67th, 59th and 51st avenues) to minimize future disruption. This would impact the north portion of the interchanges and potentially bridges.
- Develop a DHOV ramp at Baseline Road to provide a stronger, more convenient connection to NB SR Loop 202 for buses traveling from the future 59th Avenue Park-and-Ride. In addition, if spacing does not permit a DHOV ramp, provide a bus-only bypass through any on-ramp metering for NB buses.
- (Guide Signing Plan) Provide appropriate overhead structure and way finding signage for the Pecos/40th Street Park-and-Ride (existing) and the future Baseline Road/SR Loop 202 Park-and-Ride. The overhead would be placed in the freeway and the smaller green way finding signs would be located on the off ramps and adjacent major streets. This is a similar scenario found in other areas of Phoenix.

SR Loop 202 (South Mountain Freeway): Draft Environmental Impact Statement and Section 4(f) Evaluation

- Pg. 1-14, Will this be a truck bypass route in lieu of all the truck accidents in the Central City? Could this section reference 3-64 "Trucking in the MAG region".
- Pg. 3-6, Regarding the light rail being eliminated from further study. With savings from the W59 Alternate (Pg. 3-69 Estimated Costs) can this study be furthered due to the public comments on Pg. 6-22, multimodal options, Consideration of multimodal alternatives, to include Bus Rapid Transit (bus only lane) and other options?

15

- Pg. 3-23, Regarding W59 Alternate frontage road sections. How would business access on the frontage roads be determined? Is an Access Control determination required?

16

- Pg. 4-28, "The ADOT Right-of-Way Group would coordinate the design phase to designate necessary utility corridors…" Is there potential to designate excess land in utility corridors for transit uses? (Example: Happy Valley Road/I-17 Park and Ride).

Code	Issue	Response
14 (cont.)		the overall conclusions of the Draft Environmental Impact Statement in terms of purpose and need, evaluation of lane and alignment changes, responsiveness of the proposed freeway to purpose and need, and traffic conditions with the action and No-Action alternatives. The W59 Alternative in combination with the E1 Alternative was identified as the Preferred Alternative. The analyses and conclusions are reflected in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*).
15	**Design**	As described in the Draft and Final Environmental Impact Statements on page 3-23 in the section, *Alignment Description*, the frontage roads would allow direct access to properties, which would include business properties. The specifics of how access would be provided would be determined during the final design process on a property-by-property basis in collaboration with City of Phoenix staff, property owners, and other appropriate stakeholders. Generally, the description of alternatives must be developed to a sufficient level to allow for meaningful comparison of alternatives but not be so specific in design as to limit flexibility in minor changes in design after completion of the environmental impact statement process. In text beginning on pages 4-45 and page 4-51 of the Draft and Final Environmental Impact Statements, respectively, under the section, *Displacements and Relocations*, further information is provided describing the Arizona Department of Transportation responsibilities in providing access to adjacent properties.
16	**Design**	Yes, there is a potential to examine the possibility of using excess lands for transit uses. Consideration of this possibility has been a common practice for other major transportation facilities in the metropolitan area. In text beginning on pages 4-45 and page 4-51 of the Draft and Final Environmental Impact Statements, respectively, under the section, *Displacements and Relocations*, mitigation is presented to coordinate with local jurisdictions to use excess lands for alternative public uses. The discussion of enhancement opportunities is further described in the Draft and Final Environmental Impact Statements on page 3-60 in the section, *Enhancement Opportunities*.

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Page 4

17
- Include car ownership and transit-dependency in the demographic figures in maps 4-10 through 4-14.

18
- Pg. S-36 and 3-69 "The W59 Alternative would provide more direct access to downtown Phoenix." Add to this point, ability to make convenient connections to all transit modes and routes in the central city.

19
- Pg. 3-38 Decisional Criterion, "What other general transportation effects would the proposed freeway have?" Can this bullet point be expounded on, possibly adding specifics to the opportunities for freeway transit services, such as specific locations for park-and-ride lots adjacent to the freeway, addition of HOV lane access for express/rapid bus routes, further study of ROW for rail, etc.

20
- Table 1-2 under Transit, provide a summary of the T2000 Tax/Plan, include detailed language such as 4/10 of a percent sales tax, 20 year life of tax, Federal Funding match, and estimated $200 million for bus and $600 million for light rail.

21
- Pg. 3-52 Right-of-way needed for Action Alternatives, add a point about right-of-way for transit purposes.

22
- Figure 3-29 add dashed line depicting future Capital /I-10 LRT on north side of I-10.
- Pg. 3-60 Enhancement Opportunities, this area should be expanded with more detail about how the excess R/W may be suitable for other public infrastructure projects such as park-and-ride lots.
- Figure 4-4 Planned Developments 2009 map shows the abundance of Residential near the W59 Alternative and Baseline Road. A park-and-ride in the area works well with the General Plan by focusing park-and-ride location near residential use and the Laveen Village Core.

SR Loop 202 (South Mountain Freeway): Location/Design Concept Report
Parks and Recreation Department

- Page 5-1 Incorrect reference to Section 4(f) in first paragraph.
- Page 5-8/9 Figure 5-5 should include Laveen Area Conveyance Channel (LACC) trails and for parks on Figure 5-7.
- Page 5-12 Three City of Phoenix undeveloped park sites are missing: 59th Ave/Olney - APN 300-02-060 and 55th Ave/Gwen St - APNs 300-13-810 and 300-13-792
- Page 5-15 Figure 5-8 graphics are located in the wrong areas in numerous instances and some a noted as being outside the park. The trails represented on this figure are not accurate or current.
- Page 5-20 Center column, second paragraph should read: "The Tunnel Alternatives do not…"

Code	Issue	Response
17	**Social Conditions**	The maps were created to represent environmental justice populations as defined by Arizona Department of Transportation policy (see page 4-29 of the Final Environmental Impact Statement). These populations include concentrations of minority, low-income, elderly, disabled, and female head-of-household populations. In addition, minority populations as defined by Title VI of the Civil Rights Act of 1964 are represented in the maps.
18	**Alternatives**	Text repeated on pages S-36, 3-68, and 3-69 of the Draft Environmental Impact Statement and pages S-35, 3-68 and 3-69 of the Final Environmental Impact Statement presents the logic supporting the identification of the W59 Alternative as the Preferred Alternative. Other points are made in support of the identification, specifically, "The W59 Alternative would better link the southern areas of the region with the central metropolitan area and would provide an alternative route to I-10 [Interstate 10] for regional connectivity" and "The W59 Alternative would be more consistent with local and regional transportation plans, including the RTP [*Regional Transportation Plan*]." Both points directly imply benefits for transit modes and routes. Further, discussion on pages 4-167 and 4-179 of the Draft and Final Environmental Impact Statements, respectively, under the section, *Induced Travel*, discusses cyclical benefits to transit modes resulting from the proposed action.
19	**Alternatives**	On page 3-38 of the Draft and Final Environmental Impact Statements, Table 3-9, *Implementation of the Proposed Freeway as the Appropriate Modal Alternative to Satisfy Purpose and need Criteria, 2035*, concludes that the proposed freeway, "Would provide opportunities for freeway-dependent transit services." This is an encompassing statement and addresses the comment sufficiently. The discussion of enhancement opportunities is further described on page 3-60 in the section, *Enhancement Opportunities,* in the Draft and Final Environmental Impact Statements.
20	**Purpose and Need**	The suggested language to be added is not consistent with the table subject matter of *Regional Transportation Plan* highlights.
21	**Alternatives**	Right-of-way needed for the proposed action would be used for the purpose of placing a freeway through the Study Area. The acquisition of additional right-of-way beyond that needed for the freeway for the purposes of transit use (beyond the high-occupancy lanes in the proposed action) as implied in the comment is beyond the scope of the proposed action.
22	**Alternatives**	The comment refers to the Location/Design Concept Report prepared for the proposed freeway. The 2014 Maricopa Association of Governments *Regional Transportation Plan 2035*, pages 10 to 14, includes regional funding for the completion of five additional light rail transit segments on the system. The figure will be modified in the Location/Design Concept Report to show the planned improvement accordingly.

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- Include car ownership and transit-dependency in the demographic figures in maps 4-10 through 4-14.
- Pg. S-36 and 3-69 "The W59 Alternative would provide more direct access to downtown Phoenix." Add to this point, ability to make convenient connections to all transit modes and routes in the central city.
- Pg. 3-38 Decisional Criterion, "What other general transportation effects would the proposed freeway have?" Can this bullet point be expounded on, possibly adding specifics to the opportunities for freeway transit services, such as specific locations for park-and-ride lots adjacent to the freeway, addition of HOV lane access for express/rapid bus routes, further study of ROW for rail, etc.
- Table 1-2 under Transit, provide a summary of the T2000 Tax/Plan, include detailed language such as 4/10 of a percent sales tax, 20 year life of tax, Federal Funding match, and estimated $200 million for bus and $600 million for light rail.
- Pg. 3-52 Right-of-way needed for Action Alternatives, add a point about right-of-way for transit purposes.
- Figure 3-29 add dashed line depicting future Capital /I-10 LRT on north side of I-10.

23 - Pg. 3-60 Enhancement Opportunities, this area should be expanded with more detail about how the excess R/W may be suitable for other public infrastructure projects such as park-and-ride lots.

24 - Figure 4-4 Planned Developments 2009 map shows the abundance of Residential near the W59 Alternative and Baseline Road. A park-and-ride in the area works well with the General Plan by focusing park-and-ride location near residential use and the Laveen Village Core.

SR Loop 202 (South Mountain Freeway): Location/Design Concept Report Parks and Recreation Department

25 - Page 5-1 Incorrect reference to Section 4(f) in first paragraph.

26 - Page 5-8/9 Figure 5-5 should include Laveen Area Conveyance Channel (LACC) trails and for parks on Figure 5-7.

27 - Page 5-12 Three City of Phoenix undeveloped park sites are missing: 59th Ave/Olney - APN 300-02-060 and 55th Ave/Gwen St - APNs 300-13-810 and 300-13-792

28 - Page 5-15 Figure 5-8 graphics are located in the wrong areas in numerous instances and some a noted as being outside the park. The trails represented on this figure are not accurate or current.

29 - Page 5-20 Center column, second paragraph should read: "The Tunnel Alternatives do not…"

Code	Issue	Response
23	**Design**	Sufficient detail is provided in the Draft and Final Environmental Impact Statements regarding the subject matter. The possibility of using excess lands for transit uses would be considered through the design process. Consideration of this possibility has been a common practice for other major transportation facilities in the metropolitan area. In text beginning on page 4-45 and page 4-51 of the Draft and Final Environmental Impact Statements, respectively, under the section, *Displacements and Relocations*, mitigation is presented to coordinate with local jurisdictions to use excess lands for alternative public uses. The discussion of enhancement opportunities is further described on page 3-60 in the section, *Enhancement Opportunities,* in the Draft and Final Environmental Impact Statements.
24	**Design**	Compatibility of a public land use such as a park-and-ride facility with other land uses (both existing and planned) is a local jurisdictional issue associated with land use planning. The possibility of using excess lands for transit uses would be considered through the design process. Consideration of this possibility has been a common practice for other major transportation facilities in the metropolitan area. In text beginning on page 4-45 and page 4-51 of the Draft and Final Environmental Impact Statements, respectively, under the section, *Displacements and Relocations*, mitigation is presented to coordinate with local jurisdictions to use excess lands for alternative public uses. Also, text in the section, *Enhancement Opportunities*, on page 3-60 of the Draft and Final Environmental Impact Statements, provides additional information regarding enhancement opportunities associated with the proposed action.
25	**Section 4(f) and Section 6(f)**	The reference on page 5-1 of the Draft Environmental Impact Statement is correct. The reference to Section 4(f) is referring to the situation where a Section 4(f) resource, such as the Phoenix South Mountain Park/Preserve, received Land and Water Conservation Fund Act assistance.
26	**Section 4(f) and Section 6(f)**	The Laveen Area Conveyance Channel's primary purpose is not recreation, but flood control; therefore, the channel does not qualify for protection under Section 4(f).
27	**Section 4(f) and Section 6(f)**	These undeveloped parks were added to Figure 5-7 on pages 5-12 and 5-13 of the Final Environmental Impact Statement. As noted on page 5-13 of the Final Environmental Impact Statement, these parks would be avoided by the proposed freeway.
28	**Section 4(f) and Section 6(f)**	The trail information shown in Figure 5-8 on page 5-15 of the Draft Environmental Impact Statement was digitized from a City of Phoenix pamphlet obtained at Phoenix South Mountain Park/Preserve. Information in Figure 5-8 on page 5-15 of the Final Environmental Impact Statement was obtained from a detailed Phoenix South Mountain Park/Preserve hiking map. On August 15, 2013, a Phoenix South Mountain Park/Preserve Ranger confirmed that this information reflects current conditions.
29	**Section 4(f) and Section 6(f)**	On page 5-20 of the Final Environmental Impact Statement, the sentence was changed from: "The Tunnel Alternatives do no avoid direct use of a resource afforded protection under Section 4(f), the desired outcome of this alternative development." to: "The Tunnel Alternatives would not avoid direct use of a resource afforded protection under Section 4(f), the desired outcome of this alternative development."

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- Page 5-23 Last column, first paragraph add the Phoenix Parks and Recreation Board.
- Page 5-24 Last column, second paragraph add the Phoenix Parks and Recreation Board.
- Page 5-25 First column and second column add the Phoenix Parks and Recreation Board where advisory groups are mentioned. Also, the center column and continuing to the last column, last sentence is not a factual statement. Trails are near the larger of the two cuts for the proposed project within SMPP and these cuts will be visible from both trails and from San Juan Road.

SR Loop 202 (South Mountain Freeway): Location/Design Concept Report
Water Services Department

- Page ES-1 : Table ES.1 lists several COP Streets project but no WSD projects. We have a couple in the area.
- Page 3-31/3-32 Correct zip code to 85003
- Page 3-32: How will gravity sewers span on the bridges? Most are deep and may be below the proposed freeway. Confirm in design.
- Page 3-32: Funding was added for Storm Drain siphons? COP does not like sewer siphons.
- Page 3-32: Note for large diameter water mains that are PCCP (Prestressed Concrete Cylinder Pipe). COP requires 4' undisturbed soil to be maintained in all directions around the main. These are sensitive pipes that get structural support for the soil. Additionally, all pipes need to be checks for additional loading with changes in the fill or removal of existing fill.
- Page 3-32: Same as above for water relocations. Is the contingency item storm drain siphons or vertical relocations of water mains?
- Page 3-36: Can you please provide me a copy of the Blasting Issues with the City of Phoenix South Mountain Water Transmission Main Report?

Appendix A:

- Add water and sewer mains to plan and profile sheets.
- Extra protection will be required around all Prestressed Concrete Cylinder Pipe (PCCP) water mains.
- Mains will require evaluations for fill and cut situations.
- Coordination will be required for bridge and wall footings and loading around mains.
- Several locations will require removal and new w/s mains as structures are removed with the new ROW.
- WSD is in design for a new 36" water main to be located in Buckeye Rd. Construction is anticipated to start in the next year.
- Continued coordination will be required as the freeway design progress

Code	Issue	Response
30	**Section 4(f) and Section 6(f)**	On page 5-23 of the Final Environmental Impact Statement, the bullet was changed from: "During the design phase, ADOT would consult directly with the Phoenix City Manager's office to identify and implement other design measures, when possible, to further reduce land needed for the proposed action. The City Manager's office represents its constituents, including the Sonoran Preserve Advisory Committee, Phoenix Mountains Preservation Council, Mountain Bike Association of America, and Arizona Horsemen's Association." to: "During the design phase, ADOT would consult directly with the Phoenix City Manager's office to identify and implement other design measures, when possible, to further reduce land needed for the proposed action. The City Manager's office represents its constituents, including the Sonoran Preserve Advisory Committee, Phoenix Mountains Preservation Council, Mountain Bike Association of America, Phoenix Parks and Recreation Board, and Arizona Horsemen's Association."
31	**Section 4(f) and Section 6(f)**	On page 5-24 of the Final Environmental Impact Statement, the bullet was changed from: "During this period, ADOT would consult directly with the Phoenix City Manager's office in representing City of Phoenix interests and on behalf of the Sonoran Preserve Advisory Committee and Phoenix Mountains Preservation Council in establishing a slope treatment plan for cut slopes through the ridgelines, with the clear intent to blend as well as would be possible the cut slopes with the South Mountains' natural setting." to: "During this period, ADOT would consult directly with the Phoenix City Manager's office in representing City of Phoenix interests and on behalf of the Sonoran Preserve Advisory Committee, Phoenix Parks and Recreation Board, and Phoenix Mountains Preservation Council in establishing a slope treatment plan for cut slopes through the ridgelines, with the clear intent to blend as well as would be possible the cut slopes with the South Mountains' natural setting."

Code	Comment Document
32	Review of Initial Location/DCR and DEIS for State Route 202L (South Mountain Freeway) Interstate 10 (Maricopa Freeway) to Interstate 10 (Papago Freeway) Page 5 • Page 5-23 Last column, first paragraph add the Phoenix Parks and Recreation Board. • Page 5-24 Last column, second paragraph add the Phoenix Parks and Recreation Board. • Page 5-25 First column and second column add the Phoenix Parks and Recreation Board where advisory groups are mentioned. Also, the center column and continuing to the last column, last sentence is not a factual statement. Trails are near the larger of the two cuts for the proposed project within SMPP and these cuts will be visible from both trails and from San Juan Road. **SR Loop 202 (South Mountain Freeway): Location/Design Concept Report Water Services Department** • Page ES-1 : Table ES.1 lists several COP Streets project but no WSD projects. We have a couple in the area. • Page 3-31/3-32 Correct zip code to 85003 • Page 3-32: How will gravity sewers span on the bridges? Most are deep and may be below the proposed freeway. Confirm in design. • Page 3-32: Funding was added for Storm Drain siphons? COP does not like sewer siphons. • Page 3-32: Note for large diameter water mains that are PCCP (Prestressed Concrete Cylinder Pipe). COP requires 4' undisturbed soil to be maintained in all directions around the main. These are sensitive pipes that get structural support for the soil. Additionally, all pipes need to be checks for additional loading with changes in the fill or removal of existing fill. • Page 3-32: Same as above for water relocations. Is the contingency item storm drain siphons or vertical relocations of water mains? • Page 3-36: Can you please provide me a copy of the Blasting Issues with the City of Phoenix South Mountain Water Transmission Main Report? Appendix A: • Add water and sewer mains to plan and profile sheets. • Extra protection will be required around all Prestressed Concrete Cylinder Pipe (PCCP) water mains. • Mains will require evaluations for fill and cut situations. • Coordination will be required for bridge and wall footings and loading around mains. • Several locations will require removal and new w/s mains as structures are removed with the new ROW. • WSD is in design for a new 36" water main to be located in Buckeye Rd. Construction is anticipated to start in the next year. • Continued coordination will be required as the freeway design progress

Code	Issue	Response
32	**Section 4(f) and Section 6(f)**	On page 5-25 of the Final Environmental Impact Statement, the sentence was changed from: "However, for the proposed action through SMPP, ADOT would consult directly with the Phoenix City Manager's office in representing City of Phoenix interests and on behalf of the Sonoran Preserve Advisory Committee and the Phoenix Mountains Preservation Council and with Community representatives to develop the aesthetic treatment of landscaping and structures through the park/preserve." to: "However, for the proposed action through SMPP, ADOT would consult directly with the Phoenix City Manager's office in representing City of Phoenix interests and on behalf of the Sonoran Preserve Advisory Committee, Phoenix Parks and Recreation Board, and the Phoenix Mountains Preservation Council and with Community representatives to develop the aesthetic treatment of landscaping and structures through the park/preserve." And the bullet was changed from: "During the design phase, ADOT would consult directly with the Phoenix City Manager's office (which represents its constituents, including the Sonoran Preserve Advisory Committee, Phoenix Mountains Preservation Council, Mountain Bike Association of America, and Arizona Horsemen's Association), Community delegates, Maricopa County, and assigned staff from the Arizona Department of Public Safety and the Arizona Game and Fish Department (AGFD) to finalize design features and locations of the crossings." to: "During the design phase, ADOT would consult directly with the Phoenix City Manager's office (which represents its constituents, including the Sonoran Preserve Advisory Committee, Phoenix Mountains Preservation Council, Mountain Bike Association of America, Phoenix Parks and Recreation Board, and Arizona Horsemen's Association), Maricopa County, Arizona Department of Public Safety, U.S. Fish and Wildlife Service (USFWS), Arizona Game and Fish Department (AGFD), and the Community's Department of Environmental Quality to finalize design features and locations of the crossings designed to provide access to SMPP." On page 5-25 of the Final Environmental Impact Statement, the sentence was changed from: "The cuts would be located in a remote portion of SMPP, not near any trails and barely visible from any of the more readily used trails." to: "The trails are more than ¼ mile from the alignment. In a remote portion of SMPP, the larger of the two SMPP road cuts would be visible—but not intrusively so—from two secondary trails and from San Juan Road and would be minimally discernible from one of the more heavily used trails."

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SR Loop 202 (South Mountain Freeway): Location/Design Concept Report
Water Services Department

33
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- Page 3-36: Can you please provide me a copy of the Blasting Issues with the City of Phoenix South Mountain Water Transmission Main Report?

Appendix A:

34
- Add water and sewer mains to plan and profile sheets.
- Extra protection will be required around all Prestressed Concrete Cylinder Pipe (PCCP) water mains.
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- Several locations will require removal and new w/s mains as structures are removed with the new ROW.
- WSD is in design for a new 36" water main to be located in Buckeye Rd. Construction is anticipated to start in the next year.
- Continued coordination will be required as the freeway design progress

Code	Issue	Response
33	**Design**	The list of projects will be updated in the Final Location/Design Concept Report to include the existing and planned Water Services Department projects. Coordination with the City would continue through final design to minimize impacts on City water and sewer facilities.
34	**Design**	Coordination with the City would continue through final design to minimize impacts on City water and sewer facilities. The comments provided will be considered during the design of the proposed freeway. Information related to the design of the proposed freeway is discussed beginning on page 3-54 of the Draft and Final Environmental Impact Statements.
35	**Agency Coordination**	A copy of the requested document was provided to the City.

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SR Loop 202 (South Mountain Freeway): Location/Design Concept Report
Planning and Development Department

36

- Page 5-7 The owner of the Sachs Webster House is now the City of Phoenix.

SR Loop 202 (South Mountain Freeway): Location/Design Concept Report
Neighborhood Services Department

General Comments

37

- ADOT has a noise mitigaion program and the City request that noise mitigation measuses are taken with the new consturction of SR Loop 202 (South Mountain Freeway). The City received several resident complaints regarding noise when the north SR Loop 202 (Red Mountain Freeway) was built.

38

- An outreach line for the community during the construction of the SR Loop 202 is requested and should be seamless and response turnaround times swift. Also, conducting public outreach during various phases of the project is recommended.

39

- Public art should be incorporated with public involvement on the selection of the art.

Code	Issue	Response
36	**Section 4(f) and Section 6(f)**	In Figure 5-4 of the Final Environmental Impact Statement, on page 5-7, the last bullet in the Description column has been changed from: "Owned by FCDMCe" to: "Owned by the City of Phoenix" In addition, the footnote "Flood Control District of Maricopa County" was removed and the footnote for "Arizona Department of Transportation" was changed from an "f" to an "e."
37	**Noise**	As noted on pages 4-161 and 4-173 of the Draft and Final Environmental Impact Statements, respectively, steps would be taken to minimize noise impacts from construction activities, if an action alternative were selected. These measures would include: · All equipment exhaust systems would be in good working order. · Properly designed engine enclosures and intake silencers would be used. · Equipment would be maintained on a regular basis. · New equipment would be subject to new product emission standards. · Stationary equipment would be located as far away from sensitive receivers as possible. · Construction-related noise generators would be shielded from noise receivers (e.g., use temporary enclosures to shield generators or crushers, take advantage of site conditions to provide topographic separation). · Construction alerts would be distributed to keep the public informed of construction activities and a toll-free number for construction-related complaints would be provided. · During the design phase, hours of operation would be evaluated to minimize disruptions during construction.
38	**Public Involvement**	During construction, the Arizona Department of Transportation would hold information meetings at the beginning of construction activities regarding the upcoming improvements and work schedules. The public can be informed through construction updates/newsletters, project information hotlines, Web sites, periodic meetings, project offices, and radio and newspaper.
39	**Visual**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall would be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation's standard applications. As an example, for State Route 101 Loop (Pima Freeway) in Scottsdale, the City of Scottsdale chose to add public art to the noise barriers. The City's intent went above and beyond the Arizona Department of Transportation's guidelines of reasonable aesthetic treatment and, therefore, the Arizona Department of Transportation did not fund the aesthetic portion of the project. The Arizona Department of Transportation and the City of Scottsdale entered into an intergovernmental agreement for the purposes of allowing Scottsdale rights to design and construct artistic embellishment on the Arizona Department of Transportation-supplied noise barrier. The Arizona Department of Transportation provided the funds for construction of the noise barriers themselves, but the City of Scottsdale provided the funds to cover the aesthetic portion of the walls. Draft Environmental Impact Statement pages 4-158 and 4-159 and pages 4-170 and 4-171 of the Final Environmental Impact Statement explain the process municipalities might take to achieve the desired aesthetic treatment for noise barriers or other structures.

Code	Comment Document

Review of Initial Location/DCR and DEIS for State Route 202L
(South Mountain Freeway) Interstate 10 (Maricopa Freeway)
to Interstate 10 (Papago Freeway)

Page 7

40

Letters from Rio Dell Rey Phase I Community & Riverside Elementary School District No.2

June 24, 2013

RE: Safe Path to School

Chaun Hill
ADOT
1611 West Jackson Street
Phoenix, AZ 85007

By way of introduction, my name is Jose Vejar and I am 10 year resident of the Rio Del Rey community located on 62nd Avenue and Broadway. I would like to express my concern for the safety of the children in our community. With the expansion of the new freeway coming through our community very soon, the freeway will divide both of the communities and will create a hardship for children to get to school safely. I am asking if the ADOT agency to consider the placement of a pedestrian bridge so that children in both Rio Del Rey communities can safely travel from home to school.

You consideration and attention to this issue is greatly appreciated.

Respectfully,

Jose Vejar

Rio Del Rey Phase I Community, 6222 W. Encinas Lane, Phoenix, AZ 85043, (602) 818-4792

Code	Issue	Response
40	**Neighborhoods/ Communities**	The comment reflects a concern regarding possible impacts on neighborhood cohesion of the Rio Del Rey community in the vicinity of 62nd Avenue and Broadway Road. After passage of Proposition 300 in 1985 (information about Proposition 300 is presented on page 1-9 of the Final Environmental Impact Statement), local jurisdictions, through planning efforts, sought to preserve corridors where segments of the Regional Freeway and Highway System freeways were to be located. As shown in Detail B of Figure 3-32 on page 3-56 of the Final Environmental Impact Statement, *Local Street Realignments, W59 Alternative (Preferred Alternative), Western Section*, such a swath of land was set aside with the intention that a freeway would pass through the area. The land has been vacant for almost 30 years. The referenced community developed around the planned freeway corridor in phases between 2001 and 2005. This suggests in approving the subdivision, the developers were made aware of the future freeway development and should have disclosed this information to potential homebuyers. Text in the text box entitled *Freeway Awareness*, beginning on page 4-12 of the Final Environmental Impact Statement, describes the obligation of the local jurisdictions, land developers, and the Arizona Department of Transportation in disclosing information about planned transportation facilities near proposed developments. Therefore, through the phased development of the community on each side of a known, planned-for freeway location, the project developers created a basis for community separation. The corridor is fenced off between 61st and 62nd avenues, and the conversion to the freeway use would not occur until sometime after 2014, if an action alternative were the Selected Alternative. There are two bus routes with stops at 60th Avenue and Elwood Street and 60th Avenue and Warner Street. It is the policy of the school district to discourage children from walking to school (although it is reported that some children still do walk to school) and to bus all the children to school using routes along the major arterial streets. Table 4-9, *Impacts on Community Character and Cohesion, Action Alternatives*, beginning on page 4-24 of the Final Environmental Impact Statement, addresses community cohesion impacts. Criteria for determining such impacts are presented in the sidebar entitled, *Cohesion and character of communities*, on page 4-21 of the Final Environmental Impact Statement. It is noted therein that one form of cohesion impact is the elimination of neighborhood access to commercial areas, schools, parks, or other community amenities. In this case, alternative pedestrian access would be provided at the service traffic interchanges and arterial street crossings at Broadway and Lower Buckeye roads (although children walking to school would be discouraged and bus routes provided). Pedestrian facilities provided at those crossings would be designed to meet applicable design standards established in part for the safe use of those facilities, and, therefore, access would not be eliminated. This alternative pedestrian access would be provided during construction and after the freeway were built, if an action alternative were to become the Selected Alternative; however, pedestrian facilities near potential freeway construction would be closed for limited periods of time for safety reasons. Such closures would be temporary and would occur only during construction activities.

(Response 40 continues on next page)

Code	Comment Document

Code	Issue	Response
40 (cont.)		Regardless of the subdivision development history and the alternative pedestrian access, additional text was added into Final Environmental Impact Statement Table 4-9 on page 4-24 for the W59 Alternative in the heading column, *Effect on Community Cohesion*, to read "Would displace residences within the Rio Del Rey subdivision, an area of census blocks that contain minority populations." In the section, *Mitigation*, beginning on page 4-23 of the Final Environmental Impact Statement, a measure was added to the text to read "ADOT would coordinate with appropriate City of Phoenix officials during the final design process to consider and identify, if appropriate, enhancements such as a pedestrian overpass to reduce possible pedestrian-related impacts. During that process, if mitigation is warranted, the operations, maintenance, and liabilities of the facilities would be passed on to the local jurisdictions." The following was added to Table S-4 on page S-18 of the Final Environmental Impact Statement: "ADOT would coordinate with the City of Phoenix to consider and identify, if appropriate, measures to reduce possible pedestrian-related impacts."

Code	Comment Document

June 24, 2013

RE: Safe Bridge to School

To whom it may concern:

40

By way of introduction, my name is Patty Lopez-Vejar and I am 10 year resident of the Rio Del Rey community located on 62nd Avenue and Broadway. I would like to express my concern for the safety of the children in our community. With the expansion of the new freeway coming through our community very soon, I am asking if the ADOT, City of Phoenix and any other interested agencies/stakeholders will consider the placement of a pedestrian bridge so that children in both Rio Del Rey communities can safely travel from home to school.

You consideration and attention to this issue is greatly appreciated.

Respectfully,

Patty Lopez-Vejar

Rio Del Rey Phase I Community, 6222 W. Encinas Lane, Phoenix, AZ 85043, (602) 818-4792

Code	Issue	Response

Code	Comment Document

Olga Soto/NSD/PHX
06/26/2013 01:44 PM

To Myesha Harris/STR/PHX@PHXENT
cc
bcc
Subject Fw: Letter for ADOT

Letter regarding the SRTS at Broadway for the Rio del Ray communities. I have another one but am asking for them to send it in PDF.

:=)

Olga Soto, Neighborhood Specialist
City of Phoenix, Neighborhood Services Department
200 West Washington, 4th Floor
602-256-3493
olga.soto@phoenix.gov

----- Forwarded by Olga Soto/NSD/PHX on 06/26/2013 01:39 PM -----

<spence1101@cox.net>
06/25/2013 08:17 PM

To Olga Soto/NSD/PHX@PHXENT
cc
Subject Letter for ADOT

40

Good day,
I see a couple major concerns when the 202 goes through our subdivision. One, it the safety of the school children or anyone else that would like to cross the highway. Many student attend school just west of the subdivision. They would have to find a way to walk to school safely. It would create a hardship for students and parents I believe that ADOT should include the SRTS as part of the 202 project. Another concern is the freeway will divide the community. Rio Del Rey is made up of different Phases. Board members of our HOA board come from both Phases. We have community cookouts and gathering that would create problems if one phases couldn't cross the highway safely. Please consider some form of walkway to go over the highway.
Thank you
Resident of Rio Del Rey subdivision.
Susan Young Lot 1122

Code	Issue	Response

Code	Comment Document

Olga Soto/NSD/PHX
06/27/2013 09:00 AM

To Myesha Harris/STR/PHX@PHXENT
cc
bcc
Subject Fw: safe route to school.

History: This message has been replied to.

Another e-mail regarding the South Mountain Freeway SRTS.

:=)

Olga Soto, Neighborhood Specialist
City of Phoenix, Neighborhood Services Department
200 West Washington, 4th Floor
602-256-3493
olga.soto@phoenix.gov

---- Forwarded by Olga Soto/NSD/PHX on 06/27/2013 08:58 AM ----

"Troy Erhardt"
<terhardt@ctscabling.com>
06/27/2013 08:28 AM

To Olga Soto/NSD/PHX@PHXENT
cc
Subject safe route to school.

40

To whom it may concern. My son is going to be going to school during the construction of the new freeway and my concern is that during this time there is no safe path for the kids to travel. Being the President of the HOA this is a very big concern for the community. Is there anything that can be constructed to help us such as a walk way over the freeway and a temporary path during the construction. Please feel free to contact me at any time.

Troy Erhardt
Service Manager
Cell: (602) 319-7842
Fax: (480) 377-0228
terhardt@ctscabling.com
www.ctscabling.com

AZ ROC 259799 L-67

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Code	Issue	Response

Code	Comment Document

Olga Soto/NSD/PHX
06/27/2013 01:33 PM

To Myesha Harris/STR/PHX@PHXENT
cc
bcc
Subject Fw: request for loop 202 SRTS for Rio Del Rey

One more e-mail on the SRTS at Broadway.

:=)

Olga Soto, Neighborhood Specalist
City of Phoenix, Neighborhood Services Department
200 West Washington, 4th Floor
602-256-3493
olga.soto@phoenix.gov

—— Forwarded by Olga Soto/NSD/PHX on 06/27/2013 01:31 PM ——

John Tyler
<johntyler480@gmail.com>
06/27/2013 12:58 PM

To Olga Soto/NSD/PHX@PHXENT
cc
Subject request for loop 202 SRTS for Rio Del Rey

40

Dear Ms. Soto,

I am writing to request a "safe route to school" bridge be included by ADOT in the loop 202 construction between Broadway and Lower Buckeye.

I am a resident of the Rio Del Rey community. The construction of the freeway will divide the community and impede traffic between the school and residences. A bridge would allow students to continue their education services uninterrupted and alleviate some of the hardships borne during construction of the freeway..

I appreciate your consideration in this matter.

Sincerely,
John Tyler

Math Teacher | Adobe Mountain School
AZ PBL State Officer Liaison | azpbl.org | @azpbl

Code	Issue	Response

Code	Comment Document
40	Review of Initial Location/DCR and DEIS for State Route 202L (South Mountain Freeway) Interstate 10 (Maricopa Freeway) to Interstate 10 (Papago Freeway) Page 12 RIVERSIDE ELEMENTARY SCHOOL DISTRICT NO. 2 1414 S. 51st Avenue Phoenix, Arizona 85043 #2 Governing Board District Administration jrivera@riverside.k12.az.us 602-477-8900 Ext. 3116 Mr. Ruben D. Gutierrez Teaching & Learning (602) 477-8900 Ext. 1117 rgutierrez@riverside.k12.az.us Mr. Jose Moreno Business & Student Services (602) 477-8900 Ext. 1120 jmoreno@riverside.k12.az.us School Administration Mr. Marcus J. Piña Principal Riverside Traditional School 602-272-1339 Ext. 2004 mpina@riverside.k12.az.us Mr. Talmadge Tanks Principal Kings Ridge Preparatory Academy (602) 477-8960 Ext. 3115 ttanks@riverside.k12.az.us Thursday, June 27, 2013 RE: Safe Path to School Chaun Hill Arizona Department of Transportation 1611 West Jackson Street Phoenix, AZ 85007 Ms. Hill, Riverside Elementary School District #2 has been in existence since 1872. We have been the center of our community and continue to provide services to our students and parents that reside within our boundaries. As the city has approved additional housing developments within our school boundaries it is imperative that we plan accordingly in the design of the proposed freeway. Our student population will increase twofold by 2014. This will increase pedestrian traffic to and from Kings Ridge Preparatory Academy. The proposed freeway will cut through our Rio Del Rey Community leaving a major portion of our students crossing the freeway. We are recommending that ADOT consider the safety of our students by locating a pedestrian bridge within the vicinity of 62nd Avenue and Broadway. This will ensure a safe transit point for our students to and from school. Please feel to contact me if you need any additional information to support this recommendation. Sincerely, Jaime A. Rivera, Superintendent of Schools Riverside Elementary School District #2

Code	Issue	Response

Code	Comment Document

City of Phoenix
OFFICE OF THE CITY COUNCIL

SAL DICICCIO
COUNCILMAN

District 6
(602) 262-7491
Fax: (602) 534-3574
TTY: (602) 495-5810
council.district.6@phoenix.gov

July 23, 2013

John Halikowski, ADOT Director
c/o South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

RE: Opposition to proposed South Mountain Loop 202 Pecos Alignment

The South Mountain Freeway is the most important issue affecting the quality of life in Ahwatukee. I am strongly opposed to the South Mountain Loop 202 Freeway, in particular, the Pecos Road alignment. I am on record, since the 90's, opposing this due to the damage it will cause.

Ahwatukee is home to me and my family. We love this community dearly and it is my goal to preserve the quality of life we have all come to enjoy.

1 The proposed Loop 202 alignment will have a dramatic affect on our community. The loss of over 250 houses, churches and vital water resources that impact huge communities like the Lakewood development and the Foothills development, whose well water will be lost in the construction, are just some of the reasons to oppose the Pecos Road alignment. In addition, it is unimaginable that a proposed route would cut through one of our state treasures – South Mountain Park. As an avid hiker of this park, the prospect of any portion of it being blasted apart to make way for a freeway shows a total lack of understanding of this area and the importance South Mountain Park plays in our way of life in Ahwatukee.

2 I have fought hard to seek alternative routes and I will continue to do so. I have made a commitment to protect our community and make sure all options are explored. However, I will continue to oppose the Pecos Road alignment, as it is not the right choice for our community.

3 Sincerely,

4 Sal DiCiccio

Sal DiCiccio
Phoenix City Councilman, District 6

200 West Washington Street, 11th Floor, Phoenix, Arizona 85003-1611
Recycled Paper

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see pages 4-17 and 4-21 of the Final Environmental Impact Statement). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see page 4-88 of the Final Environmental Impact Statement).
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See text box on page 4-108 of the Final Environmental Impact Statement.) The well replacement program as outlined by State law would be implemented by the Arizona Department of Transportation to effectively mitigate well impacts associated with its projects throughout the region.
4	**Section 4(f) and Section 6(f)**	The proposed South Mountain Freeway would pass through the park's southwestern edge. Section 4(f) of the Department of Transportation Act extends protection to significant publicly owned public parks, recreation areas, and wildlife and waterfowl refuges, as well as significant historic sites, whether they are publicly or privately owned. This protection stipulates that those facilities can be used for transportation projects only if there is no prudent and feasible alternative to using the land and the project includes all possible planning to minimize harm to the land [see Final Environmental Impact Statement, Chapter 5, *Section 4(f) Evaluation*]. The project team examined alternatives to avoid the Phoenix South Mountain Park/Preserve, but did not identify any feasible and prudent alternatives to avoid impacts on the park. The Arizona Department of Transportation continues to work with park stakeholders to minimize impacts and address concerns. Measures to minimize harm to the park were developed (see Final Environmental Impact Statement, starting on page 5-23). The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Draft and Final Environmental Impact Statements page 5-31). Phoenix South Mountain Park/Preserve would remain the largest municipally owned park in the United States. Nine-tenths of a mile of the proposed freeway would pass through the park's southwestern edge (see page 5-14 of the Final Environmental Impact Statement). The activities that make the park a highly valued resource (recreational activities, interaction with the Sonoran Desert) would remain.

Code	Comment Document

4318

me because I'm over on 74th Avenue. That's pretty much all I have.

* * *

UNIDENTIFIED SPEAKER: I think they're a little late in doing this, but I hope they do do this at some point. I don't see any reason not to do this. I think in Phoenix, in general, they wait until it's too late to do some of this planning. So I think with all the information available, it's very overwhelming. But this project is definitely needed and just to alleviate some of the stress downtown with traffic and help have alternative ways of getting to West Phoenix other than driving through Central Phoenix.

So I'm a native to Ahwatukee, and this has been something on the burner for a while now and hasn't come to fruition, so I think that's my statement.

I don't see any reason why they haven't built it around. I think of all the new opportunities, it will -- housing and jobs and stuff, just "build it and they will come" kind of thing. If they build a freeway, there might not be anything there now, but why wait until everything is there and then build it -- not aggressive or proactive, but that's basically it.

* * *

MR. NOWAKOWSKI: Michael Nowakowski. I am

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

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1

a city councilman for the City of Phoenix for District 7, which happens to be in the location of the South Mountain Freeway. And one of the concerns I have here is that the Valley commuters have to wait a long time in traffic jams; that the I-10 is hours and hours of waiting, and coming in and out of town, that we're going to end up being another Los Angeles and that we need to complete the 202; that putting in the so-called South Mountain Freeway will relieve all of that; that we need to make sure that traffic moves smoothly and that it's not congested.

We're also looking at two different votes. People voted back in, I think it was 1985 and in 2004, to build the freeway, and it's about time that we do so; that people were promised in 2001 that it was -- the freeway, that they would break ground on the freeway. Now we're at 2013 and it hasn't broken ground, and it's impacting in the City of Phoenix because of our infrastructure. Our infrastructure is all based on the freeway itself, so we can't complete all of our streets and sidewalks and connect the west to east boundaries.

It was completed in the Laveen area, the north to south; but there is a delay on the east to west because we're not sure if the freeway is going in. If it does go in, we want to make sure we're not building

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www.drivernix.com

Code	Issue	Response
1		Comment noted.

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recommending -- or that's why I as a city council member are recommending to build it on city property.

Pecos Road has already been cleared for that, the majority has already been bought. If you drive down the I-10, you will see the stack for the Pecos Road and the rest of the 202. The 202 will -- this portion of the South Mountain Freeway will connect what is the missing link between the East Valley and the West Valley. It will complete the whole 202.

We're the 6th largest city in the country and not having a freeway that's connected creates this congestion and has motorists on freeways for hours just idling, and I think that's worse for our environment than not building a freeway.

On top of all of that, we're looking at 30,000 jobs, and it'll probably be the biggest stimulus project in the state of Arizona that we're going to have, close to almost $2 billion. So it's something that's going to bring revenues for the state, something that's going to bring jobs for the state, and the other thing is it's going to basically relieve the traffic that we have and reduce the air pollution and that's one of the things that we need.

Also, if you look in the Laveen and South Phoenix areas, we have low income individuals that have

Code	Issue	Response

Code	Comment Document

streets in the wrong area.

The other thing is that the residents out in the Laveen area are still waiting for all the different amenities, like restaurants, hospitals, things for families, just movie theaters and all of that. And every time we try to advocate for businesses to move to Laveen, they're saying that once the freeway is decided that's when they'll make the decision to bring in those types of businesses, hospitals, and other things that are needed.

If you look at the City of Phoenix, south of the Rio Salado, there's not a hospital. And shame on us that we don't have a hospital south of the river. And this freeway will bring a hospital south of the river, if it's built.

The other concerns we're hearing out there is the whole concern of the residency, that they don't want the freeway to be built on the reservation, so that means that we have to build it on the foothills of the South Mountain. And basically we're looking at about a 17,000-acre park, and we're going to probably touch about 30 acres of that park or of the mountain, because we can't build it on the reservation.

They have taken some of the votes and they have been voted down. That's why the City of Phoenix is

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no ways to get to a hospital if there's a emergency. So having a freeway will bring a hospital closer to individuals. Instead of driving at least 20 minutes away, you'll have a hospital within five to ten minutes. You'll just have people with disabilities that have no way of getting to a hospital also, and this will bring a hospital for that. So for low income people, people from disability, and for minorities, it'll bring not only a hospital but good paying jobs also. That's it. Just build that damn freeway.

* * *

PAULA FLECK: Paula Fleck. I just wanted to add that I heard a woman get up and speak and mention that she believed that adding the 202 would cause emphysema. And I'm a respiratory therapist, and I can tell you that emphysema is not caused by pollution from the 202. Over 90 percent of it is caused by smoke like cigarettes or any kind of thing you would smoke. About, I'd say, five percent would be from secondhand smoke or working in a job where you're around a lot of chemicals, directly exposed and not protecting yourself with the mask, and about one percent of it is caused by alpha 1-antitrypsin. Those are rough numbers.

But I'll tell you this is from my schooling, as well as what I've seen working in a

Code	Issue	Response

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SPECIAL INTEREST GROUP COMMENTS AND RESPONSES

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 22, 2013 10:50:39 AM
Attachments: SouthMountainFreewayProject_Letter.pdf

From: Helen Heiden [mailto:hheiden@azchamber.com]
Sent: Tuesday, May 21, 2013 12:53 PM
To: Projects
Cc: info@buildthe202.com; Glenn Hamer
Subject: Build the South Mountain Freeway

Attached please find a letter from the Arizona Chamber of Commerce and Industry supporting the South Mountain Freeway project.

May 21, 2013

Arizona Department of Transportation
205 South 17th Avenue, #371
Phoenix, Arizona 85007
Delivered via email

To Whom It May Concern:

1

The Arizona Chamber of Commerce and Industry strongly supports the construction of the South Mountain Freeway. We believe that this freeway addition will cut traffic congestion across the metro area, reduce air pollution, and have a positive impact on Arizona's economy.

Arizona's workers rely on our roads and freeways as an efficient way to get to and from their workplace. If we don't build the South Mountain Freeway, traffic in the region will get much worse over the next two decades. According to a study conducted by the Arizona Department of Transportation, morning and evening commute times will increase 39% to 82% over the next twenty years and traffic congestion on city streets will increase by 46%. This means vehicles will spend longer periods of time idling in traffic, consequently increasing air pollution in the area.

The South Mountain Freeway project is also crucial to Arizona's economic recovery. The project will create 30,000 jobs during the five to six year construction period and result in a $2 billion investment in the Phoenix economy.

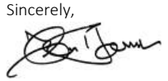
Furthermore, The South Mountain Freeway is welcomed with broad support across Maricopa County by a near 2-1 margin according to a poll commissioned by We Build Arizona. The poll also revealed that voters in Ahwatukee and Laveen, who would be directly affected by the construction, view the freeway project with 59% support.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

The Arizona Chamber of Commerce and Industry encourages you to move forward and build the South Mountain Freeway.

Sincerely,



Glenn Hamer
President and CEO

Helen Heiden
Government Relations
Arizona Chamber of Commerce and Industry
Arizona Manufacturers Council
3200 N. Central Avenue | Suite 1125 | Phoenix, AZ 85012
p: (602) 248-9172 x128 | **e:** hheiden@azchamber.com

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Code	Comment Document

ARIZONA CHAMBER of Commerce and Industry
Uniting Business. Advancing Arizona.

May 21, 2013

Arizona Department of Transportation
205 South 17th Avenue, #371
Phoenix, Arizona 85007
Delivered via email

To Whom It May Concern:

1 The Arizona Chamber of Commerce and Industry strongly supports the construction of the South Mountain Freeway. We believe that this freeway addition will cut traffic congestion across the metro area, reduce air pollution, and have a positive impact on Arizona's economy.

Arizona's workers rely on our roads and freeways as an efficient way to get to and from their workplace. If we don't build the South Mountain Freeway, traffic in the region will get much worse over the next two decades. According to a study conducted by the Arizona Department of Transportation, morning and evening commute times will increase 39% to 82% over the next twenty years and traffic congestion on city streets will increase by 46%. This means vehicles will spend longer periods of time idling in traffic, consequently increasing air pollution in the area.

The South Mountain Freeway project is also crucial to Arizona's economic recovery. The project will create 30,000 jobs during the five to six year construction period and result in a $2 billion investment in the Phoenix economy.

Furthermore, The South Mountain Freeway is welcomed with broad support across Maricopa County by a near 2-1 margin according to a poll commissioned by We Build Arizona. The poll also revealed that voters in Ahwatukee and Laveen, who would be directly affected by the construction, view the freeway project with 59% support.

The Arizona Chamber of Commerce and Industry encourages you to move forward and build the South Mountain Freeway.

Sincerely,

Glenn Hamer
President and CEO

ARIZONA MANUFACTURERS COUNCIL

3200 North Central Avenue, Suite 1125 ● Phoenix, AZ 85012
www.azchamber.com ● Phone 602-248-9172 ● Fax 602-265-1262

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Serena Unrein
To: Projects
Subject: South Mountain Freeway comments
Date: Wednesday, July 24, 2013 3:51:49 PM
Attachments: Arizona PIRG Education Fund - South Mountain Freeway.pdf

Comments from the Arizona PIRG Education Fund on the draft EIS for the South Mountain Freeway are attached.

Serena Unrein
Public Interest Advocate
Arizona PIRG Education Fund
130 N. Central Avenue, Suite 202 | Phoenix, AZ 85004
Office: (602) 252-1184 | Cell: (602) 908-0451
www.arizonapirgedfund.org | sunrein@arizonapirg.org

Code	Issue	Response

Code	Comment Document

Arizona PIRG Education Fund

130 N. Central Ave., Ste. 202 | Phoenix, AZ 85004
www.arizonapirgedfund.org (602) 252-9227 (ph)

July 24, 2013

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MC 126F
Phoenix, AZ 85007

To Whom It May Concern:

On behalf of the Arizona PIRG Education Fund, I am writing to respond to the Arizona Department of Transportation's draft Environmental Impact Statement (EIS) for the South Mountain Freeway. In our opinion, there is a critical flaw in the draft EIS and its assumptions on recent driving data and driving trends.

South Mountain Freeway was originally proposed in 1985, so three decades later, Arizona's policy makers should be evaluating if this project still makes sense given current transportation trends. Investing taxpayer money in the construction of a major highway deserves thorough examination.

1 For the first time in two generations, there has been a significant shift in how many miles Americans are driving each year. A report that the Arizona PIRG Education Fund released last year demonstrates that young people in particular are decreasing the amount they drive and increasing their use of transportation alternatives.[1]

2 Since transportation infrastructure lasts for decades, the investments we make in transportation infrastructure should be based not only on what is required to meet our needs today, but also on anticipated future needs. For decades, it was assumed that we would drive more miles, necessitating new highways to alleviate the crippling congestion that was sure to follow. For at least the past five years, though, those anticipated increases in driving have failed to materialize in Arizona. It does not appear that this draft EIS has taken these changes into account and instead assumes that Arizonans will continue to drive more and more. Our research indicates that a return to the previous patterns of driving ever more miles is unlikely.[2]

[1] *Transportation and the New Generation*, Arizona PIRG Education Fund, April 2012.
http://www.arizonapirgedfund.org/reports/azf/transportation-new-generation
[2] *A New Direction,* Arizona PIRG Education Fund, May 2013.
http://arizonapirgedfund.org/reports/azp/new-direction

Code	Issue	Response
1	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. The traffic analysis used the Maricopa Association of Governments travel demand model (TransCAD software platform), as certified by the Federal Highway Administration and reviewed by the U.S. Environmental Protection Agency for air quality conformity (see Final Environmental Impact Statement page 3-27). The model projects demand for multiple modes of travel, including automobile, bus, and light rail. Driving patterns and alternative modes of transportation are among the key model inputs used to forecast travel demand in the Study Area.
2	**Purpose and Need**	The proposed freeway is part of a multimodal transportation plan, the *Regional Transportation Plan*, that includes substantial investments in transit, nonmotorized travel, and system management and demand management strategies. The proposed freeway is part of the system needed in the region to address future travel needs for the movement of people, goods, and services. The comment relies on national trends for travel; however the local conditions and setting of the Phoenix metropolitan area are not consistent with areas of high-density cities in other parts of the country. In Maricopa County, daily vehicle miles traveled levels increased by almost 2 percent between 2011 and 2012 and the 2012 daily vehicle miles traveled is approaching the prerecession peak in 2007. (*Source*: Arizona Department of Transportation Multimodal Planning Division Highway Performance Monitoring System Data for the Calendar Year 2012 and 2011). Even if the trend of vehicle miles traveled "per capita" decreasing continues, the total vehicle miles traveled in the region would still increase along with increases in total population.

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According to Federal Highway Administration data, total vehicle-miles travelled (VMT) for Arizona is last reported for 2011 at 59,574 million annually,[3] which is a decline of more than 5 percent from the peak year of 2007 when Arizona topped out at 62,963 million miles.[4] Furthermore, a graphic in the summary of the draft EIS places an unnecessarily large arrow covering what has happened to VMT since 2005,[5] thus obscuring how post-2005 data actually assumes reversal of current trends.

The VMT projected in the draft EIS are, at best, out-of-date, and at worst, inaccurate and could greatly overstate future driving patterns.

Please do not hesitate to contact me if you have any questions. I can be reached at sunrein@arizonapirg.org or at 602-252-1184.

Sincerely,

Serena Unrein
Public Interest Advocate

[3] Highway Statistics 2011, Federal Highway Administration.
http://www.fhwa.dot.gov/policyinformation/statistics/2011/vm2.cfm
[4] Highway Statistics 2007, Federal Highway Administration.
http://www.fhwa.dot.gov/policyinformation/statistics/2007/vm2.cfm
[5] South Mountain Freeway draft EIS summary, Arizona Department of Transportation, page 2.
http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/FHWA-AZ-EIS/00b-SMDEIS-Summary-Chapter_Description-of-the-Proposed-Action.pdf

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Revised Comments
Date: Wednesday, May 22, 2013 10:48:44 AM
Attachments: image001.png
ARPA South Mountain 202 Project Comments.pdf

From: Steve Trussell [mailto:steve@azrockproducts.org]
Sent: Wednesday, May 22, 2013 6:59 AM
To: Projects
Subject: Revised Comments

Please disregard our first submittal. Attached is an updated comment letter from our association.

Regards,

Steve Trussell
Executive Director

ARIZONA ROCK PRODUCTS ASSOCIATION
916 W. Adams
Phoenix, AZ 85007
Office (602)271-0346
Cell (602)989-3854
Fax (888)269-0430

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(Comment codes begin on next page)

Code	Comment Document

ARPA ARIZONA ROCK PRODUCTS ASSOCIATION

May 17, 2013

Arizona Department of Transportation
Attn: South Mountain Study Team
1655 W. Jackson St. MD 126F
Phoenix, AZ 85007

RE: Support of the 202 South Mountain Freeway Project

Members of the ADOT South Mountain Study Team:

1 The Arizona Rock Products Association (ARPA) supports moving forward expeditiously with the 202 Freeway Project. The South Mountain 202 freeway project will significantly reduce traffic congestion across the Phoenix metro area, reduce air pollution, create jobs and save drivers' time and money.

ARPA has been providing representation for 38 member companies involved with the production of aggregates, asphaltic concrete, ready mix concrete, asphalt, lime products, and portland cement. ARPA members, include over 53 associate members providing related transportation, contracting, and consulting services to vital state infrastructure projects like these.

The Traffic

The Valley's freeways, especially I-10, are congested throughout different times of the day. Traffic on Interstate 10 is projected to grow significantly between now and 2035. According to an ADOT study we may be facing a 28% increase in volumes. Specific locations within the Phoenix Metropolitan area could see increases of 103,000 cars every day. Travel times will increase without the South Mountain Freeway and commutes can be expected to take from 39% to 82% longer if nothing is done to relieve congestion. As a result, traffic on surface streets will grow 46% by 2035. Something can and must be done.

The Environment

The same report indicates the project also will positively impact air pollution by reducing the time vehicles spend stuck in traffic. Valley commuters spend inordinate amounts of time in traffic jams throughout the valley which exacerbate our current air quality issues and business, industry and taxpayers pay for dearly in the form of additional measures to reduce emissions. Likewise, we risk loss of further transportation funding if we fail to attain at the air quality monitors. It is incumbent on us to pursue transportation options that reduce emissions.

916 West Adams Street • Phoenix, AZ 85007-2732
(602) 271-0346 • Fax (602) 255-0363 • www.azrockproducts.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

The Economy

There is no more important transportation project to the area's commuters and workers than the South Mountain Freeway project. The 202 will create 30,000 jobs during the five to six year construction period and result in a $2 billion dollar investment in the Phoenix-area economy.

Let's Go!

Based on recent polls, 64.3% of likely voters in Maricopa County support construction of the freeway. Further, in a separate survey, 59% of likely voters living in Ahwatukee and Laveen support the freeway. The support is there for the project, the money to build the freeway is in the budget and it was approved by voters twice, first in 1985 and again in 2004. It is clearly time to begin construction on the South Mountain 202!

Sincerely,

Steve Trussell
Executive Director

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for by the citizens. It is they who enjoy the multitude of trails and recreational opportunities provided by these Preserves. So it is only fitting and proper that they decide if roadways are appropriate."

Thank you for your diligent consideration and support of this popular cause. Thank you.

THE FACILITATOR: Thank you, Mr. Gironda.

Prem Goyal? Did I pronounce that correctly? Are you in the auditorium?

Okay. We'll go to the next name. Steve Trussell. Steve Trussell in the auditorium? Here he comes.

If there's anyone else in the auditorium that would like to speak today, please make sure you register first; that way we can get your name into the list. Yes, please, right here.

And sir, your name is?

MR. TRUSSELL: Steve Trussell.

THE FACILITATOR: Steve Trussell.

MR. TRUSSELL: I'm with the Arizona Rock Products Association, and we support moving forward expeditiously with the 202 Freeway project. The southbound 202 Freeway project will significantly

1

Code	Issue	Response
1		Comment noted.

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reduce traffic congestion across the Phoenix metropolitan area, reduce air pollution, create new jobs, and save drivers time and money.

ARPA has been providing representation for 38 producer companies of aggregates, asphalt and concrete, readymix concrete, asphalt lime products and Portland cement. ARPA members include over 53 associate members providing related transportation, contracting, and consulting services for the vital state infrastructure projects like these.

First of all, I'd like to talk about the traffic very quickly. The Valley's freeways, especially I-10, are congested throughout different times of the day, as we all know, and traffic on Interstate 10 is projected to grow significantly between now and 2035. According to an ADOT study, we may be facing a 28 percent increase in volumes.

Specific locations within the Phoenix metropolitan area can see increases of 103,000 cars every day. Travel times will increase without the South Mountain Freeway and commutes can be expected to take 39 to 82 percent longer if nothing is done to relieve the congestion.

As a result, traffic on surface streets will grow 46 percent by 2035. Something can and must

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be done, given the fact that this is a project that's already been voted on twice and the funding is available.

Now, regarding the environment, the same report indicates the project will also positively impact air pollution by reducing the time vehicles spend stuck in traffic. Valley commuters spend inordinate amounts of time in traffic jams throughout the Valley, which exacerbate our current air quality issues and business and industry taxpayers pay for this dearly in the form of additional measures to reduce emissions. Likewise, we risk loss of further transportation funding if we fail to attain at the air quality monitors.

It is incumbent upon us to pursue transportation options that reduce emissions. There is no more important transportation project to the area's commuters and workers than the South Mountain Freeway project. The 202 will create 30,000 jobs during the next five- to six-year construction period, and result in a $2 billion investment in the Phoenix area economy.

So let's move on. And based on the recent polls, 64 percent of likely voters in Maricopa County support construction of the freeway. Further,

Code	Issue	Response

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in a separate survey, 59 percent of likely voters living in the Ahwatukee and Laveen area support the freeway as well.

The support is there for the project, and the money to build the freeway is in the budget, as it was approved by voters twice, in '85 and in 2004. It's clearly time to begin construction on the South Mountain. Thank you.

THE FACILITATOR: Thank you, Mr. Trussell.

Ariel LeBarron.

MS. LeBARRON: Hello, my name is Ariel LeBarron, and I am a student at the School of Feasibility. I grew up here, I was born and raised. And I oppose the South Mountain Freeway, just because it would increase air pollution, and I feel there are better alternatives that we could be putting our tax money into, such as public transportation. This would increase our air quality, so that our future generations wouldn't be as affected. And I think by putting a freeway and expanding it outward is going to make people use and buy cars more, instead of trying to switch to public transportation.

I think for our future we should be focusing on better alternatives. Thank you.

Code	Issue	Response

Code	Comment Document

From: Rusty Crerand
To: ADOT
Cc: Jennifer Grentz
Subject: Loop 202 S. Mt.
Date: Monday, June 10, 2013 11:31:18 AM
Attachments: image001.png

1

I just got a call from the Director's Office. Lila received a call from a Mr. Steve Brittle from Don't Waste Arizona. He is very upset that a number he was given to make a comment on the South Mountain Project 602-712-7767 doesn't work or won't let him leave a comment. He is threatening to escalate his actions if this isn't corrected. I've included the link to the website of the organization he represents. I have not spoken to the gentleman, but I was told he would like to have someone call him ASAP.

Please let me know who can contact Mr. Brittle.

http://dontwastearizona.org/about.html

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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.

Code	Issue	Response
1	**Public Involvement**	Comment noted.

Code	Comment Document

1

From: Rusty Crerand
To: ADOT
Cc: Jennifer Grentz
Subject: RE: Loop 202 S. Mt.
Date: Monday, June 10, 2013 4:30:05 PM
Attachments: image001.png

Mr. Brittle is calling the Director's office wondering where to pick up some documents. Apparently someone called him today around 1:00, but he doesn't know where to go and is worried because it's after 4:00. Could whoever called him let me know what's been arranged. The Director's office is confused and has no idea of what he is talking about.

Thanks,

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

From: Rusty Crerand
Sent: Monday, June 10, 2013 11:31 AM
To: 'adot@hdrinc.com'
Cc: Jennifer Grentz
Subject: Loop 202 S. Mt.

I just got a call from the Director's Office. Lila received a call from a Mr. Steve Brittle from Don't Waste Arizona. He is very upset that a number he was given to make a comment on the South Mountain Project 602-712-7767 doesn't work or won't let him leave a comment. He is threatening to escalate his actions if this isn't corrected. I've included the link to the website of the organization he represents. I have not spoken to the gentleman, but I was told he would like to have someone call him ASAP.

Please let me know who can contact Mr. Brittle.

http://dontwastearizona.org/about.html

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

Code	Issue	Response
1	**Public Involvement**	The first record of a call placed to the Arizona Department of Transportation Environmental Planning Group by the commenter was Saturday, June 8, 2013. The call was returned to the commenter on Monday, June 10, 2013, and a disc containing the technical reports was provided on the same day. On June 17, 2013, the commenter contacted the Arizona Department of Transportation by e-mail to request a scoping technical report, if one existed. The scoping technical report was provided on June 18, 2013. Two of the technical reports requested [Cultural Resources and Section 4(f)] contained confidential information. After discussion with the Federal Highway Administration, release of the reports, in redacted form, was approved. Additional time was needed for the Arizona Department of Transportation's cultural resources staff to review the documents and to redact the information deemed confidential. However, the redacted technical reports were provided on June 28, 2013. Because the comment period on the Draft Environmental Impact Statement was doubled for this project (90-day comment period instead of the 45-day comment period required by 40 Code of Federal Regulations 1506.10), the commenter had adequate time to prepare comments.

Code	Comment Document

ADOT Communications

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4357

with the panel, they are here to listen to your comments, they are indeed comments.

So at this point I'd like to go ahead and get started, and we have one preregistered person who has arrived and that person is Maxine Lakin -- I'm sorry, Joanne McCarthy will go first.

And as you see your names in the queue, you're welcome to come up to each microphone so we can keep people moving.

We will now proceed to the non-preregistered procedure, so at this point, Steve Brittle, please.

MR. BRITTLE: My name is Steve Brittle, I'm the president of an organization named Don't Waste Arizona. We'll be filing substantive comments later, but I want to put something on the record immediately. Upon review of this wholly inadequate environmental impact statement draft, I have seen many in my life, I've never seen one so wrong and so devoid of real and current information.

The real shocker to me as an expert in Hazmat is the chapter in Hazmat does not talk about the risk of truck transportation of hazardous materials. And when I first looked at that I thought well, certainly HDR, who has done this kind of thing, should know about commodity flow studies done by the state emergency response commission, so I went there to get them and I got them.

1

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www.drivernix.com

Code	Issue	Response
1	**Hazardous Materials**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-166 of the Final Environmental Impact Statement). The project team is aware of the Hazardous Materials Commodity Flow Studies that the Arizona State Emergency Response Commission maintains. These studies are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing emergency response plans. If the plan is amended, it is made available to the Arizona Department of Transportation. In the event of an incident with a hazardous materials issue on a State or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, which responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary. According to 46 *Federal Register* 18026 (March 23, 1981), the environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible.

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And I also found out that HDR was under contract with ADOT to look at all of that information. Now, in the commodity flow study they talked about what kinds of chemicals are being transported on the highways and all the information is there; but, of course, this was deliberately excluded because it would lead only to the logical conclusion of a no-build.

You would breathe in chemicals that would have never been in that community of Ahwatukee or Laveen ever before; 77,000 people in Ahwatukee, 35,000 people in Laveen will be at imminent risk of death because the area that -- where people would be killed or harmed includes in the case of a worst-case scenario from chlorine release, which is on the highway documented, would kill most people in Ahwatukee within five minutes. There is no way out. This is a unique cul-de-sac-type community and you're even going to remove one of the routes out of there by taking away the 30th exit street alignment on Pecos Road, so it's a death trap. The people in Laveen, 35,000 of them, they don't have this kind of stuff in their community. They would never know and they would be over with.

Now, it's obvious that HDR and ADOT knew about all of this. The warnings are right there even in the executive summaries of these transportation commodity

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flow studies, which means in this case we go beyond the pale of ignorant or a slant. I think we're in the area of felonious behavior, fraud, racketeering, and we're going to be urging the attorney general of this state to do a probe of ADOT and HDR.

You spent $22 million and you didn't do anything with it other than lie, obfuscate, and eliminate anything that might lead to the logical conclusion, which is the no-build option. And we will be waiting for them in court. I have to say, I have to thank them, such a deficient and devoid argument should make it pretty much easier than we had anticipated to litigate this, and hopefully, with any luck, some of these people will actually go to jail. Thank you.

THE FACILITATOR: Thank you, Mr. Brittle.

One more comment before we continue. For those of you who see their name on the screen, if you're in the back part of the room if you want to make your way up so we can get people closer to the microphone, that would help us throughout the day, so feel free to move up.

Just one note for those of you who are -- and we understand it's very difficult sometimes in working with prepared notes, to keep in mind the time here, so if you would from time to time, if you're working from notes please take time out to double-check the time. You're

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Code	Issue	Response

Code	Comment Document

From: Don"t Waste Arizona
To: Projects
Subject: Comment regarding the South Mountain Freeway DEIS; call for audit of ADOT and federal grand jury
Date: Wednesday, July 24, 2013 5:22:09 PM

Don't Waste Arizona, Inc. (DWAZ) is a non-profit environmental organization dedicated to the protection and preservation of the environment in Arizona. DWAZ is especially concerned about dishonest government agencies that do not do their job, environmental justice, civil rights protections, risks from hazardous materials and toxics, and air pollution. DWAZ has an extensive, successful background in litigation enforcing federal environmental laws and some NEPA cases.

DWAZ is headquartered at 6205 South 12th Street, Phoenix, AZ 85042, and may be reached at (602) 268-6110. DWAZ has members in the affected areas. DWAZ is allied with PARC, et al for the purposes of preparing comments in opposition to the freeway, and the use of these comments by these allies is allowed and unrestricted. Stephen Brittle, President of Don't Waste Arizona, is also a member of PARC.

After reviewing the expert comments and submittals for PARC et al, DWAZ states its opinion in the following comments:

There is no way that the DEIS is valid in any way, and there is no accident that it is a deceitful, deficient, and fraudulent document. This has to be by design; the pattern of errors and miscalculation as presented in this DEIS cannot occur randomly. There is evidence of a pattern of deception and deceit, of what appears to be fraud, of a deliberate withholding of critical information that would put the proposed freeway in a negative light, and of negligence, perhaps criminal intent.

Some examples of what leads DWAZ to this conclusion:

(1) The withholding of the public documents that NEPA requires to be openly available during the time 90-day comment period, and the long delays in responding to public records requests, including the production of some documents without communicating the request for records was incomplete.

(1) The statements in the DEIS about the availability of documents and their being placed at certain public repositories when they were never placed there, and calling the numbers listed in the DEIS to get access or copies were not returned.

(2) The willingness to represent that the South Mountain Freeway would reduce air pollution when it would instead worsen it and harm public health along the freeway route by exceedances of the particulate matter and carbon monoxide standards, which indicates a knowing and informed willingness to put public health and safety at risk.

(3) The misrepresentation of the hazards and risks of Mobile Source Air Toxics along the freeway route, by not stating honestly that there is already a severe problems with high levels of Mobile Source Air Toxics along the freeway route, which indicates a knowing and informed willingness to put public health and safety at risk.

(4) The complete omission of the risks caused by transportation of hazardous materials along the

Code	Issue	Response
1	**Public Involvement**	The Draft Environmental Impact Statement was made available at five public locations throughout the area and was available for purchase at one location. All hard copies of the Draft Environmental Impact Statement placed for public viewing contained the appendices as a compact disc in pockets in the back of the document. The Draft Environmental Impact Statement was also available by compact disc by request, at the public hearing, and on the Web site at <azdot.gov/southmountainfreeway>. These locations were advertised and the public notification history is documented on page 6-23 of the Draft Environmental Impact Statement. Technical reports and other information were available by request. The first record of a call placed to the Arizona Department of Transportation Environmental Planning Group by the commenter, was Saturday, June 8, 2013. The call was returned to the commenter on Monday, June 10, 2013 and a disc containing the technical reports was provided on the same day. On June 17, 2013, the commenter contacted the Arizona Department of Transportation by e-mail to request a scoping technical report, if one existed. The scoping technical report was provided on June 18, 2013. Two of the technical reports requested (Cultural Resources and Section 4[f]) contained confidential information. After discussion with the Federal Highway Administration, release of the reports, in redacted form, was approved. Additional time was required for the Arizona Department of Transportation's cultural staff to review the documents and to redact the information deemed confidential. However, the redacted technical reports were provided on June 28, 2013. Because the comment period on the Draft Environmental Impact Statement was doubled for this project (90-day comment period instead of the 45-day comment period required by 40 Code of Federal Regulations 1506.10), the commenter had adequate time to prepare comments.
2	**Air Quality**	The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
3	**Air Quality**	The emissions modeling developed for the proposed action showed that for the mobile source air toxics study area, constructing the freeway would have a marginal effect on total mobile source air toxics emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative) (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.

(Response 3 continues on next page)

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	South Mountain Freeway and the likelihood that there would be serious loss of life and severe public health impacts in the event of an incident involving the release of hazardous chemicals, especially when ADOT had its contractor for the DEIS review all of the Hazardous Materials Commodity Flow Studies at the Arizona Emergency Response Commission, therefore knowing quite well of the nature and frequency of the transport of these chemicals, which indicates a knowing and informed willingness to put public health and safety at risk.
5	The failure to utilize the most current data and scientific methods in preparing the DEIS, contrary to regulation, and mostly using data, reports, and studies that are eight years old, in violation of NEPA regulations.
6	The expenditure of over $22 million in the preparation of the DEIS as well as the $87 million+ in acquiring properties along the proposed route before the NEPA process was completed; indeed starting 14 years before the NEPA process even began, and purchasing $43 million of properties just along the 59th Avenue alignment, while pretending that there were three alternative routes being examined in the DEIS.
	The strange concoctions of formulas represented to the public as legitimate modeling of data to show the desired outcomes of supporting the freeway, when no capable or competent environmental professional would ever use the data that was used, nor would these calculations ever be conducted in the manner they were, which indicates a knowing and informed willingness to put public health and safety at risk.
7	The omission of any information about the WQARF sites that the western alignment would cross, and the environmental contamination liability and cleanup costs that the public would assume as a result of the condemnation of the affected properties.
	The many unsubstantiated statements and assertions in the DEIS that have no basis in fact or have accompanying documentation.
8	The lack of any discussion of the severe property devaluation that would occur along the freeway route, especially in Ahwatukee Foothills along the Pecos Toad alignment.
9	The arbitrary rejection of alternate routes for the freeway through the years, and the arbitrary rejection of SMCAT's choice, the 101 alignment.
10	The racist and discriminatory dismissal of native American tribal concerns about a mountain that is sacred to them.
	Because of the aforementioned, DWAZ concludes that the proper action should be an audit of ADOT and the convening of a federal-level grand jury investigation of ADOT in these matters, as this DEIS is what appears to be a fraudulent scheme to get federal money for an ill-advised freeway that would solve no problems regarding traffic flow, congestion, and air pollution.
	Stephen M. Brittle
	President

Code	Issue	Response
3 (cont.)		The Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No-Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the South Mountain Freeway would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the freeway under consideration. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.
4	**Hazardous Materials**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-166 of the Final Environmental Impact Statement). The project team is aware of the Hazardous Materials Commodity Flow Studies that the Arizona State Emergency Response Commission maintains. These studies are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing emergency response plans. Whenever a new road is introduced to an area, the jurisdiction with responsibility for maintaining that area's emergency response plan amends the plan to include the new facility. If the plan is amended, it is made available to the Arizona Department of Transportation. In the event of an incident with a hazardous materials issue on a State or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, which responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary. According to 46 *Federal Register* 18026 (March 23, 1981), the environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible.

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5	**Air Quality**	Data and scientific methods used in the Draft Environmental Impact Statement were the most appropriate information available and considered state-of-the-practice respectfully throughout the environmental impact statement process. Beginning as early as 2004, methods, assumptions, and data sources were shared and confirmed with appropriate resource and regulatory agencies for the purposes of study. The dynamic aspect of the process led to modifications in alternatives' design and locations which subsequently led to continuous validation pertinent to data, methods, and assumptions. This normal, accepted, and National Environmental Policy Act "allowed for" process has continued through the Final Environmental Impact Statement as represented in several sections with changed text. For example, Maricopa Association of Governments' approved new population, employment, housing, and traffic projections (June 2013) was used to update information in chapters 1, 3 and 4. Other examples in the Final Environmental Impact Statement of updating methods, assumptions, and data include information associated with particulate matter (PM_{10}) modelling being added to the section, *Air Quality*, beginning on page 4-68, more information regarding special status species being added to the section, *Biological Resources*, beginning on page 4-125, and results from the Jurisdictional Delineation of Waters of the United States being added to the section, *Waters of the United States*, beginning on page 4-116.
6	**Alternatives**	The comment suggests the environmental impact statement process was biased by a history of property acquisitions within the Study Area. More specifically, properties falling within the limits of the Preferred Alternative, as identified in the Final Environmental Impact Statement, were targeted for acquisition. As noted in text on page 3-54 of the Final Environmental Impact Statement, the Arizona Department of Transportation began acquiring land for the original alignment in 1988. Between 1988 and 2001, the Arizona Department of Transportation acquired approximately 293 acres. Most of this land (258 acres) is located in the Eastern Section along Pecos Road. In 2006, the Arizona Department of Transportation began protective and hardship land acquisition in the alignment right-of-way footprint for the W59 and E1 Alternatives. Between 2006 and October 2013, the Arizona Department of Transportation purchased 326 acres (303 in the Western Section and 23 in the Eastern Section). The process for hardship and advanced acquisitions is explained in text on page 4-50. The comment infers that by taking such action, the objective equal consideration of the alternatives studied in detail in the Draft and Final Environmental Impact Statements is tainted. Advanced acquisitions in parallel to a National Environmental Policy Act environmental determination process is not unprecedented and is common practice. In this case, property acquisitions by the Arizona Department of Transportation for purposes of implementing the proposed action are done at risk as communicated to the agency by the Federal Highway Administration. If another action alternative were to be ultimately selected, the agency would likely have to place the acquired properties on the market for sale and purchase. The Arizona Department of Transportation attempts to balance the risk against its mission of timely delivery of transportation infrastructure to the driving public. Further, Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.

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7	**Hazardous Materials**	The West Van Buren Water Quality Assurance Revolving Fund site was identified and considered during development of the Draft Environmental Impact Statement (see page 4-165 of the Final Environmental Impact Statement, and the Draft Initial Site Assessment prepared for the proposed project). These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected medium (groundwater) and the construction zone (near-surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165.
8	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
9	**Alternatives**	In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the systematic alternatives development and screening process presented in Chapter 3 of the Draft and Final Environmental Impact Statements. The Preferred Alternative was the outcome of this process. The 59th Avenue connection (W59 Alternative) with Interstate 10 (Papago Freeway) was seen as the best option to balance fiscal responsibility, regional mobility needs, community sensitivity, and additional considerations such as consistency with long-range planning goals, economic and environmental impacts, and public and agency input. The W101 Alternative would connect with State Route 101L, but would also result in substantial impacts on the community of Tolleson. While the South Mountain Citizens Advisory Team recommended the W101 Alternative, all stakeholders' input was accounted for—including regional leaders, municipalities, members of the public, and members of the South Mountain Citizens Advisory Team—before identifying the W59 Alternative as the Preferred Alternative (see Final Environmental Impact Statement pages 3-62 and 3-68).

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10	**Environmental Justice**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community.

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Okay, thank you.
THE FACILITATOR: Thank you.
If you'd like to speak and haven't registered out front, please do so.
(The proceeding was at recess from 1:21 p.m. to 2:04 p.m.)
THE FACILITATOR: Good afternoon. I'd like to introduce to you our 2:00 to 4:00 p.m. panel. With the Arizona Department of Transportation, Brock Barnhart; with the Federal Highway Administration, Roman Moreno, and with the Arizona Department of Transportation, Brent Cain.
We'd like to remind you that we discourage applause.
Our next speaker is Lori Riddle.
MS. RIDDLE: I guess they had some short people up here.
THE FACILITATOR: Welcome, Ms. Riddle. You have three minutes.
MS. RIDDLE: Thank you. I'll try to talk fast. I am a member of the Gila River Indian Community, I am co-founder of Gila River Alliance for a Clean Environment. I'm the sponsor of Gila River Environmental Youth. I'm also a member of the PARC, Protecting Arizona Resources and Children, as well as a number of other

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organizations that is not in support of the freeway.

The points I would like to make is, you know, people have been talking about the need to expand the transportation, when my people have survived centuries without a proper transportation system. Many of our community members don't have vehicles, they help each other out and they rely on other people, other family members for vehicle transportation needs.

1 I feel that the DEIS is not complete, it does not include the J-tap study that the U.S. EPA Region 9 did a few decades ago. It doesn't include the air monitoring study that was done in Gila River. There's a few studies that are mentioned and referred to, but it doesn't include those things, so I feel like it's an incomplete study and I don't feel like we need to comment on an incomplete study. It's biased. As I have always told my community members, these studies usually go favor on the side of where the money is.

2 One of my friends had mentioned about the biocarbon study and the animal-plants study, that's another issue that we've been noticing in Gila River is the disappearance of some of our prominent plants and animals. There's plants that we don't see anymore that used to be abundant on our reservation -- I see my time's winding down.

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1	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. Several studies on the health effects of emissions and traffic are found in the Draft Environmental Impact Statement on page 4-75. The Draft Environmental Impact Statement does not disclose all studies on the subject nor does it disclose the studies in their entirety. As stated in the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, environmental impact statements should be analytic rather than encyclopedic [40 Code of Federal Regulations Part 1502.2(a)]. The discussion included in the Draft Environmental Impact Statement appropriately illustrates studies on the subject are ongoing and to date, specific subject matter and study findings have varied.
2	**Biology, Plants, and Wildlife**	Within the context of overall vegetation, wildlife, and wildlife habitat, all action alternatives and options would decrease the amount of cover, nesting areas, and food resources for wildlife species caused by habitat loss, fragmentation, and traffic disturbance. See the section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-136 of the Final Environmental Impact Statement, for additional details on potential effects on vegetation, wildlife, and wildlife habitat. The Arizona Department of Transportation and Federal Highway Administration completed a Biological Evaluation containing analysis of the project effects on listed and candidate species under the Endangered Species Act. The Biological Evaluation was completed in 2014 following identification of the Preferred Alternative in the Draft Environmental Impact Statement. The Biological Evaluation was sent to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality for technical assistance with assessing the level of project effects on listed and candidate species prior to completion of the Final Environmental Impact Statement. The Arizona Department of Transportation and Federal Highway Administration have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation. The results of the Biological Evaluation may be found beginning on page 4-125 of the Final Environmental Impact Statement. Text beginning on page 4-85 of the Final Environmental Impact Statement discusses the relationship and the contribution of the proposed action to Greenhouse Gas Emissions (Climate Change). In short, Federal Highway Administration has

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1 The amount of money that we're spending on this
2 freeway, 100 million per, what was it, mile, that's
3 outrageous, not to mention the $20 million to complete
4 this DEIS. People keep talking about cutting down on
5 pollution, but what about the pollution in our community?
6 Do we not matter? The air that we breathe, is our air
7 any less important than the people of Phoenix? When are
8 we going to actually matter? When are those
9 considerations going to happen?
10 And you're blasting through sacred mountain that
11 is religious and sacred to our people. I can't elaborate
12 on that because my time is out, but I just want to
13 mention that that is significant to our people.
14 THE FACILITATOR: Thank you, Ms. Riddle.
15 Our next speaker is David Martin. We welcome
16 David Martin.
17 Welcome, Mr. Martin.
18 MR. MARTIN: Thank you.
19 THE FACILITATOR: You have three minutes.
20 MR. MARTIN: Thank you. Members of the panel,
21 for the record, my name is David Martin, I sort of have
22 multiple hats here today. I am the president of the
23 Associated General Contractors, I chair an organization
24 called We Build Arizona, and I am an Ahwatukee resident,
25 so I sort of wear three hats.

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2 (cont.)		concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed action that such emissions from the proposed action would not result in reasonably foreseeable substantial adverse impacts on the human environment.
3	**Air Quality**	The Final Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency recently determined that Phoenix has attained the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. Fugitive dust and mobile source emissions from construction of the proposed freeway would be controlled by requiring the contractor to comply with the dust-control methods in Arizona Department of Transportation's *Standard Specifications for Road and Bridge Construction* (2008) and Maricopa County Rule 310, Fugitive Dust Ordinance. Disruption to traffic, especially during peak travel periods, would be minimized by a traffic control plan to help reduce impacts of traffic congestion and associated emissions during construction. These methods are discussed on page 4-85 of the Final Environmental Impact Statement.

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4	**Cultural Resources**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resource studies and engaging in an ongoing, open dialogue with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the Gila River Indian Community that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Final Environmental Impact Statement). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer.

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MS. RIDDLE: Okay. My name is Lori Riddle. I'm the co-founder of Grace Gila River Alliance for a Clean Environment, and I'm sponsored for GREY, that's Gila River Environmental Youth. I'm also a member of PARC, Protecting Arizona Resources and Children. I am a community member that lives here in the community. So just a few things that I'd like to mention, and I'll be doing my own written that I'll e-mail to the address.

Well, the first thing I want to touch on is the fact that the health impacts are not really addressed in this EIS. There are numerous health impacts that studies have shown in other states and other cities. You know, I mean, we're talking about an increase of heart attacks and strokes, we're talking about cancer, we're talking about development issues with unborn babies, miscarriages and stillborns.

So in my written comment, I'll go ahead and reference some things directly related to that. The other thing I would like to mention is the animal impact. We're talking about rains that would wash some of the fluids from vehicles into the pathway or into the areas where animals drink from. And with those -- those different type of fluids would be like

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1	**Health Effects**	Under the Clean Air Act, the U.S. Environmental Protection Agency is responsible for establishing National Ambient Air Quality Standards to protect public health and the environment from adverse effects of air pollutants. Health effects from air pollutants are based on the concentration of the pollutants and the duration of exposure. Concentrations vary with distance from a roadway based on many factors, including background (or ambient) levels of pollution from all sources; the number, speed, and type of vehicles on the roadway; wind speed and direction; topography; and other factors. For the proposed freeway, the Federal Highway Administration conducted modeling for carbon monoxide and particulate matter (PM_{10}) using worst-case (most congested or highest traffic) modeling locations at discrete receptor locations around each analysis location (primarily residences near the interchanges). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe) with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations. Overall, researchers felt that there was “sufficient” evidence for causality for the exacerbation of asthma. Evidence was “suggestive but not sufficient” for health outcomes such as cardiovascular mortality and others. Study authors also noted that past epidemiological studies may not provide an appropriate assessment of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics “hot spots.” In general, the

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1 radiator fluid, oils, anything dripping from the
2 vehicles that will be on the roadway. And once the
3 rains hit that and washes it down into the area where
4 the habitat is, I have a big problem with that. Not
5 to mention that the desert tortoise is up for
6 consideration for under the endangered species.
7 The plant impact, we're talking about
8 plants that we consider are medicinal plants both for
9 our medicine and healing uses, as well as sustenance.
10 You know, things that are edible that we've eaten for
11 -- for years that not only will the waters wash to
12 the animals, it will wash to plants and it would
13 directly impact those things.
14 I have an issue with this so-called
15 consultation with the tribe. In section 2 of the
16 DEIS, there's a list of meetings, but where was the
17 public notification with that? We didn't see
18 posters. We didn't see announcements in our tribal
19 newsletter.
20 So, you know, the other thing too is when
21 we had TTT meetings a month or so ago, technical
22 transportation team meeting, we were told that there
23 was going to be bus -- free bus services for
24 community members. I tried calling the number that's
25 listed for ADOT and I got -- I kept getting a message

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1 **(cont.)**		authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified. These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work. Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment: *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.* *In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.* *The report also looks at trends in other health conditions, such as Attention-Deficit/Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.* Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues.
2	**Biology, Plants, and Wildlife**	Impacts on biological resources are described in text beginning on page 4-125 of the Final Environmental Impact Statement. Various mitigation strategies presented in the Final Environmental Impact Statement will be implemented to reduce water quality impacts. For example, as noted in text on page 3-58 of the Final Environmental Impact statement drainage features will be constructed to specific design standards to reduce and control the amount of pollutant loading in drainage leaving the roadway. Further, the permitting processes described in the sections, *Water Resources* and *Waters of the United States*, beginning on pages 4-101 and 4-116, respectively, outline procedures to mitigate water quality impacts during construction and operation of the freeway. Finally, on page 4-108 of the Final

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saying the box is full and if I -- when I finally did leave a message, I left a message for someone to return my call and this was the week prior to the hearing in Phoenix at the convention center. No one returned my call. And when I approached a MAG member, Maricopa Association of Governments member, he shrugged his shoulders like it wasn't important and he said, "Oh, well, it's too late now." So I mean, the consultation and the communication has been a problem.

I do have a problem with the design of the casino. The fact that there are no accessible routes to our community. This is because I sit on the CTERC commission for my community, it's Chemical Tribal Emergency Response Commission. And so the first responders would have a difficult time going into the freeway if there are less exits and entrances to the freeway. So, you know, it would be time-consuming in a life-saving event to try to find which -- which exit is the closest, you know, especially in an area that doesn't have access.

The other thing is, there are no frontage roads provided, you know. No roads that we can utilize as the local community to -- to get from point A to point B without using a freeway itself.

Code	Issue	Response
2 (cont.)		Environmental Impact Statement, to reduce the potential impact of contaminants such as oil, grease, soil, and trash, settling basins would be used to collect water and allow materials to settle. These settling basins would require periodic cleaning and would be accredited as part of the Statewide Stormwater Management Program.
3	**Biology, Plants, and Wildlife**	A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the Sonoran desert tortoise. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). The Arizona Department of Transportation and Federal Highway Administration have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community personnel, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation.
4	**Biology, Plants, and Wildlife**	Within the context of overall vegetation, wildlife, and wildlife habitat, all action alternatives and options would decrease the amount of cover, nesting areas, and food resources for wildlife species caused by habitat loss, fragmentation, and traffic disturbance. See the section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-136 of the Final Environmental Impact Statement, for additional details on potential effects on vegetation, wildlife, and wildlife habitat. The Arizona Department of Transportation and Federal Highway Administration have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community personnel, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation.
5	**Public Involvement**	Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Final Environmental Impact Statement). In addition, representatives from the Gila River Indian Community participated for years in the South Mountain Citizens Advisory Team. On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. It is also important to note that the Gila River Indian Community's Lieutenant Governor is a member of the Transportation Policy Committee of the Maricopa Association of Governments, which oversees the development of the 20-year *Regional Transportation Plan* and guides transportation planning in the region. See Chapter 6, *Comments and Coordination*, of the Final Environmental Impact Statement for more information related to the outreach to members of the public, including members of the Gila River Indian Community throughout the environmental impact statement process.
6	**Public Involvement**	The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona

(Response 6 continues on next page)

Code	Comment Document

1

So, the air impacts. I understand that the air would be cleaner in the Phoenix metropolitan area, but all it's going to do is move the air pollution into our community. It's going to be excessive pollution because of the terrain of the area. Because we have two mountains as walls on the north and south side. So these things, I mean, they're heavy-duty things.

We're talking about dioxin furans which is cancer-causing. It's basically like Agent Orange. We're talking about particulate matter 2.5 microns and 10 microns that causes heart attacks and strokes because you breathe it into your lungs and it gets deep into your lungs and it starts affecting your heart. We're talking about carbon monoxide, we're talking about a multitude of other things and so that concerns me.

Also I mentioned earlier about water -- about the water impact, about the drainage off of the freeway and how it will be accessible for animals and plants to be utilizing that water. There's no catch, you know. And plus too we're talking about having the freeway next to Ahwatukee community. I mean, it's going to eventually get into some water sheds and eventually get into a community drinking system.

8

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Code	Issue	Response
6 (cont.)		Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 Papago, Maricopa, and Santan Freeways. These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013) and one in June (close of the Draft Environmental Impact Statement public comment period). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area. The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations.
7	**Design**	Traffic interchanges (on- and off-ramps) would be located at Van Buren Street, Buckeye Road, Lower Buckeye Road, Broadway Road, Southern Avenue, Baseline Road, Dobbins Road, Elliot Road, 51st Avenue, 17th Avenue, Desert Foothills Parkway, 24th Street, and 40th Street. Emergency responders would address the construction of the proposed freeway by amending the local emergency response plan to include the facility. Information related to this is presented on page 4-166 of the Final Environmental Impact Statement. Local traffic can continue to use existing roads to get from point A to point B. Frontage roads would increase the footprint of the Preferred Alternative and would result in greater social, economic, and environmental impacts. Therefore, frontage roads are not a part of the Preferred Alternative.
8	**Groundwater**	Impacts on groundwater are addressed in the Final Environmental Impact Statement, *Water Resources* section. The Study Area is located within two Active Management Areas that are regulated by the State of Arizona. The Arizona Department of Water Resources administers groundwater use. Water level decline in one subbasin can be offset by recharging water in another subbasin of the Active Management Area. The Arizona Department of Water Resources regulates drilling, installation, and abandonment of groundwater wells. (See Final Environmental Impact Statement page 4-104). If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See the text box on Final Environmental Impact Statement page 4-108.)

Code	Comment Document

1

The studies regarding health impacts. I mean, there was a study in Utah, the state of Utah. Was done by the Sierra Club and impacts the people there living near freeways. There's also been studies in the L.A. area about the impacts to the people there and to the children. I believe there was even a study in the metropolitan Phoenix area. I believe it was in the north, northwest side of Phoenix, and I'll reference all these in more detail on my -- on my written comment. But just bringing up the fact that there's a multitude of health issues that we need to be looking at. And I think that's it right now.

(The proceedings concluded at 12:00 p.m.)

Code	Issue	Response
		Responses to specific comments are provided on the following pages.

Code	Comment Document

From: contaminatedinaz@yahoo.com
To: Projects
Cc: Brad Angel; Monica Fish
Subject: GRACE comments to DEIS part 1 of 3
Date: Wednesday, July 24, 2013 5:50:48 PM
Attachments: GRACE Comments to ADOT 7.24.13.doc
ATT00001.txt

Lori Riddle
520-610-3405

Code	Issue	Response

Code	Comment Document

July 24, 2013

South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007
projects@azdot.gov

(via email)

COMMENTS IN OPPOSITION TO THE PROPOSED SOUTH MOUNTAIN LOOP 202

The Gila River Alliance for a Clean Environment (GRACE), a grassroots organization of the Akimel O'odham, (River People) and Maricopa (Pee Posh) indigenous peoples of the Gila River Indian Community (GRIC), submits these comments to the Arizona Department of Transportation (ADOT) in opposition to the South Mountain Loop on behalf of our tribal members that would be negatively and disparately impacted by the proposed project.

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."[1] The GRIC, as a protected class of people, was discriminated against by:

- ADOT knowingly and purposely designing the South Mountain Loop 202 through our sacred South Mountain, recognizing and acknowledging that the South Mountain Loop 202 would have a serious and major disparate impact on us as a nation both culturally and spiritually.

- ADOT's reason a purpose and need for the DEIS with inaccurate estimates of population projections, alleged uses of the South Mountain Loop 202.

- ADOT's failure to analyze the South Mountain Loop 202's disparate environmental, economic, and health impacts on the GRIC.

- ADOT's inadequate consultation and informed consent, notice, and meaningful participation in the DEIS scoping and planning.

We urge ADOT to abide by Title VI and comply with state and federal civil rights mandates, to follow applicable laws, and reject the South Mountain Loop 202.

[1] 42 U.S.C § 2000d

Gila River Alliance for a Clean Environment
P.O. Box 11217
Bapchule Az 85121
529-610-3405
contaminatedinaz@yahoo.com

Code	Issue	Response
		Responses to specific comments are provided on the following pages.

Code	Comment Document

Attached are our full comments that include an addendum of tribal member comments that have been incorporated into our comments, and our Title VI Civil Rights Complaint that will be filed with the Federal Transit Administration Office of Civil Rights.

Sincerely,

Lori Riddle,
GRACE Co-Founder
P.O. Box 11217
Bapchule Az 85121
contaminatedinaz@yahoo.com

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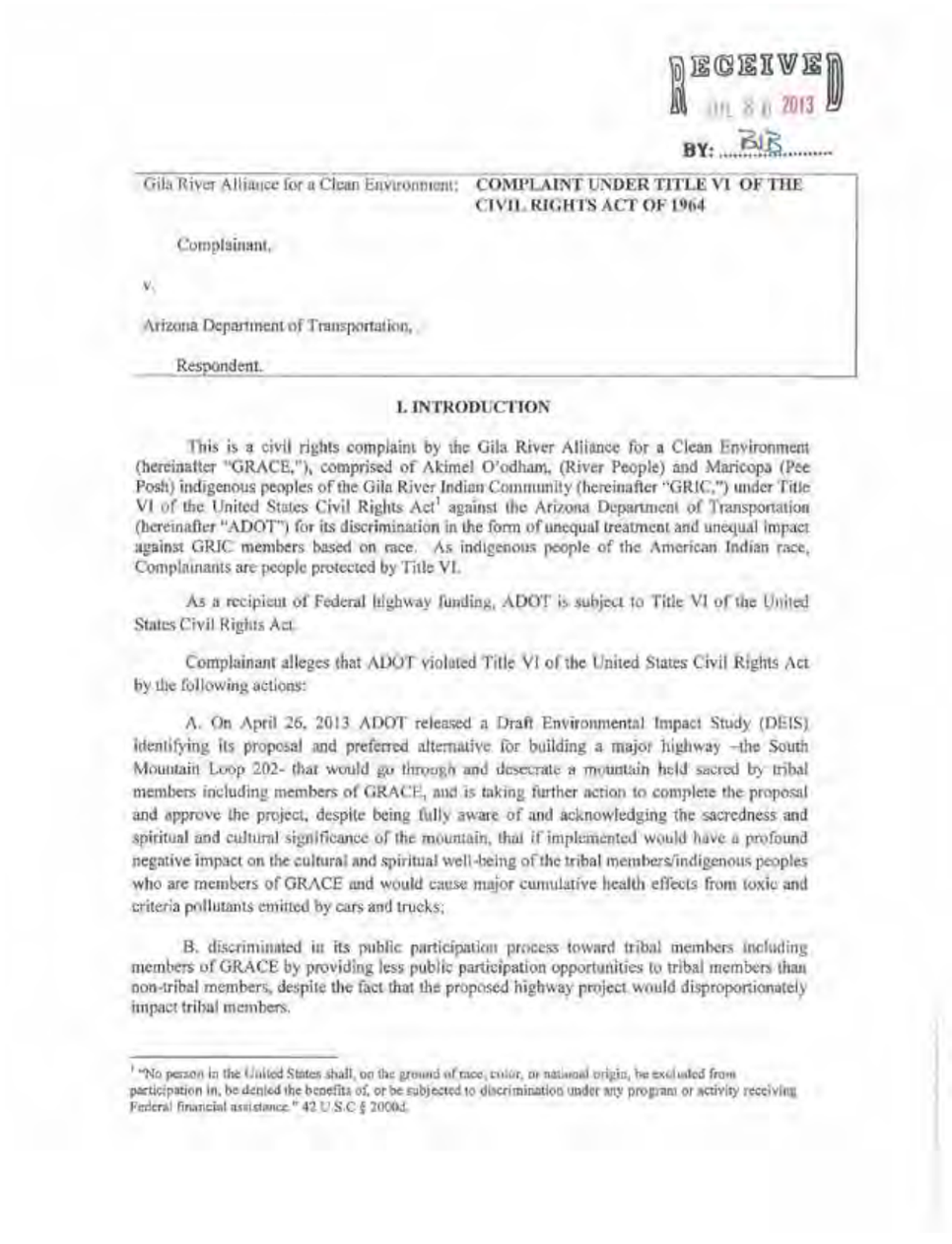
Code	Issue	Response

Code	Comment Document



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OCT 30 2013
BY: BJR

Gila River Alliance for a Clean Environment; COMPLAINT UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Complainant,

v.

Arizona Department of Transportation,

Respondent.

I. INTRODUCTION

1 This is a civil rights complaint by the Gila River Alliance for a Clean Environment (hereinafter "GRACE,"), comprised of Akimel O'odham, (River People) and Maricopa (Pee Posh) indigenous peoples of the Gila River Indian Community (hereinafter "GRIC,") under Title VI of the United States Civil Rights Act[1] against the Arizona Department of Transportation (hereinafter "ADOT") for its discrimination in the form of unequal treatment and unequal impact against GRIC members based on race. As indigenous people of the American Indian race, Complainants are people protected by Title VI.

As a recipient of Federal highway funding, ADOT is subject to Title VI of the United States Civil Rights Act.

2 Complainant alleges that ADOT violated Title VI of the United States Civil Rights Act by the following actions:

3 A. On April 26, 2013 ADOT released a Draft Environmental Impact Study (DEIS) identifying its proposal and preferred alternative for building a major highway –the South Mountain Loop 202- that would go through and desecrate a mountain held sacred by tribal members including members of GRACE, and is taking further action to complete the proposal and approve the project, despite being fully aware of and acknowledging the sacredness and spiritual and cultural significance of the mountain, that if implemented would have a profound negative impact on the cultural and spiritual well-being of the tribal members/indigenous peoples who are members of GRACE and would cause major cumulative health effects from toxic and criteria pollutants emitted by cars and trucks;

4

5 B. discriminated in its public participation process toward tribal members including members of GRACE by providing less public participation opportunities to tribal members than non-tribal members, despite the fact that the proposed highway project would disproportionately impact tribal members.

[1] "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." 42 U.S.C § 2000d.

Code	Issue	Response
1	**Title VI**	Since Gila River Alliance for a Clean Environment's Title VI complaint was received during the public comment period for the Draft Environmental Impact Statement, it has been included as a part of the Comment and Response appendix. However, it should be noted that the National Environmental Policy Act process is separate from the U.S. Department of Transportation Title VI complaint process.
2	**Title VI**	Specific comments are addressed below.
3	**Cultural Resources**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resource studies and engaging in an ongoing, open dialogue with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the Gila River Indian Community that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
4	**Air Quality**	The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012

(Response 4 continues on next page)

Code	Comment Document
6	II. TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 To succeed in this Civil Rights complaint, the complainant does not have to show that there was a deliberate, intentional discrimination by ADOT, but rather, that there is a discriminatory effect / disparate impact that gives rise to a section 601 Title VI of the Civil Rights Act of 1964 violation. Section 601 of Title VI of the Civil Rights Act of 1964 states that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."[2] Section 602 of Title VI states: "Each Federal department and agency which is empowered to extend Federal financial assistance to any program or activity[3]…is authorized and directed to effectuate the provisions of section 601"[4] Section 602 prohibits recipients of federal funds to engage in any activities that result in discriminatory effect or disparate impact against individuals, groups of people, or whole communities of a certain race, color, or national origin.[5] The discriminatory effect / disparate impact can occur when a seemingly neutral decision or action results in an unjustifiable adverse effect. Or in other words, an inaction or action by a recipient of federal funds that may appear neutral on its face and is not accompanied with any intent to discriminate, but nevertheless negatively affects an individual, groups of people, or a whole community of a certain race, color, or national origin, without any substantial legitimate justification, violates Title VI. The actions of ADOT were clearly not neutral and were made with total awareness and acknowledgement that the proposed freeway route through the sacred mountain would have serious negative cultural, spiritual and health impacts on a protected class of people. III. THE COMPLAINANTS Complainant GRACE is a grassroots organization of the Akimel O'odham, (River People) and Maricopa (Pee Posh) indigenous peoples of the GRIC. The GRIC's reservation abuts the proposed project site, the GRIC and its people including the complainant have strong cultural and spiritual ties to South Mountain and they use the project site for cultural and spiritual purposes. Under Title VI, Native Americans are a protected class and historically have been discriminated against by the US government GRACE advocates for the protection of the environment and the sacred and cultural sites of the Gila River Indian Community and its people.[6] Its mission is "to inform Indigenous peoples on environmental issues affecting their communities."[7] GRACE was formed in the early [2] 42 U.S.C § 2000d. [3] Arizona's transportation system is partly funded by grants from the Federal Highway Administration through the Federal Aid Highway Program. [4] Transcript of Civil Rights Act (1964) http://www.ourdocuments.gov/doc.php?flash=true&doc=97&page=transcript (last visited July 23, 2013). [5] U.S. Commission on Civil Rights, Title VI and Environmental Justice http://www.usccr.gov/pubs/envjust/ch3.htm (last visited July 6, 2013). [6] Gila River originates in southwestern New Mexico and stretches about 600 miles across Arizona. (The Gila River Featured as Arizona's River of the Month Aug. 29, 2012 http://www.edf.org/news/gila-river-featured-arizonas-river-month (last visited July 6, 2013)). [7] Gila River Alliance for a Clean Environment - Support and Network, *Take action for Indigen ous rights and sacred land on Indigenous Peoples Day*, http://www.geocities.ws/contaminatedinaz/announce.html (last visited July 6, 2013). 2

Code	Issue	Response
4 (cont.)		conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.
5	**Environmental Justice, Public Involvement**	The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. This information has also been added to the *Environmental Justice and Title VI* Section on pages 4-38 and 4-44 of the Final Environmental Impact Statement, respectively. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and fully considered input and comments that were received. Chapter 2 of the Final Environmental Impact Statement is dedicated to the explanation of the Gila River Indian Community outreach undertaken for the project. Chapter 6 of the Final Environmental Impact Statement further describes Community outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionate and highly adverse impacts would result from the construction and operation of the proposed action.
6	**Title VI**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. The section entitled *Title VI and Environmental Justice,* beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of

(Response 6 continues on next page)

Code	Comment Document
7	II. TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 To succeed in this Civil Rights complaint, the complainant does not have to show that there was a deliberate, intentional discrimination by ADOT, but rather, that there is a discriminatory effect / disparate impact that gives rise to a section 601 Title VI of the Civil Rights Act of 1964 violation. Section 601 of Title VI of the Civil Rights Act of 1964 states that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."[2] Section 602 of Title VI states: "Each Federal department and agency which is empowered to extend Federal financial assistance to any program or activity[3]…is authorized and directed to effectuate the provisions of section 601"[4] Section 602 prohibits recipients of federal funds to engage in any activities that result in discriminatory effect or disparate impact against individuals, groups of people, or whole communities of a certain race, color, or national origin.[5] The discriminatory effect / disparate impact can occur when a seemingly neutral decision or action results in an unjustifiable adverse effect. Or in other words, an inaction or action by a recipient of federal funds that may appear neutral on its face and is not accompanied with any intent to discriminate, but nevertheless negatively affects an individual, groups of people, or a whole community of a certain race, color, or national origin, without any substantial legitimate justification, violates Title VI.
8	The actions of ADOT were clearly not neutral and were made with total awareness and acknowledgement that the proposed freeway route through the sacred mountain would have serious negative cultural, spiritual and health impacts on a protected class of people.
	III. THE COMPLAINANTS
9	Complainant GRACE is a grassroots organization of the Akimel O'odham, (River People) and Maricopa (Pee Posh) indigenous peoples of the GRIC. The GRIC's reservation abuts the proposed project site, the GRIC and its people including the complainant have strong cultural and spiritual ties to South Mountain and they use the project site for cultural and spiritual purposes. Under Title VI, Native Americans are a protected class and historically have been discriminated against by the US government
10	GRACE advocates for the protection of the environment and the sacred and cultural sites of the Gila River Indian Community and its people.[6] Its mission is "to inform Indigenous peoples on environmental issues affecting their communities."[7] GRACE was formed in the early
	[2] 42 U.S.C § 2000d. [3] Arizona's transportation system is partly funded by grants from the Federal Highway Administration through the Federal Aid Highway Program. [4] Transcript of Civil Rights Act (1964) http://www.ourdocuments.gov/doc.php?flash=true&doc=97&page=transcript (last visited July 23, 2013). [5] U.S. Commission on Civil Rights, Title VI and Environmental Justice http://www.usccr.gov/pubs/envjust/ch3.htm (last visited July 6, 2013). [6] Gila River originates in southwestern New Mexico and stretches about 600 miles across Arizona. (The Gila River Featured as Arizona's River of the Month Aug. 29, 2012 http://www.edf.org/news/gila-river-featured-arizonas-river-month (last visited July 6, 2013)). [7] Gila River Alliance for a Clean Environment - Support and Network, *Take action for Indigen ous rights and sacred land on Indigenous Peoples Day*, http://www.geocities.ws/contaminatedinaz/announce.html (last visited July 6, 2013).
	2

Code	Issue	Response
6 (cont.)		comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community.
7	**Title VI**	Comment noted. Regulation cited.
8	**Environmental Justice and Title VI, Air Quality**	The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community. The Arizona Department of Transportation and Federal Highway Administration have been attentive to concerns expressed by the Gila River Indian Community and reiterate that position in this comment; the agencies have taken these concerns into account in describing potential impacts in the Draft Environmental Impact Statement, in ensuring that access to South Mountain would be preserved, and in developing and recommending the implementation of numerous mitigation measures. The proposed freeway is not located on Native American land. The South Mountain Park/Preserve is owned by the City of Phoenix. Through many years of transportation planning in the valley and as discussed in Chapter 1, *Purpose and Need*, there is a compelling government interest for the proposed freeway. Consultation has occurred and will continue to occur at all levels of government, including the Gila River Indian Community. Mitigation measures have been identified by the Tribal Historic Preservation Officer that will be implemented. The Preferred Alternative is recognized to have an adverse impact on the South Mountains. Other alternatives that would have avoided the South Mountains were rejected by the Gila River Indian Community or would have had severe social and economic impacts. These alternatives would have increased costs of extraordinary magnitude. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile

(Response 8 continues on next page)

Code	Comment Document
11	2000s when action was needed to stop Stericycle, a medical waste incineration facility, located on the GRIC reservation from continuing to illegally burn medical and non-medical waste imported onto the reservation and emit Hazardous Air Emissions (HAPs).[8] GRACE also led the successful campaign to prevent Romic, another private hazardous waste facility operating on the GRIC reservation without the required federal permits, from continuing to violate hazardous waste laws and pollute the area and residents."[9] GRIC tribal members and the tribe hold the South Mountain sacred and see it as central to its creation story.[10] GRACE opposes the proposed South Mountain Loop 202 because the project would desecrate the South Mountain by going through it, resulting in a disparate impact – culturally and spiritually on the GRIC[11]-- and in disparate cumulative health effects[12] on the GRIC tribal members. Complainant GRACE brings this Civil Rights Complaint on behalf of its GRIC tribal members who have been discriminated against by ADOT's inadequate consultation and unequal public participation process and who would be disparately affected by the implementation of the South Mountain Loop due to devastating cultural, spiritual, health and environmental impacts. The GRIC includes the tribes of the Akimel O'odham, (River People), and the Maricopa (Pee Posh).[13] The Akimel O'odham, who have inhabited the Sonoran Desert long before Europeans settled the Americas, are native to central and southern Arizona and are descendants of the Hohokam, whose artifacts have been dated as far back as 10,000 years ago.[14] Known as the "desert farmers" by some, the Akimel O'odham were sophisticated engineers and farmers, successfully growing a variety of crops in the Sonoran desert landscape.[15] The Maricopa are a Yuman tribal people.[16] As early as the mid-1700s, the Maricopa arrived from their lower Colorado River area homes.[17]

[8] Greenaction for Health & Environmental Justice, *Gila River Alliance for a Clean Environment* Nov. 26, 2002 http://greenaction.cclearn.org/ies/pr112602.shtml (last visited July 6, 2013).
[9] Greenaction for Health and Environmental Justice, *Gila River Indian Community Tribal Members & Environmental Justice Supporters to Hold Rally to Demand Closure of Romic Toxic Waste Plant* http://greenaction.cclearn.org/indigenouslands/gilariver/documents/PressAdvisoryGilaRiverIndianCommunityToxicWasteProtest032407.pdf (last visited July 6, 2013); Censored News, Bradley Angel, *Gila River: Victory to shut down hazardous waste facility* June 20, 2007 http://bsnorrell.blogspot.com/2007/06/gila-river-victory-to-shut-down.html (last visited July 6, 2013).
[10] Gila River Indian Community Resolution NO. GR-41-07, A Resolution Designating the South Mountain Range (Muhadag, Avikwaxos) as a Sacred Place and Traditional Cultural Property of the Gila River Indian Community.
[11] Indian County Media Network, *Video: Footage From Sacred Sites Rally in Arizona* April 2, 2013 http://indiancountrytodaymedianetwork.com/2013/04/02/video-footage-sacred-sites-rally-arizona-148501http://indiancountrytodaymedianetwork.com/2013/04/02/video-footage-sacred-sites-rally-arizona-148501 (last visited July 6, 2013).
[12] Gila River Indian Community, Roberto A. Jackson *202 Referendum Kicks Off in Sacaton* http://www.gilariver.org/index.php/january-2012-grin/2519-loop-202-forum (last visited July 6, 2013).
[13] The Maricopa live in district 7 of the GRIC. The Gila River Indian Community, History: the Gila River, http://www.gilariver.org/index.php/about-tribe/profile/history (last visited July 6, 2013).
[14] The Gila River Indian Community, History: the Gila River, http://www.gilariver.org/index.php/about-tribe/profile/history (last visited July 6, 2013); This is the current age and most likely will change as archeologists continue to find older and older artifacts.
[15] The Gila River Indian Community, History: the Gila River, http://www.gilariver.org/index.php/about-tribe/profile/history (last visited July 6, 2013).
[16] *Id.*
[17] *Id.*

Code	Issue	Response
8 (cont.)		source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.
9	**Title VI**	Comment noted.
10	**Cultural Resources**	Comment noted.
11	**Cultural Resources**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resource studies and engaging in an ongoing, open dialogue with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the Gila River Indian Community that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources,* beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly

(Response 11 continues on next page)

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2000s when action was needed to stop Stericycle, a medical waste incineration facility, located on the GRIC reservation from continuing to illegally burn medical and non-medical waste imported onto the reservation and emit Hazardous Air Emissions (HAPs).[8] GRACE also led the successful campaign to prevent Romic, another private hazardous waste facility operating on the GRIC reservation without the required federal permits, from continuing to violate hazardous waste laws and pollute the area and residents."[9]

GRIC tribal members and the tribe hold the South Mountain sacred and see it as central to its creation story.[10] GRACE opposes the proposed South Mountain Loop 202 because the project would desecrate the South Mountain by going through it, resulting in a disparate impact – culturally and spiritually on the GRIC[11]-- and in disparate cumulative health effects[12] on the GRIC tribal members.

12 Complainant GRACE brings this Civil Rights Complaint on behalf of its GRIC tribal members who have been discriminated against by ADOT's inadequate consultation and unequal public participation process and who would be disparately affected by the implementation of the South Mountain Loop due to devastating cultural, spiritual, health and environmental impacts.

13 The GRIC includes the tribes of the Akimel O'odham, (River People), and the Maricopa (Pee Posh).[13] The Akimel O'odham, who have inhabited the Sonoran Desert long before Europeans settled the Americas, are native to central and southern Arizona and are descendants of the Hohokam, whose artifacts have been dated as far back as 10,000 years ago.[14] Known as the "desert farmers" by some, the Akimel O'odham were sophisticated engineers and farmers, successfully growing a variety of crops in the Sonoran desert landscape.[15] The Maricopa are a Yuman tribal people.[16] As early as the mid-1700s, the Maricopa arrived from their lower Colorado River area homes.[17]

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[8] Greenaction for Health & Environmental Justice, *Gila River Alliance for a Clean Environment* Nov. 26, 2002 http://greenaction.cclearn.org/ies/pr112602.shtml (last visited July 6, 2013).
[9] Greenaction for Health and Environmental Justice, *Gila River Indian Community Tribal Members & Environmental Justice Supporters to Hold Rally to Demand Closure of Romic Toxic Waste Plant* http://greenaction.cclearn.org/indigenouslands/gilariver/documents/PressAdvisoryGilaRiverIndianCommunityToxicWasteProtest032407.pdf (last visited July 6, 2013); Censored News, Bradley Angel, *Gila River: Victory to shut down hazardous waste facility* June 20, 2007 http://bsnorrell.blogspot.com/2007/06/gila-river-victory-to-shut-down.html (last visited July 6, 2013).
[10] Gila River Indian Community Resolution NO. GR-41-07, A Resolution Designating the South Mountain Range (Muhadag, Avikwaxos) as a Sacred Place and Traditional Cultural Property of the Gila River Indian Community.
[11] Indian County Media Network, *Video: Footage From Sacred Sites Rally in Arizona* April 2, 2013 http://indiancountrytodaymedianetwork.com/2013/04/02/video-footage-sacred-sites-rally-arizona-148501http://indiancountrytodaymedianetwork.com/2013/04/02/video-footage-sacred-sites-rally-arizona-148501 (last visited July 6, 2013).
[12] Gila River Indian Community, Roberto A. Jackson *202 Referendum Kicks Off in Sacaton* http://www.gilariver.org/index.php/january-2012-grin/2519-loop-202-forum (last visited July 6, 2013).
[13] The Maricopa live in district 7 of the GRIC. The Gila River Indian Community, History: the Gila River, http://www.gilariver.org/index.php/about-tribe/profile/history (last visited July 6, 2013).
[14] The Gila River Indian Community, History: the Gila River, http://www.gilariver.org/index.php/about-tribe/profile/history (last visited July 6, 2013); This is the current age and most likely will change as archeologists continue to find older and older artifacts.
[15] The Gila River Indian Community, History: the Gila River, http://www.gilariver.org/index.php/about-tribe/profile/history (last visited July 6, 2013).
[16] *Id.*
[17] *Id.*

Code	Issue	Response
11 (cont.)		meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Final Environmental Impact Statement). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and the Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. No disparate health effects, either direct or cumulative, would result from the implementation of the Preferred Alternative. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement.
12	**Title VI**	The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received. Chapter 2 of the Final Environmental Impact Statement is dedicated to explaining the Gila River Indian Community outreach undertaken for the project. The Gila River Indian Community was provided the same opportunities to participate in the project as all other populations and agencies. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Final Environmental Impact Statement). In addition, representatives from the Gila River Indian Community participated for years in the South Mountain Citizens Advisory Team. On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. It is also important to note, that the Gila River Indian Community's Lieutenant Governor is a member of the Transportation Policy

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13	In 1859, GRIC was established as the first reservation in part of what later became Arizona in 1912.[18] In 1862, when water flowed freely, GRIC was growing more than one million pounds of wheat a year; however, between the 1870s and 1880s, water supplies drastically diminished due to upstream diversions by non-Native farmers. These diversions rendered farming almost nonexistent.[19] Between approximately 1880 and 1920, GRIC faced mass famine and starvation.[20] Due to the need for outside assistance, diet and way of life completely changed.[21] Alcoholism became a major problem and the GRIC "experienced the loss of certain cultural and artistic traditions and rituals."[22] "This time became one of…the darkest moment(s) in …their… long history."[23] In the 1930s, circumstances began to improve when the U.S. government completed Coolidge Dam on the upper Gila River, which created the San Carlos Reservoir: this restored some farming practices.[24] Eventually, small businesses, schools, health centers, and new housing began to appear on the reservation.[25] However, GRIC faces one of the highest levels of diabetes in the United States, thought to be directly a result of the disappearance of the traditional lifestyle and diet.[26]
14	The GRIC history also includes forced boarding school for children, which not only was psychologically and physically oppressive but was culturally and socially oppressive, as it was instituted to acculturate Native American children into non-native American Indian speaking and practicing children.
15	Today, encompassing 372,000 acres along the Gila River, GRIC is the seventh largest federally recognized reservation in Arizona.[27] It is in both Pinal and Maricopa counties and is 17 miles south of downtown Phoenix.[28] Approximately 14,000 of the 21,000 enrolled GRIC members live on the reservation.[29] 4,274 or 36% of GRIC tribal members on the reservation are under 18 and 7,438 or 64% are over 18; 675 or 6% of GRIC tribal members are 65 and older.[30] The Akimel O'odham (River People) comprise 90% of the GRIC reservation and the Pee Posh (Maricopa), who live at the west end of the South Mountain, comprise about 10% of the GRIC

[18] In 1846, the territory now known as southern Arizona, came under the control of the US, and in 1854, the entire present day Arizona territory was officially made part of the United States territory. Arizona became a US state in 1912. *Id.*
[19] *Id.*
[20] *Id.*
[21] *Id.*
[22] *Id.*
[23] *Id.*
[24] *Id.*
[25] *Id.*
[26] Jovana J. Brown, *When Our Water Returns: Gila River Indian Community and Diabetes1* http://www.evergreen.edu/tribal/docs/WhenOurWaterreturns%2009-25-09.pdf (last visited July 6, 2013).
[27] ADOT, South Mountain Study Team, *Chapter 2 Gila River Indian Community Coordination* http://www.azdot.gov/south-mountain-loop-202-docs/eis/chapter2/chapter2.pdf (last visited July 6, 2013).
[28] Gila River, Tourist Attractions, http://www.gilariver.org/index.php/about-tribe/profile/tourism/18-tourist-attractions/159-tourist-attractions (last visited July 6, 2013).
[29] ADOT, South Mountain Study Team, *Chapter 2 Gila River Indian Community* Coordinationhttp://www.azdot.gov/south-mountain-loop-202-docs/eis/chapter2/chapter2.pdf (last visited July 6, 2013).
[30] United States Census Bureau, *2010 Demographic Profile* http://www.census.gov/popfinder/ (last visited June 17, 2013).

Code	Issue	Response
12 (cont.)		Committee of the Maricopa Association of Governments, which oversees the development of the 20-year *Regional Transportation Plan* and guides transportation planning in the region. The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing, and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along Interstate 10 (Papago, Maricopa, and Santan Freeways). These electronic notices included notice of availability of the Draft Environmental Impact Statement (distributed on April 26, 2013); date of the public hearing (distributed on May 10, 2013); dates of the community forums (distributed on May 29, 2013); and notification in June regarding the close of the Draft Environmental Impact Statement public comment period. In addition, anyone who had attended a previous meeting regarding the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area. The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations. Response to Comment 11 immediately preceding this response addresses cultural, spiritual, health and environmental impacts referenced in the comment.
13	**Cultural Resources**	Comment noted.
14		Comment noted.
15	**Tribal Involvement**	Comment noted.

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reservation. GRIC is organized into seven territorial districts.[31] GRIC has an executive branch, comprised of a governor and lieutenant governor; a legislative, made up of a Community Council[32] consisting of members from the seven territorial districts of the reservation; and a judicial branch, with a Community Court of seven judges that provides services to approximately 20,000 members of GRIC.[33]

15 GRIC's economy has been growing via agricultural, gaming, and the development of industrial parks.[34] GRIC is currently one of the largest agricultural producers in the state of Arizona, farming cotton, wheat, millet, alfalfa, barley, melons, pistachios, olives, citrus, and vegetables.[35] Now that it has finally settled an ongoing water dispute and will be receiving enough water to sustain itself, it plans to put in approximately 140,000 more acres of agriculture in the next 20 years.[36] GRIC has three casinos, Wild Horse Pass, Lone Butte, and Vee Quiva.[37] GRIC operates three industrial parks.[38] Like the US states, GRIC has its own transportation and environmental departments.

16 As a Native Nation, the federal government has a direct trust relationship with the GRIC and its people. The basis for this special legal relationship is found directly in the Constitution and memorialized in treaties.[39] This trust relationship applies to all Federal agencies and to Federal action outside Indian reservations.[40] Due to this trust relationship, the government has a special legal responsibility to review this complaint according to the unique requirements owed to the GRIC by the government.

17 Because of the 1992 National Historic Preservation Act (NHPA) Amendments, the GRIC has a Tribal Historic Preservation Officer (THPO) to assist in identifying and nominating historic properties / historic resources on their tribal lands[41] for the National Park Service (NPS) to place

[31] The districts are: Blackwater, Hashen, Kehk, Sacaton, Santan, Casa Blanca, Komatke, Maricopa Colony. (The Gila River Indian Community, Government, http://www.gilariver.org/index.php/about-tribe/districts (last visited June 9, 2013)).
[32] According to Article III Sect. 6 of the Gila River Indian Community Constitution, "the Council shall have the power to enact ordinances, subject to review of the Secretary of the Interior." http://thorpe.ou.edu/IRA/gilacons.html (last visited July 8, 2013).
[33] The Gila River Indian Community, Government, http://www.gilariver.org/ (last visited July 8, 2013).
[34] Inter Tribal Council of Arizona, Inc., Gila River Indian Community http://itcaonline.com/?page_id=1158 (last visited July 8, 2013).
[35] *Id.*
[36] GRIC Response to EPA, Gila River Indian Community Response to EPA's Nine Factors Requirement for Designation of PM-2.5 Under the National Ambient Air Quality Standards, p. 2 Jan. 4, 2011, http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2010-0163-0016 (last visited July 6, 2013); Arizona Department of Water Resources, Gila River Indian Community Water Rights Settlement – 2006, http://www.azwater.gov/AzDWR/SurfaceWater/Adjudications/New_Gila_River_Indian_Community_Settlement.htm (last visited July 11, 2013).
[37] Gila River Gaming Enterprises, http://www.wingilariver.com/ (last visited July 22, 2013).
[38] Inter Tribal Council of Arizona, Inc., Gila River Indian Community http://itcaonline.com/?page_id=1158 (last visited July 8, 2013).
[39] See Art. I, § 8, par. 3 of the U.S. Constitution.
[40] See, e.g., Nance v. Environmental Protection Agency, 645 F.2d 701, 711 (9th Cir. 1981), cert. den. 454 U.S. 1081 (1981); Pyramid Lake Paiute Tribe v. U.S. Dept. of Navy, 898 F.2d 1410, 1420 (9th Cir. 1990). See, e.g., internal guidance documents issued by the Department of the Interior in its Departmental Manual (DM), at 303 DM chapter 2, 512 DM chapter 2 (acknowledging that all bureaus and offices within DOI are subject to the federal trust responsibility when their actions affect "tribal trust resources, trust assets, or tribal health and safety." 512 DM §2.2. The DOI Departmental Manual is available in the Electronic Library of Interior Policies at: elips.doi.gov.
[41] Tribal lands means "all lands within the exterior boundaries of any Indian reservation; and …all dependent Indian communities" (16 U.S.C. § 470w(14)).

Code	Issue	Response
16	**Title VI**	Since Gila River Alliance for a Clean Environment's Title VI complaint was received during the public comment period for the Draft Environmental Impact Statement, it has been included as a part of the Comment and Response appendix. However, it should be noted that the National Environmental Policy Act process is separate from the U.S. Department of Transportation Title VI complaint process.
17	**Cultural Resources**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resource studies and engaging in an ongoing, open dialogue with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the Gila River Indian Community that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.

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on the National Register of Historic Places (NRHP) of 1966. The purpose of the NHPA is to "preserve the historical and cultural foundations of the Nation as living parts of community life."[42] The NHPA "established the National Register of Historic Places and the requirements under Section 106 of that Act that require federal agencies to take into account the effects of their actions on historic properties listed on or eligible for inclusion on the National Register."[43] The South Mountain has been approved as a traditional cultural property "eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community."[44]

IV. THE ARIZONA DEPARTMENT OF TRANSPORTATION

ADOT, a state government agency created in 1974, is the sponsor of the proposed construction and operation of the South Mountain Loop 202.[45] It is "responsible for collecting transportation revenues and for planning, constructing and maintaining Arizona's highway infrastructure,"[46] as well as, the state's public transportation and municipal airports.[47] Its mission is "to provide a safe, efficient, cost-effective transportation system."[48] On April 26, 2013, ADOT released a DEIS for the Loop 202 South Mountain Freeway Study.[49]

ADOT is a recipient of federal highway funds and is thus subject to and required to comply with the non-discriminatory requirements of Title VI of the U.S. Civil Rights Act.

V. RIPENESS

18

This complaint is timely filed because it is in response to the improper and discriminatory action taken by ADOT's April 26, 2013 sponsorship and release of the DEIS for the Loop 202 South Mountain Freeway Study that was prepared by the Federal Highway Administration (FHWA), the federal lead agency for the proposed action, in cooperation with the U.S. Army Corps of Engineers (USACE), the U.S. Bureau of Indian Affairs (BIA), and the Western Area

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[42] Patricia Parker, *Traditional Cultural Properties: What You Do and How We Think*, Volume 16 CRM 1993 http://www8.nau.edu/hcpo-p/Parker.pdf.
[43] *Id.*
[44] National Park Service, National Register Bulletin 38, Guidelines for Evaluating and Documenting Traditional Cultural Properties 1990, available at www.cr.nps.gov/nr/publications/bulletins/nrb38/htm; Criteria for eligibility for being on the National Register are: "associated with events that have made a significant contribution to the broad patterns of our history; are associated with the lives of persons significant in our past; embody the distinctiveness of a type, period, or method of construction, or…represent the work of a master, or…possess high artistic values, or…represent a significant and distinguishable entity whose components may lack individual distinction; or have yielded, or may be likely to yield, information important in prehistory or history." 36 C.F.R. § 60.4.
[45] ADOT, South Mountain Study Team, *South Mountain Freeway Draft EIS Summary*, 1 available at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/FHWA-AZ-EIS/00-SMDEIS-Summary-Chapter.pdf
[46] ADOT, *Strategic Plan fiscal years 2013-2017*, 2011 available at http://www.azdot.gov/Inside_adot/PDF/StrategicPlan.pdf.
[47] About ADOT, http://www.azdot.gov/Index_docs/About_ADOT.asp (last visited July 8, 2013).
[48] *Id.*
[49] Loop 202 (South Mountain Freeway), http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/index.asp (last visited July 8, 2013).

Code	Issue	Response
18	**Title VI**	Since Gila River Alliance for a Clean Environment's Title VI complaint was received during the public comment period for the Draft Environmental Impact Statement, it has been included as a part of the Comment and Response appendix. However, it should be noted that the National Environmental Policy Act process is separate from the U.S. Department of Transportation Title VI complaint process.

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19	Power Administration.[50] The release of the DEIS began a 90-day public review and comment period that will conclude on July 24, 2013.[51] This complaint is also timely filed because ADOT conducted a public participation process to receive public input on the proposed project, but conducted it in a way that provided GRIC tribal members, including members of GRACE, less of an opportunity to meaningfully participate in the process than non-Native people. VI. STATEMENT OF FACTS A. SOUTH MOUNTAIN (Muhadag, Avikwaxos) The South Mountain, known in the Pima language as the Muhadag and in the Maricopa language, Avikwaxos,[52] consists of the Ma Ha Tauk, Gila, and Guadalupe Mountain Ranges.[53] It abuts the northern territory of the GRIC and consequently, is the immediate landscape of the northern boundary of the GRIC reservation. A portion of Main Ridge North and Main Ridge South of the South Mountain is on the GRIC, and serve as the "Community's main, direct physical link to the South Mountains".[54] The South Mountain "figures prominently in oral traditions of both the Akimel O'Odham (River People) and the Pee Posh (Maricopa)."[55] The Akimel O'odham believe that South Mountain is where their creator immerged. On January 6, 1982, the Gila River Indian Community Tribal Council adopted an ordinance declaring "as a matter of Community policy and legislative determination, that the public interests of the Pima-Maricopa people and the interests of all other persons living within the jurisdiction of the Gila River Indian Community require that the Community adopt a means whereby all sites, location, structures, and objects of sacred, historical or scientific interest or nature will be protected from desecration, destruction, theft, or other interference."[56] Then in 1989, the Gila River Indian Community Tribal Council adopted a resolution to preserve the lands of their Hohokam ancestors, by approving the "Policy Statement of the Four Southern Tribes (Salt River Pima-Maricopa Indian Community, Ak Chin Indian Community, Tohono O'odham Nation, and the Gila River Indian Community) which outlines the Four Tribes intent to protect, promote, and preserve cultural affinity to the HuHuKam."[57] On April 4, 2007, the Gila River Indian Community Tribal Council adopted a tribal resolution affirming that the South Mountain is "a sacred place / traditional cultural property …that…must be kept inviolate[58] thereby recording the sacredness and significance of South [50] ADOT, South Mountain Study Team, *South Mountain Freeway Draft EIS Summary*, at 1. [51] ADOT, Loop 202 (South *Mountain* Freeway), http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/index.asp (last visited July 8, 2013). [52] Gila River Indian Community Resolution NO. GR-41-07, A Resolution Designating the South Mountain Range (Muhadag, Avikwaxos) as a Sacred Place and Traditional Cultural Property of the Gila River Indian Community. [53] City of Phoenix, South Mountain Park Preserve Map, available at http://phoenix.gov/webcms/groups/internet/@inter/@rec/@parks/@parks/@nrd/documents/web_content/062880.pdf. [54] ADOT, South Mountain Study Team, chapter 5 *Section 4(f) Evaluation p. 26* available at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/south-mountain-loop-202-docs/EIS/chapter5/chapter5.pdf. [55] Gila River Indian Community Resolution NO. GR-41-07, A Resolution Designating the South Mountain Range (Muhadag, Avikwaxos) as a Sacred Place and Traditional Cultural Property of the Gila River Indian Community. [56] *Id.* [57] *Id.* [58] *Id.* 7

Code	Issue	Response
19	Title VI	The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Final Environmental Impact Statement). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. Chapter 2 of the Final Environmental Impact Statement is dedicated to the explanation of the Gila River Indian Community outreach undertaken for the project. The Gila River Indian Community was provided the same opportunities to participate in the project as all other populations and agencies. The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing, and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along Interstate 10 (Papago, Maricopa, and Santan Freeways). These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); date of the public hearing (distributed on May 10, 2013); dates of the community forums (distributed on May 29, 2013); and notification in June regarding the close of the Draft Environmental Impact Statement public comment period. In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area.

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Power Administration.[50] The release of the DEIS began a 90-day public review and comment period that will conclude on July 24, 2013.[51]

This complaint is also timely filed because ADOT conducted a public participation process to receive public input on the proposed project, but conducted it in a way that provided GRIC tribal members, including members of GRACE, less of an opportunity to meaningfully participate in the process than non-Native people.

VI. STATEMENT OF FACTS

A. SOUTH MOUNTAIN (Muhadag, Avikwaxos)

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The South Mountain, known in the Pima language as the Muhadag and in the Maricopa language, Avikwaxos,[52] consists of the Ma Ha Tauk, Gila, and Guadalupe Mountain Ranges.[53] It abuts the northern territory of the GRIC and consequently, is the immediate landscape of the northern boundary of the GRIC reservation. A portion of Main Ridge North and Main Ridge South of the South Mountain is on the GRIC, and serve as the "Community's main, direct physical link to the South Mountains".[54] The South Mountain "figures prominently in oral traditions of both the Akimel O'Odham (River People) and the Pee Posh (Maricopa)."[55] The Akimel O'odham believe that South Mountain is where their creator immerged.

On January 6, 1982, the Gila River Indian Community Tribal Council adopted an ordinance declaring "as a matter of Community policy and legislative determination, that the public interests of the Pima-Maricopa people and the interests of all other persons living within the jurisdiction of the Gila River Indian Community require that the Community adopt a means whereby all sites, location, structures, and objects of sacred, historical or scientific interest or nature will be protected from desecration, destruction, theft, or other interference."[56]

Then in 1989, the Gila River Indian Community Tribal Council adopted a resolution to preserve the lands of their Hohokam ancestors, by approving the "Policy Statement of the Four Southern Tribes (Salt River Pima-Maricopa Indian Community, Ak Chin Indian Community, Tohono O'odham Nation, and the Gila River Indian Community) which outlines the Four Tribes intent to protect, promote, and preserve cultural affinity to the HuHuKam."[57]

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On April 4, 2007, the Gila River Indian Community Tribal Council adopted a tribal resolution affirming that the South Mountain is "a sacred place / traditional cultural property …that…must be kept inviolate[58] thereby recording the sacredness and significance of South

[50] ADOT, South Mountain Study Team, *South Mountain Freeway Draft EIS Summary*, at 1.
[51] ADOT, Loop 202 (South *Mountain* Freeway), http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/index.asp (last visited July 8, 2013).
[52] Gila River Indian Community Resolution NO. GR-41-07, A Resolution Designating the South Mountain Range (Muhadag, Avikwaxos) as a Sacred Place and Traditional Cultural Property of the Gila River Indian Community.
[53] City of Phoenix, South Mountain Park Preserve Map, available at http://phoenix.gov/webcms/groups/internet/@inter/@rec/@parks/@parks/@nrd/documents/web_content/062880.pdf.
[54] ADOT, South Mountain Study Team, chapter 5 *Section 4(f) Evaluation p. 26* available at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/south-mountain-loop-202-docs/EIS/chapter5/chapter5.pdf.
[55] Gila River Indian Community Resolution NO. GR-41-07, A Resolution Designating the South Mountain Range (Muhadag, Avikwaxos) as a Sacred Place and Traditional Cultural Property of the Gila River Indian Community.
[56] *Id.*
[57] *Id.*
[58] *Id.*

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19 (cont.)		On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area. The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations.
20	**Cultural Resources**	Comment noted.
21	**Cultural Resources, Native Americans**	Comment noted.

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Mountain to the people of the GRIC and its tribal government. This important tribal resolution is attached as Exhibit A and incorporated into this complaint. The resolution states the GRIC Community Council "strongly opposes any alteration of the South Mountain Range for any purpose"…and any alteration…"would be a violation of the cultural and religious beliefs of the Gila River Indian Community and would have a negative cumulative effect on the continuing lifeways of the people of the Gila River Indian Community."[59]

22 Not only is South Mountain itself sacred, but there are also numerous sites with highly significant meaning and purpose to GRIC.[60] There are many ancestral burial and archeological sites, and ancient shrines.[61] Further, the Colorado River Indian Tribes[62], Salt River Pima-Maricopa Indian Community[63], the Ak-Chin Indian Community[64], the Tohono O'odham Nation[65], and the Pascua Yaqui Tribe[66] also hold the South Mountain sacred.[67]

23 Much of the South Mountain is within the South Mountain Park Preserve (SMPP),[68] which is a 16,600 mile park preserve in the Sonoran desert[69] in Phoenix, Arizona. First created in 1924 during the New Deal era, 13,000 acres of the land were bought from the federal government by the city of Phoenix for a "scenic/pleasure park."[70] Then, in 1927, the Bureau of Land Management ("BLM") conveyed 9,200 acres of land to the City of Phoenix where some of that land was converted into the SMPP.[71] Then, in April 2009, 247 acres of State Trust Land, were purchased from the Arizona Land Department.[72] SMPP is a historic property and is eligible

[59] *Id.*
[60] For example, Red Mountain, South Back Mountain, and Sandi Muck Mountain.
[61] YouTube, *South Mountain Freeway Protest*, https://www.youtube.com/watch?v=IMws03pJ0iE (last visited July 8, 2013).
[62] Colorado River Indian Tribes, http://www.crit-nsn.gov/ (last visited July 8, 2013).
[63] The Salt River Pima-Maricopa Indian Community, http://www.srpmic-nsn.gov/ (last visited July 8, 2013).
[64] Ak-Chin Indian Community, http://www.ak-chin.nsn.us/ (last visited July 8, 2013).
[65] Tohono O'odham Nation, http://www.tonation-nsn.gov/default.aspx (last visited July 8, 2013).
[66] Pascua Yaqui Tribe, http://www.pascuayaqui-nsn.gov/ (last visited July 8, 2013).
[67] The DEIS states "archaeological sites and places considered culturally important by Native American groups would be affected by any of the build alternatives. The Gila River Indian Community (GRIC) and the Salt River Pima-Maricopa Indian Community have both passed Tribal Resolutions designating the South Mountains as a TCP and the Colorado River Indian tribes have said that they also consider the South Mountains a TCP." (South Mountain Transportation Corridor August 28, 2008 Draft Technical Report Summary Cultural Resources p. 4 available at http://www.azdot.gov/southmountainfreeway/PDF/082808_SMCAT_CulturalResources_Summary_Final.pdf).
[68] The Trust for Public Land: Conserving Land for People, *The 150 Largest City Parks* available at http://cloud.tpl.org/pubs/ccpe-largest-oldest-most-visited-parks-4-2011-update.pdf.
[69] This desert is approximately 100,000 square miles spanning from New Mexico, California, and into Southern Arizona. The Sonoran desert is one of the most diverse deserts in the world. http://sciencefriday.com/segment/03/29/2013/the-secret-life-of-the-sonoran-desert.html (last visited July 8, 2013); Further, the Sonoran desert is providing extensive ecosystem services to humans, some already identified, like climate regulation. http://www.sonorandesert.org/ (last visited July 8, 2013).
[70] AZR, *City Commission Approves Plan For Municipal Park In Salt River Mountains,* April 6, 1924, South Mountain History, found at http://southmountainhistory.blogspot.com/2009/05/city-commission-approves-plan-for.html.
[71] ADOT, South Mountain Study Team, chapter 5 *Section 4(f) Evaluation* at 25.
[72] "In 1988, the planning of what became known as South Mountain 620 began. Through years of negotiating with the City of Phoenix, and after many unsuccessful auctions, the 247 acre parcel north of Chandler Boulevard was auctioned successfully on April 2, 2009 for $18 million. The Development Agreement for the parcel provides for a preserve, fire station and park, and also paves the way for sale and development of approximately 350 acres south of Chandler Boulevard when the market recovers." This sale was under the name of Arizona Open Space Sales. (Arizona State Agency Publications, Arizona State Land Department Annual Report 2008-2009 p. 11 available at

Code	Issue	Response
22	**Cultural Resources**	Comment noted.
23	**Cultural Resources, South Mountain Park/ Preserve**	Comment noted.

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for listing in the National Register of Historic Places.[73] As stated previously, some of the South Mountain is within the GRIC's northern territorial edge, giving the GRIC a corridor to get to other areas of the South Mountain from the reservation. As the DEIS states, the portions of the South Mountain on Community land are at the western end: the Main Ridge North and Main Ridge South. These ridges "serve as the Community's main, direct physical link to the mountains."[74] The SMPP, which includes the South Mountain, one of their TCPs, preserves cultural, historical, geological, and ecological resources relevant to the GILA tribal members.[75]

For the GRIC, the concept of creation is not something in the past but is an ongoing process, one that they are intrinsically a part of and are obligated to participate in. The GRIC fulfill this duty through ceremonies and rituals designed to preserve and stabilize the earth. Failure to fulfill those obligations is thought to result in great harm to the earth and the people who depend on it. Ceremonies are efforts undertaken for specific purposes in accordance with instructions handed down from generation to generation. Rituals are performed in prescribed locations that are unique and specific sites possess different spiritual properties and significance.

Some traditionalists and Elders of the GRIC use portions of the South Mountain for periodic ceremonies and rituals. These are special people who are keepers of the tribal peoples' heritage and culture who possess an essential role believed to sustain the tribal people as a whole. These ceremonies and rituals have been passed on through the ages and have been performed for ages.

Traditionalists also are people who follow the natural Native American way of living from the earth: picking and harvesting traditional cultural foods like the fruit of the saguaro[76] and medicines, and teaching and guiding the young in the cultural and spiritual ways.

B. SOUTH MOUNTAIN LOOP 202 PROPOSAL

The South Mountain Loop 202 is a proposed eight-lane, 22-mile long highway in southwestern Maricopa County, Arizona.[77] If constructed, it would be the last section of the proposed master plan Regional Freeway and Highway System first proposed in 1985 by

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http://azmemory.azlibrary.gov/cdm/compoundobject/collection/statepubs/id/2318/show/8057/rec/15).

[73] ADOT, South Mountain Study Team, chapter 4 *Affected Environment, Environmental Consequences, and Mitigation* p. 130 available at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/FHWA-AZ-EIS/04-SMDEIS-Chapter-4-Affected-Environment,-Environmental-Consequences,-Mitigation.pdf.

[74] ADOT, South Mountain Study Team chapter 5 *Section 4(f) Evaluation* at 26.

[75] City of Phoenix, South Mountain http://phoenix.gov/parks/trails/locations/south/ (last visited July 8, 2013); YouTube Fat Man's Pass http://www.youtube.com/watch?v=EhhS86uAaAc&feature=youtu.be (last visited July 8, 2013).

[76] The saguaro is a large, tree-sized cactus species which can grow to be over 70 ft. tall. It is native to the Sonoran Desert in Arizona. The saguaro blossom is the State Wildflower of Arizona. Harming a saguaro in any manner is illegal by state law in Arizona, and when houses or highways are built, special permits must be obtained to move or destroy any saguaro affected.

[77] ADOT, South Mountain Study Team, chapter 4 *Affected Environment, Environmental Consequences, and Mitigation* at 4-9; Maricopa County has 3 interstates, 1 US route, 3 loops, and 7 state routes. (Lands of Arizona, http://www.landsofarizona.com/County-Data-For-Maricopa-County-Arizona (last visited July 8, 2013); Its public transportation includes a 57-mile transit system in Phoenix, Tempe, Mesa, Glendale and Chandler, which includes Local, LINK, Express and RAPID commuter bus service; Light rail; neighborhood circulators; rural route; dial-a-Ride; Vanpool service; and an online carpool and vanpool matching system. (Providing Public Transportation Alternatives for the Greater Phoenix Metro Area, http://www.valleymetro.org/overview (last visited June 16, 2013))

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Maricopa Association of Governments ("MAG"),[78] that when connected to a surface transportation system would allegedly: "reduce increasing congestion on the Interstate Highway System in the urban core; facilitate and more effectively distribute the regional movement of goods and delivery of services; more evenly distribute traffic on the major arterial street grid and reduce regional traffic using the grid; better serve already-occurring regional traffic; provide an alternate route for pass-through traffic; provide an integrated intermodal network of freeways strategically located to accommodate local and regional land use planning; enhance local mobility by removing regional traffic from the local road network; create infrastructure to support the regional bus transit system component of the intermodal Long Range Transportation Plan (LRTP) (MAG 2001a); encourage and direct planned growth."[79]

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Although the master plan Regional Freeway and Highway System has done without this last section, the DEIS asserts that this section is necessary. The DEIS sites that "over the past 40 years, Phoenix-area population, housing, and employment experienced some of the fastest growth in the nation…and from the early 1950s to the mid-1990s, population in the MAG region grew by over 500 percent."[80] The DEIS assumes that population growth will continue at the same rate as it did between the 1950s to mid-1990s and that Maricopa County's population will add an average of 1 million a decade from 2005-2035.[81] The DEIS states that "almost 50 percent of projected increases in population, housing, and employment from 2005 to 2035 for the entire MAG region are expected to occur in the southwestern and southeastern portions of the Phoenix metropolitan area" and would benefit from the highway to get back and forth to central Phoenix.[82] The DEIS cites public support of the South Mountain Loop by "Voter approval of the one-half cent sales tax in 1985 (Proposition 300) and its continued endorsement in 2004 (Proposition 400) for continued public support for investment in regional transportation projects; results from the Maricopa County Official Canvas (Maricopa County 2004a) that show voters in 90 percent of the county's 1,058 voting precincts voted in favor of Proposition 400 and the

[78] ADOT, South Mountain Study Team, chapter 4 *Affected Environment, Environmental Consequences, and Mitigation* at 4; Update Regional Transportation Plan p. 71 http://www.azmag.gov/Documents/RTP_2010-Annual-Report_Final_v17.pdf; The Maricopa Association of Governments (MAG) is the metropolitan planning organization (MPO) for transportation planning in the Maricopa County region; the principal planning agency for the region in air quality and water quality; and the designated agency for developing population estimates and projections for the region. (Maricopa Association of Governments, http://www.azmag.gov/). The DEIS relies on MAG's planning from 1985 and its population projections for the proposed South Mountain highway. (Arizona Department of Transportation, Strategic Plan fiscal years 2013-2017 http://www.azdot.gov/Inside_adot/PDF/StrategicPlan.pdf).

[79] ADOT, South Mountain Study Team, chapter 1 *Purpose and Need* p. 4 available at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/FHWA-AZ-EIS/01-SMDEIS-Chapter-1-Purpose-and-Need.pdf; ADOT's Long Range Transportation Plan: 2010-2035 includes a list of roadway projects ordered in importance, with the South Mountain Loop taking third place. The first two are for the Hassayampa Freeway, which is part of the CANAMEX Trade Corridor, route going through Arizona, Nevada, Utah, Idaho, and Montana, and linking to the Canadian province of Alberta and the Mexican states of Sonora, Sinaloa, Nayarit, and Jalisco. It is argued by PARC, and others, that if South Mountain is created, it will be used by truck drivers looking for a bypass to more easily get through the Maricopa area; something ADOT asserts is not the purpose of the loop. Even if it is not the purpose of the loop, it would be a result of the South Mountain Loop: Since the CANAMEX route has not been put in and there is a route put in that is better than the existing roadways, truckers will use it.

[80] ADOT, South Mountain Study Team, *Summary* at 5; Maricopa County is the most populated county in Arizona and it is also one of the largest counties in the United States, and Phoenix, the state's capital, is its largest city. (Maricopa's population was 3,817,117 in 2010. (United States Census Bureau, 2010 Demographic Profile http://www.census.gov/popfinder/ (last visited June 17, 2013)).

[81] ADOT, South Mountain Study Team, *Summary* at 5.

[82] *Id at 5-6.*

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24	**Socioeconomic Projections**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. The comment states in the Draft Environmental Impact Statement support of the freeway project through voter approval of Propositions 300 and 400. To clarify, the text on page 1-9 of the Draft Environmental Impact Statement states, "Voter approval of the one-half cent sales tax in 1985 (Proposition 300) and its continued endorsement in 2004 (Proposition 400) underscore continued public support for investment in regional transportation projects. Results from the Maricopa County Official Canvas (Maricopa County 2004a) indicate voters in 90 percent of the county's 1,058 voting precincts voted in favor of Proposition 400 and the projects it would fund. Voters in 81 percent of the 31 voting precincts in the Study Area favored Proposition 400 and the projects it would fund." The reference to the propositions only states continued voter approval for transportation infrastructure in the region.

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projects it would fund; and voters in 81 percent of the 31voting precincts in the Study Area favored Proposition 400 and the projects it would fund."[83]

The DEIS also asserts that pollution will actually be reduced, ultimately improving air quality with the South Mountain Loop 202. The stated reason for this viewpoint is that the problem with the existing roadways is traffic and congestion. With the South Mountain Loop 202, some cars would have an alternative route for driving back and forth to downtown Phoenix.

The DEIS lays out several options, called "action alternatives" to choose from for implementing the proposal.[84] One action alternative is a no-build.[85] The DEIS evaluation concluded that the No-Build Alternative would not satisfy the projects purpose and need: the purpose and need are based on socioeconomic factors (population, housing, and employment projections); regional transportation demand (traffic and congestion); and existing and projected transportation system capacity deficiencies (present and future transportation system management, transportation demand management, transit, street network expansion, land use, and a combination of the transportation systems).[86] The DEIS states that with population growth, and its resulting increase in traffic and congestion, and even future alternative freeway modes that have been planned and would likely be funded, like for example, increasing bus routes, could not solve the purpose and need that the South Mountain Loop would fulfill. Chapter 3 states that "These alternatives alone would have limited effectiveness in reducing overall traffic congestion in the Study Area and, therefore, would not meet the purpose and need criteria; specifically, they would not adequately address projected capacity and mobility needs of the MAG region:…Based on projected regional travel demand and the extent of mobility needs of the MAG region and in the Study Area, arterial street network improvements alone would not meet the needs of the MAG region; and The Land Use Alternative is not a viable alternative because no plans exist to alter planned land uses in the region."[87]

The build options consist of choosing one western alternative -W59, W71, and W101- and the one available eastern action alternative – E1.[88] All western alternatives begin at 1-10 (Papago Freeway) and proceed east to a common point to all on an alignment parallel and adjacent to the GRIC boundary. All alternatives would cross Union Pacific RR, Salt River, Roosevelt Canal, Laveen Area Conveyance Channel, and all require 1-10 improvement.[89]

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There is only one eastern alternative because the only other alternative that ADOT had considered was a route on GRIC land, which the GRIC rejected. DEIS states "the E1 Alternative is the only action alternative developed for the Eastern Section. Despite efforts by ADOT and FHWA to seek permission to study an alternative in detail on Community land, permission has not been granted. Therefore, ADOT, with concurrence from FHWA, identified the E1 Alternative as its Preferred Alternative in the Eastern Section."[90]

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[83] ADOT, South Mountain Study Team, Chapter 1 *Purpose and Need* at 9.
[84] ADOT, South Mountain Study Team, *Summary* at 4.
[85] *Id.* at *8.*
[86] ADOT, South Mountain Study Team, chapter 1 *Purpose and Need* at 11-13.
[87] ADOT, South Mountain Study Team, Chapter 3 *Alternatives* p. 3 available at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/south-mountain-loop-202-docs/EIS/chapter3/chapter3.pdf.
[88] ADOT, South Mountain Study Team, *Summary* at 8; 38; Maricopa County is the most populated county in Arizona and it is also one of the largest counties in the United States.
[89] ADOT, South Mountain Study Team, Chapter 3 *Alternatives* at 48.
[90] ADOT, South Mountain Study Team, *Summary* at 38.

Code	Issue	Response
25	**Air Quality**	The Final Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency recently determined that Phoenix has attained the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner-burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.

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The DEIS states: "based on the alternatives screening process, environmental impacts assessment, and stakeholder input, ADOT, with the concurrence from FHWA", identified the W59 Alternative as its Preferred Alternative in the Western Section and the E1 Alternative the Eastern Section.[91] This "preferred" route would be down Pecos Road in the Ahwatukee Foothills, through the western portion of the South Mountain Preserve, including through the South Mountain itself, and up 59th Avenue through Laveen.[92] The DEIS approximates that 31.3 of the 16,600 acres of the SMPP would be taken for the proposed highway and 0.9 mile of Loop 202 would pass through the southwestern edge of South Mountain.[93] Cuts to South Mountain would be a 220-foot cut through one ridge, a 190-foot cut to another, and a 70-foot cut to a third for an estimated cost of $30 million.[94]

C. ADOT AND THE DEIS ACKNOWLEDGE SACRED AND CULTURAL SIGNIFICANCE OF SOUTH MOUNTAIN

The DEIS acknowledges that the South Mountain is sacred to the GRIC, is a TCP[95], and further, is National Register of Historic Places ("NRHP")-eligible. The DEIS indicates that ten locations have been identified by GRIC as places of cultural importance: the South Mountains, two prehistoric village sites, an active shrine site, two prehistoric petroglyph sites, and four prehistoric trail sites, which qualify as NRHP-eligible TCPs.[96] The NRHP eligibility of two of the properties was confirmed by FHWA through consultation with the GRIC[97] Five TCPs have been identified within the project area of "potential effects". The DEIS specifically states that the South Mountains were determined eligible for NRHP listing as a TCP under Criteria A and B.[98]

The DEIS states: "the Community has expressed to ADOT and FHWA its concerns about an alignment through the South Mountains and the irreversible impacts on the South Mountains from the proposed action. To the Community, the South Mountains are part of a continuum of life and not an individual entity that can be isolated and analyzed."[99]

The DEIS further acknowledges that the GRIC is opposed to any destruction of the South Mountain. It states "the mountains are considered sacred—playing a role in tribal cultures, identities, histories, and oral traditions—and appear in many creation stories. Many traditional

[91] ADOT, South Mountain Study Team, Chapter 3 *Alternatives* at 65, 69.
[92] ADOT, South Mountain Study Team, *Summary* at 35.
[93] *Id.* at 13.
[94] Alison Hurtado, Ahwatukee Foothills News, *Environmental impact: Groups have big concerns about South Mountain Freeway* July 3, 2013 http://www.ahwatukee.com/news/article_115f9b36-e3a0-11e2-8a62-0019bb2963f4.html (last visited 7/3/13).
[95] ADOT, South Mountain Study Team, *Summary* at 39.
[96] ADOT, South Mountain Study Team, chapter 4 *Affected Environment, Environmental Consequences, and Mitigation* at 140.
[97] *Id.*
[98] *Id*; Under Criteria A, properties can be eligible for the National Register if they are associated with events that have made a significant contribution to the broad patterns of American history and under Criteria B, properties may be eligible for the National Register if they are associated with the lives of persons significant in American past. (National Register Bulletin, How to Apply the National Register Criteria for Evaluation 1997 http://www.nps.gov/nr/publications/bulletins/pdfs/nrb15.pdf (last visited June 23, 2013).
[99] ADOT, South Mountain Study Team, Chapter 5 *Section 4(f) Evaluation* at 5-26.

Code	Issue	Response
26	**Alternatives**	Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Gila River Indian Community (Figure 3-6 on page 3-10 of the Final Environmental Impact Statement illustrates a representation of such alternatives). Other alternatives that would have avoided the South Mountains were rejected by the Gila River Indian Community or would have had severe social and economic impacts. These alternatives would have increased costs of extraordinary magnitude Ultimately the other alternatives were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to develop alternatives on its land (see Final Environmental Impact Statement page 3-25). The E1 Alternative when combined with the W59, W71, and W101 (and its options) Alternatives in the Western Section represents three distinct action alternatives from project termini to project termini, and therefore, represents a full range of reasonable alternatives for detailed study in the Draft and Final Environmental Impact Statements. Therefore, the Arizona Department of Transportation, with concurrence from the Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.
27		Information noted.

Code	Comment Document
28	religious and ceremonial activities continue on the mountains."[100] Further, ADOT is aware that GRIC prefers the no-build alternative.[101] The DEIS states that their preferred-action alternative would cut through the South Mountains resulting in removing two archaeological sites identified as contributing components of the South Mountains TCP, (considered NRHP-eligible under Criteria A and D); modif(ying) the spiritual landscape of Native peoples; altering access by Native American groups to culturally important places; interfering with ceremonial practices and religious activities of some Native American groups.[102] The DEIS also states: "two contributing components to the TCP are located within the Study Area, one of which is considered NRHP-eligible under Criterion A. The first site is…unique and possibly associated with traditional religious and ceremonial activities associated with the South Mountains. The second site is situated within the South Mountains TCP. These sites continue to function in the living Akimel O'odham and Pee Posh communities and often serve as spiritual places (Tribal Historic Preservation Officer [THPO] response [not concurrence] regarding NRHP-eligibility of the South Mountains as a TCP and its contributing components was received on August 17, 2011; consultation is ongoing)."[103] Further, the DEIS acknowledges that the portions of the South Mountains on GRIC located on the western end serve as the "Community's main, direct physical link to the mountains."[104] Further, it states, "the E1 Alternative would result in direct use of the TCP. Approximately 3 miles of freeway alignment would pass through the mountains and would affect the southern and southwestern portions of the TCP."[105] Further, the DEIS states "While the conversion and permanent loss of part of the mountains to a transportation use by the proposed action is a concern, related Community-expressed concerns focus on impacts on history, culture, traditions, and the ability to maintain and continue the cultural identity of the communities…Within the context of the TCP, the proposed action would be a physical barrier on the landscape, altering traditional access to sacred sites, disrupting traditional cultural practices, and degrading the overall integrity of the cultural tradition and identity. Even with mitigation, implementation of the proposed action would alter the direct physical connection Community members have between their homeland and the South Mountains and would restrict the ability to visit or use these locations in a traditional cultural manner."[106] After stating all of the above, the DEIS states that "the E1 Alternative was designed in such a way as to avoid a site that is a contributing element to the South Mountains TCP, resulting in no direct use of this TCP element. A R/W fence would limit access to the site by freeway

[100] ADOT, South Mountain Study Team, *Summary* at 39.
[101] In a letter to ADOT's Director John Halikowski in 2010, GRIC stated "despite our desire for a no-build option…the Community is willing to assist ADOT in studying potential On-Reservation alignments" in an effort to "mitigate cultural impacts to Muadag (South Mountain)." (GRIC Executive Office of the Governor & Lieutenant Governor, January 27, 2010 letter to ADOT, John Halikowski).
[102] ADOT, South Mountain Study Team, chapter 4 *Affected Environment, Environmental Consequences, and Mitigation* at 129-132.
[103] ADOT, South Mountain Study Team, Chapter 5 *Section 4(f) Evaluation* at 26.
[104] *Id.*
[105] *Id.*
[106] *Id.* at 27.

Code	Issue	Response
28		Information noted.

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users, but Community members would continue to gain access to the site as they currently do."[107]

Nevertheless, the DEIS then states, "even with mitigation, implementation of the proposed action would alter the direct physical connection Community members have between their homeland and the South Mountains and would restrict the ability to visit or use these locations in a traditional cultural manner."[108]

The DEIS later states, "alternatives to avoid use of the South Mountains TCP were evaluated and determined to be not prudent and feasible."[109]

The DEIS states that besides the South Mountain itself, another TCP would be affected. Although not physically damaged by the construction of the South Mountain Loop, this TCP would abut the highway and would be affected by highway related consequences, i.e. noise. The DEIS states: "AZ T:12:112 (ASM) is used by contemporary Community members actively exercising their traditional religious and ceremonial practices and beliefs. The site and its use are part of a broad pattern of traditional religious and ceremonial practices and beliefs that defined the cultural identity, continuity, and traditions of the Akimel O'odham. Therefore, the site is eligible for listing in the NRHP under Criterion A as a TCP." However, it states, this "resource does not have noise-sensitive activities or viewshed characteristics that contribute to its importance as a Section 4(f) resource. Therefore, according to 23 C.F.R. § 774.15, no further analysis of these proximity impacts to determine whether they would substantially impair the resource is necessary."[110]

The DEIS concludes, "in summary, the intrusion of the proposed freeway into the South Mountains, including especially the cuts into three ridgelines, would likely be perceived as severe by many members of the Community. The above measures have been and/or would be undertaken to avoid, reduce, or otherwise mitigate impacts on the South Mountains TCP and on AZ T:12:112 (ASM). The proposed freeway would be located in an area used frequently by members of the Community, one that provides direct access to the South Mountains. Thus, the proposed action would adversely affect physical access to the TCP and adversely affect another TCP within the South Mountains TCP. Perhaps more important to members of the Community, the proposed action might be perceived as severing the Community's spiritual connection to the mountain."[111]

VII. ARGUMENT

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Discrimination against people on the basis of color, race, or national origin is prohibited under Title VI. Title VI provides that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."[112] One form of discrimination prohibited is action that causes a disparate impact on a protected class of people. For the DEIS to move forward, it cannot violate Title VI.[113] However, if the South Mountain Loop 202 is constructed, the distribution of negative impacts

[107] *Id.*
[108] *Id.*
[109] *Id.*
[110] *Id.* at 28.
[111] *Id.*
[112] 42 U.S.C § 2000d.
[113] ADOT, South Mountain Study Team, *Summary* at 12.

Code	Issue	Response
29		Information noted
30	**Cultural Resources, Title VI**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. A representative impact is the Gila River Indian Community member-expressed concern that the E1 Alternative would interfere with ceremonial practices and religious activities of some Native American groups. While impacts on the South Mountains Traditional Cultural Property would be substantial and unique in context, the direct conversion of lands to a transportation use would be limited to less than 0.2 percent of Phoenix South Mountain Park/Preserve and would not prohibit ongoing access and the cultural and religious practices by Native American tribes. Mitigation measures and measures to minimize harm as the result of extensive consultation, avoidance alternatives analyses, and efforts in developing mitigation strategies would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious purposes. Text relating to this mitigation can be found on pages 4-38, 4-42, and 4-44 of the Final Environmental Impact Statement. Additionally, the section, *Mitigation*, beginning on page 4-158, presents several measures (e.g., multifunctional crossings, contributing element avoidance) to mitigate effects on cultural resources. The section, *Measures to Minimize Harm*, beginning on page 5-27, presents several measures to reduce effects on the South Mountains Traditional Cultural Property and other cultural resources. Even if one were to reach a contrary conclusion and determine that disproportionately high and adverse and/or disparate effects would occur as a result of the proposed freeway, there is substantial justification for the proposed freeway. It is needed to serve projected growth in population and accompanying transportation demand and to correct existing and projected transportation system deficiencies (see Chapter 1, *Purpose and Need*). There is no feasible and prudent alternative to the use of the South Mountains, as discussed in Chapter 5, *Section 4(f) Evaluation*. The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and fully considered input and comments that were received.

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and burdens[114] would be highly unequal to the GRIC and for the foregoing reasons, Title VI was violated by ADOT because:

- the proposed route through South Mountain would knowingly, improperly, and illegally desecrate a site with profound sacred and spiritual significance resulting in an unjustifiable disparate impact on the GRIC;
- construction and the effects of vehicle and truck traffic on the proposed South Mountain Loop 202 would result in pollution causing disproportionate cumulative health effects causing a disparate impact on the GRIC and its tribal members, including members of GRACE, and;
- inadequate consultation and inadequate process was given to the GRIC.

A. SOUTH MOUNTAIN LOOP 202 DISPARATE CUMULATIVE SPIRITUAL AND CULTURAL EFFECTS ON THE GRIC, INCLUDING GRACE COMPLAINANTS

GRIC grievances about the proposed South Mountain Loop 202 have common themes Like the following, they identify the great cultural and spiritual meaning the South Mountain signifies to the GRIC: "our people feel that the mountain is a sacred place and we should respect it,"[115] "we need to protect it because that mountain is sacred to our people,"[116] you don't know what it means to us having the mountain there, it won't be the same if it should be gone,"[117] and "when I was younger I recall being taught about our people's heritage…I remember being taught by my elders that we come from South Mountain."[118] See attachments. Another GRIC tribal member stated "as we were growing up we were taught that our land was sacred and that we need to protect it at all cost. South Mountain…is one of our sacred mountains."[119] See attachment. Plainly put, construction of the South Mountain Loop 202 would desecrate a natural landscape with profound sacred and spiritual significance to the GRIC. One GRIC tribal member wrote that "my connection to South Mountain is that it is a very sacred place to me and my people."[120] See attachment. Another said "it is a sacred mountain to our people…and…it was most sacred to our ancestors…there are stories about that mountain I was told by my elders, and there are plants that grow on this mountain that we use today for healing, eating, and blessings."[121] See attachment.

Cutting and blasting the South Mountain to place a highway through it would result in a major disparate impact on the GRIC. One tribal member stated "the mountain is central to the

[114] This is not the first time that the GRIC would have to carry the burden of a transportation project: Arizona "reneged on promises to build interchanges and frontage roads on Interstate 10, which ADOT had offered in return for allowing an interstate to bisect the reservation." (Sean Holstege, The Republic, *1998 plan for South Mountain Freeway passed*, March 25, 2013 http://www.azcentral.com/community/ahwatukee/articles/20130308south-mountain-freeway-plan-ignored.html (last visited July 11, 2013). Further, the GRIC just recently got reimbursed by ADOT for allowing I-10 on the reservation.
[115] Beonka Thomas, GRIC tribal member, Aff. July 3, 2013.
[116] Laverne Thomas, GRIC tribal member, Aff. July 8, 2013.
[117] Stephanie Thomas, GRIC tribal member, Aff. July 8, 2013.
[118] Laura Thomas, GRIC tribal member/GRACE member, Aff. ¶ 2.
[119] Daniel Hernandez, GRIC tribal member Aff. ¶ 1.
[120] Nicole Johns, GRIC tribal member Aff. ¶ 1 June 29, 2013.
[121] Winnona Catha, GRIC tribal member Aff. ¶ ¶ 1-2 July 2, 2013.

Code	Issue	Response
30 (cont.)		Chapter 2 of the Final Environmental Impact Statement is dedicated to the explanation of the Gila River Indian Community outreach undertaken for the project. Chapter 6 of the Final Environmental Impact Statement further describes Gila River Indian Community outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionate and highly adverse impacts would result from the construction and operation of the proposed action.
31	**Air Quality**	The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. With respect to air quality, the Final Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency recently determined that Phoenix has attained the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner-burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile

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Code	Issue	Response
31 (cont.)		source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. Further, the Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and fully considered input and comments that were received. Chapter 2 of the Final Environmental Impact Statement is dedicated to the explanation of the Gila River Indian Community outreach undertaken for the project. Chapter 6 of the Final Environmental Impact Statement further describes Community outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionately high adverse impacts would result from the construction and operation of the proposed action.
32	**Tribal Involvement**	The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received. Chapter 2 of the Final Environmental Impact Statement is dedicated to the explanation of the Gila River Indian Community outreach undertaken for the project. The Gila River Indian Community was provided the same opportunities to participate in the project as all other populations and agencies. The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing, and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*.

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Code	Issue	Response
32 (cont.)		The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along Interstate 10 (Papago, Maricopa, and Santan Freeways). These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); date of the public hearing (distributed on May 10, 2013); dates of the community forums (distributed on May 29, 2013); and notification in June of the close of the Draft Environmental Impact Statement public comment period. In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area. The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations.
33	**Title VI, Cultural Resources**	The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resource studies and engaging in an ongoing, open dialogue with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the Gila River Indian Community that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation

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33	O'odham creation story and continues to be a place to hold ceremonies by and for the O'odham people. The mountain is also sacred to us because of the plant life we use for medicinal and ceremonial purposes and also because of the wildlife we hunt to sustain ourselves. The construction of this freeway would greatly harm the wellbeing of the mountain and therefore will bring harm to the O'odham."[122] See attachment. South Mountain is a very major and significant part of the GRIC spiritual and cultural life. It is a place of importance with esteemed meaning: it is associated with integrity, strength, patience and offers innumerable cultural and spiritual benefits to the GRIC. It has been there on the landscape and has withstood time and the elements in good and bad times with generations of GRIC ancestors. Becoming a major historical and spiritual theme in the GRIC's lives, stories, teachings, rituals, ceremonies, and medicines are derived from South Mountain. One tribal member stated "South Mountain is important to me because it's part of our heritage. There are many teachings that go with that mountain. Stories and songs that our generations to carry on."[123] See attachment. Another stated "according to our oral history South Mountain is a sacred mountain to our people. Akimel O'odham legends and stories talk about South Mountain being the home of the deity for our tribe. There are also stories about artifacts and petroglyphs from our ancestors the Hohokam located on South Mountain."[124] See attachment. Another GRIC tribal member stated "Oral history and legends state that South Mountain is the home of "Elder Brother" (I'itoi) deity of the Akimil O'odham Tribe (Gila River Indian Community Tribe). South Mountain was also once inhabited by our ancestors the Hohokam. The Hohokam has been acknowledged by archeologist, anthropologist and historians to be one of the first settlers of this region. South Mountain is also a place of worship, sacred ceremonies are preformed, prayer and blessings are given and shrines are built to honor I'itoi and our ancestors."[125] See attachment. Disturbing South Mountain would be desecrating it and desecrating it would be harming the GRIC itself –"to take the South Mountain away is a great impact to the Gila River Indian Community. It would be losing a part of us even more."[126] See attachment. "To hear of this mountain being destroyed has put a great hurt in my spiritual life…The mountain has given me much in my life. It has kept me strong, sane, peaceful, and healthy."[127] See attachment. Much harm would occur because this significant historical and cultural site that has been handed down through the generations is rich with the past: its heritage reaches into the present and connects with the GRIC living today. One tribal member stated "I have a very strong connection to South Mountain. In my late teens I left my hometown of Ajo, Arizona to attend Arizona State University. As a young woman far from home it was a difficult adjustment to live in the city, but going to South Mountain helped with this transition…as a young mother raising a child in the late sixties/early seventies, I often went to south Mountain to meditate when times became tough or if I was unable to return to Gila River for family emergencies. South Mountain has always made me feel closer to home and closer to my O'odham Himdag."[128] See attachment.

[122] Renee Jackson, GRIC tribal member Aff. ¶ 2.
[123] Fairietta Morago, GRIC tribal member Aff. ¶ 1.
[124] Peggy Mae Morago, GRIC tribal member Aff. ¶ 2 July 6, 2013.
[125] Joseph Morago, GRIC tribal member/GRACE member, Aff. ¶ 2 July 22, 2013.
[126] Fairietta Morago, GRIC tribal member Aff. ¶ 1.
[127] Bernadette Stevens, GRIC tribal member Aff. ¶¶ 4-5 July 2, 2013.
[128] Peggy Mae Morago, GRIC tribal member Aff. ¶ 2 July 6, 2013.

Code	Issue	Response
33 (cont.)		Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The mitigation measures were suggested in a letter from the Lieutenant Governor of the Gila River Indian Community to the Administrator, Arizona Division, Federal Highway Administration, dated June 23, 2010 (see page A372 of Appendix 2-1 of the Final Environmental Impact Statement). In this letter, the Gila River Indian Community submitted a proposal to address partial measures for the mitigation of adverse effect from the Pecos Road Alignment of the South Mountain Freeway. The Gila River Indian Community's proposal found the engineering solutions acceptable, but stated that implementation and construction of the proposed freeway would require further consultation. In committing to the evaluation of the South Mountains Traditional Cultural Property, the Arizona Department of Transportation and Federal Highway Administration also committed to the Gila River Indian Community's participation in ongoing engineering design refinements and acknowledged the importance of all plants and animals in the traditional culture of the Akimel O'odham and Pee Posh of the Gila River Indian Community.

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GRIC and GRIC tribal members in GRACE[129] have repeatedly and publicly communicated the sacred significance of South Mountain, while at the same time, opposing ADOT's actions and the South Mountain Loop 202 project. However, ADOT has consistently ignored these communications and continued its efforts to plan the South Mountain Loop 202 through the South Mountain. One tribal member lamented "you may see the Mountain as an obstacle! But we see it as a refuge for our animals, a place where we can take our children and teach them our culture. It may not seem like a lot but the Mountain means so much to our community."[130] See attachment.

In April 29, 2008, the Arizona Republic published an article entitled, *Gila resolution calls freeway path 'sacred land'*.[131] The article reads: "The (GRIC) council in April 2007 designated the South Mountain Range as "a sacred place/traditional cultural property" that must not be violated. The council said any alteration of the range "for any purpose would be a violation of the cultural and religious beliefs of the Gila River Indian Community"[132]

Nevertheless, ADOT's August 2008 Draft Technical Report Summary states "direct impacts on cultural resources from construction could result in their partial or total loss."[133] It goes on to state "archaeological sites and places considered culturally important by Native American groups would be affected by any of the build alternatives. The Gila River Indian Community (GRIC) and the Salt River Pima-Maricopa Indian Community have both passed Tribal Resolutions designating the South Mountains as a TCP and the Colorado River Indian tribes have said that they also consider the South Mountains a TCP. The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) recognize the South Mountains as a TCP."[134]

34

During a MAG public comment meeting on the South Mountain Loop 202 on December 21, 2009, GRIC tribal members and supporters pled with the government association to stop their plans to go through the South Mountain and "respect the heritage of their peoples."[135] With a banner outside stating "standing against those who ruin the land" tribal members expressed their "deep and abiding love" for South Mountain and their "responsibility to protect" it for their ancestors and future generations.[136] One youth stated: "this pressure has to stop…we had a river taken away…our lands have been reduced enough…our ancestors should not have had to go through what they did for a highway to go basically past their cemetery."[137] A speaker from Protecting Arizona's Resources and Children ("PARC") pointed out that GRIC at that time was

[129] GRACE has spent extensive time and resources during the planning and preparing of the DEIS by attending the various South Mountain Freeway meetings, speaking out to the media communicating the sacredness of the South Mountain, and urging the government to choose an alternative transportation mode that would not desecrate the GRIC's cultural heritage.
[130] Daniel Hernandez, GRIC tribal member Aff. ¶ 1.
[131] Colleen Sparks, The Arizona Republic , *Gila resolution calls freeway path 'sacred land' Apr. 29, 2008* found at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/articles/PDF/042908AZREP.pdf.
[132] *Id.*
[133] ADOT, South Mountain Transportation Corridor Study Citizens Advisory Team Draft Technical Report Summary Cultural Resources August 28, 2008 p. 2 available at http://www.azdot.gov/southmountainfreeway/PDF/082808_SMCAT_CulturalResources_Summary_Final.pdf.
[134] *Id.* at 4.
[135] YouTube, South Mountain Freeway Proposal - Public Comments pt 1, Dec. 21, 2009 https://www.youtube.com/watch?v=1Mws03pJ0iE (last visited June 17, 2013).
[136] *Id.*
[137] *Id.*

Code	Issue	Response
34	**Cultural Resources, No-Action Alternative**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. The Arizona Department of Transportation and Federal Highway Administration acknowledge the expressed comments of Gila River Indian Community members as referenced in the GRACE comment. Several measures to avoid the use of a portion of the mountains, including tunneling, bridging, and rerouting were fully examined but, for reasons explained fully in Chapters 3 and 5 of the Draft and Final Environmental Impact Statements, were eliminated from detailed study in the environmental impact statement process. Use of the mountains for the purposes of the proposed freeway represents two-tenths of one percent of the total mountain range. Since 1988, and as part of this environmental impact statement process, several measures have been undertaken and will be undertaken to further reduce effects on the mountains. These measures, including narrowing the design footprint, acquiring replacement land immediately adjacent to the mountains, and the provision of highway crossings, are outlined in text beginning on page 5-23 of the Draft Environmental Impact Statement. In addition, Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities as noted in the beginning of this response. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.

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being pressured to permit a highway either through their limited reservation or through sacred ancestral land abutting their reservation –both of which have sacred and traditional values.[138]

Also in that meeting, GRIC tribal members shared how their ancestors are a part of the "sacred territory" of South Mountain and how the tribal members of GRIC continue to be defined by it.[139] One tribal member expressed his concern that this desecration was "just another attempt to take more land" from indigenous people, whose historical legacy was one of losing more and more of their land by non-indigenous people.[140] He furthered shared with the audience how South Mountain is where their "creator started" and reiterated that it is a "sacred area that cannot be touched."[141] Another speaker stated his elders taught him that South Mountain "can't be disturbed and if disturbed, would cause problems" to the world.[142] Another stated that "this (cultural land of his ancestors) is what binds us together"; and another stated that "desecration of the South Mountain would break and kill them."[143] Another pointed out to the audience the compromises the tribal members have already had to make like having to tolerate sacred places in the SMPP being desecrated with graffiti and trash.[144] She said it was unfair and wrong that now they are expected to permit their sacred South Mountain to be bulldozed for a highway.

GRACE co-founder, Lori Riddle, also spoke to the audience during the 2009 MAG public comment meeting. She stated that GRACE was opposed to the project because the proposal "impead(s) on fundamental "cultural sensitivities" of indigenous peoples of the GRIC.[145] Further she said, the GRIC "honor the land…honor the mountains."[146] This is where they "pray…fast…prepare…gather…strength."[147] This is "a heritage that goes back hundreds and thousands of years."[148] Frustrated with ADOT's failure to respect tribal concerns about the proposed desecration of the sacred mountain, Riddle had to say once again "the community has already chose(n) not to have a highway."[149]

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The November, 11, 2009, Ahwatukee Foothills News article, *Questions remain on blasting into South Mountain*, questioned the soundness of "blasting through…major ridges of South Mountain in the park, which the Gila River Indian Community (GRIC) considers sacred." It went on to quote Shannon Rivers, a member of GRIC, who said that the South Mountain "has burial sites, archeological sites and shrines." The article also quoted Lori Riddle's concerns with cutting into the ridges of the sacred South Mountain. Riddle stated, "when they talk about

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[138] *Id.* In 2009, a route through the reservation was being pressured on the GRIC.
[139] YouTube, South Mountain Freeway Protest, https://www.youtube.com/watch?v=IMws03pJ0iE (last visited June 17, 2013).
[140] YouTube, South Mountain Freeway Proposal - Public Comments /Part 1 found at http://www.youtube.com/watch?v=tZ8MWrOX8eQ.
[141] *Id.*
[142] *Id.*
[143] *Id.*
[144] *Id.*; Only certain tribal members are allowed even in the sacred places and only certain tribal members knowledgeable and skilled do ceremonies in the sacred places.
[145] YouTube, South Mountain Freeway Proposal - Public Comments /Part 2 Dec. 21, 2009, https://www.youtube.com/watch?v=zGW3LwbaI5Y (last visited June 17, 2013).
[146] *Id.*
[147] *Id.*
[148] *Id.*
[149] *Id.*

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34 (cont.)		In terms of the comment's reference to pressures to locate a freeway on Gila River Indian Community land, as stated on page 3-24 of the Final Environmental Impact Statement, in January 2010, the Arizona Department of Transportation Director received a letter from the Gila River Indian Community Governor, who indicated that the Gila River Indian Community was willing to assist in conducting a study of the proposed South Mountain Freeway on Gila River Indian Community land. In response, the project team conducted preliminary analyses of projected engineering issues, cultural resources impacts, natural resources, multiuse crossings, air quality impacts, noise level impacts, socioeconomic impacts, and Section 4(f) issues. Following this effort, a coordinated referendum of Gila River Indian Community members to favor or oppose construction of the proposed South Mountain Freeway on Gila River Indian Community land or to support a no-build option occurred in February 2012. Gila River Indian Community members voted in favor of the no-build option. The Gila River Indian Community's position regarding a "no-build" option was considered in the Draft and Final Environmental Impact Statements. That position is formally known as the No-Action Alternative and was evaluated in depth in assessments of the impacts of the proposed action on each resource. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

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blasting the mountain, it hurts… It's totally going to change the area and people don't realize that."[150]

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In a 2010 Environmental Assessment for a tower site on South Mountain, the Arizona Department of Game and Fish reported the sacredness of the South Mountain. It stated "the Gila River Indian Community and Salt River Pima-Maricopa Indian Community have passed resolutions declaring the South Mountains to be a sacred place/traditional cultural property because of the prominent role the mountains have in oral traditions and songs of the Akimel O'odham (Pima) and Pee Posh (Maricopa) tribes."[151]

On January 21, 2011, the Ahwatukee Foothills News published, *Gila River Tribe: Sacred Sites On South Mountain Top Issue In 202 Debate*, which stated "foremost on the mind of Gila River Indian Community members are the sacred sites and shrines on South Mountain that would be destroyed if plans to blast a freeway through the mountain proceed…The No. 1 concern by far is the desecration of that mountain…there are a number of areas of cultural significance that would be compromised. There are a number of cultural sites throughout the entire mountain." [152]

Further, in a 2012 press release, Lori Riddle of GRACE stated: "This project would harm the physical and spiritual integrity of Muhadag Do'ag (South Mountain) and traditional cultural properties associated with the mountain."[153] "Many of the affected mountains in the South Mountain Range are sacred homelands of the O'odham people."[154] "That is why the people in the Gila River Indian Community voted against having it on our lands and why we oppose the alignment that would cut through the mountain."[155]

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In 2013, in an interview on 91.5 KJZZ, Riddle spoke again stating: "I know people try to diminish that (sacredness of the mountain to the GRIC tribal members), but it's a freedom of religion that we have all rights to, and we feel like they are taking that freedom away from us."[156]

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[150] Doug Murphy Ahwatukee Foothills News, *Questions remain on blasting into South Mountain*, Nov. 11, 2009 found at http://www.azdot.gov/southmountainfreeway/PDF/20091111_questionsremaininblastingintosouthmountain.pdf.

[151] EA, Finding of No Significant Impact for South Mountain Tower, found at http://www.ntia.doc.gov/legacy/psic/AZ_1.02f_South%20Mtn_EA%20and%20FONSI%20package_signed.pdf.

[152] Ari Cohn, Ahwatukee Foothills News, *Gila River Tribe: Sacred Sites on South Mountain Top Issue In 202 Debate*, January 21, 2011 found at http://www.azdot.gov/southmountainfreeway/PDF/012111AFN.pdf.

[153] Sierra Club, *New Sierra Club Report Identifies How the Nation's Best and Worst Transportation Projects Will Move the US Beyond Oil, or Keep Us Shackled to the Pump: South Mountain Freeway Makes the List of Worst Projects*, December 11, 2012 found at http://www.arizona.sierraclub.org/pr_and_alerts/pr_and_alerts_2012/alert_12-11-12.asp (last visited July 10, 2013).

[154] *Id.*

[155] *Id.*

[156] Steve Shadley, *South Mountain Freeway proposal gets mixed reviews at a public hearing* May 21, 2013 http://www.kjzz.org/content/1305/south-mountain-freeway-proposal-gets-mixed-reviews-public-hearing (last visited July 1, 2013); The Free Exercise Clause of the First Amendment states that Congress shall not pass laws prohibiting the free exercise of religion; GRACE also argues that ADOT's action to desecrate South Mountain is a violation of the United States trust responsibility with the Native Americans based on the fact that no analysis of ADOT's action is made in light of the American Indian Religious Freedom Act ("AIRFA"). The AIRFA of 1978 declares that it is the policy of the United States to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian, Ekimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship though ceremonials and traditional rites. (Pub. L. No. 95-341 (codified in part at 42 U.S.C. § 1996)). AIRFA provides land managers with the authority to take action to protect sacred lands. (Dean Suagee and Jack Trope, Native Sacred Places Protection Legal workshop, revised 2/11/2008 P. 13). AIRFA requires policies of all governmental agencies to eliminate interference with the free exercise of Native religion, based on the First Amendment, and to accommodate access to and use of religious sites to the extent that the use is practicable and is

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35	**Cultural Resources**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The American Indian Religious Freedom Act, 42 United States Code Section 1996, provides a policy statement of the United States to "protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian . . . including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites." The Arizona Department of Transportation and Federal Highway Administration complied with the policy stated in the American Indian Religious Freedom Act throughout the environmental impact statement process, as evidenced by consultation efforts, mitigation measures, and a discussion of cultural resources issues in the Draft Environmental Impact Statement. The study would not violate the American Indian Religious Freedom Act because, as stated above, members of the Gila River Indian Community would not be prohibited from continuing to practice their beliefs even if the project goes forward because access to the mountain would be maintained, impacts would be mitigated based on input by the Gila River Indian Community and others, and only a small fraction of the mountain would be affected.

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36	B. SOUTH MOUNTAIN LOOP 202 DISPARATE CUMULATIVE HEALTH AND ENVIRONMENTAL EFFECTS ON THE GRIC, INCLUDING GRACE COMPLAINANTS With approximately 67,000 cars travelling daily between Phoenix and Tucson on Interstate 10 (one of the three interstate highways that serves as the through-routes for nearly all truck traffic) only a small fraction of those cars are driven by tribal members.[157] However, because approximately 25 miles of Interstate 10, two lanes in each direction, is running through the GRIC, pollution is being created and emitted onto the GRIC.[158] The GRIC assert that this is its single biggest source of air pollution in the community.[159] There are also several million cars owned by people who live, work, and commute within the greater Phoenix area, causing pollution, while car ownership in GRIC is low because GRIC members work and live in the same districts.[160] The GRIC even goes as far to encourage customers to its casinos to use buses from the near-by urban areas on a regular basis to reduce single occupancy car traffic to its Casinos.[161] However, even with this proactive approach to the environment, the 2005 Joint Air Toxics Assessment Program (JATAP) report shows that GRIC has high Particulate Matter ("PM") and Volatile organic compounds (VOC) in its air.[162] The South Mountain Loop 202 would be yet another source of pollution not created by the GRIC but affecting the GRIC. Maricopa County has struggled to meet the National Ambient Air Quality Standards (NAAQS) for particulate matter (PM).[163] The American Lung Associations' State of the Air 2013, gave Maricopa County a grade of F for the period between 2009-2011 in High Particle Pollution 24-hr days.[164] It also ranked Phoenix-Mesa-Glendale, AZ 18th in Most Polluted by Year-Round Particle Pollution (Annual PM 2.5) and 21st in Most Polluted by Short Term Particle

not inconsistent with an agency's essential functions. (Canby, John C. Jr., *American Indian Law in a Nutshell*, pg. 339, 340 1988 West Publishing Company). The Merriam Webster dictionary defines practicable as "capable of being put into practice or of being done or accomplished: feasible." (Merriam-Webster, http://www.merriam-webster.com/dictionary/practicable. (last visited June 13, 2013)) Here FDOT and ADOTs essential functions are not compromised by not going through South Mountain. Further, there are practicable and feasible alternatives to going through South Mountain like expanding existing highways and developing the public transit systems.

[157] GRIC Response to EPA, *Gila River Indian Community Response to EPA's Nine Factors Requirement for Designation of PM-2.5 Under the National Ambient Air Quality Standards*, p. 4 Jan. 4, 2011, found at http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2010-0163-0016.

[158] *Id.*

[159] *Id.*

[160] *Id.*

[161] *Id.*

[162] Hilary R. Hafner Analysis of Air Toxics Collected As Part of The Joint Air Toxics Assessment Project Dec. 2006 found at http://www.epa.gov/ttnamti1/files/20032004csatam/FinalreportJATAP2005.pdf.

[163] Paul Atkinson, *2011 record year for Maricopa County air pollution* 91.5 KJZZ, Feb. 24, 2012 http://www.kjzz.org/content/1202/2011-record-year-maricopa-county-air-pollution (last visited July 11, 2013); Phoenix has one of the worst air pollution problems in the nation. Mother Nature Network, *7 U.S. cities with the worst air pollution*, http://www.mnn.com/health/healthy-spaces/photos/7-us-cities-with-the-worst-air-pollution/phoenix (last visited July 11, 2013).

[164] American Lung Association, *State of the Air 2013*, found at http://www.lung.org/associations/states/california/assets/pdfs/sota-2013/sota-2013-full-report.pdf .

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36	**Air Quality, Construction**	The Final Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency recently determined that Phoenix has attained the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner-burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the U.S. Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information). The transportation conformity rule in 40 Code of Federal Regulations § 93.123(c)(5) states that hot-spot analyses are not required to consider construction-related activities that cause temporary increases in emissions. Temporary increases are defined as those that occur only during the construction phase and last 5 years or less at any individual site. Although the duration of the overall construction period of the entire 22- to 24-mile proposed action would be 5 to 6 years according to page 3-60 of the Final Environmental Impact Statement, any particular portion of the Study Area would not see construction lasting for 5 to 6 years. Construction would be phased based on the factors appearing on page 3-59 of the Final Environmental Impact Statement. Any particular area of the project would not be expected to see construction activities beyond an approximate 2-year period; therefore, the construction effects described above would be temporary and would not require additional analysis.

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36	Pollution (24-hour PM 2.5).[165] According to the EPA Green Book, Maricopa County has been in nonattainment in Particulate Matter (PM)-10 since 1992.[166] PM-10 is a "complex mixture of extremely small particles and liquid droplets…made up of a number of components, including acids…, organic chemicals, metals, and soil or dust particles."[167] PM-10 are "inhalable coarse particles," that can be found near roadways and dusty industries.[168] They can affect the heart and lungs and cause serious health effects.[169] Those most at risk to PM-10 are people with heart or lung disease[170], older adults, children, and physically active people.[171] People with diabetes may also be at risk.[172] Further, new studies suggest that exposure to high particle levels may also be associated with low birth weight in infants, pre-term deliveries, and possibly fetal and infant deaths.[173] Long-term exposures have been associated with problems such as reduced lung function and the development of chronic bronchitis and even premature death.[174] Short-term exposures to particles can aggravate lung disease, causing asthma attacks and acute bronchitis, and may also increase susceptibility to respiratory infections.[175] Almost every one of the PM-10 exceedances has been detected at the air quality monitor at 43rd Avenue and Broadway Road. Because the air is already heavily polluted, the placement of a freeway about a mile and a half upwind from this monitor will have a disparate impact on the health and welfare of the GRIC, who are situated next to the proposed site. The GRIC has the highest level of diabetes in the nation; those with diabetes are more susceptible to irritation from PM-10 and more susceptible to other medical conditions. Additionally, during the construction phase, thousands of tons of dirt would be moved around upwind of the 43rd Avenue and Broadway Road monitor causing increased levels of PM. The proposed path of the South Mountain Loop 202 would cause PM over the Salt River bed, where extensive earthmoving will be necessary for the construction of the bridges. Blasting South Mountain would also release enormous amounts of PM, and the natural wind currents and prevailing wind patterns would push this PM toward the air monitor at 43rd Avenue. Because people are contracting Valley Fever (Coccidioidomycosis) in Southern Arizona (especially in the Phoenix and Tucson areas),[176] Valley Fever is a threat. The two species of coccidioides fungi that cause Valley Fever are commonly found in the soil of specific areas, one of which is Arizona's Sonoran desert, and are stirred into the air by anything that disrupts the soil like construction.[177] Moreover, Native Americans are more susceptible to developing serious

[165] *Id.* at 13-15.
[166] Nonattainment Status for Each County by Year for Arizona As of December 14, 2012 http://www.epa.gov/oaqps001/greenbk/anay_az.html (last visited June 24, 2013).
[167] EPA, Particulate Matter (PM) http://www.epa.gov/airquality/particlepollution/ (last visited 6/24/13).
[168] *Id.*
[169] *Id.*
[170] In people with heart disease, short-term exposures have been linked to heart attacks and arrhythmias.
[171] Air Now, Particle Pollution and Your Health http://airnow.gov/index.cfm?action=particle_health.page1#2 (last visited June 24, 2013).
[172] *Id.*
[173] *Id.*
[174] *Id.*
[175] *Id.*
[176] The University of Arizona, Valley Fever Center for Excellence, https://www.vfce.arizona.edu/ValleyFeverInPeople/WhoGetsIt.aspx (last visited June 24, 2013).
[177] Mayo Clinic, Definition: Valley Fever, http://www.mayoclinic.com/health/valley-fever/DS00695 (last visited July 1, 2013).

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36 (cont.)		Detecting the fungus responsible for valley fever in soils is not practical at this time. However, to reduce the amount of construction dust generated that could carry the fungus, particulate control measures related to construction activities would be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from the Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement). The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. No violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics.

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infection from it than are whites.[178] If the South Mountain Loop 202 is constructed there would be a real risk to the members of the GRIC.

37 The GRIC would also be disparately affected by negative environmental consequences to its agriculture sector. Agriculture plays an important role for the GRIC and is a major sector in GRIC's economic development plan. "15,000 acres of Community farms on the GRIC support a variety of crops such as cotton, wheat, millet, alfalfa, barley, melons, pistachios, olives, citrus, and vegetables. And independent farming operations cultivate an additional 22,000 acres of similar crops, bringing the total agricultural product value to an excess of $25 million."[179] Now with its newly restored water rights, the GRIC is planning on developing a much larger agricultural industry. However, PM decreases crop production, and because of this, not only will the health of the crops be compromised but the profit from the GRIC's agriculture will be compromised by the air pollution from the South Mountain Loop 202.

38 Maricopa County has also been in nonattainment in 8-Hr ozone 1997 since 2004 and in 8-Hr ozone 2008 since 2012.[180] The American Lung Associations' State of the Air 2013, gave Maricopa County a grade of F for the period between 2009-2011 in High Ozone days[181] and 23rd in Most Ozone-Polluted Cities.[182] Ozone is formed when pollutants emitted by cars, power plants, industrial boilers, refineries, chemical plants, and other sources react chemically in the presence of sunlight.[183] Those most at risk are children, adults who are active outdoors, adults - including older adults- with respiratory diseases, such as asthma, and people with unusual susceptibility to ozone.[184] Ozone can aggravate asthma and inflame and damage the lining of the lungs that can in turn cause long-term health effects and a lower quality of life.[185]

39 Higher ozone levels would have a disparate effect on the people of the GRIC. First, many GRIC members have asthma and other respiratory problems. Ozone increases will exacerbate existing problems. Second, because the Hassayampa Freeway CANAMEX route is not first being built, the South Mountain Loop would be used as a bypass for truck drivers traveling from Canada to Mexico. This would also have a major disproportionate effect on the GRIC. With Interstate 10 already running through the GRIC, more diesel trucks near the GRIC would only increase pollution, some of which are cancer-causing.[186] Diesel from trucks can create the same amount of air pollution as 150 passenger cars[187] and diesel exhaust has been

[178] Mayo Clinic, Risk Factors: Valley Fever, http://www.mayoclinic.com/health/valley-fever/DS00695/DSECTION=risk-factors (last visited July 1, 2013).
[179] Inter Tribal Council of Arizona, Inc., Gila River Indian Community http://itcaonline.com/?page_id=1158 (last visited 7/8/13).
[180] EPA, Nonattainment Status for Each County by Year for Arizona As of December 14, 2012 http://www.epa.gov/oaqps001/greenbk/anay_az.html (last visited July 13, 2013); 91.5 KJZZ, Paul Atkinson, *2011 record year for Maricopa County air pollution*, Feb. 24, 2012 http://www.kjzz.org/content/1202/2011-record-year-maricopa-county-air-pollution (last visited July 13, 2013); Phoenix has one of the worst air pollution problems in the nation. Mother Nature Network, *7 U.S. cities with the worst air pollution*, http://www.mnn.com/health/healthy-spaces/photos/7-us-cities-with-the-worst-air-pollution/phoenix (last visited July 13, 2013).
[181] American Lung Association, State of the Air 2013 found at http://www.lung.org/associations/states/california/assets/pdfs/sota-2013/sota-2013-full-report.pdf .
[182] *Id.* at 13-15.
[183] AirNow, Smog - Who does it hurt? http://airnow.gov/index.cfm?action=smog.page1(last visited 6/27/13).
[184] *Id.*
[185] *Id.*
[186] Cancer-causing pollutants from trucks are diesel particulate matter and Volatile Organic Compounds (VOCs) such as benzene, formaldehyde, and polycyclic aromatic hydrocarbons (PAHs). (Sierra Club, Highway Health Hazards, http://www.sierraclub.org/sprawl/report04_highwayhealth/report.pdf (last visited 6/29/13)).
[187] MECA, *Clean Air Facts Emission Controls for Diesel Engines* http://www.meca.org/ (last visited 7/2/13).

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37	**Air Quality, Agriculture**	As noted on page 4-68 of the Final Environmental Impact Statement, secondary standards are established for criteria pollutants to minimize environmental and property damage. Primary and secondary standards for particulate matter (PM_{10}) are identical; no threshold is established by the U.S. Environmental Protection Agency for carbon monoxide (CO). The air quality assessment for the proposed freeway revealed no violations of either the carbon monoxide or particulate matter (PM_{10}), even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Because the secondary standards for particulate matter (PM_{10}) are identical, the proposed project would also not cause a violation of the secondary particulate matter (PM_{10}) standard. Further, the construction and operation of the proposed freeway would not alter agricultural operations on the Gila River Indian Community.
38	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the *Regional Transportation Plan* that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014.
39	**Trucks**	Creating a truck bypass is not a goal of the proposed action. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicles using the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed freeway, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85 (see page 3-64 of the Final Environmental Impact Statement). The air quality analyses included projected truck traffic. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more

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linked to lung cancer and the development of asthma.[188] Moreover, although the United States has implemented national heavy-duty diesel emissions standards and Ultra-low-sulfur diesel ("ULSD") fuel requirements, Mexico has not made significant progress in implementing its heavy-duty diesel emissions standards nor has it transitioned to ULSD.[189] And, although the Arizona Department of Air Quality monitors 1967 through 2008 diesel powered vehicles in the metro Phoenix (Area A) and Tucson (Area B), commercial vehicles that are licensed in multiple states are not.[190] Further, some trucks using the South Mountain Loop 2002 will be carrying hazardous material causing major risks to the GRIC. Although the DEIS admits that the South Mountain Loop 202 will be used to transport hazardous waste, it does not include an emergency plan for the different communities that could be affected by accidents by transporters of hazardous waste.

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There is also a risk of a pollution hot spot developing in the GRIC because of the leveling of mountain ridges and the placement of a highway with speeding cars and trucks on the flattened area abutting the GRIC. The GRIC reservation is situated between the Sierra Estrella to the west running north and south along the entire distance of the GRIC on the western edge, the South Mountain to its north separating the GRIC from Phoenix and Tempe, and the Santan Mountains on the northeast side, separating the GRIC from Gilbert and Apache Junction.[191] "These natural barriers are large enough and have sufficient altitude to prevent pollution from transporting onto GRIC even during periods of inversions and stagnant air.[192] The South Mountain Loop will eliminate the natural barrier of the South Mountain separating the GRIC from the heavily polluting cities of Phoenix and Tempe. Further, the new car and truck emissions will be emitted near the GRIC. Under certain wind and weather patterns, these emissions will be captured and contained within the remaining ranges on the GRIC causing a hotspot. Like past off-reservation polluting activities, the GRIC will have to bear the consequences of pollution not created by them but migrating to its lands.

41

The GRIC also would be disproportionality affected by other public health concerns, concerns of which were not mentioned in the DEIS. The GRIC struggle with substance abuse, such as alcoholism and methamphetamine addiction, and have been struggling with a high suicide rate.[193] American Indian and Alaska Native (AI/AN) people are significantly more likely to report past-year alcohol and substance use disorders than any other race.[194] And suicide rates for AI/AN people are 1.7 times higher than the U.S. all-races rate.[195] Further, several sources

[188] EPA, *Health Assessment Document for Diesel Engine* Exhaust (Final 2002) found at http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=29060#Download.
[189] EPA, Thirteenth Report of the Good Neighbor Environmental Board to the President and Congress of the United States, p. 15 found at http://www.epa.gov/ofacmo/gneb/gneb13threport/English-GNEB-13th-Report.pdf.
[190] Arizona Department of Air Quality, Air Quality Division: Vehicle Emissions: Diesel Vehicles, http://www.azdeq.gov/environ/air/vei/diesel.html (last visited 7/2/13).
[191] GRIC Response to EPA, Gila River Indian Community Response to EPA's Nine Factors Requirement for Designation of PM-2.5 Under the National Ambient Air Quality Standards, p. 5 Jan. 4, 2011, found at http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2010-0163-0016.
[192] *Id.*
[193] National Indian Health Board, *The Gila River Indian Community's Equine Programs*, http://www.nihb.org/behavioral_health/mspi_program_gila_river.php (last visited July 1, 2013).
[194] Substance Abuse and Mental Health Services Administration Office of Applied Studies, The NSDUH Report (2007) found at http://www.oas.samhsa.gov/2k7/AmIndians/AmIndians.htm.
[195] Indian Health Service Office of Public Health Support, Trends in Indian Health, 2002-2003; Historical trauma is linked to increased suicide risk not only through depression, despair, and helplessness felt because of cultural oppression, but also because anger, aggression, and violence felt in response to experiences of victimization can be

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39 (cont.)		than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Because Mexican trucks are currently restricted to the border region, they are not operating in the project Study Area and they were not included in the air quality analyses. Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on specific or unique emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-166 of the Final Environmental Impact Statement). The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. The Arizona Department of Public Safety also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on page 4-166 of the Final Environmental Impact Statement). The Arizona Department of Transportation maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Arizona Department of Public Safety on incidents within their jurisdiction. Requirements for shippers are maintained by the Arizona Department of Transportation's Enforcement Compliance Division. In the event of an incident with a hazardous materials issue on a State or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, which responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary.
40	**Air Quality**	Air quality depends on several factors such as the area itself (size and topography), the prevailing weather patterns (meteorology and climate) and the pollutants released into the air. Cuts through the South Mountains would be expected to produce microclimate differences similar to those produced by a series of buildings in a large city which produce localized wind tunnel effects. The mountain cuts, however, would not affect regional air quality. Hourly meteorological data used for the dispersion modeling with CAL3QHCR were downloaded from the U.S. Environmental Protection Agency's Support Center for Regulatory Atmospheric Modeling for the Phoenix Sky Harbor International Airport (surface data) and the Tucson International Airport (upper air data) for the 5-year period from 1987 through 1991 (epa.gov/ttn/scram/metobsdata_databases.htm). The 5 years of surface and mixing height data were processed with PCRAMMET to develop meteorological input files compatible with CAL3QHCR and incorporated into the particulate matter (PM_{10}) and carbon monoxide model runs at the

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indicate that AI/ANs are at higher risk for certain mental health disorders than other racial/ethnic groups.[196] The Office of Minority Health reports that AI/ANs experience higher rates than all races in the following areas: serious psychological distress; feelings of sadness, hopelessness, and worthlessness; feelings of nervousness or restlessness; and suicide.[197]

41 The Indian Health Service, the Federal Health Program for American Indians and Alaska Natives, recognizes that one major reason for these higher national rates of substance abuse and psychological problems is historical trauma.[198] Historical trauma describes the cumulative effects of the massive group trauma experienced by AI/AN peoples and nations since the arrival of European settlers on the American continent.[199] This trauma has taken various forms, from outright violence of wars and forced relocation to damaging prohibitions on Native languages and cultural and religious practices. Historical trauma has many dimensions, but one important aspect is that, as with any trauma situation, parents and caregivers who have been traumatized often pass on trauma response patterns to their children.[200] This means that the effects of historical trauma in AI/AN communities include not just past or present acts of oppression and racism that AI/AN people have been victimized by, but also the ways that trauma response behaviors are internalized, repeated, and passed on within AI/AN families and communities.[201]

42 The people of the GRIC, like many other Native Americans in the US, have continued to socially and psychologically struggle to heal from losing traditional ways of life, homeland, language, traditions, etc. due to intrusions on their culture. Because cultural identity and psychological health are related, healing is thwarted by continued marginalization of their culture and worldview. ADOT, deliberately destroying more culture unnecessarily is discriminatory and irresponsible. It is discriminatory because the act destroys an integral part of the GRIC's identity while history shows that Native Americans and the people of the GRIC have lost an incredible amount of their culture already. The GRIC in particular have been embattled in a water right dispute for decades. The loss of water has changed its way of life in very significant ways like food production, diet, independence, etc. And only just recently are the GRIC's water rights being restored after having had to struggle for almost a century with severely reduced water flows. Moreover, ADOT's action is discriminatory because modern psychology shows that cultural identity and environment play a major role in human health, especially for Native Americans who have a unique relationship with their culture and the natural environment.

43 Not only will a sacred mountain be desecrated but access to historical, ancestral land will be more limited, less accessible, and will be disturbed by noise, cars, and pollution. The landscape will be more fragmented and urbanized, qualities not compatible with sacredness. Modern psychology is not the only messenger to ADOT: the GRIC's 2007 Community Council resolution stated that they "strongly oppose(d) any alteration of the South Mountain Range for

turned against oneself. (Subia BigFoot, D., *History of Victimization in Native Communities*, found at http://icctc.org/History%20of%20Victimization%20Issues-%20Final.pdf).

[196] Olson, L. & Wahab, S., American Indians and Suicide: A Neglected Area of Research. Trauma, Violence, and Abuse, 2006 7(1), 19-33.

[197] US Department of Health and Human Services Office of Minority Health, *Mental Health and American Indians and Alaska Natives*, found at http://minorityhealth.hhs.gov/templates/content.aspx?ID=6475.

[198] U.S. Department of Health and Human Services, *American Indian /Alaska Native Behavioral health Briefing Book,* August 2011, found at http://www.ihs.gov/behavioral/documents/AIANBHBriefingBook.pdf.

[199] Brave Heart, M. Y. H. and DeBruyn, L. M., The American Indian Holocaust: Healing Historical Unresolved Grief, American Indian and Alaska Native Mental Health Research, 1998 8(2), 61.

[200] U.S. Department of Health and Human Services, *American Indian /Alaska Native Behavioral health Briefing Book,* August 2011, found at http://www.ihs.gov/behavioral/documents/AIANBHBriefingBook.pdf.

[201] *Id.*

Code	Issue	Response
40 (cont.)		three analysis locations described above. The use of Phoenix Sky Harbor International Airport meteorological data is consistent with the Maricopa Association of Government's regional conformity analysis, which was approved by the U.S. Department of Transportation on February 12, 2014, and with the Arizona Department of Environmental Quality's air quality permitting efforts in the region. In addition, the use of these data was agreed to during interagency consultation for the proposed project. The selected 5-year data set is representative of the project area and encompasses the wide variety of weather conditions that are likely to be experienced in the project area. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.
41	**Title VI, Cumulative, Social Conditions**	The comment indicates that these impacts have been experienced by the Native American and by the Gila River Indian Community in particular. This comment indicates that these conditions currently exist; therefore, the current state of the public health of the Gila River Indian Community is the baseline condition under consideration. It is not the obligation of the proposed action to mitigate impacts caused by other unrelated actions. Text beginning on page 4-179 of the Final Environmental Impact Statement addresses the proposed freeway's contribution to cumulative impacts. The comment infers the proposed freeway along with future actions would continue to contribute to the struggles referenced in the comment. The suggested cause is a loss of a traditional way of life and a marginalization of related traditions, inferred primarily by loss of natural lands and loss of access to those lands. The Draft and Final Environmental Impact Statements disclose recognition that some populations with environmental justice characteristics have specific needs associated with their identity being tied directly to geographic setting. Text on page 4-187 of the Final Environmental Impact Statement discloses that for the Gila River Indian Community, association with the South Mountains is important to identity and is established through direct spiritual and visual access to the mountains. Land developments in the area have encroached on the South Mountains, and the proposed action would contribute to encroachment on the southern side of the mountains but would be offset by mitigation measures highlighted in text in the section, *Cultural Resources*, beginning on page 4-140 and in Chapter 5 of the Final Environmental Impact Statement. The contribution of the proposed action to this cumulative effect would be negligible when considering land development patterns encroaching on the resource. The Final Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be affected by the proposed freeway (less than 0.03 percent of the total area). Although the Final Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community.
42	**Title VI**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices.

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[196] Olson, L. & Wahab, S., American Indians and Suicide: A Neglected Area of Research. Trauma, Violence, and Abuse, 2006 7(1), 19-33.

[197] US Department of Health and Human Services Office of Minority Health, *Mental Health and American Indians and Alaska Natives*, found at http://minorityhealth.hhs.gov/templates/content.aspx?ID=6475.

[198] U.S. Department of Health and Human Services, *American Indian /Alaska Native Behavioral health Briefing Book*, August 2011, found at http://www.ihs.gov/behavioral/documents/AIANBHBriefingBook.pdf.

[199] Brave Heart, M. Y. H. and DeBruyn, L. M., The American Indian Holocaust: Healing Historical Unresolved Grief, American Indian and Alaska Native Mental Health Research, 1998 8(2), 61.

[200] U.S. Department of Health and Human Services, *American Indian /Alaska Native Behavioral health Briefing Book*, August 2011, found at http://www.ihs.gov/behavioral/documents/AIANBHBriefingBook.pdf.

[201] *Id.*

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42 (cont.)		The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
43	**Title VI, Cultural Resources**	The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed South Mountain Freeway. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource

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43 (cont.)		Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community. The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and fully considered input and comments that were received. Chapter 2 of the Final Environmental Impact Statement is dedicated to the explanation of the Gila River Indian Community outreach undertaken for the project. Chapter 6 of the Final Environmental Impact Statement further describes Gila River Indian Community outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionately high adverse impacts would result from the construction and operation of the proposed action.

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any purpose"…and any alteration…"would be a violation of the cultural and religious beliefs of the Gila River Indian Community and would have a negative cumulative effect on the continuing lifeways of the people of the Gila River Indian Community."[202] ADOT's decision is irresponsible because the government is sponsoring a program that significantly reduces Native American culture and identity while at the same time knowing the integral relationship the GRIC has with the South Mountain and possessing all the tools to recognize that Title VI of the Civil Rights Act is being violated.

C. ADOT DISCRIMINATED BY NOT CONDUCTING ADEQUATE CONSULTATION TO PREVENT A DISPARATE IMPACT AND BY PROVIDING INADEQUATE NOTICE, ACCESS, AND PUBLIC PARTICIPATION OPPORTUNITIES FOR GRIC AND GRACE TRIBAL MEMBERS

44

GRIC tribal members are speaking out strongly because GRIC feel that they have not been properly included, consulted, and heard. In analyzing ADOT's procedure and process before and after the release of the DEIS, it is apparent that ADOT did not comply with Title VI's requirement that no person may be excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving Federal financial assistance on the basis of race, color, or national origin.[203] It is also apparent that ADOT did not comply with NEPA's provision to provide for "all Americans safe, healthful, productive, and esthetically pleasing surroundings", or to take a "systematic, interdisciplinary approach" to aid in considering environmental and community factors in decision making.[204]

45

Ignoring the fact that GRIC, as a Native American peoples with community centered values and a strong sense of responsibility to protect the integrity of the past, present, and future generations, ADOT has embraced MAG's interpretation that the South Mountain Loop 202 is an absolute necessary component of the MAG master-plan. MAG's subcommittee, the Transportation Policy Council (TPC), which plans for and sets aside money for transportation projects in the Maricopa County region and provides the overall plan for all modes of transportation in Maricopa County, is heavily filled with business leaders and corporate executives, who have a bias toward seeing the South Mountain constructed. The GRIC however must make decisions that protect their culturally rich ancestral lands and the health and welfare of present and future generations of GRIC.[205] The TCP includes executives from trucking companies (Swift, Knight), shopping mall owners and operators (Macerich), several realty companies, casino architects (The Killian Companies), and a construction firm that builds freeways (FNF Construction).[206] ADOT, who is captive to MAG"s belief that the project is necessary, has designed the DEIS so as to create the impression that the South Mountain Loop 202 must be built and no other alternatives are prudent or feasible, downplaying and ignoring the disparate impacts that would result if the South Mountain Loop 202 were constructed.

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[202] Gila River Indian Community Resolution NO. GR-41-07, A Resolution Designating the South Mountain Range (Muhadag, Avikwaxos) as a Sacred Place and Traditional Cultural Property of the Gila River Indian Community.
[203] 42 U.S.C § 2000d.
[204] Pub. L. 91-190, 42 U.S.C. 4321-4347, January 1, 1970, as amended by Pub. L. 94-52, July 3, 1975, Pub. L. 94-83, August 9, 1975, and Pub. L. 97-258, § 4(b), Sept. 13, 1982.
[205] MAG, TCP http://www.azmag.gov/Committees/Committee.asp?CMSID=1041 (last visited July 15, 2013).
[206] *Id.*

Code	Issue	Response
44	**Title VI**	The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received. Chapter 2 of the Final Environmental Impact Statement is dedicated to the explanation of the Gila River Indian Community outreach undertaken for the project. The Gila River Indian Community was provided the same opportunities to participate in the project as all other populations and agencies. Consultation related to cultural resources followed the requirements of Section 106 of the National Historic Preservation Act. Project communication with Gila River Indian Community officials followed a protocol established for this study, from years of previous consultation and coordination recognizing the sovereign nation status of the Gila River Indian Community and with respect for the Gila River Indian Community's cultural norms (see letter on page A152 of Appendix 1-1). Consultation and coordination occurred one-on-one with the appropriate Gila River Indian Community officials. Representatives from the Gila River Indian Community participated for years in the South Mountain Citizens Advisory Team. During the public comment period, Community members were provided the same opportunities to attend the public hearing and participate in a public forum as all other populations. The Arizona Department of Transportation and Federal Highway Administration did comply with the National Environmental Policy Act's provision to provide for "all Americans safe, healthful, productive, and esthetically pleasing surroundings", or to take a "systematic, interdisciplinary approach" to aid in considering environment and community factors in decision making. The alternatives development and screening process outlined in Chapter 3 of the Final Environmental Impact Statement is one example of the agencies' arduous, exhaustive, and comprehensive systematic and interdisciplinary approach to the National Environmental Policy Act. Further, as shown in Figure 3-41 on page 3-67, the process of identifying a preferred alternative demonstrates the interdisciplinary accounting in decision making in the process.
45	**Purpose and Need**	The Transportation Policy Committee was established by the Maricopa Association of Governments Regional Council in 2002 to oversee the development of the 20-year *Regional Transportation Plan* and to guide transportation planning in the region. The Transportation Policy Committee is made up of 23 members. The membership includes 13 city representatives, a Maricopa County Supervisor, an Arizona Department of Transportation State Transportation Board member, and seven business representatives. The final member, representing Native American Indian Communities is the Gila River Indian Community Lieutenant Governor. So the Gila River Indian Community has a direct voice in the direction of transportation funding in the region. The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The role of the Arizona Department of Transportation is to implement the freeway program from the voter-approved plan.

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46	ADOT has minimally consulted with the GRIC in the scoping and preparing of the DEIS both officially and unofficially. While ADOT indicates that it has conducted 178 meetings with GRIC on its South Mountain Loop 202 proposal between 2001 to 2012, only three, all in 2011, were identified as cultural resource consultation meetings and none were attended by the BIA.[207] Further, these cultural resource consultation meetings were designated as "Meetings Focused on the Proposed On-Community Alignment, 2010-2012 biasing any efforts to satisfy the goals of a cultural resource consultation meeting. The National Park Services' guidance for federal historic preservation programs states: "consultation means the process of seeking, discussing, and considering the views of others, and, where feasible, seeking agreement with them on how historic properties should be identified, considered, and managed. Consultation is built upon the exchange of ideas, not simply providing information.[208] Further, consultation should start early for a proposed project, not 9 years after conducting meetings. And those best equipped to communicate the tribes' sensitivities to cultural places should be consulted with and not just met with so as to satisfy what it believes is its Title VI and EJ requirements.[209] ADOT spent the first 9 years just informing GRIC representatives what its plan were and trying to "coordinate" its agenda -not consulting: ADOT worked mainly with the Natural Resources Standing Committee (NRSC) and the Transportation Technical Team (TTT). The NRSC is a special committee reporting to the Community Council that reviews all land use actions under its jurisdiction, acts as a key decision-making agent in actions pertaining to land use effects on Community land, and issues right-of-entry permits for non-Community members wishing to conduct a survey or other data collection tasks on Community land." And the TTT is a special committee established by the Community Council…to facilitate informed decisions on transportation requests.[210] These two committees do not participate in consultation, which is something very different from making land use decisions, issuing right-of-entry permits for non-Community members, and facilitating informed decisions on transportation requests. Moreover, ADOT didn't conduct the informational scoping meetings itself. The DEIS states that in August 2010 while ADOT believed it still could secure an on-reservation alignment, it presented an environmental and engineering overview outlining the freeway and its

[207] None of these meetings was the one that the Four Southern Tribes of Arizona attended. (ADOT, South Mountain Study Team, Chapter 2 *Gila River Indian Community Coordination* at 4-7); The federal government is obligated by its "trust responsibility" to represent the best interests of tribes and their members. This specific responsibility is delegated to the U.S. Bureau of Indian Affairs (BIA)." (*Id.* at 2); Under Executive Order 13,175, each federal agency must establish a process for consultation with tribal officials in the development and implementation of "policies that have tribal implications" based upon the "unique legal relationship" between the United States and "Indian tribal governments as set forth in the Constitution of the United States, treaties, statutes, Executive Orders, and court decisions." (65 FED. REG. 67249 (Nov. 6, 2000) https://www.federalregister.gov/articles/2000/11/09/00-29003/consultation-and-coordination-with-indian-tribal (last visited July 15, 2013)). With the BIA as one of ADOT's partners, any ADOT action with the South Mountain Freeway is dependent on it complying with Executive Order 13,175.

[208] National Park Service, The Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs pursuant to the National Historic Preservation Act, 63 FED. REG. 20496, 20504 (Apr. 24, 1998).

[209] While the Elderly Concerns Group was met with twice, in 2001 and in then in 2002 by ADOT, nothing came of it. Because their concerns did not influence the DEIS, the Group on June 12, 2013 had to make a formal motion that the Elderly Concerns Group was opposed to the South Mountain Freeway and the destruction of the South Mountain. See attachment.

[210] ADOT, South Mountain Study Team, Chapter 2 *Gila River Indian Community Coordination* p. 3 found at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/FHWA-AZ-EIS/02-SMDEIS-Chapter-2-Gila-River-Indian-Community-Coordination.pdf.

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45 (cont.)		Chapter 1, *Purpose and Need*, was developed based on Federal Highway Administration guidance in terms of complying with the National Environmental Policy Act with respect to the purpose and need for a proposed action. As noted on page 1-1 of the Draft Environmental Impact Statement, "...if the lead agency concludes ... there is no need, an EIS would not be prepared..." The determination of purpose and need in terms of assessing if a transportation problem exists that warrants action was done objectively, defensibly and without pre-determination and in so doing, the Arizona Department of Transportation and Federal Highway Administration facilitated an environmental impact statement process without a determination that the proposed action is "... an absolute necessary component of the Maricopa Association of Governments master-plan..." as is incorrectly stated in the comment. The purpose and need criteria used to define the transportation problem are described (see Figures 1-8, 1-9, 1-10, 1-11, 1-12, and 1-13). The summation of the need for the proposed action is described in the conclusions section, beginning on page 1-21 of the Draft Environmental Impact Statement. In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process presented in Chapter 3 of the Draft Environmental Impact Statement. The preferred alternative was the outcome to this process. A thorough feasible and prudent avoidance analysis of the South Mountains was conducted as presented in Chapter 5 of the Draft and Final Environmental Impact Statements and concluded avoidance to the direct use of the resource was not feasible and prudent. In support of this response and given the concerns about the South Mountains, consider the following review from the U.S. Department of the Interior on the Draft Environmental Impact Statement: comment: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources." The complete letter can be found in Appendix 7, Volume III, on page B4 of the Final Environmental Impact Statement.
46	**Tribal Involvement**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. As noted in Table 4-47 that begins on page 4-145 of the Final

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46 **(cont.)**		Environmental Impact Statement, the Gila River Indian Community was initially consulted in 2003 with subsequent contact in 2005, 2006, 2007, 2008, 2010, 2011, 2012, and 2013. This supports an early and continued consultation with the Gila River Indian Community related to resources of importance. This consultation has resulted in concurrence from the State Historic Preservation Office and Gila River Indian Community Tribal Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. However, there is no requirement to consult with individual tribal members under Section 106. Agency scoping comments from the project initiation in 2001 are presented beginning on page 6-3 of the Draft and Final Environmental Impact Statements. The Gila River Indian Community was part of the agency scoping process. While specific topics are not identified in Table 2-1 of the Draft Environmental Impact Statement, cultural resource-related issues were a standard topic and the Bureau of Indian Affairs were regular attendees at these consultation and coordination meetings. Additionally, Gila River Indian Community concerns are summarized on page 2-10 of the Draft and Final Environmental Impact Statements. As noted in Table 4-47 beginning on page 4-145 of the Final Environmental Impact Statement, the Bureau of Indian Affairs has been consulted over the course of the project on cultural resources-related issues. Also, the Bureau of Indian Affairs, as a cooperating agency, reviewed the Draft Environmental Impact Statement prior to the public release. The Bureau of Indian Affairs approved the document for release with only minor comment. Since the beginning of the environmental impact statement process for the proposed freeway, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in an ongoing, open dialogue with the Gila River Indian Community, its Tribal Historic Preservation Officer, and its Cultural Resource Management Program regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. The Gila River Indian Community's own Cultural Resource Management Program performed the cultural field investigations and developed recommendations for mitigation for project impacts. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. The Yavapai-Prescott Indian Tribe deferred to the Southern Tribes to take the lead in identifying the traditional cultural properties. A response from Salt River Pima-Maricopa Indian Community dated August 14, 2012 cited the existing consultation management agreement between the Four Southern Tribes (Ak-Chin Indian Community, Gila River Indian Community,

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ADOT spent the first 9 years just informing GRIC representatives what its plan were and trying to "coordinate" its agenda -not consulting: ADOT worked mainly with the Natural Resources Standing Committee (NRSC) and the Transportation Technical Team (TTT). The NRSC is a special committee reporting to the Community Council that reviews all land use actions under its jurisdiction, acts as a key decision-making agent in actions pertaining to land use effects on Community land, and issues right-of-entry permits for non-Community members wishing to conduct a survey or other data collection tasks on Community land." And the TTT is a special committee established by the Community Council…to facilitate informed decisions on transportation requests.[210] These two committees do not participate in consultation, which is something very different from making land use decisions, issuing right-of-entry permits for non-Community members, and facilitating informed decisions on transportation requests.

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Moreover, ADOT didn't conduct the informational scoping meetings itself. The DEIS states that in August 2010 while ADOT believed it still could secure an on-reservation alignment, it presented an environmental and engineering overview outlining the freeway and its

[207] None of these meetings was the one that the Four Southern Tribes of Arizona attended. (ADOT, South Mountain Study Team, Chapter 2 *Gila River Indian Community Coordination* at 4-7); The federal government is obligated by its "trust responsibility" to represent the best interests of tribes and their members. This specific responsibility is delegated to the U.S. Bureau of Indian Affairs (BIA)." (*Id.*at 2); Under Executive Order 13,175, each federal agency must establish a process for consultation with tribal officials in the development and implementation of "policies that have tribal implications" based upon the "unique legal relationship" between the United States and "Indian tribal governments as set forth in the Constitution of the United States, treaties, statutes, Executive Orders, and court decisions." (65 FED. REG. 67249 (Nov. 6, 2000) https://www.federalregister.gov/articles/2000/11/09/00-29003/consultation-and-coordination-with-indian-tribal (last visited July 15, 2013)). With the BIA as one of ADOT's partners, any ADOT action with the South Mountain Freeway is dependent on it complying with Executive Order 13,175.

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[210] ADOT, South Mountain Study Team, Chapter 2 *Gila River Indian Community Coordination* p. 3 found at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/FHWA-AZ-EIS/02-SMDEIS-Chapter-2-Gila-River-Indian-Community-Coordination.pdf.

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46 (cont.)		Salt River Pima-Maricopa Indian Community, and Tohono O'odham Nation) and stated that the Four Southern Tribes are in consensus that Gila River Indian Community would take the lead in providing comments for the project. For more discussion of traditional cultural properties, see Draft Environmental Impact Statement pages 4-129 through 4-132, 4-148, and 5-26 through 5-28. In investigating the comment, it was noted that two of the meetings referred to in Table 2-2 discussed resources that were located off the Gila River Indian Community. As a result, these two meetings (8/4/2011 and 11/30/2011) have been removed from Table 2-2 and were added to Table 4-47 beginning on page 4-145 of the Final Environmental Impact Statement.
47	**Tribal Involvement**	Public and agency scoping for the proposed action was conducted in accordance with the requirements established by the National Environmental Policy Act as disclosed in Chapter 6 of the Draft Environmental Impact Statement. Agency scoping comments from the project initiation in 2001 are presented beginning on page 6-3 of the Draft Environmental Impact Statement. The Gila River Indian Community was part of the agency scoping process. As stated on page 2-8 of the Draft Environmental Impact Statement, the meetings in 2010 between the Gila River Indian Community's Transportation Technical Team, Arizona Department of Transportation, and the Federal Highway Administration were held in response to a request received from the Governor of the Gila River Indian Community and were not a part of the agency or public scoping process. The information provided to the Transportation Technical Team was used by the Team and the Public Information Office in the Gila River Indian Community's outreach effort prior to the February 2012 coordinated referendum. The referendum and the outreach effort were tribal actions and, other than providing requested information to the Gila River Indian Community, Arizona Department of Transportation and Federal Highway Administration did not participate in these actions.

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impacts on GRIC land to the TTT, who with the help of the Public Information office solicited recommendations and comments from GRIC tribal members on an off-reservation and an on-reservation alignment.[211] The DEIS states that meetings were held from December 2010 through March 2011 in each of the seven districts, with some districts having multiple meetings.[212] The DEIS states that meetings were also held with special interest groups and a total of 15 meetings occurred.[213] GRACE states that these meetings were heard about only if one participated in certain closed meetings and only certain people were invited to those closed meetings. Further, many in attendance questioned why ADOT was not conducting these meetings but rather GRIC representatives. It appears that ADOT inappropriately gave its duty for scoping and community outreach to tribal representatives, and failed to make sufficient and direct efforts to engage GRIC tribal members between December 2010 and March 2011.

47

The only information publicized in the GRIN that the general GRIC community had before they voted in February 2012 to voice their opinion about the South Mountain was a paid ad by Pangea in the December 2011 and January 2012 GRIN telling tribal members that an on-reservation build would save South Mountain and an off-reservation build would desecrate South Mountain and an article by GRACE in the January 2012 GRIN expressing that a no build was an option, which meant that neither the reservation would be built on nor would South Mountain be desecrated. Still, uninterested in knowing how an off and an on-reservation build would impact the GRIC negatively,[214] without conducting consultation and arguably never communicating with the general GRIC community themselves, ADOT moved forward with designing only one eastern alternative through the South Mountain. Needless to say, many GRIC tribal members felt they had not been consulted. One GRIC tribal member stated: "A.D.O.T. did not ask in proper manners what we as a community would like done or not done with our sacred place of gathering."[215] See attachment.

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As a sovereign nation with historical, cultural, and spiritual connections with lands no longer fully assessable but which they have rights to, adequate consultation is necessary. Not only does the NHPA require consultation with the GRIC because the South Mountain is a TCP with religious and cultural significance[216] but Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations also calls for consultation. Executive Order 12898 states "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations"[217] Nonetheless, after listing ADOT's meetings with the GRIC, Chapter 2's *Gila River Indian Community Coordination* ends with, "in

[211] *Id.* at 8.
[212] *Id.* at 8.
[213] *Id.* at 8.
[214] GRACE's article in the January 2012 GRIN states "Both proposed freeway alignments destroy the mountain. The on reservation alignment will force the loss of more than 600 acres of GRIC lands at the base of South Mountain (source: Kimberly Dutcher, GRIC Law Office). These sites are full of cultural significance, and The Arizona Department of Transportation (ADOT) knows this. By destroying the foothills of Muhadag Do'ag, we destroy the entire mountain, as well as Muhadag Do'ag's connection to the Estrellas. And what about the Pee Posh and O'odham families that would fall victim to the on-reservation alignment, and lose their homes to the freeway?" GRIN, Jan. 2012 15, NO.01 p. 4 found at www.gilariver.org/news)
[215] Nicole Johns, GRIC tribal member, Aff. ¶ 5 June 29, 2013.
[216] 16 U.S.C. § 470a(d)(6)(B); 36 C.F.R. §§ 800.3(d) and (f)(2) and 36 C.F.R. § 800.2(c)(2)(ii).
[217] Exec. Order No. 12898, 59 Fed. Reg. (Feb. 11, 1994) found at http://www.archives.gov/federal-register/executive-orders/pdf/12898.pdf.

Code	Issue	Response
48	**Environmental Justice**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. However, there is no requirement to consult with individual tribal members under Section 106. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

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49	accordance with Executive Order 12898, on environmental justice, and with Title VI of the Civil Rights Act of 1964 (Title VI), the coordination efforts outlined in this chapter establish that reasonable efforts have been made to engage and provide the Community's population access to the EIS process for the proposed action."[218] ADOT's weak coordination efforts and flimsy access to the EIS process however are not enough: Title VI fundamentally requires consultation where exchange of ideas happens to prevent disparate impacts that Title VI prohibits. One-sided informational meetings, which most of the various GRIC meetings were between 2001 and 2012 do not give a community the potential to affect the opinions of the decision makers. The meetings to discuss the South Mountain Loop 202 were only for technical, information gathering, and for ADOT to present its intent and not for consultation. For example, while the DEIS acknowledges that the Community Council is "the primary decision-making and legislative body for the Community….consist(ing) of 17 members elected by residents of the Community's seven districts[219]", ADOT only coordinated two meetings with them, one in 2003 that only included community council representatives from districts 4, 6, and 7 and another in 2005. It is apparent ADOT was only meeting to satisfy what it allegedly believed its requirements were under Executive Order 12898 and Title VI to "coordinate" and "engage"[220] the GRIC, and moreover, to "ensure full and fair participation"[221] –again, not to truly consult or to consider anything but an on-reservation or a South Mountain Preserve alignment. Additionally, ADOT's meetings between 2001 and 2012 with the GRIC were not even full and fair. As a potential especially affected group, full and fair mean equal opportunity to participate and communicate ones position. For example, between 2010 through 2012, none of the 76 meetings focused on the proposed on-reservation alignment were conducted in districts three or five because as chapter 2 *GRIC Coordination* states, they would have been "less affected" by an on reservation alignment. This is not true because overall, the reservation is community land and any change of use will affect all tribal members. Further, a no-build is an equally legitimate option that NEPA requires analyzed. However, the meetings between 2001 and 2009 were conducted under the assumption that an alternative on the reservation was obtainable, while the meetings between 2010 and 2012 were conducted under the assumption an on-reservation alignment could be ultimately negotiated: none of the meetings therefore consulted and considered alternatives focusing on the effects and impacts on the GRIC for using GRIC land or the effects and impacts on the GRIC for desecrating sacred land. For example, chapter 2 goes on and says "informational meetings have been conducted with District 1 and 2 representatives regarding project status and identification of their concerns regarding the proposed action. These meetings occurred in 2002; both Districts 1 and 2 are outside of the Study Area. Although presentations to Districts 1 and 2 have not been made since 2002, articles regarding the project have appeared in the Gila River Indian News."[222] One GRIC tribal member stated "I wasn't notified about the meetings that they had about this freeway being built. I believe that they should of set out flyers to notify people not just only landowners but members of our community that should also be included to this matter that is coming in affect to our

[218] ADOT, South Mountain Study Team, Chapter 2 *Gila River Indian Community Coordination* at 11.
[219] ADOT, South Mountain Study Team, Chapter 2 *Gila River Indian Community Coordination* at 3.
[220] *Id.* at 1, 4.
[221] ADOT, South Mountain Study Team, chapter 4 *Affected Environment, Environmental Consequences, and Mitigation* at 29.
[222] ADOT, South Mountain Study Team, Chapter 2 *Gila River Indian Community Coordination* at 8.

Code	Issue	Response
49	**Tribal Involvement**	The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received. Efforts to involve the Gila River Indian Community in the environmental impact statement process are documented in Chapter 2 of the Final Environmental Impact Statement. Gila River Indian Community members were able to comment on the environmental impact statement process and its content at any time during the preparation of the Draft Environmental Impact Statement and through the comment period once the Draft Environmental Impact Statement was issued. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. This is disclosed in Chapter 2 of the Final Environmental Impact Statement. Project communication with Gila River Indian Community officials followed a protocol established for this study, from years of previous consultation and coordination recognizing the sovereign nation status of the Gila River Indian Community and with respect for the Gila River Indian Community's cultural norms. Consultation and coordination occurred one-on-one with the appropriate Gila River Indian Community officials. Representatives from the Gila River Indian Community participated for years in the South Mountain Citizens Advisory Team until early 2006, when the Gila River Indian Community requested all project-related communications take place at the government-to-government level. During the public comment period, Gila River Indian Community members were provided the same opportunities to attend the public hearing and participate in a public forum as all other populations.

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50	accordance with Executive Order 12898, on environmental justice, and with Title VI of the Civil Rights Act of 1964 (Title VI), the coordination efforts outlined in this chapter establish that reasonable efforts have been made to engage and provide the Community's population access to the EIS process for the proposed action."[218] ADOT's weak coordination efforts and flimsy access to the EIS process however are not enough: Title VI fundamentally requires consultation where exchange of ideas happens to prevent disparate impacts that Title VI prohibits. One-sided informational meetings, which most of the various GRIC meetings were between 2001 and 2012 do not give a community the potential to affect the opinions of the decision makers. The meetings to discuss the South Mountain Loop 202 were only for technical, information gathering, and for ADOT to present its intent and not for consultation. For example, while the DEIS acknowledges that the Community Council is "the primary decision-making and legislative body for the Community....consist(ing) of 17 members elected by residents of the Community's seven districts[219]", ADOT only coordinated two meetings with them, one in 2003 that only included community council representatives from districts 4, 6, and 7 and another in 2005. It is apparent ADOT was only meeting to satisfy what it allegedly believed its requirements were under Executive Order 12898 and Title VI to "coordinate" and "engage"[220] the GRIC, and moreover, to "ensure full and fair participation"[221] –again, not to truly consult or to consider anything but an on-reservation or a South Mountain Preserve alignment. Additionally, ADOT's meetings between 2001 and 2012 with the GRIC were not even full and fair. As a potential especially affected group, full and fair mean equal opportunity to participate and communicate ones position. For example, between 2010 through 2012, none of the 76 meetings focused on the proposed on-reservation alignment were conducted in districts three or five because as chapter 2 *GRIC Coordination* states, they would have been "less affected" by an on reservation alignment. This is not true because overall, the reservation is community land and any change of use will affect all tribal members. Further, a no-build is an equally legitimate option that NEPA requires analyzed. However, the meetings between 2001 and 2009 were conducted under the assumption that an alternative on the reservation was obtainable, while the meetings between 2010 and 2012 were conducted under the assumption an on-reservation alignment could be ultimately negotiated: none of the meetings therefore consulted and considered alternatives focusing on the effects and impacts on the GRIC for using GRIC land or the effects and impacts on the GRIC for desecrating sacred land. For example, chapter 2 goes on and says "informational meetings have been conducted with District 1 and 2 representatives regarding project status and identification of their concerns regarding the proposed action. These meetings occurred in 2002; both Districts 1 and 2 are outside of the Study Area. Although presentations to Districts 1 and 2 have not been made since 2002, articles regarding the project have appeared in the Gila River Indian News."[222] One GRIC tribal member stated "I wasn't notified about the meetings that they had about this freeway being built. I believe that they should of set out flyers to notify people not just only landowners but members of our community that should also be included to this matter that is coming in affect to our

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[222] ADOT, South Mountain Study Team, Chapter 2 *Gila River Indian Community Coordination* at 8.

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50	**Tribal Involvement**	As discussed on page 2-4 of the Draft Environmental Impact Statement, in August 2000, the Gila River Indian Community Council passed Resolution GR-64-96. This resolution concluded that the Gila River Indian Community Council strongly opposed any future alignment of the South Mountain Freeway on Gila River Indian Community land. That resolution has never been rescinded by Gila River Indian Community Council and is still considered in force and to represent the will of the Gila River Indian Community by the Arizona Department of Transportation and Federal Highway Administration. The comments received from Gila River Indian Community Governor Gregory Mendoza (see letter dated July 11, 2013, on page B38 in Appendix 7, Volume III, of the Final Environmental Impact Statement) confirm the Gila River Indian Community's position. As stated on page 2-8 of the Draft Environmental Impact Statement, the meetings in 2010 between the Gila River Indian Community's Transportation Technical Team, Arizona Department of Transportation, and the Federal Highway Administration were held in response to a request received from the Governor of the Gila River Indian Community and were not a part of the agency or public scoping process. The information provided to the Transportation Technical Team was used by the Team and the Public Information Office in the Gila River Indian Community's outreach effort prior to the February 2012 coordinated referendum. The referendum and the outreach effort were tribal actions and, other than providing requested information to the Gila River Indian Community, Arizona Department of Transportation and Federal Highway Administration did not participate in these actions. It is unclear to what timeframe the inadequate notification comment is referring. However, the Arizona Department of Transportation and Federal Highway Administration have attended meetings as requested by Gila River Indian Community groups, including the Gila Borderlands Advisory Committee and the Elderly Concerns Group. To keep Gila River Indian Community members engaged in the process and to ensure adequate access to project activities, three newsletters have been provided to the Gila River Indian Community for distribution and articles have been provided to the *Gila River Indian News* for inclusion in the weekly tribal newspaper. The Arizona Department of Transportation has participated in the Gila River Indian Community's annual fair to answer questions regarding the proposed action. Times and locations of all public meetings (see Chapter 6, *Comments and Coordination*) relating to the project have been advertised to the Gila River Indian Community, inviting members to attend. Offers to the Gila River Indian Community Manager to host a public outreach event on the Gila River Indian Community began in summer 2012. The Gila River Indian Community first officially responded to this offer at the April 30, 2013 meeting of the Transportation Technical Team. During this meeting, the Gila River Indian Community Manager requested a community forum be conducted on the Gila River Indian Community following the public hearing. This was the only request the Arizona Department of Transportation received from the Gila River Indian Community regarding whether the Arizona Department of Transportation could hold a public outreach event during the public comment period. The Arizona Department of Transportation agreed to do so, and a community forum was held on June 22, 2013 at the Komatke Boys & Girls Club on the Gila River Indian Community.

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51	reservation."[223] See attachment. Another tribal member stated "I don't know why they can't hold a meeting in each District to see what the people think. Even though it is for landowners. But I think it is going to affect the whole reservation."[224] GRIC's issues and concerns of the environmental, health, and cultural cumulative impacts on them and the misuse of transportation dollars for unnecessary highway expansion in the name of parochial economic development could not be considered in the decision making process because they were ignored by ADOT's tunnel vision agenda of obtaining an on-reservation alignment so that they could spare the South Mountain and the Ahwatukee Foothills.[225] No evidence suggests that the GRIC's concerns were appropriately considered: why else after the GRIC voted for a no-build[226] did ADOT end up with only one eastern alternative that goes through the GRIC's sacred mountain. The community forum meetings during the 90 day comment period also were not full and fair.[227] As a nation with an oral tradition centered around community involvement and community transmission, (which is very different from a written tradition that is individualistic and easily transferable by non-community engagement), the one ADOT meeting on the reservation did not allow for formal "public testimony". Rather, the meeting only allowed participants to report to a court reporter who recorded GRIC members' comments individually. This was unfair as the May 21st downtown Phoenix public hearing allowed people to speak with a court reporter, complete a comment form, or give a formal 3-minute comment (public testimony).[228] By the time GRIC's community forum meeting came around June 22, 2013, the three options offered at the downtown Phoenix public hearing narrowed into only speaking with a court reporter or completing a comment form. Attendees at the GRIC community forum meeting were also forbidden to bring signs and banners to communicate and voice their opinions. These restrictions were a great insult to tribal members, especially since they felt excluded from the DEIS scoping and preparation of the DEIS. Also, the same video that was played at the beginning of the release of the DEIS and that can be found on the website was played over and over at this meeting instead of providing tribal members the opportunity to address everyone at the meeting.

[223] Winnona Catha, GRIC tribal member, Aff. ¶ 3 July 2, 2013.
[224] Bernadette Stevens, GRIC tribal member, Aff. ¶ 5 July 2, 2013.
[225] For example, after many failed attempts, Ahwatukee Foothills representative DiCiccio was hired by ADOT in 2006 as a consultant to negotiate with the GRIC to reconsider allowing the freeway on its land. (Sean Holstege, The Republic, *1998 plan for South Mountain Freeway passed*, March 25, 2013 http://www.azcentral.com/community/ahwatukee/articles/20130308south-mountain-freeway-plan-ignored.html (last visited July 11, 2013)).
[226] In late 2011, the GRIC Community Council passed a resolution to hold a Community-wide referendum on the freeway. The referendum asked members whether they supported an on-reservation alignment, an off-reservation alignment, or a "no-build" option. On February 7, 2012, most GRIC voters voted for the "no-build" option.
[227] Meetings were held in: Ahwatukee Foothills Village; Avondale; Chandler; Estrella Village; Gila River Indian Community; and Laveen Village. Public testimony was formally prohibited at all meetings. (ADOT, Public participant Guide for the Loop 202 South Mountain Freeway Study Draft Environmental Impact Statement, found at http://www.smfonlinehearing.com/files/2313/6881/9504/SMTN_Meeting_Guide.pdf; However, public testimony was allowed at the May 21st Phoenix Public Hearing.
[228] ADOT, You're invited! Loop 202 South Mountain Freeway Study Draft Environmental Impact Statement Available for Public Review and Comment, found at http://www.azdot.gov/Highways/EPG/EPG_Common/PDF/Public_Notices/Loop202-South-Mountain-Freeway-project.pdf.

Code	Issue	Response
50 (cont.)		The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 Papago, Maricopa, and Santan Freeways. These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013) and one in June (close of the Draft Environmental Impact Statement public comment period). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area.
51	**Tribal Involvement**	As earlier comments recognize, the Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received. While efforts to study project alternatives on Community land that did not directly impact South Mountain were attempted, as noted on page 2-8 of the Draft Environmental Impact Statement, a coordinated referendum occurred in February 2012, and Gila River Indian Community members voted in favor of the no-build option. Therefore, the on-Gila River Indian Community alignment was eliminated from further study. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process. However, mitigation measures developed through consultation and coordination with the Tribal Historic Preservation Office and other concerned parties would be considered for implementation in any final action.

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reservation."[223] See attachment. Another tribal member stated "I don't know why they can't hold a meeting in each District to see what the people think. Even though it is for landowners. But I think it is going to affect the whole reservation."[224]

GRIC's issues and concerns of the environmental, health, and cultural cumulative impacts on them and the misuse of transportation dollars for unnecessary highway expansion in the name of parochial economic development could not be considered in the decision making process because they were ignored by ADOT's tunnel vision agenda of obtaining an on-reservation alignment so that they could spare the South Mountain and the Ahwatukee Foothills.[225] No evidence suggests that the GRIC's concerns were appropriately considered: why else after the GRIC voted for a no-build[226] did ADOT end up with only one eastern alternative that goes through the GRIC's sacred mountain.

52 The community forum meetings during the 90 day comment period also were not full and fair.[227] As a nation with an oral tradition centered around community involvement and community transmission, (which is very different from a written tradition that is individualistic and easily transferable by non-community engagement), the one ADOT meeting on the reservation did not allow for formal "public testimony". Rather, the meeting only allowed participants to report to a court reporter who recorded GRIC members' comments individually. This was unfair as the May 21st downtown Phoenix public hearing allowed people to speak with a court reporter, complete a comment form, or give a formal 3-minute comment (public testimony).[228] By the time GRIC's community forum meeting came around June 22, 2013, the three options offered at the downtown Phoenix public hearing narrowed into only speaking with a court reporter or completing a comment form. Attendees at the GRIC community forum meeting were also forbidden to bring signs and banners to communicate and voice their opinions. These restrictions were a great insult to tribal members, especially since they felt excluded from the DEIS scoping and preparation of the DEIS. Also, the same video that was played at the beginning of the release of the DEIS and that can be found on the website was played over and over at this meeting instead of providing tribal members the opportunity to address everyone at the meeting.

[223] Winnona Catha, GRIC tribal member, Aff. ¶ 3 July 2, 2013.
[224] Bernadette Stevens, GRIC tribal member, Aff. ¶ 5 July 2, 2013.
[225] For example, after many failed attempts, Ahwatukee Foothills representative DiCiccio was hired by ADOT in 2006 as a consultant to negotiate with the GRIC to reconsider allowing the freeway on its land. (Sean Holstege, The Republic, *1998 plan for South Mountain Freeway passed*, March 25, 2013 http://www.azcentral.com/community/ahwatukee/articles/20130308south-mountain-freeway-plan-ignored.html (last visited July 11, 2013)).
[226] In late 2011, the GRIC Community Council passed a resolution to hold a Community-wide referendum on the freeway. The referendum asked members whether they supported an on-reservation alignment, an off-reservation alignment, or a "no-build" option. On February 7, 2012, most GRIC voters voted for the "no-build" option.
[227] Meetings were held in: Ahwatukee Foothills Village; Avondale; Chandler; Estrella Village; Gila River Indian Community; and Laveen Village. Public testimony was formally prohibited at all meetings. (ADOT, Public participant Guide for the Loop 202 South Mountain Freeway Study Draft Environmental Impact Statement, found at http://www.smfonlinehearing.com/files/2313/6881/9504/SMTN_Meeting_Guide.pdf; However, public testimony was allowed at the May 21st Phoenix Public Hearing.
[228] ADOT, You're invited! Loop 202 South Mountain Freeway Study Draft Environmental Impact Statement Available for Public Review and Comment, found at http://www.azdot.gov/Highways/EPG/EPG_Common/PDF/Public_Notices/Loop202-South-Mountain-Freeway-project.pdf.

Code	Issue	Response
51 (cont.)		In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process presented in Chapter 3 of the Draft Environmental Impact Statement. The preferred alternative was the outcome to this process. As noted in the previous comment response, the Draft Environmental Impact Statement on page 2-4 acknowledges that the Gila River Indian Community Council passed Resolution GR-64-96 that strongly opposed any future alignment of the South Mountain Freeway on Community land. In addition, the comments received from Gila River Indian Community Governor Gregory Mendoza (see letter dated July 11, 2013, on page B38 in Appendix 7, Volume III, of the Final Environmental Impact Statement) confirm the Gila River Indian Community's position. To clarify, the comment concludes that because a distinct population conducts a vote, the outcome of said vote should be deemed as "final" when, such a vote is the reflection of a population subset of a much larger population. The environmental impact statement process accounts for such information from the voter outcome as a contributing factor to be taken into account as one of many factors to consider in terms of the National Environmental Policy Act decision making intent to promote a more informed decision in regards to the proposed action. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
52	**Tribal Involvement**	The comment is correct that the opportunity for public testimony was offered only at the public hearing on May 21, 2013. The six community forums, including the one at the Komatke Boys & Girls Club offered the opportunity to view the same materials, present comments in writing or to a court reporter and were formatted in exactly the same manner. However, signs and banners were also prohibited at the public hearing on May 21. Community forums were held after the public hearing to further invite public comment. The public hearing for the proposed action was widely advertised. Newspaper ads in six newspapers of area-wide distribution ran advertisements at least twice each. Announcements occurred on five radio stations and six television stations. Mailers were sent on May 6, 2013 to 73,564 individuals (approximately 311 on the Gila River Indian Community) who had previously expressed an interest in the project. The Arizona Department of Transportation utilized the Government Delivery system to distribute to over 12,000 recipients. E-newsletters were distributed on three different occasions. All materials were also provided to the Gila River Indian Community Public Information Officer.

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53	"Many Community members voiced disappointment in the format of the forum, which they said was completely from ADOT's perspective…and…one-sided".[229] One GRIC tribal member stated "I was unable to attend the ONE and only meeting that I would have been allowed to speak at publicly. As stated before I don't travel to the Phoenix metro-area due to the distance, pollution and the heat. I am an elder that is in a wheelchair, which needs assistance to get around. Attending this meeting was impractical for me and the ONE meeting held in the Gila River Indian Community was held over fifty miles from my home. I feel that A.D.O.T. violated my civil right by not allowing anyone to speak at the meeting held in the Gila River Indian Community, as well as other meetings held in other communities. I was raised by oral traditions, I was taught to speak out, and I have a right to be heard in a public forum."[230] See attachment. Another GRIC tribal member said "I feel ADOT discriminated against us all at the last public forum held in Komatke, AZ. Gila River Indian Community members were not able to voice their public comments. No matter where the meetings are held. All parties whether you are against or for the freeway should be able to speak. No meeting should be one sided for any reason what so ever. That is very unfair. Again this is a fast fix to eliminate process that everyone should abide by."[231] See attachment.
54	Notice was also inadequate. The June 22 meeting was not publicized on GRIN until an ADOT advertisement appeared on GRIN the day before the actual event.[232] This did not give tribal members enough notice to plan and prepare to attend the meeting, especially because many GRIC members lack transportation. To make matters worse, transportation was not provided to the GRIC as promised for the downtown Phoenix public hearing. Because of this, minimal GRIC participation at the Phoenix meeting was possible. In attempting to obtain community transportation for the Phoenix event, GRACE representative, Lori Riddle, called to speak with ADOT on numerous occasions to ask about transportation assistance. However, no one ever picked up. She had to leave messages and left several until ADOT's answering machine became too full to allow her to leave any more messages. Then, when she then turned to MAG's Senior Engineer Bob Hazlett for assistance in resolving this issue, he only shrugged his shoulders at her and said that it was just discovered that the ADOT message machine was designed to take up to 12 or so messages at a time. He said nothing else and did nothing to help. Not until the Phoenix meeting, did ADOT then hand out instructions about transportation assistance. And, then when GRACE tried to secure transportation for GRIC tribal members for the on-reservation public forum meeting on June 22, 2013, ADOT failed to provide vans to pick up tribal members that many of the GRIC needed to attend the meeting. At the last moment, ADOT put the responsibility on the GRIC requesting that GRACE representative, Lori Riddle, provide ADOT with a list of those who needed transportation with their contact information and addresses: because of the time constraints, this was not possible to provide.
	One GRIC tribal member summed up ADOT's performance with the GRIC: "the manner in which ADOT has pursued the Gila River community member's voice and cooperation regarding the Draft Environmental Impact Study and the planning process has been poor to say

[229] Joshua Jovanelly, GRIC Website, ADOT outreach on proposed 202 ext. held in Komatke http://www.gilariver.org/index.php/news/3829-adot-outreach-on-proposed-202-ext-held-in-komatke (last visited July 15, 2013).
[230] Peggy Mae Morago, GRIC tribal member, Aff. ¶ 4 July 6, 2013.
[231] Fairietta Morago, GRIC tribal member, Aff. ¶ 6.
[232] GRIN, *Learn More about the DEIS*, June 21, 2013 found at http://www.gilariver.org/GRIN/JUNE_21_GRIN_Final.pdf.

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52 (cont.)		The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations.
53	**Tribal Involvement**	Although not everyone could possibly be accommodated under all circumstances, all parties were offered equal access to the public hearing. Equal opportunities were offered to all that wished to participate. The endeavor to engage all population segments exceeded National Environmental Policy Act requirements pertinent to public outreach and involvement. The outreach was full and fair; all members of the population including those in the Gila River Indian Community were provided opportunity to provide oral and written testimony in a manner appropriate to National Environmental Policy Act requirements with sufficient opportunity and time and means to participate in such engagement. The outreach also provided ample opportunity for those with special needs to inform Arizona Department of Transportation and Federal Highway Administration of special needs to allow Arizona Department of Transportation and Federal Highway Administration to be responsive to those special needs. Specifics of the outreach associated with the Draft Environmental Impact Statement comment period can be found in Chapter 6, *Comments and Coordination*, of the Final Environmental Impact Statement
54	**Tribal Involvement**	Community forums were held after the public hearing to further invite public comment. The public hearing for the proposed action was widely advertised. Newspaper ads in six newspapers of area-wide distribution ran advertisements at least twice each. Announcements occurred on five radio stations and six television stations. Mailers were sent on May 6, 2013 to 73,564 individuals (approximately 311 on the Gila River Indian Community) who had previously expressed an interest in the project. The Arizona Department of Transportation utilized the Government Delivery system to distribute to over 12,000 recipients. E-newsletters were distributed on three different occasions. All materials were also provided to the Gila River Indian Community Public Information Officer. Offers to the Gila River Indian Community Manager to host a public outreach event on the Gila River Indian Community began in summer 2012. The Gila River Indian Community first officially responded to this offer at the April 30, 2013 meeting of the Transportation Technical Team. During this meeting, the Gila River Indian Community Manager requested a community forum be conducted on the Gila River Indian Community following the public hearing. This was the only request the Arizona Department of Transportation received from the Gila River Indian Community regarding whether the Arizona Department of Transportation could hold a public outreach event during the public comment period. The Arizona Department of Transportation agreed to do so, and a community forum was held on June 22, 2013, at the Komatke Boys & Girls Club on the Gila River Indian Community.

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"Many Community members voiced disappointment in the format of the forum, which they said was completely from ADOT's perspective…and…one-sided".[229] One GRIC tribal member stated "I was unable to attend the ONE and only meeting that I would have been allowed to speak at publicly. As stated before I don't travel to the Phoenix metro-area due to the distance, pollution and the heat. I am an elder that is in a wheelchair, which needs assistance to get around. Attending this meeting was impractical for me and the ONE meeting held in the Gila River Indian Community was held over fifty miles from my home. I feel that A.D.O.T. violated my civil right by not allowing anyone to speak at the meeting held in the Gila River Indian Community, as well as other meetings held in other communities. I was raised by oral traditions, I was taught to speak out, and I have a right to be heard in a public forum."[230] See attachment. Another GRIC tribal member said "I feel ADOT discriminated against us all at the last public forum held in Komatke, AZ. Gila River Indian Community members were not able to voice their public comments. No matter where the meetings are held. All parties whether you are against or for the freeway should be able to speak. No meeting should be one sided for any reason what so ever. That is very unfair. Again this is a fast fix to eliminate process that everyone should abide by."[231] See attachment.

Notice was also inadequate. The June 22 meeting was not publicized on GRIN until an ADOT advertisement appeared on GRIN the day before the actual event.[232] This did not give tribal members enough notice to plan and prepare to attend the meeting, especially because many GRIC members lack transportation. To make matters worse, transportation was not provided to the GRIC as promised for the downtown Phoenix public hearing. Because of this, minimal GRIC participation at the Phoenix meeting was possible. In attempting to obtain community transportation for the Phoenix event, GRACE representative, Lori Riddle, called to speak with ADOT on numerous occasions to ask about transportation assistance. However, no one ever picked up. She had to leave messages and left several until ADOT's answering machine became too full to allow her to leave any more messages. Then, when she then turned to MAG's Senior Engineer Bob Hazlett for assistance in resolving this issue, he only shrugged his shoulders at her and said that it was just discovered that the ADOT message machine was designed to take up to 12 or so messages at a time. He said nothing else and did nothing to help. Not until the Phoenix meeting, did ADOT then hand out instructions about transportation assistance. And, then when GRACE tried to secure transportation for GRIC tribal members for the on-reservation public forum meeting on June 22, 2013, ADOT failed to provide vans to pick up tribal members that many of the GRIC needed to attend the meeting. At the last moment, ADOT put the responsibility on the GRIC requesting that GRACE representative, Lori Riddle, provide ADOT with a list of those who needed transportation with their contact information and addresses: because of the time constraints, this was not possible to provide.

55

One GRIC tribal member summed up ADOT's performance with the GRIC: "the manner in which ADOT has pursued the Gila River community member's voice and cooperation regarding the Draft Environmental Impact Study and the planning process has been poor to say

[229] Joshua Jovanelly, GRIC Website, ADOT outreach on proposed 202 ext. held in Komatke http://www.gilariver.org/index.php/news/3829-adot-outreach-on-proposed-202-ext-held-in-komatke (last visited July 15, 2013).
[230] Peggy Mae Morago, GRIC tribal member, Aff. ¶ 4 July 6, 2013.
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Code	Issue	Response
54 (cont.)		The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. Like the public hearing, the community forums were widely advertised. In addition to the efforts of the Gila River Indian Community Communication and Public Affairs Office, Arizona Department of Transportation ran newspaper ads in six newspapers of area-wide distribution four times each. In addition to these sources, The Gila River Indian Community's facebook page advertised the hearing and the community forum on the Gila River Indian Community. Likewise, the Gila River Against Loop 202 facebook page advertised the hearing, public transportation to the hearing, and the community forum on the Gila River Indian Community.
55	**Tribal Involvement**	As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community, a sovereign nation, in the environmental impact statement process are extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. The individuals who felt that they were not included in the comment process are doing so through this complaint. Community forums were held after the public hearing to further invite public comment.

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the least. There was very little communication between the GRIC and MAG and ADOT. When community members were made aware of public hearings and meetings, it was short notice and not sympathetic to our community members lack of transportation. Furthermore, when ADOT did hold a "Public Forum" in GRIC, members were not to voice their statements verbally as others were able to do at the Phoenix hearing."[233] See attachment.

ADOT also circulated and gave out inaccurate information about the GRIC, creating the false impression that the GRIC did not have as much to lose in the South Mountain Loop 202.[234] While participating in this ADOT community forum meeting on the GRIC, GRIC attendees recognized that while in the DEIS there are two TCPs[235] discussed, both of which would be completely destroyed if the proposed freeway extension was built, the ADOT posters at the meeting did not show this.[236] When the attendees asked the ADOT representatives why this was so, different representatives replied in various ways: one said that the posters were outdated, another said there were no inaccuracies, and another stated that the discrepancies were up for interpretation.[237] The posters also did not list other O'odham cultural resources such as petroglyph sites and prehistoric trails rich in artifact remains.[238] It can only be guessed at how much damage the inadequate and incompetent presentation of the GRIC's many cultural and sacred areas and artifacts have done in regards to the dialogue and understanding of this project. It also shows what is produced by inadequate consultation, full and fair participation, and actual coordination.

D. NO SUBSTANTIAL LEGITIMATE JUSTIFICATION FOR SOUTH MOUNTAIN LOOP 202 AND FEASIBLE, REASONABLE AND NON-DISCRIMINATORY ALTERNATIVES EXIST FOR ADOT

57

As enumerated in the facts of the DEIS, ADOT is well aware of the sacredness of the South Mountain and the role that the mountain plays in the GRIC tribal members' culture and heritage. Title VI requires that recipients of federal funding such as ADOT must not take actions that have a disproportionate effect /disparate impact on peoples of a specific color, race, or national origin such as the people of the GRIC who are Native Americans.

With sacred places that must be undisturbed and where rituals and ceremonies may not even be conducted without the right environment, the South Mountain Loop would disparately impact GRIC tribal members. Here, there is an Indigenous Peoples, whose culture is embedded with its relationship with the South Mountain environment –known as a sacred territory-- from which they get physical, mental, and spiritual life. The desecration of South Mountain by construction and operation of a highway loop would result in a monumental disparate impact and a prohibited discriminatory effect. Further, the health and environmental impacts would also be disproportionally burdensome on the GRIC. Native Americans are supposed to be afforded civil rights protections from the majority: this is why GRACE requests ADOT to protect and to not

[233] Renee Jackson, GRIC tribal member, Aff. ¶ 3.
[234] Akimel o'odham youth collective's Blog, *O'odham Zombies March Against the 202,* June 24, 2013 http://aoycblog.wordpress.com/ (last visited July 18, 2013).
[235] The prehistoric Huhukam villages and the Pueblo del Alamo and Villa Buena.
[236] Akimel o'odham youth collective's Blog, *O'odham Zombies March Against the 202,* June 24, 2013 http://aoycblog.wordpress.com/ (last visited July 18, 2013).
[237] *Id.*
[238] *Id.*

Code	Issue	Response
56	**Cultural Resources**	The descriptions of cultural resources and potential effects to those resources as discussed in the Draft Environmental Impact Statement were correct and complete. The banners produced for the public meetings were necessarily abbreviated and simplified for quick summaries of information. The first banner related to Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, contained two important cautions to the public: "Chapter 4 of the Draft Environmental Impact Statement includes a substantial discussion of those elements of the environment most affected by the proposed freeway." and "Viewers are urged to review the contents of Chapter 4 to obtain more information about the environmental elements presented in the banners." The banners accurately represented the number of National Register of Historic Place-eligible archaeological sites that would be adversely affected by alternative (2 to 7 sites, depending on alternative) and Traditional Cultural Properties - South Mountains (0 for Western Alternative, 1 for the E1 Alternative). The National Register of Historic Places-eligible archaeological sites that would be adversely affected presented in the banner included the trails and artifact remains referenced in the comment. The National Register of Historic Places-eligible petroglyph sites referenced in the comment would be avoided by the alternatives. Potential adverse effects to Villa Buena and Pueblo del Alamo as archaeological sites would be addressed under Section 106 of the National Historic Preservation Act. Potential impacts to Villa Buena and Pueblo del Alamo as Traditional Cultural Properties would be addressed through the implementation of the enhancement and management plan developed in consultation with the Gila River Indian Community's Cultural Resources Management Program and the Tribal Historic Preservation Officer (see page 4-142 of the Final Environmental Impact Statement). This plan outlines measures that would sufficiently reduce or eliminate the potential for adverse effect to the National Register of Historic Places-eligible Traditional Cultural Properties attributes of Villa Buena and Pueblo del Alamo.
57	**Title VI**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28.

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57 (cont.)		Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
58	**Title VI, Environmental Justice**	The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and fully considered input and comments that were received.

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purposely create a disparate impact on a protected class of people that would have a monumental and disastrous effect on the welfare and quality of life of the GRIC.

58 For all of the effort that was put into spelling out environmental justice requirements, Title VI itself was not defined, nor was it evaluated effectively in the DEIS. ADOT's August 2008 South Mountain Transportation Corridor Study Citizens Advisory Team Draft Technical Report Summary/Cultural Resources states that "by law, adverse impacts on cultural resources determined eligible for listing in the NRHP must be mitigated. The degree of mitigation required is directly related to the historic designation as described by Section 106. Direct impacts from construction on cultural resources determined to be of religious or traditional cultural importance by Native American groups or others could result in desecration of a sacred place. A potential indirect impact might be a community's loss of access to a culturally important place as a result of construction restrictions."[239]

59 ADOT's August 2008 South Mountain Transportation Corridor Study Citizens Advisory Team Draft Technical Report Summary/Environmental Justice [240] acknowledged that GRIC was a protected peoples[241] under Title VI; however, it made no mention that evaluating sacred places through the lens of Section 106 of the NHPA that requires "agencies to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment,"[242] does not eliminate the necessity of evaluating the disparate impact of losing sacred places, culture, heritage, etc. based on Title VI.[243] In this document, Title VI was not analyzed.

60 In chapter 4 of ADOT's DEIS, Title VI is only mentioned as a subset of Environmental Justice and the1994 Executive Order 12898 on environmental justice; moreover, it is not defined. Title VI is not a policy or an executive order, but is the law and must be complied with as the rule of the law. Only in a short sidebar, does chapter 4 say, "in addressing environmental justice, it is important to understand whether the proposed action would have disproportionately high and adverse impacts on the protected population"[244] but it doesn't say this in regards to Title VI or spell out its criteria. Rather, it directs the reader to go on to Land Use, Social Conditions, Displacements and Relocations, Economic Impacts, Air Quality, Noise, Cultural Resources, Visual Resources, Prime and Unique Farmlands, and Temporary Construction Impacts, which essentially are various sections of the DEIS that are over hundreds of pages long.

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[239] ADOT, South Mountain Transportation Corridor Study Citizens Advisory Team Draft Technical Report *Summary Cultural Resources* August 28, 2008 p. 2 found at http://www.azdot.gov/southmountainfreeway/PDF/082808_SMCAT_CulturalResources_Summary_Final.pdf.

[240] ADOT, South Mountain Transportation Corridor Study Citizens Advisory Team Draft Technical Report *Summary Environmental Justice*, found at http://www.azdot.gov/southmountainfreeway/PDF/062608_SMF_CAT_EJ_Summary_Final.pdf.

[241] It appears that in this report, ADOT is not identifying GRIC accurately as a protected class. It is protected because of race not by color. The US Census currently identifies the following races: white, black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and other Pacific Islander. Race, Definition (last visited 6/23/2013) http://quickfacts.census.gov/qfd/meta/long_RHI525211.htm). Further, the protection is because of a history of discrimination; therefore, the disparate impact must be evaluated through the lens of the class of people experiencing political, social, economic, cultural discrimination historically.

[242] Section 106 Regulations Summary http://www.achp.gov/106summary.html (last visited 6/23/2013).

[243] This section on Title VI errs in defining what it is by not defining it but rather, conflating it into a subsection of environmental justice. Title VI does have a place in environmental justice, but Title VI is much more than environmental justice.

[244] ADOT, South Mountain Study Team, Chapter 4 *Affected Environment, Environmental Consequences, and Mitigation* at 38.

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58 (cont.)		Chapter 2 of the Final Environmental Impact Statement is dedicated to the explanation of the Gila River Indian Community outreach undertaken for the project. Chapter 6 of the Final Environmental Impact Statement further describes Gila River Indian Community outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionately high adverse impacts would result from the construction and operation of the proposed action.
59	**Cultural Resources**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. As noted in Table 4-47 that begins on page 4-145, the Gila River Indian Community was initially consulted in 2003 with subsequent contact in 2005, 2006, 2007, 2008, 2010, 2011, 2012, and 2013. This supports an early and continued consultation with the Gila River Indian Community related to resources of importance. However, there is no requirement to consult with individual tribal members under Section 106. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28.

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59 (cont.)		Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
60	**Title VI, Environmental Justice**	The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

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ADOT is responsible for ensuring its actions and non-actions do not violate Title VI. Building a freeway through and desecrating South Mountain disproportionally affects a protected class and may only be done if there is a substantial legitimate justification. Connecting Ahwatukee Foothills to Laveen so that businesses like malls and movie theaters can come in is not a substantial legitimate justification.[245] Nor is alleviating traffic a substantial legitimate justification without first addressing the alleged problem of congestion[246] and pollution when there are more prudent and feasible alternatives[247], as well as, comparably effective alternatives with less of a disparate impact to choose from.

A substantial legitimate justification for creating a disparate impact is just not found in the DEIS. To prove a "substantial legitimate justification," the recipient of federal funds must show that the challenged action or non-action was "necessary to meeting a goal that was legitimate, important, and integral to the [recipient's] institutional mission."[248] The justification must bear a "manifest demonstrable relationship" to the challenged policy.[249] And there must not be an alternative that is comparably effective with less of a disparate impact.[250]

ADOT purposely crafted its purpose and need to strategically make a no-build alternative appear non-debatable. The DEIS gives reasons for why it appears the proposal is favored and what the projects alleged purposes and needs are. The DEIS states that population growth, housing demand, economic growth, and the deficiencies in alternative modes of transportation

[245] In a Loop 202 Meeting in Laveen on May 21, 2013, Phoenix City Councilman Michael Nowakowski stated that Laveen has "plans for a hospital, a mall, restaurants and shops, but … all the plans are dependent on the South Mountain Freeway being built…shops and businesses won't come unless there's a possibility that residents from other parts of the Valley could be attracted to the area." (Allison Hurtado, Ahwatukee Foothills News, *Laveen residents gather to organize support for South Mountain Freeway*, http://www.ahwatukee.com/news/article_20023ca0-c1ab-11e2-befb-001a4bcf887a.html (last visited July 14, 2013).

[246] Texas A&M's 30th Urban Mobility Report ranks the Phoenix-Mesa metropolitan area 40th among U.S. cities for the average amount of time motorists spend in traffic jams. 39 other areas rank higher for congestion than Phoenix-Mesa.

[247] "Section 4(f) refers to the original section within the U.S. Department of Transportation Act of 1966 which established the requirement for consideration of park and recreational lands…and historic sites in transportation projects. The law, now codified in 49 U.S.C. §303 and 23 U.S.C. §138, is implemented by the Federal Highway Administration (FHWA) through the regulation 23 CFR 774. Before approving a project that uses Section 4(f) property (e.g. a public park like SMPP), FHWA must either (1) determine that the impacts are de minimis, or (2) undertake a Section 4(f) Evaluation. If the Section 4(f) Evaluation identifies a feasible and prudent alternative that completely avoids Section 4(f) properties, it must be selected. If there is no feasible and prudent alternative that avoids all Section 4(f) properties, FHWA has some discretion in selecting the alternative that causes the least overall harm (see discussion below). FHWA must also find that all possible planning to minimize harm to the Section 4(f) property has occurred." (FHWA, *Section 4(f) at a Glance*, http://environment.fhwa.dot.gov/4f/4fAtGlance.asp (last visited July 15, 2013). SCOTUS has provided parameters to guide interpretation of the statute in *Overton Park v. Volpe*. (401 U.S. 402 (1971)). The Court defined "feasible" as an alternative grounded in "sound engineering." The Court interpreted a "prudent" alternative as one that would not present "unique" or "truly unusual" problems, or "costs or community disruption of extraordinary magnitude." (Id. at 413). The Overton Park decision stressed that protection of 4(f) lands was of "paramount importance" under the statute. (Id. at 412-413). Here, there is a 4(f) land of paramount importance, a federally funded transportation project, impacts that are not de minimis, and prudent and feasible alternatives.

[248] *Sandoval v. Hagan*, 7 F.Supp. 2d 1234, 1278 (M.D. Ala. 1998), aff'd, 197 F.3d 484 (11th Cir. 1999), cert. granted sub. nom. Alexander v. Sandoval, __ U.S. __, 121 S.Ct. 28, 68 U.S.L.W. 3749 (U.S. Sept. 26, 2000) (No. 99-1908) (quoting Elston, 997 F.2d at 1413).

[249] Georgia State Conference, 775 F.2d. at 1418. See, e.g., Elston, 997 F. 2d at 1413.

[250] *See* Elston, 997 F.2d at 1407.

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61	**Title VI, Environmental Justice**	The obligation of the Arizona Department of Transportation and Federal Highway Administration, as the federal lead agency, in accordance with the National Environmental Policy Act is to assess if the proposed action and its alternatives would lead to substantial adverse environmental impacts, disclose those impacts and identify mitigation to reduce the impact below a level of significance (and if such mitigation is unavailable, disclose that such an impact would occur but not be mitigated). The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. Even if one were to reach a contrary conclusion and determine that disproportionately high and adverse and/or disparate effects would occur as a result of the proposed freeway, there is substantial justification for the proposed freeway. It is needed to serve projected growth in population and accompanying transportation demand and to correct existing and projected transportation system deficiencies (see Chapter 1, *Purpose and Need*). There is no feasible and prudent alternative to the use of the South Mountains, as discussed in Chapter 5, *Section 4(f) Evaluation*. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. Chapter 2 of the Final Environmental Impact Statement is dedicated to the explanation of the Gila River Indian Community outreach undertaken for the project. Chapter 6 of the Final Environmental Impact Statement further describes Community outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionately high adverse impacts would result from the construction and operation of the proposed action.

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make the South Mountain Loop absolutely necessary. Further, it argues a no-build solution is not a feasible alternative. The DEIS states that the proposed project's purpose and need is to get people off the southern part of Phoenix out of the existing roads onto another route; it goes on to assert that this cannot be satisfied without creating this specific Loop. The DEIS asserts that moreover, this proposal has been supported since 1985 and would complete the last part of the master plan.[251] Therefore, it is claimed that a no-build could not fulfill this purpose and need. However, if the essential purpose and need is to reduce congestion, a no-build alternative using various transportation modalities, including rail serving the southwest and southeast suburbs of Phoenix, and that included changes in zoning, used the Census Bureau's more realistic medium population prediction rather than the high prediction projection, acknowledged that the 2006 economic downturn has changed the future demographics of the area, and took a hard look on who actually would be using the South Mountain Loop 202, the purpose and need would still be fulfilled.[252] One no-build alternatives PARC has suggested is light rail along Pecos Road that would go through a small portion of the GRIC (with permission) rather than cutting through South Mountain.

[251] The DEIS states that because voters voted for a one-half cent sales tax for transportation funding in 1985, then extended the life of that tax via proposition 400, and then canvassing results by MAG showed that over a majority of voters supported proposition 400, there is overall public support for the South Mountain Loop. However, both proposition 300 and 400 are general propositions for regional transportation projects and not for the South Mountain Loop specifically. Further, the South Mountain Loop proposal has always been extremely controversial and is opposed by many. Many find the South Mountain Loop outdated, bad for communities and too expensive. (Road Rage "Jana's View" Phoenix Magazine Feb. http://www.janabommersbach.com/phx-mag-feb07.php (last visited June 26, 2013)). For example, many people of the Ahwatukee Foothills are opposed to the project. The loop would demolish recently built homes in this planned community in the foothills of South Mountain: some ask if it was that important, why it wasn't already built and why the state let this development get so large. Protecting Arizona's Resources and Children (PARC) also believes the project is unnecessary, financially irresponsible, and contrary to the public interest. (Allison Hurtado, Ahwatukee Foothills News, PARC to host public meeting about Loop 202, May 8, 2013 (last updated May 16, 2013) http://www.ahwatukee.com/community_focus/article_d7b6f25e-b748-11e2-a138-0019bb2963f4.html). South Mountain Park Board of Trustees is also against the project because the SMPP is a park preserve, land designated as conservation land: they say that this land is critical habitat and further fragmentation of natural desert will only expedite loss of species. It further degrades the essence of what a preserve is and moreover destroys highly culturally significant sites that are held sacred to many Native American Indians. The Sierra Club also opposes the South Mountain Loop for a variety of reasons, one of which is the argument that the South Mountain Loop will not reduce pollution in the long run: smart growth must be adopted and reliance of highway systems will not solve traffic or pollution problems. Don't Waste Arizona also opposes the South Mountain Freeway arguing that NEPA was violated in multiple ways: no recent scoping was done; projections of growth are outdated, most current scientific data isnot used; there is no purpose or need; major emergency planning issues were not even mentioned; and a huge superfund will need to be cleaned up. (Don't Waste Arizona and PARC, Steve Brittle, http://player.vimeo.com/video/70051539 (last visited July 12, 2013)); and the Akimel O'odham Youth Collective has been very active and vocal about the cultural and health effects that the South Mountain highway would cause. (http://aoycblog.wordpress.com/).

[252] The US census gives low, medium, and high population projections. The DEIS used the high estimates. Further, the DEIS ignores that after 1990, population growth stopped speeding at the level the DEIS predicts for 2020 and 2035; Tom R. Rex, *New Population Projections For The United States, Arizona And Arizona Counties A Report from the Office of the University*, Economist Jan. 2013 found at http://wpcarey.asu.edu/seid/ccpr/upload/Projections.pdf.

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61 (cont.)	**Purpose and Need**	The comment further notes "Connecting Ahwatukee Foothills to Laveen so that businesses like malls and movie theaters can come in is not a substantial legitimate justification." The comment infers the action is proposed to support/promote development in the Study Area. Text beginning on page 4-170 of the Draft Environmental Impact Statement describes the proposed action's relation to development in the Study Area in that it would be built in an area planned for urban growth as established in local jurisdictions' land use planning activities for at least the last 25 years and that purpose of the project is not to promote economic development but to respond to a growing need for additional transportation capacity as a result of regional growth occurring now and as projected. As presented in Chapter 1, *Purpose and Need*, an objective and unbiased examination of the existing and planned future transportation network in the Study Area was undertaken to determine if the catalyst for the need for the environmental impact statement (being the proposed action) was still warranted. As explained in the chapter, the examination successfully attempted to provide an answer to whether or not a transportation problem(s) exist and would continue to exist in the foreseeable future. The analysis was undertaken in accordance with the National Environmental Policy Act and Federal Highway Administration guidance and policy for implementing the National Environmental Policy Act. The results confirmed the transportation problems as framed in the region's adopted long range transportation plans (both past and present) still exist and would continue to exist in the foreseeable future. The need for action was not to implement the long range plan objectives but to correct a transportation problem in the region; a beneficial outcome in doing so was consistency with the region's long range transportation planning activities. The purpose and need criteria used to frame the transportation problem are described (see Figures 1-8, 1-9, 1-10, 1-11, 1-12, and 1-13). As summarized in the section, *Conclusions*, beginning on page 1-21 of the Draft and Final Environmental Impact Statement, the analysis confirmed that without a major transportation facility in the Study Area, the region's transportation network (as recognized in over 25 years of transportation planning) will not be able to efficiently move goods and people throughout the region without major investments in the region. The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available.

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61 (cont.)		The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
	Alternatives	In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process presented in Chapter 3 of the Draft Environmental Impact Statement. The preferred alternative was the outcome to this process. In support of this response and given the concerns about the South Mountains, consider the following review from the U.S. Department of the Interior on the Draft Environmental Impact Statement: comment: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources." The complete letter can be found in Appendix 7, Volume III, on page B4 of the Final Environmental Impact Statement. Comments from other groups (e.g., South Mountain Park Board of Trustees) will be addressed in the Final Environmental Impact Statement in the same manner as the Gila River Alliance for a Clean Environment's comments are addressed. The information regarding the context and attributes of the South Mountains is disclosed in the Draft Environmental Impact Statement. The acreage of parkland to be converted to a transportation use is reported on page 5-14 in the section, *Direct Use*. It is reported that 31.3 acres or just less than 0.2 percent of the parkland would be converted (this is a reduction in the amount of use planned for in 1988). The text goes on to point out other concerns associated with the direct use reported, and text on page 5-14 in the sidebar, "*The South Mountains in Phoenix's Sonoran Preserve System*", describes the importance of Phoenix South Mountain Park/Preserve in the region. Beginning on page 5-23 in the section, *Measures to Minimize Harm*, measures are presented to be undertaken to address the use impacts, including land replacement, on properties adjacent to the park. The section, *Cultural Resources*, beginning on page 4-140, also discloses the relation of the proposed action to the cultural resource attributes of the South Mountains. The project team examined alternatives to avoid the park, but did not identify any feasible and prudent alternatives to avoid impacts. The Arizona Department of Transportation continues to work with park stakeholders to minimize impacts and address concerns. Measures to minimize harm to the park were developed (see Final Environmental Impact Statement, starting on page 5-23). The first segment of the Central Phoenix/East Valley Light Rail Transit project has been completed through central Phoenix, northern Tempe, and northwestern Mesa. While expansion routes are being studied, none would link the western and eastern termini of the proposed freeway in the Study Area. Most light rail lines radiate from a central demand generator (e.g., a central business district or major airport). Light rail

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62	The DEIS analysis of the no-build asserts that more pollution would result with nothing built and that the U.S. Environmental Protection Agency's air quality standards could be met if the project went through. However, building more highway miles will only increase more driving and more pollution. And it would only motivate more urban sprawl that supports further development into the Sonoran desert of cultural significance. Moreover, the Sonoran desert is being reduced at record speed causing the loss of major ecosystem services.[253] For example, the Sonoran desert regulates temperature. "As the Phoenix metropolitan area continues to sprawl, (replacing Sonoran desert with more development) the urban heat island will expand from the urban core further into suburban regions."[254] What Arizona's unchecked urban sprawl is creating is unsustainability[255] because for one, it is not controlling it with sustainable transportation.[256] The urban heat island actually affects people of lower socioeconomic status elderly, and minorities, like Native Americans.[257] Moreover, because of their inaccurate assumptions and relative insignificance, the build verses no-build differences in percentage of trips in the study area, travel time to downtown, and differences in miles of 1-10 with 3 + hours of congestion do not identify a substantial legitimate justification for the financial cost, pollution consequences, and disparate impact to GRIC, as well as the additional consequence of added congestion on existing roadways for example, to bypass the additional 10 miles the loop would put on the Ahwatukee Foothills residents on their way to downtown Phoenix.[258] According to the DEIS, the percent change in traffic on arterial streets would be 9% and the percent change in traffic on freeways would be 8%.[259] Further, the DEIS estimates 10 saved minutes for travel time from Laveen to downtown and 6 saved minutes for Ahwatukee to downtown if the South Mountain Loop was constructed.[260] And, the DEIS estimates that with the South Mountain Loop, there would be 7 less miles of 1-10 with 3+ hours of congestion in the morning and 12 less hours of congestion in the evening.[261] The substantial legitimate justification argument fails by the fact that E-I as the preferred alternative for the east side had no other alternatives from which to compare or choose because, as the DEIS states, GRIC forbid ADOT from using GRIC reservation land for the South [253] Ecosystem services are services from natural systems like deserts that assist humans either directly or indirectly. (de Groot, R.S., M.A. Wilson, and R. M.J. Boumans. 2002. A typology for the classification, description and valuation of ecosystem functions, goods, and services. Ecological Economics 41:393-408.) [254] Sally Wittlinger, Decades, Arizona State University, *Sustainability: The Urban Heat Island* http://arizonaindicators.org/sites/default/files/content/publications/Decades-vol1-issue-10.pdf. [255] The Brundtland Commission defined sustainability as a system that meets the needs of the present without compromising the needs of future generations. (United Nations Economic Commissions for Europe. Sustainable development - concept and action. http://www.unece.org/oes/nutshell/2004-2005/focus_sustainable_development.html (last visited July 11, 2013)). [256] Paul Mees, Transport for Suburbia: Beyond the Automobile Age Earthscan 2010. [257] Rachel Morello-Frosch, *The Climate Gap: Inequalities in How Climate Change Hurts Americans & How to Close the Gap*, found at http://dornsife.usc.edu/pere/documents/The_Climate_Gap_Full_Report_FINAL.pdf. [258] "If you are going to use the new Loop 202 to go to Downtown Phoenix, good luck as you just added another 10 miles to your route. The loop from I-10 (San Tan/Pecos) to 59th Avenue is 22 miles, and then add another 5 miles to back-track to Central and you have a total of 27 miles. The current distance from the same starting point is 17 miles." (Jim Jochim, Ahwatukee Foothills News, *Proposed South Mountain Freeway will do permanent harm to our environment*, http://www.ahwatukee.com/tukee_talk/article_bc0a8868-d4c1-11e2-bbe4-0019bb2963f4.html (last visited July 14, 2013). [259] ADOT, South Mountain Study Team, Chapter 1: *Purpose and Need* Banner at http://www.smfonlinehearing.com/materials/chapter1/ [260] *Id.* [261] *Id.* 35

Code	Issue	Response
61 (cont.)		along the proposed corridor would be inconsistent with a radial transit model and would not be able to connect to existing light rail or the planned extension. While light rail segments are planned in the *Regional Transportation Plan* near the western and eastern termini of the proposed freeway, no funds are available or anticipated to support a combined system through the Study Area. The light rail alternative alone or in combination with other nonfreeway alternatives would not meet the purpose and need criteria; specifically, they would not adequately address projected capacity and mobility needs of the region (see Figure 3-3 of the Final Environmental Impact Statement, which describes the contribution of these improvements to meeting regional transportation needs). The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
62	**Purpose and Need**	The Draft Environmental Impact Statement—particularly in Chapter 1, *Purpose and Need*, and Chapter 3, *Alternatives*—explains how the process of establishing a purpose and need for the proposed action followed nationally accepted guidance and policy. Examples of how the purpose and need analyses were applied include the: · section, *Context of Purpose and Need in the EIS Process*, on page 1-1 · sidebar, *"A proposed action's purpose and documentation should:"*, on page 1-1 · sidebar, "*How are MAG data used in the DEIS?*", on page 1-4 · sidebar, "*What is the MAG regional demand model?*", on page 1-5 · sidebar, "*How will the economic downturn affect growth rates?*", on page 1-11 · section, *Need Based on Regional Transportation Demand and Existing and Projected Transportation System Capacity Deficiencies*, beginning on page 1-13 · section, *Conclusions*, on page 1-21 · section, *Reconfirm the Purpose and Need for the Proposed Action*, on page 3-1 · section, *Responsiveness of the Proposed Freeway to Purpose and Need Criteria*, beginning on page 3-27 The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. No violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute

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The DEIS analysis of the no-build asserts that more pollution would result with nothing built and that the U.S. Environmental Protection Agency's air quality standards could be met if the project went through. However, building more highway miles will only increase more driving and more pollution. And it would only motivate more urban sprawl that supports further development into the Sonoran desert of cultural significance. Moreover, the Sonoran desert is being reduced at record speed causing the loss of major ecosystem services.[253] For example, the Sonoran desert regulates temperature. "As the Phoenix metropolitan area continues to sprawl, (replacing Sonoran desert with more development) the urban heat island will expand from the urban core further into suburban regions."[254] What Arizona's unchecked urban sprawl is creating is unsustainability[255] because for one, it is not controlling it with sustainable transportation.[256] The urban heat island actually affects people of lower socioeconomic status elderly, and minorities, like Native Americans.[257]

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Moreover, because of their inaccurate assumptions and relative insignificance, the build verses no-build differences in percentage of trips in the study area, travel time to downtown, and differences in miles of I-10 with 3 + hours of congestion do not identify a substantial legitimate justification for the financial cost, pollution consequences, and disparate impact to GRIC, as well as the additional consequence of added congestion on existing roadways for example, to bypass the additional 10 miles the loop would put on the Ahwatukee Foothills residents on their way to downtown Phoenix.[258] According to the DEIS, the percent change in traffic on arterial streets would be 9% and the percent change in traffic on freeways would be 8%.[259] Further, the DEIS estimates 10 saved minutes for travel time from Laveen to downtown and 6 saved minutes for Ahwatukee to downtown if the South Mountain Loop was constructed.[260] And, the DEIS estimates that with the South Mountain Loop, there would be 7 less miles of I-10 with 3+ hours of congestion in the morning and 12 less hours of congestion in the evening.[261]

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The substantial legitimate justification argument fails by the fact that E-I as the preferred alternative for the east side had no other alternatives from which to compare or choose because, as the DEIS states, GRIC forbid ADOT from using GRIC reservation land for the South

[253] Ecosystem services are services from natural systems like deserts that assist humans either directly or indirectly. (de Groot, R.S., M.A. Wilson, and R. M.J. Boumans. 2002. A typology for the classification, description and valuation of ecosystem functions, goods, and services. Ecological Economics 41:393-408.)
[254] Sally Wittlinger, Decades, Arizona State University, *Sustainability: The Urban Heat Island* http://arizonaindicators.org/sites/default/files/content/publications/Decades-vol1-issue-10.pdf.
[255] The Brundtland Commission defined sustainability as a system that meets the needs of the present without compromising the needs of future generations. (United Nations Economic Commissions for Europe. Sustainable development - concept and action. http://www.unece.org/oes/nutshell/2004-2005/focus_sustainable_development.html (last visited July 11, 2013)).
[256] Paul Mees, Transport for Suburbia: Beyond the Automobile Age Earthscan 2010.
[257] Rachel Morello-Frosch, *The Climate Gap: Inequalities in How Climate Change Hurts Americans & How to Close the Gap*, found at http://dornsife.usc.edu/pere/documents/The_Climate_Gap_Full_Report_FINAL.pdf.
[258] "If you are going to use the new Loop 202 to go to Downtown Phoenix, good luck as you just added another 10 miles to your route. The loop from I-10 (San Tan/Pecos) to 59th Avenue is 22 miles, and then add another 5 miles to back-track to Central and you have a total of 27 miles. The current distance from the same starting point is 17 miles." (Jim Jochim, Ahwatukee Foothills News, *Proposed South Mountain Freeway will do permanent harm to our environment*, http://www.ahwatukee.com/tukee_talk/article_bc0a8868-d4c1-11e2-bbe4-0019bb2963f4.html (last visited July 14, 2013).
[259] ADOT, South Mountain Study Team, Chapter 1: *Purpose and Need* Banner at http://www.smfonlinehearing.com/materials/chapter1/
[260] *Id.*
[261] *Id.*

Code	Issue	Response
62 (cont.)		to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement.
	Induced Growth	As described in Chapter 1, *Purpose and Need*, of the Draft and Final Environmental Impact Statements the Phoenix metropolitan area was subject to a conversion from natural desert landscape to an agricultural landscape well before any roadway existed in the valley. As described in the section, *Land Use*, beginning on page 4-3, land use patterns are predominantly the result of local and regional land use planning activities; further, the subject of induced growth and travel is addressed in text beginning on pages 4-167 and 4-179 of the Draft and Final Environmental Impact Statements, respectively.
	Heat Island	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
63	**Purpose and Need**	Chapter 1, *Purpose and Need*, of the Draft and Final Environmental Impact Statements examines the purpose and need for the proposed action in terms of defining a transportation problem. In doing so, assumptions associated with past need for the freeway were discounted as part of the environmental impact statement process. The results of the purpose and need analyses included the determination that a transportation problem (similar to the type of problem that has been represented in past Regional Transportation Plans) still exists in the area and that this problem is similar in characteristics to the transportation problem that existed in prior years. The alternatives analyses considered numerous modal alternatives, and it was concluded through the screening process that a road facility is the appropriate modal choice to address the transportation problem defined.
64	**Alternatives**	The comment notes "A substantial legitimate justification fails..." assumes a disparate impact would occur from the proposed freeway. As summarized in the first part of Response 65 above, no such disparate impact (and therefore, no violation of Title VI) would occur and as such, no such demonstration nor justification is required. Even if one were to reach a contrary conclusion and determine that disproportionately high and adverse and/or disparate effects would occur as a result of the proposed freeway, there is substantial justification for the proposed freeway. It is needed to serve projected growth in population and accompanying transportation demand and to correct existing and projected transportation system deficiencies (see Chapter 1, *Purpose and Need*). There is no feasible and prudent alternative to the use of the South Mountains, as discussed in Chapter 5, *Section 4(f) Evaluation*. Regardless, as explained in Chapter 3, *Alternatives*, the Study Area was split into a Western Section and Eastern Section. This was done so for reasons explained in that chapter. As explained in that chapter, a comprehensive set of alternatives in both sections of the Study Area were subjected to a robust, multidisciplinary screening process.

(Response 64 continues on next page)

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64 (cont.)		Ultimately, the other alternatives (besides the E1 Alternative) were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to develop alternatives on its land (see Draft Environmental Impact Statement page 3-25). The E1 Alternative when combined with the W59, W71, and W101 (and its options) Alternatives in the Western Section represents three distinct action alternatives from project termini to project termini, and therefore, represents a full range of reasonable alternatives for detailed study in the Draft and Final Environmental Impact Statements. Therefore, the Arizona Department of Transportation, with concurrence from the Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities. As noted in text on page 3-54 of the Final Environmental Impact Statement, the Arizona Department of Transportation began acquiring land for the original alignment in 1988. Between 1988 and 2001, the Arizona Department of Transportation acquired approximately 293 acres. Most of this land (258 acres) is located in the Eastern Section along Pecos Road. In 2006, the Arizona Department of Transportation began protective and hardship land acquisition in the alignment right-of-way footprint for the W59 and E1 Alternatives. Between 2006 and October 2013, the Arizona Department of Transportation purchased 326 acres (303 in the Western Section and 23 in the Eastern Section). The process for hardship and advanced acquisitions is explained in text on page 4-50 of the Final Environmental Impact Statement. Advanced acquisitions in parallel to a National Environmental Policy Act environmental determination process is not unprecedented and is common practice. In this case, property acquisitions by the Arizona Department of Transportation for purposes of implementing the proposed action are done at risk as communicated to the agency by the Federal Highway Administration. If another action alternative were to be ultimately selected, the agency would likely have to place the acquired properties on the market for sale and purchase. The Arizona Department of Transportation attempts to balance the risk against its mission of timely delivery of transportation infrastructure to the driving public. Further, Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
	Tribal Involvement	As noted in the previous comment response, the Draft Environmental Impact Statement on page 2-4 acknowledges that the Gila River Indian Community Council passed Resolution GR-64-96 that strongly opposed any future alignment of the South Mountain Freeway on Gila River Indian Community land. In addition, the comments received from Gila River Indian Community Governor Gregory Mendoza (see letter dated July 11, 2013, on page B38 in Appendix 7, Volume III, of the Final Environmental Impact Statement) confirm the Gila River Indian Community's position. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

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Mountain Loop. The DEIS does not make it clear why there were no other alternatives. Putting in the failed attempt with GRIC indicates there was a real assumption by ADOT that GRIC should have permitted the highway through its territory.[262] And because GRIC rejected the request, only one other option was available, and one that would also disparately impact the GRIC.[263] By late 1998, ADOT had spent $24 million on Pecos Road right of way. And now, ADOT says it owns about 85 percent of the land it needs along Pecos Road.[264] From the facts, having a disparate effect on the GRIC, either by putting the South Mountain in the GRIC's reservation or through its sacred mountain has never been a deterrent in ADOT's plans.

65 Regulations implementing NEPA explain that an EIS "shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives."[265] And the Ninth Circuit has determined that agencies should be afforded considerable discretion in defining the purpose and need of a project.[266] However, this discretion is not without limitations.[267] For example, "an agency cannot define its objectives in unreasonably narrow terms."[268] And "[a]n agency will not be permitted to narrow the objective of its action artificially and thereby circumvent the requirement that relevant alternatives be considered."[269] Because there is no other alternative, the purpose and need for the proposed project is unreasonable.

66 ADOT's Long Range Transportation Plan: 2010-2035, enumerates several goals and objectives for building transportation systems. They are: improve mobility and accessibility; preserve and maintain the system; support economic growth; link transportation and land use; consider natural, cultural, and environmental resources; enhance safety and security; strengthen partnerships; and promote fiscal stewardship. ADOT's Long Range Transportation Plan is seriously flawed by giving natural, cultural, and environmental resources only consideration; as

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[262] After Governor Rhodes of the GRIC wrote a letter dated January 27, 2010 to ADOT's Director John Halikowski volunteering to allow a study of the effects of an On-Reservation Loop 2002 alignment in order "to mitigate any negative impacts to our culture and land" because "despite our desire for a no-build option, we recognize that there is a high likelihood that the Loop 2002 Mountain will be built", Governor Brewer of Arizona responded in a February 1, 2010 letter stating "I am hopeful for the opportunities that may exist to consider the economic development potential of this much-needed transportation corridor" and "I am pleased to know that your team is part of the conversation and that there is a path forward for ongoing talks about the conditions of the Community's cooperation." What is found in Governor Brewer's response is that Arizona is not interested in GRIC's values and needs but is only requesting that the GRIC "cooperate". (GRIC Executive Office of the Governor & Lieutenant Governor, January 27, 2010 letter to ADOT, John Halikowski; ADOT Governor, Feb. 1, 2010 letter to Governor William R. Rhodes, GRIC).

[263] ADOT spokesperson Tim Tait stated during the ADOT outreach in Komatke on June 22, 2013 that "A possible Gila River route will remain off the table unless the Community changes its stance either through a re-vote or Community Council action. If such a reversal occurs any time before the final record of decision on the freeway is reached in 2014, then an alternative Gila River alignment would be studied…As of now, there's no indication that that's changing, so the project team is moving ahead with the E1 alternative…That's the only thing that's on the table." (Joshua Jovanelly, GRIC Website, *ADOT outreach on proposed 202 ext. held in Komatke* http://www.gilariver.org/index.php/news/3829-adot-outreach-on-proposed-202-ext-held-in-komatke (last visited July 15, 2013).

[264] Sean Holstege, The Republic, *1998 plan for South Mountain Freeway passed*, March 25, 2013 http://www.azcentral.com/community/ahwatukee/articles/20130308south-mountain-freeway-plan-ignored.html (last visited July 11, 2013).

[265] 40 C.F.R. § 1502.13.

[266] Morrison, 153 F.3d at 1066.

[267] *Id.*

[268] City of Carmel-By-The-Sea v. United States Dep't. of Transp., 123 F.3d 1142, 1155 (9th Cir.1997).

[269] *See also* City of New York v. United States Dep't of Transp., 715 F.2d 732, 743 (2d Cir.1983).

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65	**Purpose and Need**	Chapter 1, *Purpose and Need*, of the Draft and Final Environmental Impact Statements examines the purpose and need for the proposed action in terms of defining a transportation problem. The results of the purpose and need analyses included the determination that a transportation problem (similar to the type of problem that has been represented in past Regional Transportation Plans) still exists in the area and that this problem is similar in characteristics to the transportation problem that existed in prior years. The alternatives analyses considered numerous modal alternatives, and it was concluded through the screening process that a road facility would best address the transportation problem defined. As concluded on page 3-26 of the Draft and Final Environmental Impact Statements, the process of alternatives development and screening demonstrated confirmation of the purpose and need as described in Chapter 1 of the Draft and Final Environmental Impact Statements and that the purpose and need allowed for meaningful consideration of a comprehensive set of alternatives including all substantial modes of transportation.
66	**Environmental Impact Statement Process**	The mission of the Arizona Department of Transportation to provide a safe, efficient, cost effective transportation system that links Arizona to the global economy, promotes economic prosperity, and demonstrates respect for Arizona's environment and quality of life is highlighted on page 1-3 of the Final Environmental Impact Statement. While it is the construct, operate, and maintain the state's transportation infrastructure, the agency is obligated to meet the requirements of the National Environmental Policy Act when federal funds are associated with its infrastructure. In complying with the law, the agency fully accounts for natural, cultural and environmental resources as disclosed in Chapters 3 and 4 of the Draft and Final Environmental Impact Statements. The process of preparing the Environmental Impact Statement was undertaken transparently and with full disclosure and embraced engagement by all stakeholders in the process as exemplified throughout Chapter 6 of the Draft and Final Environmental Impact Statements.
	Alternatives	In terms of fiscal stewardship, the cost comparisons referenced in the comment are not necessarily appropriate as economic conditions and material pricing was different dependent upon how long ago the referenced freeway segments were constructed. Regardless, the Arizona Department of Transportation seeks to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities. For example, cost was an important factor in the alternatives screening process described in Chapter 3 of the Draft and Final Environmental Impact Statements and in terms of the Preferred Alternative presented in the Final Environmental Impact Statement, the Arizona Department of Transportation has continuously sought to identify and incorporate cost-saving measures in preliminary design, in part, for fiscal responsibility purposes.
	Hazardous Materials	The West Van Buren Water Quality Assurance Revolving Fund site was identified and considered during development of the Draft Environmental Impact Statement (see pages 4-97 and 4-153 of the Draft Environmental Impact Statement, and the Draft Initial Site Assessment prepared for the proposed project). These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected medium (groundwater) and the construction zone (near-surface in these locations), the project team determined

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explained before, just considering significant cultural resources will limit federal funding. Further, in light of the goals and objectives, the South Mountain Loop 202 actually weakens partnerships, as the GRIC is a partner in transportation projects: marginalizing partners weakens, not strengthens partnerships. The South Mountain Loop 202 is also contrary to the promotion of fiscal stewardship. The South Mountain Highway will cost twice as much as any other highway that ADOT has built in the past: the 101 and the 202 loops cost about 40 to 46 million per mile. South Mountain would cost about 80 million per mile.[270] The DEIS also fails to even include and therefore estimate the cost of the highly contaminated areas in the path of the proposed South Mountain Loop 202 that would have to be cleaned up for the highway to be put in.[271]

The South Mountain Loop 202 is neither legitimate and integral to ADOT's mission nor is it necessary. The South Mountain Loop 202 would not be efficient or cost-effective. It would be more efficient to design a transportation mode that will strategically complement the realistic population projections, socioeconomic needs and current transportation modes to reign in urban sprawl and promote smart growth. It is not cost effective because it is going to be twice as much as other highway projects, 30 million of which would just be used to cover going through South Mountain. Having the highway through the ridges will require lots of maintenance, which will require ongoing costs.[272] Population growth, socioeconomic development and limits to current transportation modes do not bear a manifest demonstrable relationship to going through South Mountain. There are numerous ways to accommodate population growth, create smart growth and invest and improve in present transportation modes and public transportation without going through South Mountain. As PARC and others suggest, there are alternatives that are comparably effective with less of a disparate impact. Therefore, there is no substantial legitimate justification for the disparate impact on the GRIC.

If ADOT wants to fulfill the purpose and need of reducing congestion and traffic and at the same time, follow the Arizona Transportation Plan, several alternatives offered by PARC are feasible: (1) Light rail along Pecos Road but going through a small portion of the GRIC (with permission) rather than cutting through South Mountain; (2) 8-10 lane Loop 202 following Baseline Road from 51st Ave to I-10; (3) 8-10 lane Loop 202 from I-10 near Avondale going along the west side of the Estrella Mountains and then cutting between the Estrella and Maricopa Mountains, following the southern boundary of the GRIC to the I-10 north of Casa Grande; (4) 8-10 lane freeway along State Route 85 from I-10 at Buckeye to I-8 at Gila Bend as a "real" truck by-pass; (5) 8-10 lane freeway along State Route 85 from I-10 at Buckeye, cutting between the Estrella and Maricopa Mountains and across to I-10 north of Casa Grande as a "real" truck

[270] Jana Bommersbach, *Road Rage "Jana's View"* Phoenix Magazine February 2007 quoting Eric Anderson of MAG http://www.janabommersbach.com/phx-mag-feb07.php (last visited July 1, 2013).

[271] The proposed path of the freeway crosses contaminated property near Interstate 10 near 55th Avenue. Also, groundwater is contaminated with tetrachloroethene (PCE), trichloroethene (TCE), 1,1-dichloroethane (1,1-DCA), cis-1,2-dichloroethene (cis-1,2-DCE), 1,1-dichloroethene(1,1-DCE) and chromium in the area around 51st avenue and Van Buren to 59th Avenue and Van Buren: the area is on the list of the state of Arizona's Water Quality Assurance Revolving Fund (WQARF), which is the state's equivalent of a Superfund Site. (AZDEQ, *West Van Buren Water Quality Assurance Revolving Fund (WQARF) Site*, found at http://www.azdeq.gov/environ/waste/sps/download/phoenix/wvb.pdf) By purchasing this contaminated land for the freeway, the state of Arizona would have to assume the liability for the clean-up of these contaminants, along with the liability for adverse health impacts suffered by workers in the area. This would be an enormous economic impact.

[272] FHWA does not provide funding for continued maintenance of hillside erosion after construction. ADOT does not provide its maintenance highway workers funding to mitigate sediment discharges from hillside rills and failed sediment control features of the original construction best management practices.

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66 (cont.)		that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165. Given the separation distance between the adversely affected media (groundwater) and the construction zone (near surface in this location), the project team determined that this site would not pose a risk to construction or to the general public once the facility were completed.
67	**Mission, Alternatives**	The section, *Context of the Proposed Action Relative to the ADOT Mission*, beginning on page 1-3 of the Final Environmental Impact Statement describes the direct and appropriate application of the implementation of the proposed action to the agency mission. In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for detailed study was determined through application of multidisciplinary criteria in a logical, step-wise progression. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process presented in Chapter 3, *Alternatives*, of the Draft and Final Environmental Impact Statements. The criteria, in general terms, considered operations, design, ability to meet purpose and need, environmental considerations, cost, and acceptability. The preferred alternative was the outcome to this process. As described therein, a comprehensive set of modal transportation (such as light rail) and non-transportation alternatives (such as a land use based alternative) were subjected to the evaluation process (these alternatives included many of the specific alternatives referenced in the comment). Reasons for elimination of those alternatives are summarized in Table 3-2 of the Final Environmental Impact Statement. Results of the process are concluded on page 3-26 of the Final Environmental Impact Statement. According to 23 Code of Federal Regulations §771.111(f)," the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope...". The proposed action should satisfy the project need and should be considered in the context of the local area socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need. When analyzing purpose and need and in consideration of alternatives, improvements to the operations of Interstate 10 through the Phoenix metropolitan area as considered in the Maricopa Association of Governments' Long Range Transportation Plan were accounted for a part of the baseline conditions.

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by-pass; (6) 8-10 lane freeway along one of the routes described in 2, 3, or 4, and renumber it as the I-10 so all "through" traffic would take this route as a default; (7) Renumber the I-10 through Phoenix as I-810 or the like, making it obvious that it is for Phoenix traffic only.[273] Additional alternatives are improve the Broadway Curve by applying good engineering directly to the interchanges in that area; build a road to help Laveen traffic reach I-10 West, much as Pecos Road helps Ahwatukee reach I-10 East; and improve SR 85 to a freeway and renumber the truck bypass 1-10 to better facilitate and encourage all pass-through traffic to travel around the valley instead of through it.

Further, just by applying smart technology on existing highway, infrastructure projects would look entirely different. For example, traffic planners know solutions to ameliorate congestion that could be applied to the Phoenix-metropolitan area.[274] For example, simple partial solution is a toll-free 511 traffic telephone system.[275] Another technology is based on a network of freeway cameras and sensors that would measure and monitor the amount of traffic and predict how long a journey will take: information then could be fed to mobile devices and the electronic message signs on freeways that tell motorists how long it will take to reach certain intersections.[276] Highway signs could also give alerts of traffic jams miles in advance and advise people to take detours.[277] The signs could also signal lane closures miles before cars approach a bottleneck.[278] Also, some carpool lanes might be better off converted back into regular lanes.[279] And, more signs urging slow traffic to stay to the right could also relieve congestion.[280]

VIII. REMEDIES

69

For all the reasons above, ADOT violated Title VI of the Civil Rights Act by engaging in discrimination based on race, ethnic identification, and nationality.

In order to provide effective remedies for the discrimination set forth in this Complaint, ADOT must:

(1) exclude any route for the proposed freeway that would go near or through the South Mountain or GRIC or other sites considered sacred or culturally significant to indigenous people;

(2) adopt an environmental justice policy that will ensure compliance with Title VI for all current and future projects;

(3) and prohibit future federal funding to ADOT if the South Mountain Loop 202 is built.

Submitted by: Lori Riddle

on behalf of the Gila River Alliance for a Clean Environment

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[273] PARC, Possible Alternatives to SMF, http://74.53.100.109/~protecto/?page_id=31(last visited June 29, 2013).
[274] *Id.*
[275] *Id.*
[276] *Id.*
[277] *Id.*
[278] *Id.*
[279] *Id.*
[280] Sean Holstege, The Republic, *New report details Phoenix-area's traffic congestion* Feb 4, 2013 http://www.azcentral.com/news/articles/20130131phoenix-area-new-report-details-traffic-congestion.html (last visited July, 9 2013).

Code	Issue	Response
67 (cont.)	**Water Resources**	As noted on page 4-102 of the Final Environmental Impact Statement, storm water flows and related erosion from excavated areas would be addressed by implementation of a Stormwater Pollution Prevention Plan and related best practices. Stormwater Pollution Prevention Plans are required on Arizona Department of Transportation construction projects to control and mitigate erosion and loss of soil from the project and off-site movement of eroded sediments. During construction, off-site impacts to soil from erosion related to the freeway construction project are not expected. Implementation of the Stormwater Pollution Prevention Plan and related best practices would keep eroded sediments on-site for collection and replacement as appropriate. After construction, grading and drainage and landscape design components of the freeway system would act to control and mitigate erosion.
	Truck Traffic	Creating a truck bypass is not a goal of the proposed action. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicles using the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed freeway, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85 (see page 3-64 of the Final Environmental Impact Statement).
	Alternatives	According to 23 Code of Federal Regulations §771.111(f)," the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope...". The proposed action should satisfy the project need and should be considered in the context of the local area socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need. All of the alternatives reflected in the comment were accounted for in the logical, sequential, step-by-step systematic, interdisciplinary approach to developing and screening alternatives as presented in Chapter 3, *Alternatives*, of the Draft and Final Environmental Impact Statements. Each was subjected to equal consideration in the screening process and reasons for elimination can be found in that chapter.

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Please send all communications via mail or email.

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68	**Alternatives**	As discussed on page 3-3 of the Draft and Final Environmental Impact Statements, the project team considered a wide range of modal alternatives to improve transportation conditions in the Study Area such as transportation system management (maximizing the efficiency of existing transportation facilities) and transportation demand management (reducing demand on existing transportation facilities); however, these and other nonfreeway alternatives were eliminated from further study; chiefly, they did not support criteria related to transportation demand and capacity deficiencies. Transportation system management and transportation demand management strategies are included in the *Regional Transportation Plan* and these strategies will continue to be implemented throughout Maricopa County. These include the use of ramp metering; overhead, automated, advanced warning signs; freeway cameras for monitoring traffic flow/ and other intelligent transportation system technology to enhance operational characteristics; ride share programs; Maricopa County Trip Reduction Program; and van pool programs. As noted in Table 3-2 on page 3-5 of the Draft and Final Environmental Impact Statements, elimination of technological alternatives (transportation system management and transportation demand management) as distinct alternatives would not preclude the use of elements of these in combination with the freeway mode. This is further described on page 3-58 of the Final Environmental Impact Statement.
69	**Title VI**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28.

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JUL 30 2013
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Gila River Alliance for a Clean Environment (GRACE)

EMBARGO UNTIL 7 AM TUESDAY JULY 30, 2013 Contact: Lori Riddle 520-610-3405; Joseph Morago 520-610-8027

GILA RIVER INDIAN COMMUNITY TRIBAL MEMBERS TO SERVE ARIZONA DEPARTMENT OF TRANSPORTATION WITH FEDERAL TITLE VI CIVIL RIGHTS COMPLAINT FOR ADOT'S PROPOSED BLASTING OF SACRED SOUTH MOUNTAIN AND DESECRATION OF SACRED SITES IF SOUTH MOUNTAIN LOOP 202 FREEWAY IS BUILT

PRESS CONFERENCE AND SERVING ADOT WITH CIVIL RIGHTS COMPLAINT: TUESDAY, JULY 30, 2013 9 AM IN FRONT OF ARIZONA DEPARTMENT OF TRANSPORTATION 206 S. 17th AVE., PHOENIX, ARIZONA

Phoenix, AZ. – Gila River Indian Community tribal members and their community group the Gila River Alliance for a Clean Environment will have a press conference on Tuesday, July 30, 2013 at 9 am to announce that they have filed a federal civil rights complaint under Title VI of the United States Civil Rights Act against the Arizona Department of Transportation. The press conference will take place in front of ADOT, 206 S. 17th AVE., Phoenix, Arizona.

Following the press conference, tribal members with the Gila River Alliance for a Clean Environment will serve ADOT with a copy of the civil rights complaint.

The civil rights complaint alleges that ADOT violated the civil rights of Native peoples of the Gila River Indian Community by proposing and promoting the South Mountain Loop 202 Freeway that would negatively and disparately impact Gila River Indian Community tribal members by desecrating their sacred South Mountain and causing disperate health impacts. The complaint is being filed with the United States Department of Transportation, as ADOT is a recipient of funds from the US DOT/Federal Highway Administration and is subject to the non-discrimination provisions of Title VI.

Title VI states that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Tribal members, a protected class of people, were discriminated against because:

- ADOT knowingly and purposely designed the South Mountain Loop 202 through the GRIC's sacred South Mountain, despite recognizing and acknowledging that the South Mountain Loop 202 would have a serious and major disparate impact on tribal members culturally, spiritually, and religiously;
- ADOT purposely designed a narrow purpose and need for the DEIS based on inaccurate and false estimates of population projections and users of the South Mountain Loop 202 Freeway, narrow assumptions of potential alternative transportation modalities, and ignored the environmental and sociological consequences of creating more freeway rather than moving toward smart growth, eliminating any alternative that would not have a disparate and a negative cumulative effect on the Gila River Indian Community and its people;
- ADOT failed to analyze the South Mountain Loop 202's disparate health, environmental, and economic impacts on the tribe and tribal members who already experience higher rates of diabetes and asthma that would be exacerbated if the South Mountain Loop 202 were constructed;
- ADOT provided inadequate consultation and informed consent, access, notice, and meaningful participation in the Draft Environmental Impact Statement scoping and planning to the Gila River Indian Community tribal members.

The civil rights complaint requests that the federal government cease all further funding to ADOT if the South Mountain Loop 202 project is built due to the devastating cultural, spiritual and health impacts on tribal members that would unacceptably and illegally violate civil rights of tribal members.

In addition, the Gila River Alliance for a Clean Environment will be filing international complaints with UN Special Rapporteurs on human rights and fundamental freedoms of indigenous people, cultural rights, and freedom of religion.

Code	Issue	Response
69 (cont.)		Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community.
70	**Title VI**	All comments made in the attached press release have been addressed in the complaint letter above.

Code	Comment Document

RECEIVED
JUL 30 2013
BY: BJE

Gila River Alliance for a Clean Environment (GRACE)

EMBARGO UNTIL 7 AM TUESDAY JULY 30, 2013 Contact: Lori Riddle 520-610-3405; Joseph Morago 520-610-8027

GILA RIVER INDIAN COMMUNITY TRIBAL MEMBERS TO SERVE ARIZONA DEPARTMENT OF TRANSPORTATION WITH FEDERAL TITLE VI CIVIL RIGHTS COMPLAINT FOR ADOT'S PROPOSED BLASTING OF SACRED SOUTH MOUNTAIN AND DESECRATION OF SACRED SITES IF SOUTH MOUNTAIN LOOP 202 FREEWAY IS BUILT

PRESS CONFERENCE AND SERVING ADOT WITH CIVIL RIGHTS COMPLAINT: TUESDAY, JULY 30, 2013 9 AM IN FRONT OF ARIZONA DEPARTMENT OF TRANSPORTATION 206 S. 17th AVE., PHOENIX, ARIZONA

Phoenix, AZ. – Gila River Indian Community tribal members and their community group the Gila River Alliance for a Clean Environment will have a press conference on Tuesday, July 30, 2013 at 9 am to announce that they have filed a federal civil rights complaint under Title VI of the United States Civil Rights Act against the Arizona Department of Transportation. The press conference will take place in front of ADOT, 206 S. 17th AVE., Phoenix, Arizona.

Following the press conference, tribal members with the Gila River Alliance for a Clean Environment will serve ADOT with a copy of the civil rights complaint.

The civil rights complaint alleges that ADOT violated the civil rights of Native peoples of the Gila River Indian Community by proposing and promoting the South Mountain Loop 202 Freeway that would negatively and disparately impact Gila River Indian Community tribal members by desecrating their sacred South Mountain and causing disperate health impacts. The complaint is being filed with the United States Department of Transportation, as ADOT is a recipient of funds from the US DOT/Federal Highway Administration and is subject to the non-discrimination provisions of Title VI.

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Code	Issue	Response

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Code	Issue	Response

Code	Comment Document

GILA RIVER INDIAN COMMUNITY

SACATON, AZ 85247

CULTURAL RESOURCE MANAGEMENT PROGRAM
CULTURAL RESOURCE SPECIALIST OFFICE

POST OFFICE BOX 2140
(520) 562-3570
(520) 562-3571
FAX: (520) 562-3576

MEMORANDUM

71

TO: Jennifer Giff, GRIC General Counsel

FROM: Barnaby V. Lewis, CRMP Cultural Resource Specialist

DATE: March 26, 2007

SUBJECT: RESOLUTION DESIGNATING THE SOUTH MOUNTAN RANGE (Muhadag, Avikwaxois) AS A SACRED PLACE AND TRADITIONAL CULTURAL PROPERTY OF THE GILA RIVER INDAIN COMMUNITY.

Attached is a draft resolution designating the South Mountain Range as a sacred place and traditional cultural property for your review. We wish to proceed in presenting this resolution before GRIC Cultural Resource Standing Committee at the next regular meeting on Tuesday, March 27, 2007. Thank you for your attention in this review. Please call me at 562-6713 or Assistant Cultural Resource Specialist, Angela D. Garcia-Lewis at 562-6743 if you have any questions.

Code	Issue	Response
71		Comment noted. Gila River Indian Community Resolution Designating the South Mountain Range as a Sacred Place and Traditional Cultural Property

Code	Comment Document

GILA RIVER INDIAN COMMUNITY
SACATON, AZ 85247

RESOLUTION NO. GR-41-07

72

A RESOLUTION DESIGNATING THE SOUTH MOUNTAIN RANGE (*Muhadag, Avikwaxós)* AS A SACRED PLACE AND TRADITIONAL CULTURAL PROPERTY OF THE GILA RIVER INDIAN COMMUNITY.

WHEREAS, the Gila River Indian Community Council ("the Community Council") is the governing body of the Gila River Indian Community ("the Community"); and

WHEREAS, the Community Council on January 6, 1982, did adopt Ordinance No. GR-01-82 under Title XV of the Gila River Indian Community Law and Order Code in which "[i]t is…declared as a matter of Community policy and legislative determination, that the public interests of the Pima-Maricopa people and the interests of all other persons living within the jurisdiction of the Gila River Indian Community require that the Community adopt a means whereby all sites, location, structures, and objects of sacred, historical or scientific interest or nature will be protected from desecration, destruction, theft, or other interference."; and

WHEREAS, the Community Council through Resolution GR-15-89 did approve the Policy Statement of the Four Southern Tribes (Salt River Pima-Maricopa Indian Community, Ak Chin Indian Community, Tohono O'odham Nation, and the Gila River Indian Community) which outlines the Four Tribes intent to protect, promote, and preserve cultural affinity to the HuHuKam; and

WHEREAS, the Community Council has always held the preservation of historical, archaeological, cultural, religious sites as a high priority and recognizes the need to protect the cultural heritages of the Akimel O'Odham (Pima) and the Pee Posh (Maricopa); and

WHEREAS, the identification and authentication of sacred places / traditional cultural properties is the sole responsibility of the federally recognized tribe according to its unique culture; and

WHEREAS, the Community does recognize certain locations to be sacred places / traditional cultural properties based on the unique cultural and spiritual beliefs of the Akimel O'Odham (Pima) and the Pee Posh (Maricopa); and

Code	Issue	Response
72		Comment noted. Gila River Indian Community Resolution Designating the South Mountain Range as a Sacred Place and Traditional Cultural Property

Code	Comment Document

GILA RIVER INDIAN COMMUNITY
SACATON, AZ 85247

RESOLUTION NO. GR-41-07

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Code	Issue	Response

Code	Comment Document

GILA RIVER INDIAN COMMUNITY
RESOLUTION GR-41-07
PAGE 2 OF 2

WHEREAS, all, but not limited to, of the places referenced in the oral traditions of the Akimel O'Odham (Pima) and the Pee Posh (Maricopa) are culturally and spiritually significant to the continuing life ways of the Akimel O'Odham (Pima) and the Pee Posh (Maricopa); and

WHEREAS, the ***Muhadag*** (Pima language) also known as (a.k.a.) ***Avikwaxós*** (Maricopa language), a.k.a. Greasy Mountain (English language), and geographically known as the South Mountain, South Mountain Range, or Salt River Mountains (Range) figures prominently in oral traditions of both the Akimel O'Odham (Pima) and the Pee Posh (Maricopa)

NOW THEREFORE BE IT RESOLVED, that the Community Council hereby does acknowledge and recognize that the South Mountain Range in its entirety is a sacred place / traditional cultural property and must be kept inviolate.

BE IT FURTHER RESOLVED, that the Community Council hereby strongly opposes any alteration of the South Mountain Range for any purpose would be a violation of the cultural and religious beliefs of the Gila River Indian Community and would have a negative cumulative affect on the continuing lifeways of the people of the Gila River Indian Community.

BE IT FINALLY RESOLVED, that the Governor, or in his absence, the Lieutenant Governor, is hereby authorized to sign and execute such documents as are necessary to effectuate this resolution.

CERTIFICATION

Pursuant to authority contained in Article XV, Section 1, (a) (7), (9), (18), and Section 4 of the amended Constitution and Bylaws of the Gila River Indian Community, ratified by the Tribe January 22, 1960, and approved by the Secretary of the Interior on March 17, 1960, the foregoing Resolution was adopted on the 4th of April, 2007, at a Regular Community Council Meeting held in District 3, Sacaton, Arizona at which a quorum of 10 Members were present by a vote of: 9 FOR; 0 OPPOSE; 1 ABSTAIN; 5 ABSENT; 2 VACANCIES.

GILA RIVER INDIAN COMMUNITY

4-10-07
GOVERNOR

ATTEST:

COMMUNITY COUNCIL SECRETARY

Code	Issue	Response

Code	Comment Document

GILA RIVER INDIAN COMMUNITY
RESOLUTION GR-41-07
PAGE 2 OF 2

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GILA RIVER INDIAN COMMUNITY

4-10-07
GOVERNOR

ATTEST:

COMMUNITY COUNCIL SECRETARY

Code	Issue	Response

Code	Comment Document
73	GILA RIVER INDIAN COMMUNITY SACATON, AZ 85247 RESOLUTION GR-126-00 **RESOLUTION OPPOSING THE USE OF 51ST AVENUE FOR THE PROPOSED TRUCK BYPASS ROUTE AND ANY FUTURE BYPASS PLANS FOR THE PROPOSED SOUTH MOUNTAIN PARKWAY THROUGH THE DISTRICT SIX COMMUNITY OF THE GILA RIVER INDIAN COMMUNITY** **WHEREAS,** the Maricopa County Department of Transportation (the "MCDOT") completed a 51st Avenue Corridor Truck Route Analysis Study that projected traffic volumes of 7,000 vehicles per day on 51st Avenue in 1997 with volumes projected to increase to 23,000 vehicles per day by the year 2020; **WHEREAS,** MCDOT has proposed a truck bypass route that would redirect traffic and reduce current and future congestion on 51st Avenue in Laveen; **WHEREAS,** the City of Phoenix completed a South Mountain Parkway Specific Plan in 1999 to address the limited access to the west valley from Interstate 10 east; **WHEREAS,** the Maricopa Association of Governments (the "MAG") has formed a South Mountain Agency Stakeholders group for the purpose of developing a recommendation for the alignment for the proposed South Mountain Parkway; **WHEREAS,** the Arizona Department of Transportation (the "ADOT"), MCDOT, City of Phoenix, and MAG plan on extending Pecos Road west around the South Mountain with an option of crossing across lands of the Gila River Indian Community (the "Community"); **WHEREAS,** the District Six community has experienced the negative impact of increasing traffic through the residential areas along 51st Avenue south of the Community's boundary; **WHEREAS,** 51st Avenue is essential to the Community because it serves as the principal arterial from Riggs Road-Beltline road and is a significant east/west travel route to the western portion of the Community; **WHEREAS,** the District Six Community is concerned with the safety and welfare of its members, as well as other members of the Community who utilize this roadway, due to excessively speeding vehicles on 51st Avenue, which has residential areas, churches, a health clinic, a school, a Boys and Girls club, and a convenience store within its area;

Code	Issue	Response
73	**Alternatives**	Comment noted. Gila River Indian Community Resolution Opposing the South Mountain Freeway through District Six and on 51st Avenue

Code	Comment Document

GILA RIVER INDIAN COMMUNITY
RESOLUTION GR-126-00
PAGE 2

WHEREAS, the District Six Community has concerns of increasing traffic, excess speeding vehicles, the safety and welfare of its members, the area's significant cultural and religious importance to the entire Community, the deterioration of the pristine natural environment, and the increase negative noise and visual impacts;

WHEREAS, because of its concerns, the District Six Community strongly opposes the proposed parkway, truck bypass route, or any future bypass plans through portions of the South Mountain and across Community land;

WHEREAS, on June 12, 2000, the District Six Community voted to strongly oppose future transportation of hazardous waste and materials through its community; and

WHEREAS, the District Six Community strongly requests that the Community Council oppose any future development of roadways from ADOT and MCDOT through the District Six Community.

NOW THEREFORE BE IT RESOLVED, that the Community Council strongly opposes the development plans by ADOT, MCDOT, and MAG for a truck bypass route or any future bypass plans for the proposed South Mountain Parkway across Community lands.

BE IT FINALLY RESOLVED, that the Governor, or in the Governor's absence the Lieutenant Governor, is hereby authorized to take necessary action to effectuate the intent of this Resolution.

CERTIFICATION

Pursuant to authority contained in Article XV, Section 1. (a). (1), (7), (9) and Section 4 of the amended Constitution and Bylaws of the Gila River Indian Community, ratified by the Tribe January 22, 1960 and approved by the Secretary of the Interior on March 17, 1960, the foregoing Resolution was adopted by this 2nd day of August, 2000 at a Regular Community Council Meeting held in District 3, Sacaton, AZ at which a quorum of 15 Members were present by a vote of 15 FOR; 0 OPPOSE; 0 ABSTAIN; 2 ABSENT; 0 VACANCY.

GILA RIVER INDIAN COMMUNITY

GOVERNOR

ATTEST

COMMUNITY COUNCIL SECRETARY

Code	Issue	Response

Code	Comment Document

74

Elderly Concerns Group
Motion Sheet

Date: June 12, 2013

Ms. Sharon Gonzales, District Seven Elder, made a motion that we as elders oppose

The Free way project and to keep them from destroying South Mountain.

The motion was seconded by: Mr. Fred Reams, District Three Elder.

Motion approved on this 12th day of June 2013 by a majority show

Of hands from the group.

Sandra Jackson
Secretary's Signature

6/27/13
Date

Mary V. Thomas
Chairperson's Signature

6-27-13
Date

Code	Issue	Response
74		Comment noted.

Code	Comment Document

July 2, 2013

75

I, Winnona Catha am a community member of the Gila River Indian Reservation. My connection to the South Mountain is that it is a sacred mountain to our people. Also, it was most sacred to our ancestors.

There are many things that the mountain was used for such as ceremonies, there are stories about that mountain I was told by my elders, and there are plants that grow on this mountain that we use today for healing, eating, and blessings.

I wasn't notifying about the meetings that they had about this freeway being built. I believe that they should of set out flyers to notify people not just only landowners but members of our community that should also be included to this matter that is coming in affect to our reservation. Also, they should of provided transportation for the districts or have meetings at each of the service centers. Some of the community members don't have transportation to be these meeting were located at.

Our land and mountain is important to me then this freeway. As I look towards the District 6 area I can see a slightly cloud of pollution. If we have this freeway there will be a huge cloud of pollution that will cover our land. It will affect our peoples health like; asthma, lung diseases, infants may be born with birth defects, and heart diseases. I am concerned about our future generations' health and what they would have to live if this freeway is built. We got to look forward and think of their future before considering anything, because I remember when I was younger my grandmother would always say "This is your land and never let a white person take it from you." Well she said it to me in Pima; I understood what she was saying after she explained to me.

Thank You,

Winnona Catha

P.O. Box 1021

Sacaton, AZ 85147

(520) 562-1530

my.2.buterflies.0913@gmail.com

Code	Issue	Response
75	**Tribal Involvement**	As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community in the environmental impact statement process have been extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. As noted in Table 4-47 that begins on page 4-145, the Gila River Indian Community was initially consulted in 2003 with subsequent contact in 2005, 2006, 2007, 2008, 2010, 2011, 2012, and 2013. This supports an early and continued consultation with the Gila River Indian Community related to resources of importance. This consultation has resulted in concurrence from the State Historic Preservation Office and Gila River Indian Community Tribal Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 Papago, Maricopa, and Santan Freeways. These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013) and one in June (close of the Draft Environmental Impact Statement public comment period). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area.

(Response 75 continues on next page)

Code	Comment Document

Code	Issue	Response
75 (cont.)		The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations.
	Air Quality	The Final Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency recently determined that Phoenix has attained the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner-burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. No violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.

Code	Comment Document
76	My name is Renee Jackson and I am a member of the Akimel O'odham tribe also known as the Gila River Indian Community. I am writing this statement for two reasons, 1) to give a supportive statement regarding the cultural significance of Muhadag (South Mountain) and 2) to state my concerns regarding the Arizona Department of Transportation's lack of cooperation and planning with the people of GRIC. As an Akimel O'odham woman, I regard Muhadag (South Mountain) as a place of spiritual significance to the O'odham tribes. The mountain is central to the O'odham creation story and continues to be a place to hold ceremonies by and for the O'odham people. The mountain is also sacred to us because of the plant life we use for medicinal and ceremonial purposes and also because of the wildlife we hunt to sustain ourselves. The construction of this freeway would greatly harm the wellbeing of the mountain and therefore will bring harm to the O'odham. The manner in which ADOT has pursued the Gila River community member's voice and cooperation regarding the Draft Environmental Impact Study and the planning process has been poor to say the least. There was very little communication between the GRIC and MAG and ADOT. When community members were then made aware of public hearings and meetings, it was short notice and not sympathetic to our community members lack of

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76	**Tribal Involvement**	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community in the environmental impact statement process have been extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. As noted in Table 4-47 that begins on page 4-145, the Gila River Indian Community was initially consulted in 2003 with subsequent contact in 2005, 2006, 2007, 2008, 2010, 2011, 2012, and 2013. This supports an early and continued consultation with the Gila River Indian Community related to resources of importance. The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 Papago, Maricopa, and Santan Freeways. These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013) and one in June (close of the

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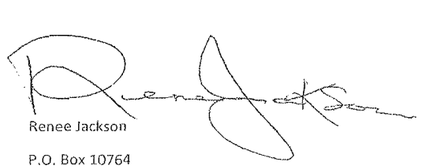
transportation. Furthermore, when ADOT did hold a "Public Forum" in GRIC, members were not to voice their statements verbally as others were able to do at the Phoenix hearing.

Most importantly, I feel that the possible construction of this freeway through our sacred Muhadag is a direct violation to my civil and religious rights as an Indigenous person. Also, as an advocate for my children, I wish to state my opposition to the Loop 202 expansion, aka, the South Mountain Freeway as I see it as a threat to their religious freedoms being that Muhadag is considered our most valued place of worship and must be protected for our future generations.



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76 (cont.)		Draft Environmental Impact Statement public comment period). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area. The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations. Community forums were held after the public hearing to further invite public comment.
	Title VI	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.

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76 **(cont.)**		The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community.

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My name is Peggy Mae Morago I am 66 yrs. old retired elementary school teacher an elder from the Gila River Indian Community. I am writing this statement to express my opposition and concerns about A.D.O.T.s proposed South Mountain Loop 202 Freeway.

I have a very strong connection to South Mountain. In my late teens I left my hometown of Ajo, Arizona to attend Arizona State University. As a young woman far from home it was a difficult adjustment to live in the city, but going to South Mountain help with this transition. According to our oral history South Mountain is a sacred mountain to our people. Akimel O'odham legends and stories talk about South Mountain being the home of the deity for our tribe. There are also stories about artifacts and petroglyphs from our ancestors the Hohokam located on South Mountain. As a young mother raising a child in the late sixties/early seventies, I often went to South Mountain to meditate when times became tough or if I was unable to return to Gila River for family emergencies. South Mountain has always made me feel closer to home and closer to my O'odham Himdag.

One of my major concerns about the proposed South Mountain Loop 202 freeway is the health effects on my community. As a retired school teacher I am well aware of the rise in respiratory illness in children within all communities. This proposed freeway will increase the occurrence of asthma, bronchitis, and many other respiratory ailments due to particulate matter and pollutions from this project. The elderly, newborns and young children will be hit the hardest from this freeway. I am an elder with Valley Fever; this freeway will defiantly affect my health. This is the major reason why I don't travel to the Phoenix metro area. It is difficult for me to breath from all to pollution in the air, and I don't want this pollution in my community.

Another issue I wish to address is the way A.D.O.T. conducted the meetings for the public. I was unable to attend the **ONE** and only meeting that I would have been allowed to speak at publicly. As stated before I don't travel to the Phoenix metro-area due to the distance, pollution and the heat. I am an elder that is in a wheelchair, which needs assistance to get around. Attending this meeting was impractical for me and the **ONE** meeting held in the Gila River Indian Community was held over fifty miles from my home. I feel that A.D.O.T. violated my civil right by not allowing anyone to speak at the meeting held in the Gila River Indian Community, as well as other meetings held in other communities. I was raised by oral traditions, I was taught to speak out, and I have a right to be heard in a public form.

Inclosing I want to state for the record that the proposed Loop 202 South Mountain Freeway is wrong. The destruction of our Sacred Mountain is not only a violation of our traditions and heritage, but detrimental to our O'odham Himdag. Enough has been taken away from us already, why must we sacrifice more.

Peggy Mae Morago 7-6-2013

Peggy Mae Morago 7/6/2013

G.R.I.D. # 6675

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77	**Cultural Resources**	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
	Air Quality	The Final Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency recently determined that Phoenix has attained the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner-burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. No violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.

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77 (cont.)	**Tribal Involvement**	The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations. Community forums were held after the public hearing to further invite public comment.

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78	My name is Joseph C. Morago I am a member the Gila River Indian Community. I am writing this statement to address my opposition of the South Mountain Loop 202 Freeway. As a charter member of G.R.A.C.E. (Gila River Alliance for a Clean Environment) I have followed this issue for many years. During this time I have notice the condescending attitude and lack of respect that A.D.O.T. (Arizona Department of Transportation) has shown to the people of the Gila River Indian Community. For well over two decades our community has repeatedly reject the idea of a freeway passing thought our community, because of cultural, religious, environmental and the current and potential health affects to our community. In spite of our concerns and objections A.D.O.T., M.A.G. (Maricopa Association of Governments), Maricopa County, and the Maricopa Regional Transportation Team still insist on building the South Mountain Loop 202 Freeway by blasting away a piece of our sacred mountain. South Mountain is a sacred place of cultural significant to the people of Gila River. Oral history and legends state that South Mountain is the home of "Elder Brother" (I'itoi) deity of the Akimil O'odham Tribe (Gila River Indian Community Tribe). South Mountain was also once inhabited by our ancestors the Hohokam. The Hohokam has been acknowledged by archeologist, anthropologist and historians to be one of the first settlers of this region. South Mountain is also a place of worship, sacred ceremonies are preformed, prayer and blessings are giving and shrines are built to honor I'itoi and our ancestors. Other activities such as the harvesting of the saguaro cactus fruit and gathering of medicinal plants occur at different times of the year. Because of the sacredness of South Mountain, any destruction would be detrimental to the spiritual wellbeing of the people of the Gila River Indian Community. Another major concern about this proposed freeway project is the health effects on the people of the Gila River Indian Community due to air quality. According to the 2005 Joint Air Toxics Assessment Program (JATAP) Gila River has a high level of Particulate Matter (PM) and Volatile Organic Compounds (VOC) in the air above the community. If the proposed South Mountain Loop 202 Freeway is completed the air quality over the Gila River Indian Community would drastically change for the worse. The U.S.E.P.A. (United States Environmental Protection Agency) "Green Book" states that Maricopa County has been nonattainment in Particulate Matter (PM)-10 since 1992. PM-10 is inhalable course particulates that consist of a complex mixture of extremely small particle and liquid droplets made up several components like acids, organic chemicals, metals, and soil or dust particles, which can cause an increase of Heart and Lung disease. Short term exposure to PM-10 can increase susceptibility to respiratory infections, aggravated lung disease, acute bronchitis and an increase of asthma attacks. Long term exposure to PM-10 have been associated with reduced lung function, chronic bronchitis, premature death, low birth weights in infants, premature delivery, and possible fetal and infant death. Infants are not the only ones at risk to these types of ailments. Older adults, the elderly, children, active adults. and people with lung and heart disease, resent studies have shown that people with diabetes are also at risk when exposed to Particulate Matter (PM)-10.

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78	**Tribal Involvement**	As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community, a sovereign nation, in the environmental impact statement process are extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. As noted in Table 4-47 that begins on page 4-145, the Gila River Indian Community was initially consulted in 2003 with subsequent contact in 2005, 2006, 2007, 2008, 2010, 2011, 2012, and 2013. This supports an early and continued consultation with the Gila River Indian Community related to resources of importance. This consultation has resulted in concurrence from the State Historic Preservation Office and Gila River Indian Community Tribal Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The Draft Environmental Impact Statement on page 2-4 acknowledges that the Gila River Indian Community Council passed Resolution GR-64-96 that strongly opposed any future alignment of the South Mountain Freeway on Gila River Indian Community land. In addition, the comments received from Gila River Indian Community Governor Gregory Mendoza (see letter dated July 11, 2013, on page B38 in Appendix 7, Volume III, of the Final Environmental Impact Statement) confirm the Gila River Indian Community's position. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process. In addition to Chapter 2 of the Final Environmental Impact Statement which explains the Gila River Indian Community outreach undertaken for the project, Chapter 6 of the Final Environmental Impact Statement further describes Community and general outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionately high adverse impacts would result from the construction and operation of the proposed action.

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The Gila River Indian Community is not the only community to raise concerns over this proposed freeway project. The residents of Ahwatukee Foothills have raised some of the same concerns about the South Mountain Loop 202 Freeway. As stated before I am a member of G.R.A.C.E. and I am also a member of P.A.R.C. (Protect Arizona's Resources & Children) to protect South Mountain. One of P.A.R.C.'s major concerns is the potential for a hazardous material incident if an accident is to occur on this proposed freeway project. According to the maps in the D.E.I.S. and A.D.O.T.'s video presentation, the South Mountain Loop 202 Freeway would be within a mile of several schools, homes, and businesses that would have to be evacuated of such an incident were to occur. With too few exits and an ineffective emergency management plan the possibility for serious injury, long term illness or loss of life is extremely high.

The next issue I wish to address is the manner in which A.D.O.T. has disseminated information concerning the South Mountain Loop 202 Freeway to the people of the Gila River Indian Community. The D.E.I.S. states that A.D.O.T. attended 178 meetings with the Gila River Indian Community. If this is true why did A.D.O.T. only attend a couple meetings with tribal council in over a decade? Who did A.D.O.T. meet with from the Gila River Indian Community? Why did A.D.O.T. fail to properly notify community members of public meeting, and why does A.D.O.T. acknowledge the cultural and religious significant of South Mountain to the Akimil O'odham people but dismiss these facts by insisting on moving forward with the construction of the South Mountain Loop 202 Freeway.

An addition to the previous mentioned issues I would like to address A.D.O.T,'s handling of the of the ninety day public comment period concerning the D.E.I.S. I feel that A.D.O.T. mishandled and misinformed the people of the Gila River Indian Community. The D.E.I.S. was released on April 25, 2013. On April 30, 2013 A.D.O.T., M.A.G., the TTT (Transportation Technical Team), Gila River Indian Community Executive Office, G.R.I.C. Law Office, G.R.A.C.E., G.R.E.Y. (Gila River Environmental Youth) with five other grassroots and private corporation organizers met to discuss how community members would be able to comment on the D.E.I.S. Among the issues discussed was transportation to the public comment meeting in Downtown Phoenix, conformation of a meeting(s) in Gila River, issues with submitting comments online, and notification to community member about important meetings, dates and other relevant information concerning the D.E.I.S. comment period.

At this meeting A.D.O.T. agreed to hold one or more public meeting(s) in Gila River to accept comments on the D.E.I.S. A.D.O.T. stated at this meeting that they would also provide free bus passes to the Downtown Phoenix public comment hearing. What A.D.O.T. failed to do was provide proper and concise information. A.D.O.T. **never** told community member that they would not be able to speak at the meeting in Gila River. A.D.O.T. also failed to provide adequate notice of this meeting. Although a notice was posted in the Gila River Indian Newspaper, this notice appeared in the paper only once on the days prior to the meeting scheduled in Gila River.

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78 (cont.)	**Cultural Resources**	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
	Health Effects	Under the Clean Air Act, the U.S. Environmental Protection Agency is responsible for establishing National Ambient Air Quality Standards to protect public health and the environment from adverse effects of air pollutants. Health effects from air pollutants are based on the concentration of the pollutants and the duration of exposure. Concentrations vary with distance from a roadway based on many factors, including background (or ambient) levels of pollution from all sources; the number, speed, and type of vehicles on the roadway; wind speed and direction; topography; and other factors. For the proposed freeway, the Federal Highway Administration conducted modeling for carbon monoxide and particulate matter (PM_{10}) using worst-case (most congested or highest traffic) modeling locations at discrete receptor locations around each analysis location (primarily residences near the interchanges). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe)

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Inclosing I would like to state for the record that A.D.O.T. has not acted in good faith concerning the South Mountain Loop 202 Freeway project as it pertains to the people of the Gila River Indian Community. In fact A.D.O.T. has violated the Civil Rights of the Gila River Indian Community by acknowledging the significant and sacredness of South Mountain, but dismissing these facts with plans to blast through portions of South Mountain. In effect A.D.O.T. has discriminated against the Gila River Indian Community by preventing tribal members from participating in the comment process. The failure of notification of meetings held within the Gila River Indian Community, not allowing tribal members to make verbal public comments at the only public form held within the Gila River Indian Community, and failure to provide the bus passes promised to the Gila River Tribal Leadership for community members to attend the only meeting that public verbal comments were accepted. A.D.O.T. has violated the Civil Rights of the residents of the Gila River Indian Community and should not be able to receive federal funding for the South Mountain Loop 202 Freeway project.

Joseph C. Morago 7/22/2013

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78 (cont.)		with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations. Overall, researchers felt that there was "sufficient" evidence for causality for the exacerbation of asthma. Evidence was "suggestive but not sufficient" for health outcomes such as cardiovascular mortality and others. Study authors also noted that past epidemiological studies may not provide an appropriate assessment of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics "hot spots." In general, the authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified. These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work. Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment: *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.* *In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.* *The report also looks at trends in other health conditions, such as Attention-Deficit/Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.* Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues.

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78 (cont.)	**Hazardous Materials**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-166 of the Final Environmental Impact Statement). The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. The Department of Public Safety also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on page 4-166 of the Final Environmental Impact Statement). The Arizona Department of Transportation maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Department of Public Safety on incidents within their jurisdiction. Requirements for shippers are maintained by the Arizona Department of Transportation's Enforcement Compliance Division. The project team is aware of the Hazardous Materials Commodity Flow Studies that the Arizona State Emergency Response Commission maintains. These studies are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing Emergency Response Plans. If the plan is amended, it is made available to the Arizona Department of Transportation. In the event of an incident with a hazardous materials issue on a State or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, who responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary.
	Tribal Involvement	As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community in the environmental impact statement process have been extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final

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78 (cont.)		Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 Papago, Maricopa, and Santan Freeways. These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013) and one in June (close of the Draft Environmental Impact Statement public comment period). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area. Community forums were held after the public hearing to further invite public comment. The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations.
	Title VI	The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received.

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79	My name is Laura M. Thomas. I am an enrolled member of The Gila River Indian Community. I am also a member of G.R.A.C.E. - Gila River Alliance for a Clean Environment. I am the founder G.R.E.Y. - Gila River Environmental Youth. I am also a member of P.A.R.C. - Protecting Arizona's Resources and Children. When I was younger I recall being taught about our people's heritage. Hearing the stories and being told about things that occurred many years ago in our culture. I remember being taught by my elders that we come from South Mountain. Battles were fought, families settled, it was always considered to be home to our people. In regards to this issue, I had been under the impression that the people of Gila River Indian Community had passed a vote for no build on the loop 202. This issue continues to be pushed upon our community after it has been said by the people we do not want this. The efforts put forth by A.D.O.T. (Arizona Department of Transportation) in the case of the freeway are a burden upon the people of the community. Each meeting they hold to try and convince community members to be in favor of the freeway is reaching a level of harassment. People have to take time out of their day in order to be able to attend meetings after it has been clearly said "we as a people do not want it". My people have been affected by chemical exposure. There are also many questions about health concerns that may arise because of the projected freeway. Air pollution, destruction of our sacred mountain, negative effects on the environment and the discrimination against our religious and cultural beliefs is why I'm against the proposed South Mountain Loop 202 Freeway. Laura Thomas P.O. Box #11217 Bapchule, Az. 85121 (480)532-5331 lthomas1985@yahoo.com

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79	**Cultural Resources**	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The Draft and Final Environmental Impact Statements on page 2-4 acknowledges that the Gila River Indian Community Council passed Resolution GR-64-96 that strongly opposed any future alignment of the South Mountain Freeway on Community land. In addition, the comments received from Gila River Indian Community Governor Gregory Mendoza (see letter dated July 11, 2013, on page B38 in Appendix 7, Volume III, of the Final Environmental Impact Statement) confirm the Gila River Indian Community's position. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
	Alternatives	In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. The preferred alternative was the outcome to this process. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process presented in Chapter 3 of the Draft and Final Environmental Impact Statement. The preferred alternative was the outcome to this process.
	Tribal Involvement	As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community, a sovereign nation, in the environmental impact statement process are extensive.
	Health Effects	Under the Clean Air Act, the U.S. Environmental Protection Agency is responsible for establishing National Ambient Air Quality Standards to protect public health and the environment from adverse effects of air pollutants. Health effects from air pollutants are based on the concentration of the pollutants and the duration of exposure. Concentrations vary with distance from a roadway based on many factors, including background (or ambient) levels of pollution from all sources; the number, speed, and type of vehicles on the roadway; wind speed and direction; topography; and other factors. For the proposed freeway, the Federal Highway Administration conducted modeling for carbon monoxide and particulate matter

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79 (cont.)		(PM_{10}) using worst-case (most congested or highest traffic) modeling locations at discrete receptor locations around each analysis location (primarily residences near the interchanges). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe) with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations. Overall, researchers felt that there was “sufficient” evidence for causality for the exacerbation of asthma. Evidence was “suggestive but not sufficient” for health outcomes such as cardiovascular mortality and others. Study authors also noted that past epidemiological studies may not provide an appropriate assessment of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics “hot spots.” In general, the authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified.

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79 (cont.)		These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work. Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment: *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.* *In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.* *The report also looks at trends in other health conditions, such as Attention-Deficit/Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.* Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues.
	Title VI	As documented in the Draft and Final Environmental Impact Statements section, *Environmental Justice and Title VI*, beginning on page 4-29, identifies acceptable methods, data, and assumptions to assess the potential for disproportionate adverse effects from the proposed action on certain populations including minority and low-income populations in sufficient detail to explain its function and the manner in which the analysis of impacts was undertaken for the proposed action to determine that no disparate impacts occurred; therefore, the Arizona Department of Transportation and Federal Highway Administration respectfully disagree that a violation to civil and religious rights has occurred.

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80	Fairietta Morago Gila River Indian Community South Mountain is important to me because it's part of our heritage. There are many teachings that go with that mountain. Stories and songs that our future generations to carry on. To take the South Mountain away is a great impact to the Gila River Indian Community. It would be losing a part of us even more. I am the 3rd generation from the boarding school era. Because of that era that happened to our grandparents. Some of the stories and songs will be lost forever. Our communities as O'odham people here on Gila River Indian Community need to salvage what is left of our lands. Not ruin it by putting a freeway through it. Learn to honor and take care of our lands. Be making change this drastic is beyond the environmental issues, and the budget/cost it will take to put this freeway there. It's spiritually connection to all walks of life. A way to stay in balance for society to be whole as best as it can be. Nobody takes time to listen and learn to why certain places should be left untouched. Now days the common human being lives too fast paced. Just think of the present time. A long time ago we knew how to think of the long term impact of ways of life. Life there is no fast fix. This freeway to travel as stated at previous meetings. A 20-minute interval to get to point A to point B does not eliminate anything. A fast fix to life creates more problems you end up with a bigger mess than what you started with. I am against putting in a freeway through or by South Mountain. It's a disruption to nature's way of life. I feel ADOT discriminated against us all at the last public forum held in Komatke , Az. Gila River Indian Community members were not able to voice their public comments. No matter where the meetings are held. All parties whether you are against or for the freeway should be able to speak. No meeting should be one sided for any reason what so ever. That is very unfair. Again this is a fast fix to eliminate process that everyone should abide by. Good, bad, and Indifferent. Every comment counts. No one comment should be left unheard or unsaid. Fairietta Morago P.O. Box 893 Sacaton, AZ 85147 (520) 562-0269

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80	**Cultural Resources**	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
	Purpose and Need	In the Draft and Final Environmental Impact Statements, Chapter 1, *Purpose and Need*, examines the purpose and need for the proposed action in terms of defining a transportation problem. The results of the purpose and need analyses included the determination that a transportation problem (similar to the type of problem that has been represented in past Regional Transportation Plans) still exists in the area and that this problem is similar in characteristics to the transportation problem that existed in prior years.
	Tribal Involvement	The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. Chapter 2 of the Final Environmental Impact Statement is dedicated to the explanation of the Gila River Indian Community outreach undertaken for the project. Chapter 6 of the Final Environmental Impact Statement further describes Community outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionately high adverse impacts would result from the construction and operation of the proposed action.

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81	July 24, 2013 Hello, my name is Lori Riddle. I am a daughter of the HoHoKam nation and a daughter of Antonio Azul, the last chief of my people. I am an enrolled member of the Gila River Indian Community. I was born here; I was raised here, lived here most of my life and will probably die here. In my lifetime, I've lived here in my territorial land and my confined reservation land, both in traditional manner and with modern conveniences. I was taught as a young girl how to gather, harvest and acquire foods and medicine for personal use. However I'm not a medicine person, a traditionalist or anything like that, I'm just a modern day O'odham woman who lives in 2 worlds and can balance both worlds. I pass this knowledge to my future generations. I am the co-founder, director and a member of GRACE (Gila River Alliance for a Clean Environment) a grassroots organization that has been, for more than a decade operating to protect my community from hazards of all types around the community. In addition, GRACE has been educating the community about subject matter surrounding those issues. I also sponsor a youth group GREY (Gila River Environmental Youth), who also does the same thing GRACE does but geared toward youth in the community. I'm also a member of various other groups and organizations, not to mention have had or currently hold seats on various committees, boards and commissions throughout the community. Finally, I am also a member of PARC (Protecting Arizona's Resources and Children). Sometime after the turn of the century events happened that set in motion my part of the equation. While being raised on the reservation I found myself living on a toxic superfund site. This began my environmental experience. I became knowledgeable of toxic substances, bio-accumulation, persistent organic pollutants, half-life and many other terms that kids such as myself shouldn't have to learn. As I translated information to my grandparents I began to find myself unknowingly being educated in the procedures used for assessment and abatement processes. I was present for the original remediation of my family's land and then again 20 years later when a bio-remediation was needed. With this knowledge and background I found locally, multiple issues in my community, one of them was the proposed South Mountain Loop 202. Taking a closer look I began to see the deficiencies in this project and notice that there was virtually no public participation. Consultation seemed minimal at best, if any? I began to look at the data for the substance releases and persistence of those substances. Ultimately, as any other project I looked at how these substances would impact Health and Human life. As a family who's been through the fire once, we've become quite aware of symptoms as a result of toxic exposure. In the documents submitted there is evidence and reference to some of the knowledge related to exposures. Back in the day of our exposure there wasn't enough information available. My concern about the Dioxin furans, the Particulate matter both 2.5 and 10 microns, Carbon monoxide and the multitude of other substances that would continually be present in our community is enormous. There is more concern because of the terrain and the natural makeup of our community. The heaviest impacted areas would be the populated villages located directly

Code	Issue	Response
81	Tribal Involvement	As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community, a sovereign nation, in the environmental impact statement process are extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. In addition to Chapter 2 of the Final Environmental Impact Statement which explains the Gila River Indian Community outreach undertaken for the project, Chapter 6 of the Final Environmental Impact Statement further describes Gila River Indian Community and general outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionately high adverse impacts would result from the construction and operation of the proposed action.
	Air Quality	The Final Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency recently determined that Phoenix has attained the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner-burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. No violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the

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82	July 24, 2013 between two natural barriers, the South Mountain and the Estrella Mountain ranges. These barriers would most definitely keep those toxic substances in my community. Currently, we have an amazing preserve that is full of the natural beauty that most Americans and people from all around the world picture when thinking of the well-known Sonoran desert. As a privileged individual, I've lived at the western tip of the South Mountain and seen many beautiful sunrises and given many blessings to the day and the people based on those gorgeous sunrises. In addition, while working for my community I have gained knowledge of aquifers, water sheds and washes that would be directly impacted. My people would be cut off from interactions with the mountain, as a third party recipient of this information I had heard that the engineers and designers have mentioned animal crossings that would be put in place but no mention of human crossings that would be needed to go pray and have ceremonies and such. Not to mention the distraction of noise from the vehicles. During prayer, it's important to be in a peaceful quiet area. I tasked my daughter to complete research; she found that it takes multiple generations for animals to learn their "new" crossings. During that learning time we lose numerous animals because of destruction of current natural known crossings. I have to mention about the cacti in the area, on the reservation the cacti grown more abundantly around and on mountain areas, not so much in the flat lands anymore. So naturally as we have our ceremonial harvesting activities, there is a greater need to gather the fruit in mountain areas. Lastly, we Akimel O'odham as many other peoples acknowledge the spiritual properties associated with mountains. It is in my O'odham sister's memory as with many of my O'odham sisters that I recall her making jellies and other delicious dishes for both personal and financial sustainability, yet another reason to have direct accessibility to the mountains. There is an enormous concern about Hazardous Material coming through our community. If this were to become "the" truck route, it most surely will be the hazardous material route. Since I sit on the CTERC (Chemical Tribal Emergency Response Commission), I have not seen hazard mitigation for this freeway. I also have not seen proposed policy to address what will happen in case a hazardous incident were to occur on this proposed freeway. Currently, we as a community do see our share of hazardous incidents/spills on the reservation by way of the I-10 (Interstate 10) freeway. Even though, when we look at potential incidents on either freeway, it will be apples and oranges as we have differences in the already established freeway (I-10) and the proposed freeway (L202). There were very few meetings, very little public participation. The very first invite extended was days after the DEIS was released which was April 25th, 2013. The meeting invite was on April 30th, 2013 at 3pm in GRIC at the Governance Center. Present were the TTT, Governor and Lt Governor (who is Chair of the TTT), various tribal departments, a rep from ADOT (who I can't recall), a rep from MAG, Senior Engineer Bob Hazlett as well as a few of the grassroots organizers. Represented were at least organizers from

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81 (cont.)		Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.
82	Biological Resources, Tribal Access	Connectivity is planned to allow wildlife movement beneath the freeway in multiuse crossings (see page 4-137 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use as well as culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement). The Arizona Department of Transportation and Federal Highway Administration would continue to work with partners, including the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and the Gila River Indian Community's Department of Environmental Quality, during the design phase regarding the design of multifunctional crossings that would allow wildlife passage across the proposed freeway alignment at natural drainages and that would allow Gila River Indian Community members to gain access to important traditional locations within the South Mountains. The Arizona Department of Transportation and Federal Highway Administration have been fully attentive to concerns expressed by the Gila River Indian Community and reiterate that position in this comment; the agencies have taken these concerns into account in describing potential impacts in the Draft Environmental Impact Statement, in ensuring that access to South Mountain would be preserved, and in developing and recommending the implementation of numerous mitigation measures.

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5 groups. During this meeting we were given 3 copies of the DEIS to divide among our groups. A few days prior, a community member attempted to call to find out how to obtain a copy of the DEIS, she was told in order to get a hard copy she would have to pay 50.00 dollars. During the April 30th meeting they also advised us about the 50.00 dollar charge for hard copies. At this meeting they also told us that free bus service would be provided to the May 21st DEIS public comment hearing in Phoenix at the Phoenix Convention Center. Details about how the free bus rides to the hearing saying community members could catch the bus in two locations and even take the light rail, but no other details regarding the bus service were given. They also went through the scenario of what to expect at the hearing, how it would be set up, etc. At the beginning of the meeting the ground rules set as relayed by TTT's David White and Stephen Lewis both individuals head of the TTT. We were not allowed to speak about anything else but what the process was going to be, at this point there wasn't any mention that the Phoenix hearing would have some differences than the community forums. It was at this meeting where GRIC Lt Gov. had to officially request that a meeting (or two) be held in GRIC for community members that couldn't make the public hearing. At this meeting the handouts "Fact sheet" and "How to participate" were distributed. That's all I can recall.

A few times I attempted to call the number provided on the handouts, which also had a recording saying they couldn't receive any more messages, the box was full, or something to that effect. I had also heard similar accounts from other people who were attempting to call the number. On the Thursday before the hearing I started to get worried because there was no further mention of free transportation besides what was relayed to us during the April 30th meeting. I called the number provided and was able to have an opportunity to leave a voice message in which I said something to the effect of: Hello my name is Lori Riddle from the Gila River Indian Community and I'm trying to get some further information on bus service, passes or vouchers for my community members. How will this work? Would someone give me a call on my cell #520-610-3405, thank you?

No Response!!!!

So on the day of the Phoenix hearing May 21st, 2013 I lingered several hours. I only recognized Mr. Bob Hazlett from MAG, I approached Mr. Hazlett and asked him, "So who's in charge here"? He chuckled but didn't answer, I told him, "I ask because I have some concerns". I told him there's a problem with the number that it is always full and can't take anymore new messages, his response, "Yes, we just found out today that it only holds so many messages (I think the number he gave me was 13)". So I told him maybe they need to empty that a few times a day? The other thing I mentioned was that I had left a message on the number and relayed the message I had left the week prior. After that I said, "So how was this supposed to work? Because we could have gotten more tribal members present". He shrugged his shoulders and said, "Well it's too late now". Also on the day of the Phoenix hearing the participants received the small booklet "SMTN Meeting Guide". This was the first time we as community members

Code	Issue	Response
82 (cont.)	Hazardous Material	Creating a truck bypass is not a goal of the proposed action. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicles using the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed freeway, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85 (see

(Response 82 continues on next page)

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had seen this. The guide did say the community forums were going to be utilizing a different format. It also listed only 1 GRIC forum and listed it as tentative.

The meeting in GRIC was short notice fliers went out to the community literally days before the event. Before this event at least three weeks prior one community organizer emailed a request urging GRIC to provide transport to community members to the meeting. There is a lack of community members without vehicles. No response. Lastly a few days before organizers and community voiced their concerns over the inability to voice, in open forum, their concerns at this meeting it was this time we saw the GRIC forum flyers for the first time. We additionally asked again if transport would be provided, they finally said yes, but we organizers had to provide a list of community members who needed transport. This was not expected, it was too short of notice to gather all that information. The day of the GRIC forum were community members dissatisfied the lack of inability to openly voice their concerns. The video was looped, as posted on ADOT's website, throughout the day.

Previously, While the TTT was going through the community with their presentation about the proposed loop 202 that I specifically TTT's David White in two district meetings that I had attended one in district six and the other in district four. There were concerns about ADOT not coming to present the information themselves. The one elder in district six asked who they were working for? He (the elder) stated that he felt like the TTT should not have been presenting the information but ADOT should have been the ones bringing this information to the community. That same consensus was expressed at the district four meeting it was raised by an elder woman (although not as confrontational as the one in district six).

In closing, I'm tired of fighting this monster of a freeway being pushed on to our community. I'm tired of reading blogs, comments to news articles and discussion forums of people with a "Bullying" attitude, telling my people what "You (Indians) need to do". Even a newspaper editorial of a popular news outlet, stated how, "the GRIC should this and should that"! It sickens me that this freeway has successfully brought out the racial wars effect. It's literally created debates, arguments and full blown fights! This needs to stop and other we need to work on discussions of cleaner transportation, safer technologies for a better cleaner, greener future for all our children.

Lori Ann Riddle, GRACE
GRID #11,180
P.O. Box 11217
Bapchule, Arizona 85121
Cell #520-610-3405
E-mail: contaminatedinaz@yahoo.com

Code	Issue	Response
82 (cont.)		page 3-64 of the Final Environmental Impact Statement). Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-164 of the Final Environmental Impact Statement). The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. The Department of Public Safety also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on page 4-164 of the Final Environmental Impact Statement). The Arizona Department of Transportation maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Department of Public Safety on incidents within their jurisdiction. Requirements for shippers are maintained by the Arizona Department of Transportation's Enforcement Compliance Division.
	Tribal Involvement	Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 Papago, Maricopa, and Santan Freeways. These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013) and one in June (close of the Draft Environmental Impact Statement public comment period). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area.

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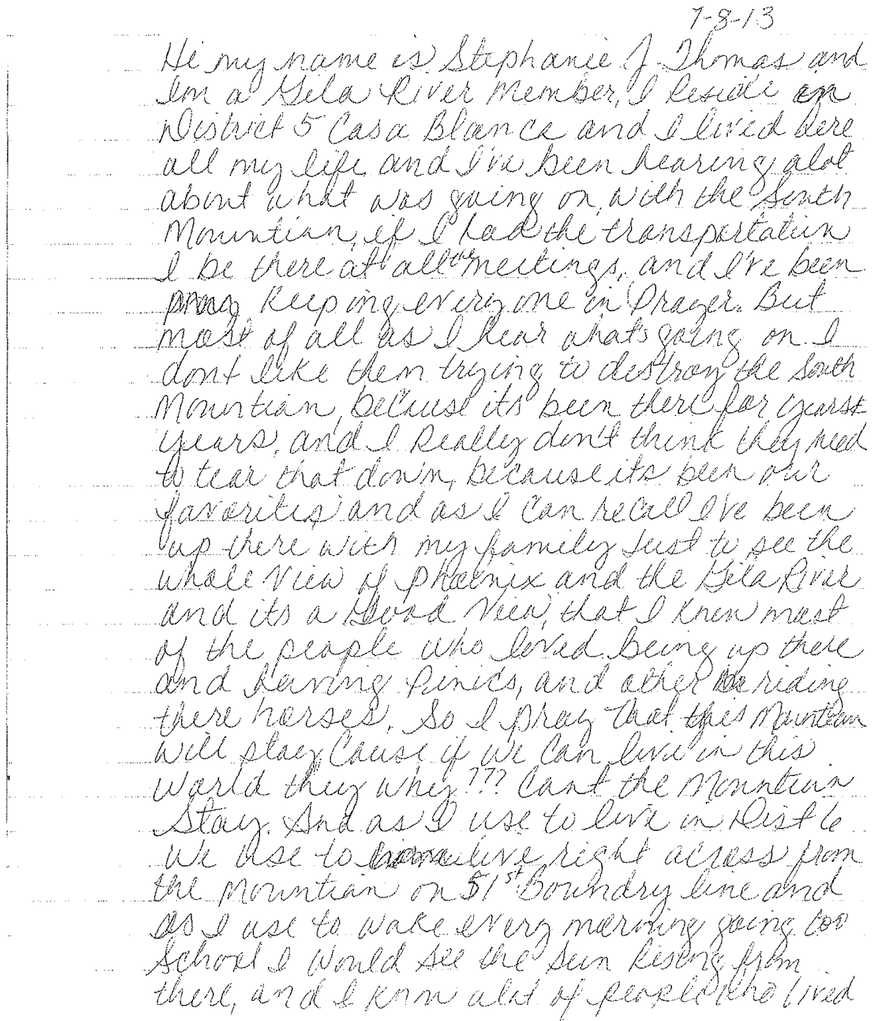
83	

7-8-13

Hi my name is Stephanie J. Thomas and Im a Gila River Member, I Reside on District 5 Casa Blanca and I lived here all my life and I've been hearing a lot about what was going on with the South Mountian, if I had the transportation I be there at all meetings, and I've been praying Keeping everyone in Prayer. But most of all as I hear what's going on I dont like them trying to destroy the South Mountain, Because its been there for 1000's years, and I Really dont think they need to tear that down, Because its been our favorites and as I can recall I've been up there with my family just to see the whole View of Phoenix and the Gila River and its a Good View, that I knew most of the people who lived being up there and having picnics, and other like riding there horses. So I pray that this Mountain will stay Cause if we can live in this World they why ??? Cant the Mountain Stay. And as I use to live in District 6 We use to have our right access from the Mountain on 51st Boundry line and as I use to wake every morning going too School I would see the Sun Rising from there, and I know alot of people who lived

Code	Issue	Response
82 (cont.)		Community forums were held after the public hearing to further invite public comment. The public hearing for the proposed action was widely advertised. Newspaper ads in six newspapers of area-wide distribution ran advertisements at least twice each. Announcements occurred on five radio stations and six television stations. Mailers were sent on May 6, 2013 to 73,564 individuals (approximately 311 on the Gila River Indian Community) who had previously expressed an interest in the project. E-newsletters were distributed on three different occasions. All materials were also provided to the Gila River Indian Community Public Information Officer. Offers to the Gila River Indian Community Manager to host a public outreach event on the Gila River Indian Community began in summer 2012. The Gila River Indian Community first officially responded to this offer at the April 30, 2013 meeting of the Transportation Technical Team. During this meeting, the Gila River Indian Community Manager requested a community forum be conducted on the Gila River Indian Community following the public hearing. This was the only request the Arizona Department of Transportation received from the Gila River Indian Community regarding whether the Arizona Department of Transportation could hold a public outreach event during the public comment period. The Arizona Department of Transportation agreed to do so, and a community forum was held on June 22, 2013 at the Komatke Boys & Girls Club on the Gila River Indian Community. Like the public hearing, the community forums were widely advertised. In addition to the efforts of the Gila River Indian Community Communication and Public Affairs Office, the Arizona Department of Transportation ran newspaper ads in six newspapers of area-wide distribution four times each. The initial hotline capacity was 20 messages; it was expanded to 80 on May 17, 2013. Any questions that came in regarding how to participate, including any shuttle bus or transportation questions, were forwarded to one individual to address. Conversation record log sheets were kept for these efforts. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations. Transportation to the community forums was not provided. As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community in the environmental impact statement process are extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer.

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around there know what Im talking about and so many things you don't know what it means to us having the mountain there, and it wont be the same if it should to be gone. We dont need this freeway there its just gonna cell alot of accidents there or others things I cant say. So Once Again Please dont take our South Mountain Away, Because it is Sacred to us,

Thank You

Gila River Pima Stephanie Thomas
Tribal # P.O. BOX 10952
13762 Coolidge Arizona
85128
(520) 610-6249

Code	Issue	Response
83	**Visual Impacts**	Visual impacts to and from South Mountain are presented in the Final Environmental Impact Statement on page 4-167.
	Cultural Resources	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The South Mountains would not be destroyed by the proposed freeway. Use of the mountains for the purposes of the proposed freeway represents two-tenths of one percent of the total mountain range. Since 1988, and as part of this environmental impact statement process, several measures have been undertaken and will be undertaken to further reduce effects on the mountains. These measures, including narrowing the design footprint, acquiring replacement land immediately adjacent to the mountains, and the provision of highway crossings, are outlined in text beginning on page 5-23 of the Final Environmental Impact Statement.

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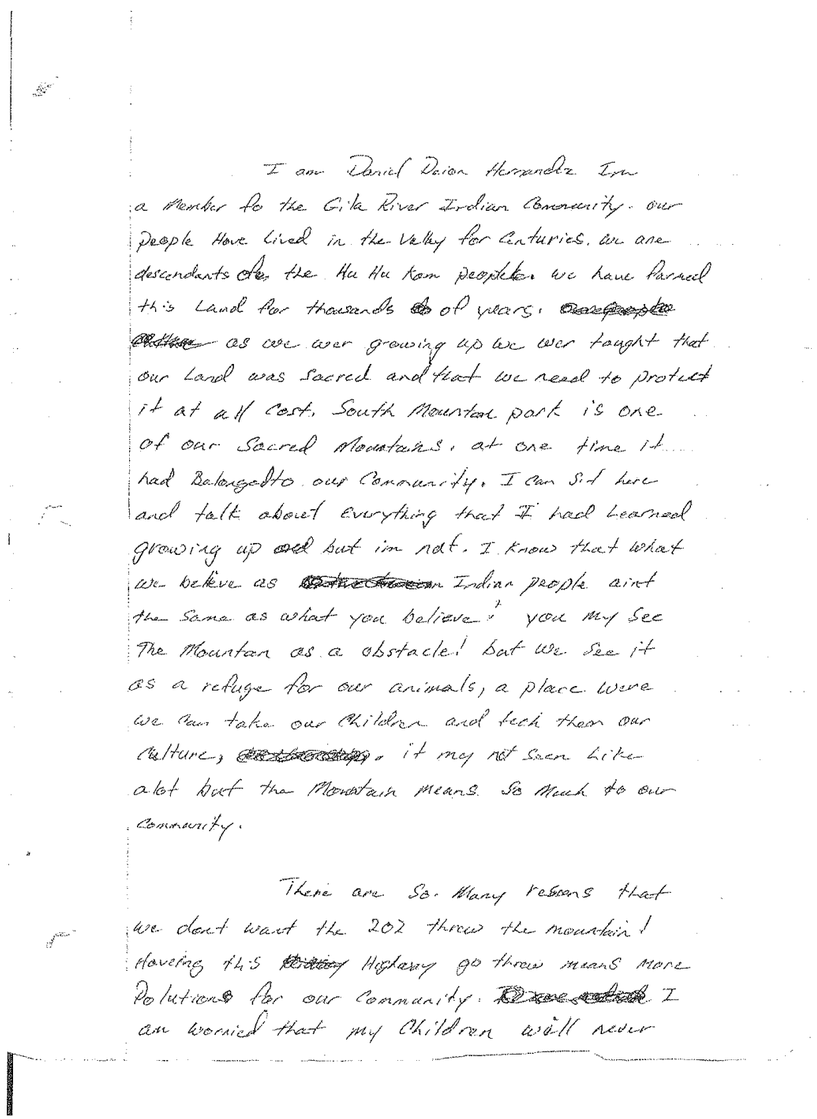
84	

I am David Dion Hernandez I'm a member to the Gila River Indian Community. our people have lived in the Valley for centuries, we are descendants of the the Hu Hu kom people. we have farmed this Land for thousands of years. as we wer growing up we wer taught that our Land was sacred and that we need to protect it at all cost. South Mountain park is one of our Sacred Mountains, at one time it had Belonged to our Community. I can Sit here and talk about everything that I had Learned growing up but im not. I know that what we believe as Indian people aint the Same as what you believe? you my See The Mountain as a obstacle! but We See it as a refuge for our animals, a place were we can take our Children and teach them our Culture, it may not Seem Like alot but the Mountain means So Much to our Community.

There are So Many reasons that we dont want the 202 throw the mountain! Having this Highway go throw means more Pollution for our Community. I am worried that my Children will never

Code	Issue	Response
84	Cultural Resources	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
	Biological Resources	Multiuse crossings would be provided for wildlife and to accommodate those members of the Gila River Indian Community who wish to gain access to areas of the South Mountains for ceremonies important for their culture (see Final Environmental Impact Statement page 4-160). In addition, as stated on page 5-27 of the Final Environmental Impact Statement, a right-of-way fence would limit access to these areas by freeway users, but allow Gila River Indian Community members to gain access to the area.
	Health Effects	Under the Clean Air Act, the U.S. Environmental Protection Agency is responsible for establishing National Ambient Air Quality Standards to protect public health and the environment from adverse effects of air pollutants. Health effects from air pollutants are based on the concentration of the pollutants and the duration of exposure. Concentrations vary with distance from a roadway based on many factors, including background (or ambient) levels of pollution from all sources; the number, speed, and type of vehicles on the roadway; wind speed and direction; topography; and other factors. For the proposed freeway, the Federal Highway Administration conducted modeling for carbon monoxide and particulate matter (PM_{10}) using worst-case (most congested or highest traffic) modeling locations at discrete receptor locations around each analysis location (primarily residences near the interchanges). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.

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So Blue Skys, they will grow up with health problems. From all the ~~smog~~ Smog. there will be more accidents, more Spills, and more problems for our Community to worry about. We realy dont need to push anther problem for our Children to worry about.

Adot needs to know we dont want this Freeway to go throw ~~our~~ South Mountain or throw our Community. We dont need to Destroy the Mountain, & Schools, Homes and Communities! the People Have Spoken No Loop 202!

Daniel Hernandez
#14479.
P.O Box 832
Sacaton Az 85147
DanielDeion Hernandez@Gmail.com

Code	Issue	Response
84 (cont.)		Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe) with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations. Overall, researchers felt that there was "sufficient" evidence for causality for the exacerbation of asthma. Evidence was "suggestive but not sufficient" for health outcomes such as cardiovascular mortality and others. Study authors also noted that past epidemiological studies may not provide an appropriate assessment of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics "hot spots." In general, the authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified. These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work. Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment: *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.*

(Response 84 continues on next page)

Code	Comment Document

Code	Issue	Response
84 (cont.)		*In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.* *The report also looks at trends in other health conditions, such as Attention-Deficit/ Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.* Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues.
	Hazardous Materials	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; truck traffic would be expected to be permissible (see the text box on page 4-166 of the Final Environmental Impact Statement).

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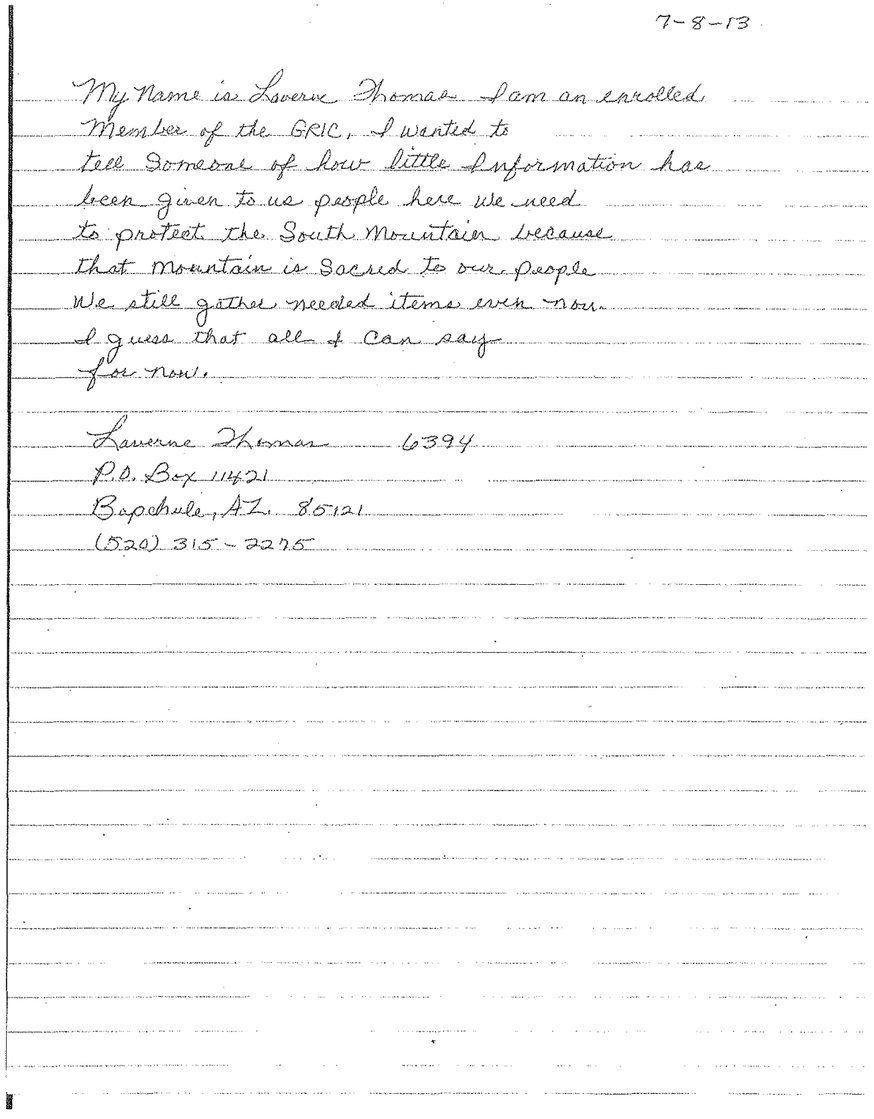
85	

7-8-13

My Name is Laverne Thomas. I am an enrolled Member of the GRIC, I wanted to tell Someone of how little information has been given to us people here we need to protect the South Mountains because that Mountain is Sacred to our People We still gather needed items even now. I guess that all I can say for now.

Laverne Thomas 6394
P.O. Box 11421
Bapchule, AZ. 85121
(520) 315-2275

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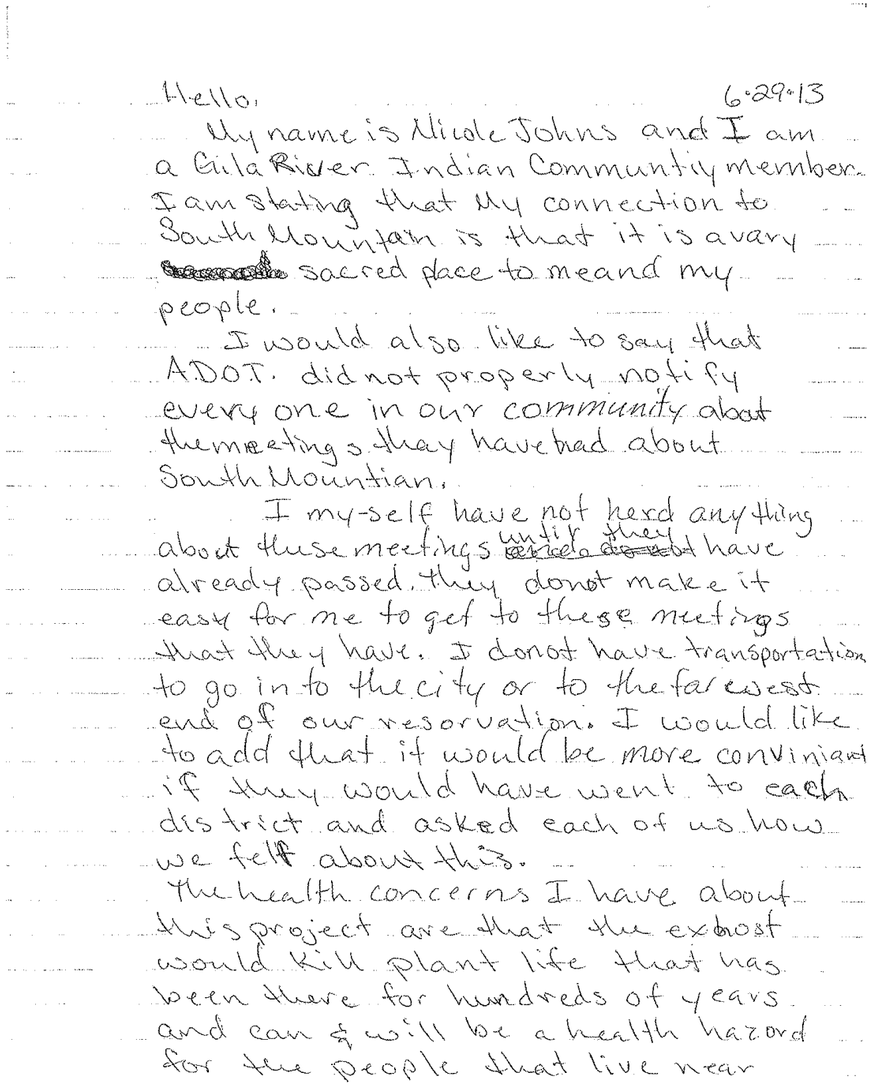
Code	Issue	Response
85	Cultural Resources	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
	Tribal Involvement	As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community, a sovereign nation, in the environmental impact statement process are extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. In addition to Chapter 2 of the Final Environmental Impact Statement which explains the Gila River Indian Community, a sovereign nation, outreach undertaken for the project, Chapter 6 of the Final Environmental Impact Statement further describes Gila River Indian Community and general outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionately high adverse impacts would result from the construction and operation of the proposed action.
86	Cultural Resources	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.

Code	Comment Document
86	

Hello, 6-29-13

My name is Nicole Johns and I am a Gila River Indian Community member. I am stating that My connection to South Mountain is that it is a very ~~sacred~~ sacred place to me and my people.

I would also like to say that A.D.O.T. did not properly notify every one in our community about the meetings they have had about South Mountian.

I my-self have not herd any thing about these meetings ~~until they~~ ~~article discussed~~ have already passed. they donot make it easy for me to get to these meetings that they have. I donot have transportation to go in to the city or to the far west end of our reservation. I would like to add that if would be more convinient if they would have went to each district and asked each of us how we felt about this.

The health concerns I have about this project are that the exhaust would kill plant life that has been there for hundreds of years and can & will be a health hazard for the people that live near

Code	Issue	Response
86 (cont.)	Tribal Involvement	Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 Papago, Maricopa, and Santan Freeways. These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013) and one in June (close of the Draft Environmental Impact Statement public comment period). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area. The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations. As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community in the environmental impact statement process are extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer.

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Code	Comment Document

and around the Freeway...
May I add that A.D.O.T. did not ask in proper manners what we as a community would like done or not done with our sacred place of gathering.

Thank You.
Nicole Johns
Gila River Indian
Community Member
17102.
(602) 390-1908 or (520) 418-1469
nicolejohns411@yahoo.com

Code	Issue	Response
86 (cont.)	**Biology, Plants, and Wildlife**	Within the context of overall vegetation, wildlife, and wildlife habitat, all action alternatives and options would decrease the amount of cover, nesting areas, and food resources for wildlife species caused by habitat loss, fragmentation, and traffic disturbance. See the section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-136 of the Final Environmental Impact Statement, for additional details on potential effects on vegetation, wildlife, and wildlife habitat.
	Health Effects	Under the Clean Air Act, the U.S. Environmental Protection Agency is responsible for establishing National Ambient Air Quality Standards to protect public health and the environment from adverse effects of air pollutants. Health effects from air pollutants are based on the concentration of the pollutants and the duration of exposure. Concentrations vary with distance from a roadway based on many factors, including background (or ambient) levels of pollution from all sources; the number, speed, and type of vehicles on the roadway; wind speed and direction; topography; and other factors. For the proposed freeway, the Federal Highway Administration conducted modeling for carbon monoxide and particulate matter (PM_{10}) using worst-case (most congested or highest traffic) modeling locations at discrete receptor locations around each analysis location (primarily residences near the interchanges). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe) with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations.

(Response 86 continues on next page)

Code	Comment Document

Code	Issue	Response
86 (cont.)		Overall, researchers felt that there was "sufficient" evidence for causality for the exacerbation of asthma. Evidence was "suggestive but not sufficient" for health outcomes such as cardiovascular mortality and others. Study authors also noted that past epidemiological studies may not provide an appropriate assessment of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics "hot spots." In general, the authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified. These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work. Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment: *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.* *In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.* *The report also looks at trends in other health conditions, such as Attention-Deficit/Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.* Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues.

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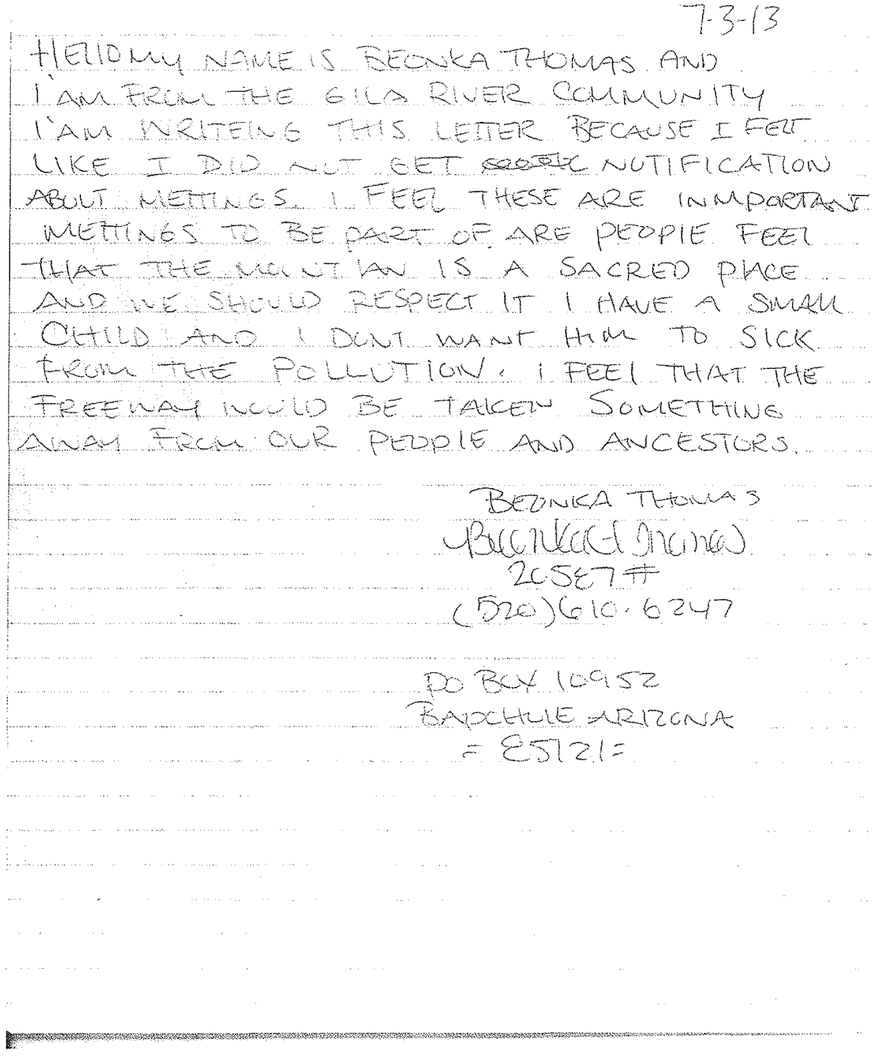
87	

7-3-13

HELLO MY NAME IS BEONKA THOMAS AND I AM FROM THE GILA RIVER COMMUNITY I'AM WRITEING THIS LETTER BECAUSE I FEEL LIKE I DID NOT GET ~~SOME~~ NOTIFICATION ABOUT MEETINGS. I FEEL THESE ARE IMMPORTANT MEETINGS TO BE PART OF ARE PEOPLE FEEL THAT THE MOUNTAIN IS A SACRED PLACE AND WE SHOULD RESPECT IT I HAVE A SMALL CHILD AND I DONT WANT HIM TO SICK FROM THE POLLUTION. I FEEL THAT THE FREEWAY WOULD BE TAKEN SOMETHING AWAY FROM OUR PEOPLE AND ANCESTORS.

BEONKA THOMAS
(928)610-6247

PO BOX 10952
BAPCHULE ARIZONA
= 85121=

Code	Issue	Response
87	**Tribal Involvement**	Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 Papago, Maricopa, and Santan Freeways. These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013) and one in June (close of the Draft Environmental Impact Statement public comment period). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area. The public hearing for the proposed action was widely advertised. Newspaper advertisements in six newspapers of area-wide distribution ran at least twice each. Announcements occurred on five radio stations and six television stations. Mailers were sent on May 6, 2013, to 73,564 individuals (approximately 311 on the Gila River Indian Community) who had previously expressed an interest in the project. E-newsletters were distributed on three different occasions. All materials were also provided to the Gila River Indian Community Public Information Officer. Offers to the Gila River Indian Community Manager to host a public outreach events on the Gila River Indian Community began in summer 2012. The Gila River Indian Community first officially responded to this offer at the April 30, 2013, meeting of the Transportation Technical Team. During this meeting, the Gila River Indian Community Manager requested that a community forum be conducted on the Gila River Indian Community following the public hearing. This was the only request the Arizona Department of Transportation received from the Gila River Indian Community regarding whether the Arizona Department of Transportation could hold a public outreach event during the public comment period. The Arizona Department of Transportation agreed to do so, and a community forum was held on June 22, 2013, at the Komatke Boys & Girls Club on the Gila River Indian Community.

(Response 87 continues on next page)

Code	Comment Document

Code	Issue	Response
87 (cont.)	Health Effects	Under the Clean Air Act, the U.S. Environmental Protection Agency is responsible for establishing National Ambient Air Quality Standards to protect public health and the environment from adverse effects of air pollutants. Health effects from air pollutants are based on the concentration of the pollutants and the duration of exposure. Concentrations vary with distance from a roadway based on many factors, including background (or ambient) levels of pollution from all sources; the number, speed, and type of vehicles on the roadway; wind speed and direction; topography; and other factors. For the proposed freeway, the Federal Highway Administration conducted modeling for carbon monoxide and particulate matter (PM_{10}) using worst-case (most congested or highest traffic) modeling locations at discrete receptor locations around each analysis location (primarily residences near the interchanges). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe) with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations.

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Code	Comment Document

Code	Issue	Response
87 (cont.)		Overall, researchers felt that there was "sufficient" evidence for causality for the exacerbation of asthma. Evidence was "suggestive but not sufficient" for health outcomes such as cardiovascular mortality and others. Study authors also noted that past epidemiological studies may not provide an appropriate assessment of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics "hot spots." In general, the authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified. These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work. Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment: *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.* *In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.* *The report also looks at trends in other health conditions, such as Attention-Deficit/Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.* Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues.

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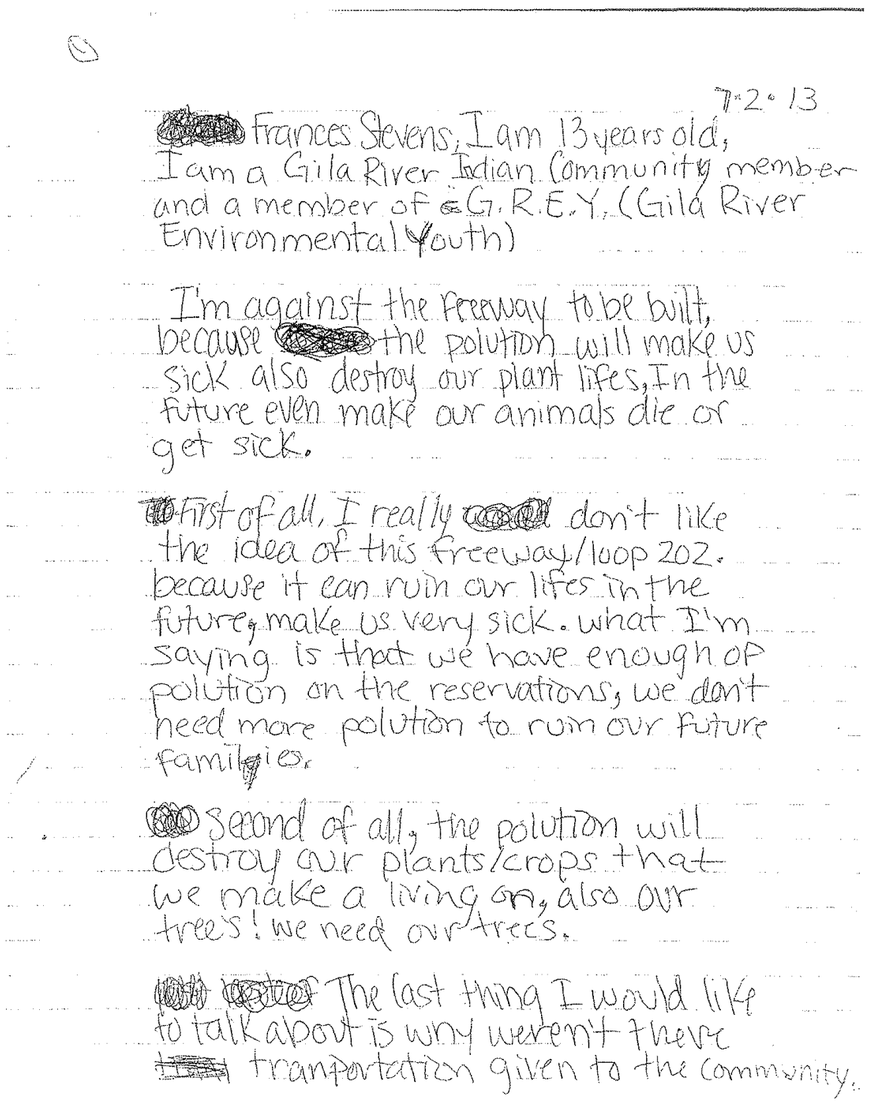
88	

7-2-13

[redacted] Frances Stevens, I am 13 years old, I am a Gila River Indian Community member and a member of G.R.E.Y. (Gila River Environmental Youth)

I'm against the freeway to be built, because [redacted] the polution will make us sick also destroy our plant lifes, In the future even make our animals die or get sick.

[redacted] first of all, I really [redacted] don't like the idea of this freeway/loop 202. because it can ruin our lifes in the future, make us very sick. what I'm saying is that we have enough of polution on the reservations, we don't need more polution to ruin our future families.

[redacted] Second of all, the polution will destroy our plants/crops that we make a living on, also our tree's! we need our trees.

[redacted] [redacted] The last thing I would like to talk about is why weren't there [redacted] tranportation given to the community.

Code	Issue	Response
87 (cont.)	**Cultural Resources**	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
88	**Biology, Plants, and Wildlife**	Within the context of overall vegetation, wildlife, and wildlife habitat, all action alternatives and options would decrease the amount of cover, nesting areas, and food resources for wildlife species caused by habitat loss, fragmentation, and traffic disturbance. See the section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-136 of the Final Environmental Impact Statement, for additional details on potential effects on vegetation, wildlife, and wildlife habitat. The Arizona Department of Transportation and Federal Highway Administration completed a Biological Evaluation containing analysis of the project effects on listed and candidate species under the Endangered Species Act. The Biological Evaluation was completed in 2014 following identification of the Preferred Alternative in the Draft Environmental Impact Statement. The Biological Evaluation was sent to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality for technical assistance with assessing the level of project effects on listed and candidate species prior to completion of the Final Environmental Impact Statement. The Arizona Department of Transportation and Federal Highway Administration have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation. The results of the Biological Evaluation may be found beginning on page 4-125 of the Final Environmental Impact Statement.
	Air Quality, Health Effects	As noted on page 4-69 of the Final Environmental Impact Statement, secondary air quality standards are promulgated to minimize environmental and property damage. Primary and secondary standards for particulate matter (PM_{10}) are identical; no threshold is established by the U.S. Environmental Protection Agency for carbon monoxide (CO). Under the Clean Air Act, the U.S. Environmental Protection Agency is responsible for establishing National Ambient Air Quality Standards to protect public health and the environment from adverse effects of air pollutants. Health effects from air pollutants are based on the concentration of the pollutants and the duration of exposure. Concentrations vary with distance from a roadway based on many factors, including background (or ambient) levels of pollution from all sources; the number, speed, and type of vehicles on the roadway; wind speed and direction; topography; and other factors. For the proposed freeway, the Federal Highway Administration conducted modeling for carbon monoxide and particulate matter (PM_{10}) using worst-case (most congested or highest traffic) modeling locations at discrete receptor locations around each analysis location (primarily residences near the interchanges). The carbon monoxide and particulate matter (PM_{10})analyses

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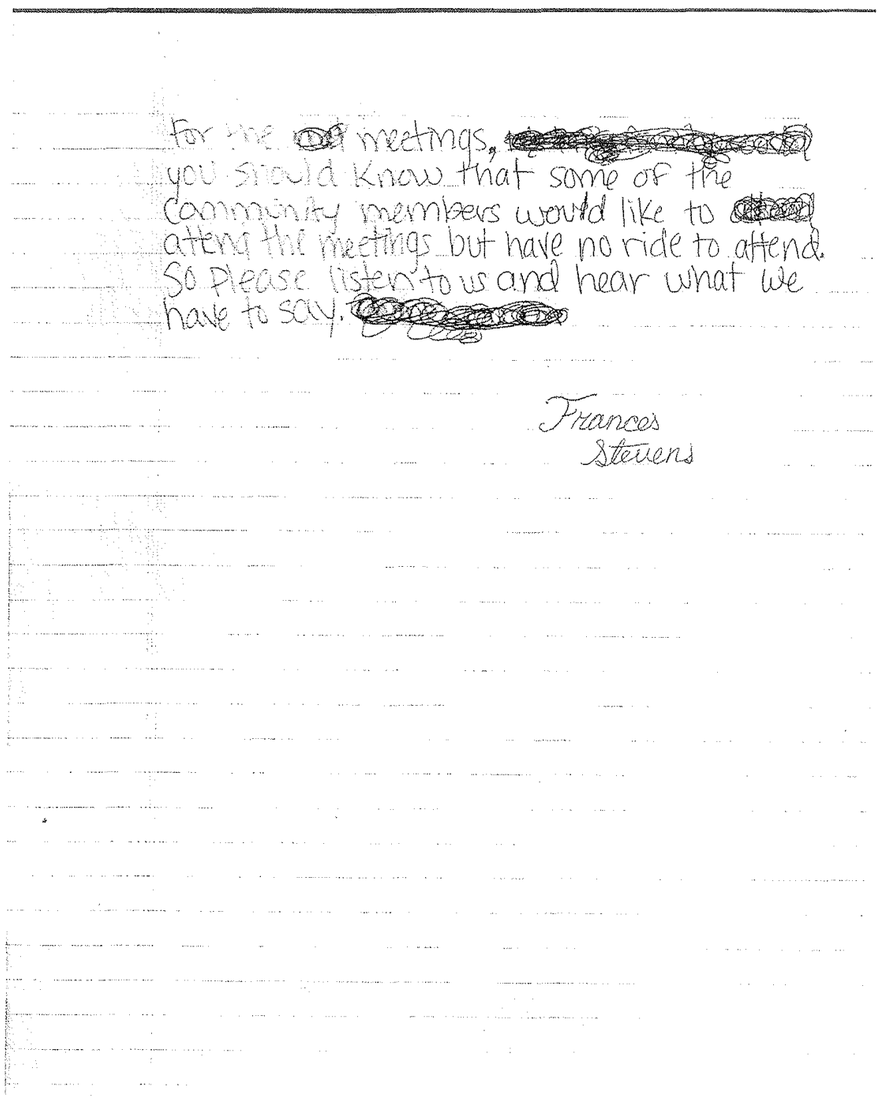

Code	Issue	Response
88 (cont.)		demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe) with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations. Overall, researchers felt that there was "sufficient" evidence for causality for the exacerbation of asthma. Evidence was "suggestive but not sufficient" for health outcomes such as cardiovascular mortality and others. Study authors also noted that past epidemiological studies may not provide an appropriate assessment of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics "hot spots." In general, the authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified. These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work.

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Code	Issue	Response
88 (cont.)		Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment: *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.* *In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.* *The report also looks at trends in other health conditions, such as Attention-Deficit/Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.* Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues.
	Tribal involvement	The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations.

Code	Comment Document

9/12/13

To whom it may concern

91 My name is Veranadette Stevens. I am an enrolled member of the Salt River Reservation. I am a Pima/Apache residing in District 3.

All and most of my life I have lived on the reservation. I originally grew up in District 3. I left the reservation a few years to another reservation out of State. As I returned back to the reservation I finished grade school and went to boarding school. By that time I learned my parents and family had moved to the West end of the reservation. There I had lived to grow into my adult hood.

So today as I hear about this project being built. It saddens me to know that they are so persistant to build this Freeway. I guess because thats all ~~that~~ that Tonto is there for. All of this saddens me to hear all the stuff that everyone is going through. As for myself. I care much for my people. And with this project in latter. I know there will be alot of health issues. As I lived on the West End. I use to do alot of running along the gas line. I also use to climb the mountain.

Code	Issue	Response
89	**Purpose and Need**	In the Draft and Final Environmental Impact Statements, Chapter 1, *Purpose and Need*, examines the purpose and need for the proposed action in terms of defining a transportation problem. The results of the purpose and need analyses included the determination that a transportation problem (similar to the type of problem that has been represented in past Regional Transportation Plans) still exists in the area and that this problem is similar in characteristics to the transportation problem that existed in prior years. The alternatives analyses considered numerous modal alternatives, and a robust screening process led to the conclusion that a road facility would best address the transportation problem defined.
	Health Effects	As noted on page 4-69 of the Final Environmental Impact Statement, secondary air quality standards are promulgated to minimize environmental and property damage. Primary and secondary standards for particulate matter (PM_{10}) are identical; no threshold is established by the U.S. Environmental Protection Agency for carbon monoxide (CO). Under the Clean Air Act, the U.S. Environmental Protection Agency is responsible for establishing National Ambient Air Quality Standards to protect public health and the environment from adverse effects of air pollutants. Health effects from air pollutants are based on the concentration of the pollutants and the duration of exposure. Concentrations vary with distance from a roadway based on many factors, including background (or ambient) levels of pollution from all sources; the number, speed, and type of vehicles on the roadway; wind speed and direction; topography; and other factors. For the proposed freeway, the Federal Highway Administration conducted modeling for carbon monoxide and particulate matter (PM_{10}) using worst-case (most congested or highest traffic) modeling locations at discrete receptor locations around each analysis location (primarily residences near the interchanges). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational

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	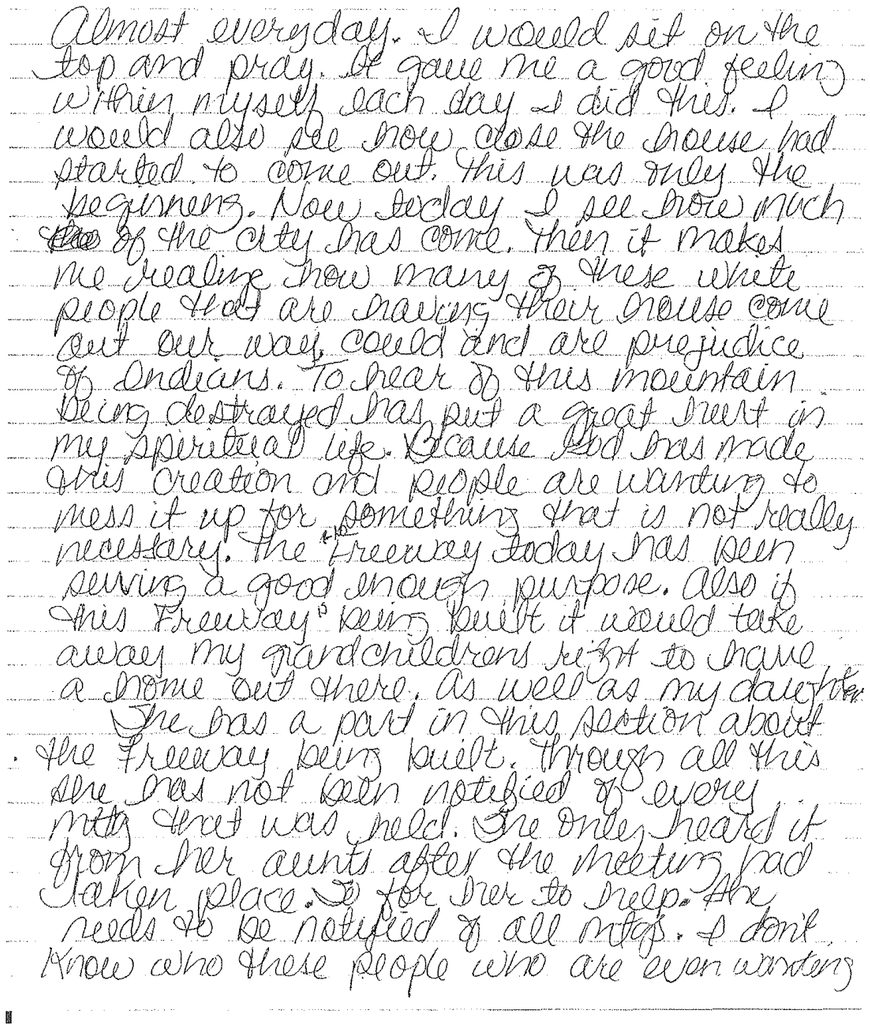

Almost everyday. I would sit on the top and pray. It gave me a good feeling within myself each day I did this. I would also see how close the house had started to come out. This was only the beginning. Now today I see more much of the city has come. Then it makes me wonder how many of these white people that are having their house come out our way, could and are prejudice of Indians. To hear of this mountain being destroyed has put a great hurt in my spiritual life. Because God has made this creation and people are wanting to mess it up for something that is not really necessary. The Freeway today has been serving a good enough purpose. Also if this Freeway is being built it would take away my grandchildrens right to have a home out there. As well as my daughter. She has a part in this section about the Freeway being built. Through all this she has not been notified of every meeting that was held. She only heard it from her aunts after the meeting had taken place. I for her to help. She needs to be notified of all mtgs. I don't know who these people who are even wanting

Code	Issue	Response
89 (cont.)		cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe) with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations. Overall, researchers felt that there was "sufficient" evidence for causality for the exacerbation of asthma. Evidence was "suggestive but not sufficient" for health outcomes such as cardiovascular mortality and others. Study authors also noted that past epidemiological studies may not provide an appropriate assessment of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics "hot spots." In general, the authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified. These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work. Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment: *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.* *In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.* *The report also looks at trends in other health conditions, such as Attention-Deficit/Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.*

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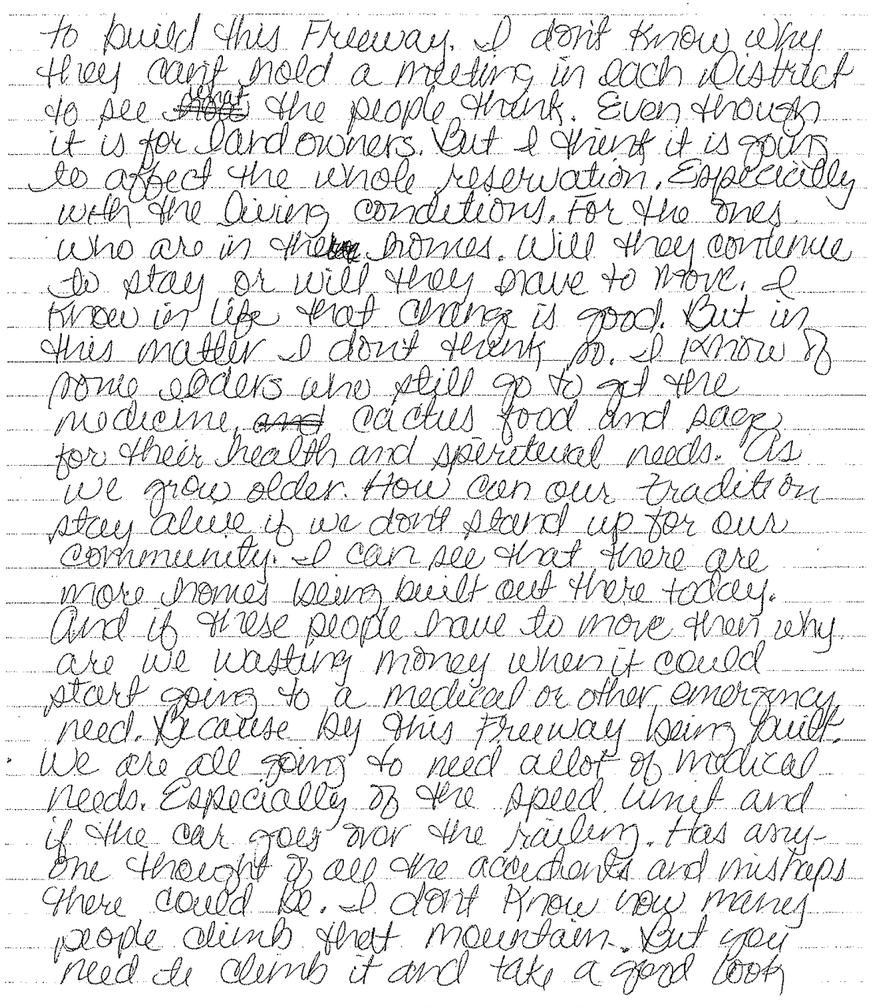

to build this Freeway. I dont know why they cant hold a meeting in each District to see ~~what~~ the people think. Even though it is for landowners. But I think it is going to affect the whole reservation. Especially with the living conditions. For the ones who are in their homes. Will they continue to stay or will they have to move. I know in life that change is good. But in this matter I dont think so. I know of some elders who still go to get the medicine, ~~and~~ cactus food and sage for their health and spiritual needs. As we grow older. How can our tradition stay alive if we dont stand up for our community. I can see that there are more homes being built out there today. And if these people have to move then why are we wasting money when it could start going to a medical or other emergency need. Because by this Freeway being built. We are all going to need alot of medical needs. Especially of the speed limit and if the car goes over the railing. Has anyone thought of all the accidents and mishaps there could be. I dont know how many people climb that mountain. But you need to climb it and take a good look

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89 (cont.)		Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues.
	Cultural Resources	The importance of the South Mountains Traditional Cultural Property is acknowledged on pages 4-130 and 4-141 of the Draft and Final Environmental Impact Statements, respectively. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. This consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Historic Preservation Act eligibility recommendations, project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
	Tribal Involvement	Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 Papago, Maricopa, and Santan Freeways. These electronic notices included notice of availability of Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013) and one in June (close of the Draft Environmental Impact Statement public comment period). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area.

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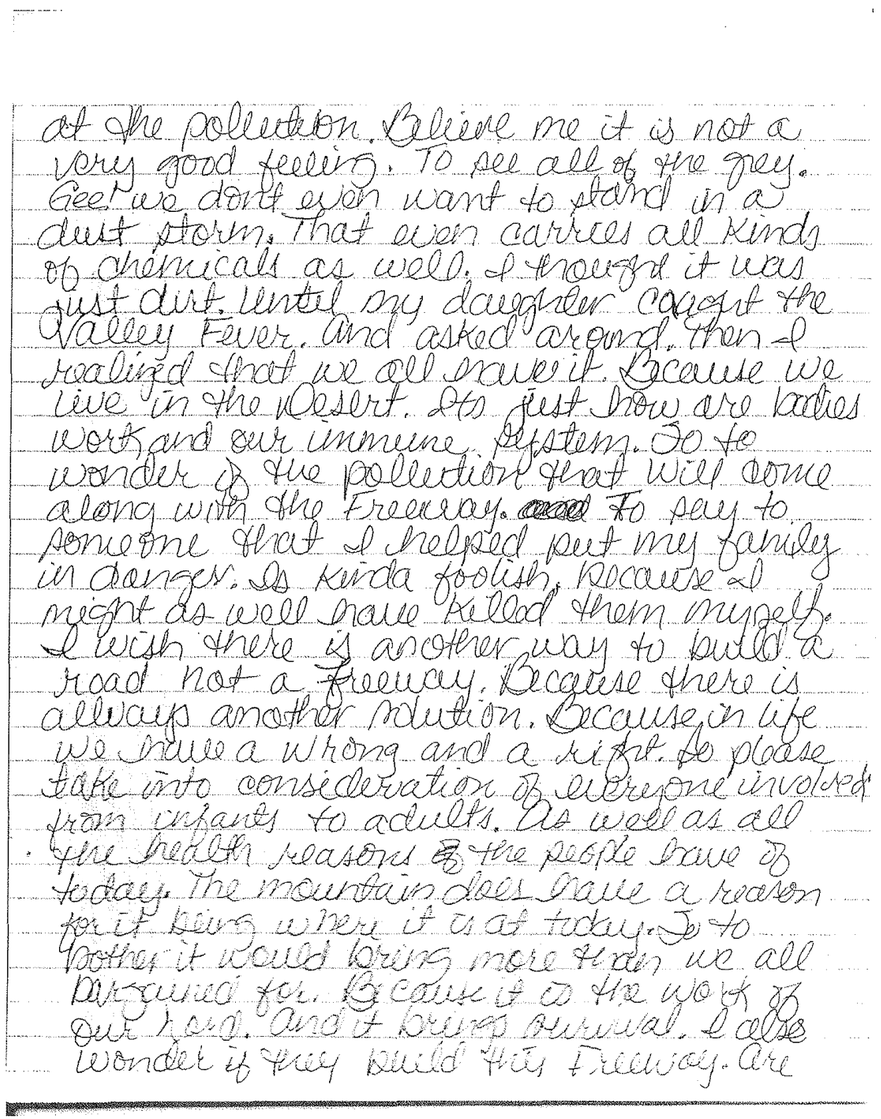

at the pollution. Believe me it is not a very good feeling. To see all of the grey. Geez we don't even want to stand in a dust storm. That even carries all kinds of chemicals as well. I thought it was just dirt. Until my daughter caught the Valley Fever. And asked around. Then I realized that we all have it. Because we live in the Desert. It's just how are bodies work and our immune system. So to wonder if the pollution that will come along with the Freeway. and To say to someone that I helped put my family in danger. Is kinda foolish. Because I might as well have killed them myself. I wish there is another way to build a road not a Freeway. Because there is always another solution. Because in life we have a Wrong and a right. So please take into consideration of everyone involved from infants to adults. As well as all the health reasons of the people have of today. The mountain does have a reason for it being where it is at today. So to bother it would bring more than we all Bargained for. Because it is the work of our Lord. And it brings Survival. I also wonder if they build this Freeway. Are

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89 (cont.)		The public hearing for the proposed action was widely advertised. Newspaper advertisements in six newspapers of area-wide distribution ran at least twice each. Announcements occurred on five radio stations and six television stations. Mailers were sent on May 6, 2013, to 73,564 individuals (approximately 311 on the Gila River Indian Community) who had previously expressed an interest in the project. E-newsletters were distributed on three different occasions. All materials were also provided to the Gila River Indian Community Public Information Officer. Offers to the Gila River Indian Community Manager to host a public outreach events on the Gila River Indian Community began in summer 2012. The Gila River Indian Community first officially responded to this offer at the April 30, 2013, meeting of the Transportation Technical Team. During this meeting, the Gila River Indian Community Manager requested that a community forum be conducted on the Gila River Indian Community following the public hearing. This was the only request the Arizona Department of Transportation received from the Gila River Indian Community regarding whether the Arizona Department of Transportation could hold a public outreach event during the public comment period. The Arizona Department of Transportation agreed to do so, and a community forum was held on June 22, 2013, at the Komatke Boys & Girls Club on the Gila River Indian Community. As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community, a sovereign nation, in the environmental impact statement process are extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer.
	Water Resources	Table 4-41 on page 4-106 of the Final Environmental Impact Statement discloses the number of wells that may be acquired by each action alternative and, as noted on page 4-108 of the Final Environmental Impact Statement, some of these wells are abandoned wells. Impacts to wells on the Gila River Indian Community are not anticipated.
	Acquisitions and Relocations	No homes on Gila River Indian Community land would be acquired for the proposed freeway.

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my people who live out there going to have to start paying for their water from the city. I know there are several water wells out there. But will they have to be covered because of the freeway. The water out in that area is not to well. But in order to have better water. The wells would have to be dug deeper. So to take things away or destroy is not a good way of life. The mountain has given me much in my life. It has kept me strong, sane, peaceful, and healthy. As well as other purposes. So to see it being destroyed is sad. Because I'm sure if we want our kids to stay active and exercise. We need to all need to take a stand. So one needs to be really honest about all aspects of this Freeway. Especially to the community of the reservation

Wenceslao Reyes
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Linda Allen

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1 Arizona Department of Transportation officials who are part of 202 planning were to have taken cultural awareness trainings put on by the Gila River Indian Community, as stated by Community Manager David White. When were those trainings conducted, what GRIC department conducted them, and what were the policy shifts, if any, that resulted from the cultural awareness trainings? What scoping comments from these trainings went into the DEIS?

2 Was the Section 106 process for South Mountain ever begun between the Tribal Historic Preservation Office and the Arizona Department of Transportation? If no, when can GRIC expect that process to start, in order to comply with the Religious Freedom and Restoration Act, as well as the National Historic Preservation Act? What outreach and scoping has ADOT done to the sister tribes of O'odham who also hold the South Mountain range as sacred, namely the Salt River Pima-Maricopa Indian Community, the Ak-Chin Indian Community, and the Tohono O'odham Nation? What outreach and scoping has ADOT done to the other tribes who have cultural affiliation to South Mountain, such as the Colorado River Indian Tribes and the Hopi Nation?

3 If the freeway were to be built, what type of assurances are there that air quality assessments for Gila River and Maricopa County will be kept separate? Gila River has been awarded a Clean Air Excellence award by the Environmental Protection Agency, and our community does not want any of our air quality measurements to fall under the Phoenix region, which has had sanctions from the EPA for withdrawing their clean air programs.

4 On January 19, 2011, the Environmental Protection Agency Regional Administrator signed the Gila River Indian Community's (GRIC) Tribal Implementation Program (TIP) into effect. The effect of this action was to make the TIP federally enforceable. The TIP regulates air quality within the boundaries of Gila River, and its purpose is to enforce air quality standards within the GRIC boundaries. The TIP contains ordinances that require GRICDEQ staff, tribal attorneys, and if needed, the GRIC tribal police, to assume civil and criminal enforcement actions against persons who violate clean air standards outlined in the TIP. If the E1 alignment is built, and air quality monitors in Gila River exceed PM10 and ozone standards, what will be the procedure for Gila River to prosecute federal agencies or persons whose actions violate clean air standards within the TIP?

5 On January 25, 2011 the State of Arizona withdrew plans for a State Implementation Plan (SIP) to meet particulate matter-10 standards in the Maricopa County PM-10 nonattainment area, thus failing to comply with provisions of the Clean Air Act. By withdrawing the SIP, the State of Arizona triggered a January 31, 2011 decision by the Environmental Protection Agency to begin a sanctions clock on Maricopa County, because the county's air quality plan does not adequately protect human health. What air quality permits will the Arizona Department of Transportation have to secure in order to begin construction on the E1 alignment in Maricopa County, especially in light of being under the sanctions clock by the

Code	Issue	Response
1	**Cultural Resources**	Cultural sensitivity training sessions were held on May 24, 2010, June 14, 2010, December 28, 2010, and January 20, 2011. The training sessions were led by the Gila River Indian Community's Tribal Historic Preservation Officer and by staff from the Gila River Indian Community's Cultural Resource Management Program. The purpose of the training was to raise awareness and sensitivity to cultural and natural resources that would be encountered by personnel as they conducted field investigations on Community land for the proposed Gila River Indian Community Alignment. The training was recommended by the Gila River Indian Community's Cultural Resources Standing Committee at the time they issued the right of entry to the South Mountain project team. The training did not result in policy shifts or scoping comments for the study. As noted on page 2-8 of the Draft and Final Environmental Impact Statement, the coordinated referendum occurred in February 2012, and Community members voted in favor of the no-build option. Therefore, the Gila River Indian Community Alignment was eliminated from further study.
2	**Cultural Resources**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. In 2003, the Federal Highway Administration and Arizona Department of Transportation initiated National Historic Preservation Act Section 106 consultations with all Native American tribes that claimed cultural affiliation to the Study Area. Consultations were initiated with the Ak-Chin Indian Community, Gila River Indian Community, the Hopi Tribe, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe. As noted in Table 4-47 that begins on page 4-145 of the Final Environmental Impact Statement, the Gila River Indian Community was consulted in 2003 with subsequent contact in 2005, 2006, 2007, 2008, 2010, 2011, 2012, and 2013. This supports an early and continued consultation with the Gila River Indian Community related to resources of importance. In 2005, the Federal Highway Administration and Arizona Department of Transportation consulted with all Native American tribes in Arizona to ensure all interested Native Americans were included in the process and had the opportunity to communicate their concerns. These tribes were the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community, the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the

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6	Because of South Mountain's religious and cultural significance to the Gila River Indian Community, the Salt River Pima-Maricopa Indian Community, and the Colorado River Indian Tribes, building the E1 alignment will have an adverse impact on the exercise of Native American religious beliefs. If MAG, ADOT, and the State of Arizona continue with plans to build the proposed E1 alignment, these agencies and the state will be violating parts of the Religious Freedom and Restoration Act (RFRA), specifically as defined in 42 U.S.C. Amendment 2000cc-5. The proposed E1 alignment would introduce visual, atmospheric, and audible elements that would diminish South Mountain's cultural and religious significance. Many O'odham feel that South Mountain is in eminent danger from construction plans that will impact their sacred site for all time. There has been a lack of good faith consultation with O'odham traditional religious leaders, and almost a complete lack of diligence in the Section 106 process with GRIC. When will ADOT begin to consult closely with O'odham religious leaders, and to also inform them that the proposed 202 extension is also part of the Maricopa Association of Governments' plan to build the Sun Corridor between Phoenix and Tucson?
7	What type of government-to-government talks will ADOT disclose that they have done with Gila River tribal leadership to uphold the United Nations Declaration of the Rights of Indigenous People (UNDRIP), namely Article 7 of Convention No. 169 which states that Indigenous and tribal peoples have the right to "decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual well-being and the lands they occupy or otherwise use, and to exercise control over their economic, social and cultural development."? Maricopa County is within the territorial boundaries of the U.S. and is subject to the laws, both international and domestic of the United States of America, and since the U.S. is a supporter of the UNDRIP, Maricopa County officials also are obligated to the UNDRIP's articles and recommendations. Finally they U.S. Ratified the ILO Convention 169 (which is legally binding) and signed onto the ILO, which means they are legally obligated to is principles and conventions.
8	The cornerstone of Convention No. 169, on which all its provisions are based, is consultation and participation of Indigenous and tribal peoples. The Convention requires that Indigenous and tribal peoples are consulted on issues that affect them. It requires that these peoples are able to engage in free, prior and informed participation in policy and development processes that affect them. This means not just the Gila River Indian Community, but also Salt River Pima-Maricopa Indian Community, Ak-Chin Indian Community, Tohono O'odham Nation, Colorado River Indian Tribes and Hopi Nation, which are all tribes that have cultural affiliations to South Mountain. To ensure that the rights of these Indigenous and tribal peoples are protected and taken into account when any measures are being undertaken that are likely to have an impact on these peoples, scoping must be done by ADOT in those communities.

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2 (cont.)		San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe. Most of these tribes did not express an interest in the proposed project. The Ak-Chin Indian Community, the Salt River Pima-Maricopa Indian Community, and the Tohono O'odham deferred to the Gila River Indian Community to take the lead with Section 106 consultations on this proposed action project. Consultation with Native America tribes has been extensive and demonstrates a reasonable and good faith effort to include all interested Native American tribes in the process to take their concerns seriously in the planning effort. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
3	**Air Quality**	The Clean Air Excellence Award was awarded to the Gila River Indian Community Department of Environmental Quality Air Quality Program Team based on the development of a multi-program Air Quality Management Plan to regulate air quality, the first of its kind for an Indian Community. The award was not in any way an indication of the quality of the air within Gila River Indian Community land. The Gila River Indian Community is not included in the Maricopa County Carbon Monoxide Maintenance Area or the Maricopa 8-hour Ozone Nonattainment Area. The northern part of the Gila River Indian Community is within the Maricopa County Particulate Matter Nonattainment Area (see Figure 4-20 on page 4-71 of the Final Environmental Impact Statement). The Gila River Indian Community is part of the Maricopa Association of Governments and as such is included in air quality conformity demonstrations for the Maricopa Association of Governments region. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. No violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.

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9	The proposed freeway is meant to be an I-10 commercial truck bypass to decrease traffic congestion on I-10 in Maricopa County. In the DEIS, the impacts of air pollution do not include vehicle emissions from commercial trucks originating from Mexico, which are fueled with diesel that does not meet the environmental standards adopted by Arizona. The air pollution models in the DEIS need to study the number of Mexican commercial trucks with destinations that pass through metro Phoenix, or whose destinations are in this geographic region. Those tons of air pollution need to be identified (what type of particulate matter it would be and the associated health impacts), quantified, and factored in to the analysis of air quality.
10	If living near a major highway adversely affects air quality, does it shorten the human lifespan, and if so, how much shorter is the human lifespan? ADOT or HDR has a legal and civil responsibility to bring in outside research and air toxicology experts to explain how poor air quality affects the body, as well as pregnancy outcomes and fertility rates. The 2005 JATAP study must be included in the FEIS, as well.
11	Aerial photography must be added to the DEIS to show how many homes in Gila River would be destroyed by the path of the proposed project, as well as the acreage of Indigenous TCPs that would be destroyed.
12	South Mountain is a sacred area not just to the Gila River Indian Community, but to the Ak-Chin Indian Community, Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Hopi, and to the Colorado River Indian Tribes. What type of scoping, community outreach, and hearings did ADOT perform in those communities?
13	What consultants from those communities were brought in to stress the protection of traditional cultural properties?
14	What types of protections are in place for NRHP-eligible resources in the South Mountain Park Preserves (SMPP)? Under Criterion A (association with an important event) and Criterion B (association with an important person) of Section 106 of the NRHP, the entire 16,600 acres of the SMPP is NRHP-eligible as a traditional cultural property. This means the No Build alternative is the only action ADOT can take to protect the South Mountains.
15	The DEIS describes a fence to be built around an O'odham cultural resource , as a mitigation measure. Culture cannot be fenced, and the freeway's direct and indirect impacts to this site must be brought back to the Gila River Indian Community, Ak-Chin Indian Community, Salt River Pima-Maricopa Indian Community, Tohono O'odham Nation, Hopi tribe, and the Colorado River Indian Tribes (CRIT) before this resource is further impaired. Article 8 of the 2007 United Nations Declaration of the Rights of Indigenous Peoples (UNDRIP) prohibits the "forced assimilation or destruction of Indigenous culture." Further analysis of direct and indirect impacts to Site AZ T:12:112 is a basic human and civil right for the affected tribal stakeholders.

Code	Issue	Response
4	**Air Quality**	The Gila River Indian Community's primary purpose for developing the Tribal Implementation Plan and the Air Quality Management Plan is to provide a regulatory structure for industrial sources that were not permitted by the Gila River Indian Community nor U.S. Environmental Protection Agency. The Gila River Indian Community's regulatory authority is limited to enforcement of these permitted facilities.
5	**Air Quality**	In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the U.S. Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information). The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. No violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The Arizona Department of Transportation will need to obtain dust control permits from Maricopa County Air Quality Department. These requirements are typical for this type of project.

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16	If the E1 alignment were built, there are eight O'odham TCPs that would be indirectly affected, including petroglyphs, artifact scatter, and prehistoric trails. The E1 alignment completely destroys another TCP element, as it is in the path of the proposed freeway. The City of Phoenix is currently undertaking an NRHP-eligibility determination study of the archaeological sites within SMPP. Civil rights and human rights within the UNDRIP mandate that an evaluation of the traditional cultural properties be performed with direct consultation of traditional O'odham leaders BEFORE any route of the proposed project can be selected. Article 7 of the UNDRIP states that Indigenous and tribal peoples have the right to "decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual well-being and the lands they occupy or otherwise use, and to exercise control over their economic, social and cultural development".
7	The City of Phoenix, under the provisions of the Phoenix Mountain Preserve Act, is not able to sell South Mountain Park Preserves land to ADOT. ADOT would have to condemn 31.3 acres of SMPP land before it could be used for the proposed freeway extension. Under the 1964 Civil Rights Act, Native Americans are a protected class, and intrusions on Native American religious practices are illegal. How does ADOT plan to condemn 31 acres of an O'odham cultural resource without consulting with traditional leaders of O'odham tribes, as well as Hopi and CRIT? Article 25, Section 3 of the UNDRIP says that "states shall give legal recognition and protection to these lands, territories and resources. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the Indigenous peoples concerned."
17	No action can be taken on the proposed freeway extension until the Tribal Historic Preservation Office responds to an August 17, 2011 document regarding NRHP eligibility of the South Mountains. Request that ADOT withdraw consideration of the South Mountain extension of the Loop 202 Freeway until all tribal stakeholders are directly consulted by the Tribal Historic Preservation Office about NRHP eligibility.
18	Because of the egregious lack of information in the DEIS, a revised DEIS must first be written by ADOT/HDR Engineering that adequately informs the public so that members of the public can make an informed decision about the proposed project.

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6	**Cultural Resources**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community.

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6 (cont.)		As detailed in Chapter 1, *Purpose and Need*, in the Draft and Final Environmental Impact Statements, the proposed action is needed to address local capacity deficiencies, not to address the Sun Corridor between Tucson and Phoenix, and has been developed in response to local growth in population, housing, employment, and travel levels. As further discussed, on page 1-5 of the Draft and Final Environmental Impact Statements, the proposed action is based on logical termini, sufficient length, independent utility, projected travel needs, and construction priorities. The proposed action is not needed in response to national freight movement, nor is it intended to provide service primarily for freight movement.

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7	**Cultural Resources**	The United States has confirmed that the United Nations Declaration on the Rights of Indigenous Peoples is "not legally binding or a statement of current international law" and is limited to "moral and political force." *Announcement of U.S. Support for the United Nations Declaration on the Rights of Indigenous Peoples*, U.S. State Department (Dec. 17, 2010) (available at: state.gov/documents/organization/154782.pdf). The government's Announcement further clarified that the United States "understands [that the Declaration] calls for a process of meaningful consultation with tribal leaders, but not necessarily the agreement of those leaders, before the actions addressed in those consultations are taken." In this case, as described in the Draft and Final Environmental Impact Statements, through consultation, the Tribal Historic Preservation Office of the Gila River Indian Community concurred with the mitigation measures recommended for implementation in connection with the E1 Alternative. To the extent there is disagreement by individual tribal members, their comments have been considered and taken into account. However, the Declaration does not create an enforceable legal standard amending the National Environmental Policy Act process. As described in the Draft and Final Environmental Impact Statements, the consultation process with Native American tribes, and in particular with the Gila River Indian Community, was lengthy, repeated, and extensive. Traditional cultural properties were evaluated with input from affected tribes and are described in the Draft and Final Environmental Impact Statements. Although the consent of tribal leaders is not required, as the United States made clear in its Announcement quoted above, the Tribal Historic Preservation Officer agrees with the mitigation measures to be imposed in connection with the E1 Alternative affecting a small portion of South Mountain. The quoted language in the comment attributed to Article 7 of the Declaration does not appear there. The language appears to derive from the International Labor Organization's 1989 Indigenous and Tribal Peoples Convention (Convention No. 169). Convention 169 has never been ratified by the United States, which has not agreed to align legislation, policies, and programs with the Convention as a legal requirement.
8	**Cultural Resources**	Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. In 2003, the Federal Highway Administration and Arizona Department of Transportation initiated National Historic Preservation Act Section 106 consultations with all Native American tribes that claimed cultural affiliation to the Study Area. Consultations were initiated with the Ak-Chin Indian Community, Gila River Indian Community, the Hopi Tribe, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe.

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8 (cont.)		As noted in Table 4-47 that begins on page 4-145 of the Final Environmental Impact Statement, the Gila River Indian Community was consulted in 2003 with subsequent contact in 2005, 2006, 2007, 2008, 2010, 2011, 2012, and 2013. This supports an early and continued consultation with the Gila River Indian Community related to resources of importance. In 2005, the Federal Highway Administration and Arizona Department of Transportation consulted with all Native American tribes in Arizona to ensure all interested Native American were included in the process and had the opportunity to communicate their concerns. These tribes were the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community, the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe. Most of these tribes did not express an interest in the proposed project. The Ak-Chin Indian Community, the Salt River Pima-Maricopa Indian Community, and the Tohono O'odham deferred to the Gila River Indian Community to take the lead with Section 106 consultations on this proposed action project. Consultation with Native America tribes has been extensive and demonstrates a reasonable and good faith effort to include all interested Native American tribes in the process to take their concerns seriously in the planning effort.
9	**Trucks**	Creating a truck bypass is not a goal of the proposed action. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicles using the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed freeway, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85 (see page 3-64 of the Final Environmental Impact Statement).

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9 (cont.)		Trucks crossing from Mexico to Arizona are restricted to the commercial zones within 25 miles of the border. The Federal Motor Carrier Safety Administration is administering a United States-Mexico cross-border, long-haul trucking pilot program. The program tests and demonstrates the ability of Mexico-based motor carriers to operate safely in the United States beyond the municipalities and commercial zones along the United States-Mexico border (see <fmcsa.dot.gov/intl-programs/trucking/trucking-program.aspx>). Petróleos Mexicanos (better known as Pemex), the Mexican state-owned petroleum company that serves all of Mexico, provides 15 parts per million in its sulfur diesel fuel in the border region, which is consistent with the U.S. Environmental Protection Agency requirements for American diesel fuel (see <http://transportpolicy.net/index.php?title=Mexico:_Fuels:_Diesel_and_Gasoline>). Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The South Mountain Freeway would operate under the same rules as other similar facilities in the state; truck traffic would be permissible (see text box on Final Environmental Impact Statement page 4-157). The CANAMEX and Phoenix truck bypass (Interstate 8/State Route 85) routes are not mandatory for truck traffic; they are recommended. The Arizona Department of Transportation does not enforce these routes. It is not anticipated that these routes would be enforced as mandatory in the future. The air quality analyses included projected truck traffic. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Because Mexican trucks are currently restricted to the border region, they are not operating in the project Study Area and they were not included in the air quality analyses.

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10	**Air Quality**	Under the Clean Air Act, the U.S. Environmental Protection Agency is responsible for establishing National Ambient Air Quality Standards to protect public health and the environment from adverse effects of air pollutants. Health effects from air pollutants are based on the concentration of the pollutants and the duration of exposure. Concentrations vary with distance from a roadway based on many factors, including background (or ambient) levels of pollution from all sources; the number, speed, and type of vehicles on the roadway; wind speed and direction; topography; and other factors. For the proposed freeway, the Federal Highway Administration conducted modeling for carbon monoxide and particulate matter (PM_{10}) using worst-case (most congested or highest traffic) modeling locations at discrete receptor locations around each analysis location (primarily residences near the interchanges). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe) with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations. Overall, researchers felt that there was “sufficient” evidence for causality for the exacerbation of asthma. Evidence was “suggestive but not sufficient” for health outcomes such as cardiovascular mortality and others. Study authors also noted that past epidemiological studies may not provide an appropriate assessment

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10 (cont.)		of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics "hot spots." In general, the authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified. These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work. Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment: *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.* *In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.* *The report also looks at trends in other health conditions, such as Attention-Deficit/Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.* Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues. Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring

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10 (cont.)		data are current),they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics.
11	**Right-of-way**	Maps of the W59 and E1 (Preferred) Alternatives were provided at the public hearing and community forums and are available for viewing and downloading through the project Web site (see azdot.gov/southmountainfreeway). None of the action alternatives would be located on Gila River Indian Community land so there would be 0 homes destroyed by the path of the proposed project. The impacts on traditional cultural properties are described in the *Cultural Resources* section beginning on pages 4-131 and 4-142 of the Draft and Final Environmental Impact Statements, respectively, and in Chapter 5, *Section 4(f) Evaluation*, beginning on page 5-26 of the Draft and Final Environmental Impact Statements. The locations of sites of cultural importance are not shown in public documents to protect the sites from potential pilfering.
12	**Cultural Resources**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.

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12 (cont.)		Agency scoping comments from the project initiation in 2001 are presented beginning on page 6-3 of the Draft and Final Environmental Impact Statements. The Gila River Indian Community was part of the agency scoping process. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. In addition to Chapter 2 of the Final Environmental Impact Statement which explains the Gila River Indian Community outreach undertaken for the project, Chapter 6 of the Final Environmental Impact Statement further describes Gila River Indian Community and general outreach throughout the process. The Gila River Indian Community was provided equal opportunities to participate in the project as all other populations and agencies. This outreach was undertaken, in part, to ensure all populations had equal access to the process and, in part, to ensure disparate nor disproportionately high adverse impacts would result from the construction and operation of the proposed action.
13	**Cultural Resources**	The Gila River Indian Community has been involved in many aspects of this proposed project. The Gila River Indian Community's Cultural Resource Management Program was contracted to provide cultural resources surveys, to determine the eligibility of cultural resources sites (including traditional cultural properties) for listing in the National Register of Historic Places, and to assist in the development of measures to minimize harm to traditional cultural properties. The Gila River Indian Community's Tribal Historic Preservation Office has also been involved in determining the eligibility of cultural resources sites (including traditional cultural properties) for listing in the National Register of Historic Places, and in assisting in the development of measures to minimize harm to traditional cultural properties. After determining that no prudent and feasible alternatives existed to avoid the South Mountains Traditional Cultural Property, efforts were undertaken to minimize harm. These measures are documented, beginning on page 5-27 of the Draft and Final Environmental Impact Statements. Some of these measures included avoidance of specific sites and providing multiuse crossings and fencing that would limit access by freeway users, but allow Gila River Indian Community members to continue to gain access to the site. In addition, the Federal Highway Administration and Arizona Department of Transportation committed to provide funds for the Gila River Indian Community to conduct a full evaluation of the South Mountains Traditional Cultural Property (see page 4-159 of the Final Environmental Impact Statement). Documentation of these efforts are in a letter from the Lieutenant Governor of the Gila River Indian Community to the Administrator, Arizona Division, Federal Highway Administration, dated June 23, 2010 (see page A372 of Appendix 2-1 of the Final Environmental Impact Statement). In this letter, the Gila River Indian Community submitted a proposal for the "Evaluation of Traditional Cultural Property and

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13 (cont.)		Adverse Effects of Transportation Corridor Development posed by the proposed construction of the current Pecos Alignment of the South Mountain Freeway." In committing to the evaluation of the South Mountains Traditional Cultural Property, the Federal Highway Administration and Arizona Department of Transportation also committed to the Gila River Indian Community's participation in ongoing engineering design refinements and acknowledged the significance of all plants and animals in the traditional culture of the Akimel O'odham and Pee Posh of the Gila River Indian Community. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received. While efforts to study project alternatives on Gila River Indian Community land that did not directly impact South Mountain were attempted, as noted on page 2-8 of the Draft and Final Environmental Impact Statements, a coordinated referendum occurred in February 2012, and Gila River Indian Community members voted in favor of the no-build option. Therefore, the on-Gila River Indian Community alignment was eliminated from further study. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process. However, mitigation measures developed through consultation and coordination with the Tribal Historic Preservation Office and other concerned parties would be considered for implementation in any final action.
14	**Cultural Resources**	The eligibility recommendations to the National Register of Historic Places for cultural resources within the Study Area begin on page 4-141 of the Final Environmental Impact Statement. According to page 5-26 of the Final Environmental Impact Statement, the South Mountains Traditional Cultural Property boundary is currently undefined; however, as noted on page 5-27, the Arizona Department of Transportation and Federal Highway Administration would provide funds for the Gila River Indian Community to conduct an evaluation of the South Mountains Traditional Cultural Properties to determine those boundaries as a measure to minimize harm to the South Mountains Traditional Cultural Properties. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Thus disclosure of effects and consultation are the outcomes of the Act. Protection of these resources is provided by Section 4(f) of the Department of Transportation Act of 1966 (as amended). The Final Environmental Impact Statement, beginning on page 5-1, describes the protections provided by Section 4(f). Section 4(f) states that the use of resources afforded protection under Section 4(f)

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14 (cont.)		requires a determination that there is no prudent and feasible alternative to using that land; and that the project includes all possible planning to minimize harm to the resource resulting from the use. The outcome of this process was the determination that there was no prudent and feasible alternative to the E1 Alternative. This conclusion was supported by the U.S. Department of the Interior in their comment on the Draft Environmental Impact Statement: comment: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources. " The complete letter can be found in Appendix 7, Volume III, on page B4 of the Final Environmental Impact Statement. Measures to minimize harm to the South Mountains Traditional Cultural Property (and traditional cultural properties that contribute to the South Mountains Traditional Cultural Property) were developed in consultation with the Gila River Indian Community (and other tribes with interest). During the design phase, the Arizona Department of Transportation would consult directly with the Gila River Indian Community to identify and implement other design measures, when feasible, to further reduce land requirements needed for the proposed action. (See Final Environmental Impact Statement page 5-27 for the discussion on measures to minimize harm.)
15	**Cultural Resources**	The complete statement on page 5-26 of the Draft Environmental Impact Statement, states, "A right-of-way fence would limit access to the site by freeway users, but Community members would continue to gain access to the site as they currently do." As described in the Draft and Final Environmental Impact Statements, the Tribal Historic Preservation Office of the Gila River Indian Community concurred with the mitigation measures recommended for implementation in connection with the E1 Alternative. To the extent there is disagreement by individual tribal members, their comments have been considered and taken into account. However, the United Nations Declaration on the Rights of Indigenous Peoples Declaration does not create an enforceable legal standard amending the National Environmental Policy Act process.
16	**Cultural Resources**	The comment that eight traditional cultural properties would be indirectly affected is incorrect. Adverse effects to the South Mountains Traditional Cultural Property and one site that is contributing to the South Mountains Traditional Cultural Property (AZ T:12:197) would occur with the construction of the E1 Alternative. No extant petroglyph sites would be adversely affected. The trail sites were determined eligible for listing in the National Register of Historic Places listing under Criterion D as archaeological sites; therefore, as noted on page 5-2 of the Final Environmental Impact Statement, generally, cultural resources eligible for listing in the National Register of Historic Places under Criterion D are not eligible for protection under Section 4(f). Through consultation and coordination, the Gila River Indian Community Tribal Historic Preservation Office, the Arizona State Historic Preservation Office, and many other tribal authorities concurred with these recommendations (see Table 4-47 on page 4-145 of the Final Environmental Impact Statement for more details on tribal concurrences). To the extent there is disagreement by individual tribal members, their comments have been considered and taken into account. However, the United Nations Declaration on the Rights of Indigenous Peoples Declaration does not create an enforceable legal standard amending the National Environmental Policy Act process.

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17	**Cultural Resources**	As documented in Table 4-47 on page 4-145 of the Final Environmental Impact Statement, the Gila River Indian Community concurred with the National Register of Historic Places eligibility of traditional cultural places and the adequacy of the draft traditional cultural places mitigation plans on July 3, 2012. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. As noted in Table 4-47 that begins on page 4-145 of the Final Environmental Impact Statement, the Gila River Indian Community was initially consulted in 2003 with subsequent contact in 2005, 2006, 2007, 2008, 2010, 2011, 2012, and 2013. This supports an early and continued consultation with the Gila River Indian Community related to resources of importance.
18	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration, in cooperation with the U.S. Army Corps of Engineers, the U.S. Bureau of Indian Affairs, and the Western Area Power Administration, prepared the Draft Environmental Impact Statement and Section 4(f) Evaluation in accordance with the National Environmental Policy Act of 1969 [42 United States Code § 4332(2)(c)], Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 United States Code § 303, as amended), and Section 404 of the Clean Water Act of 1977 (33 United States Code § 1251). The Draft Environmental Impact Statement and Section 4(f) Evaluation 1) satisfies Federal Highway Administration and Arizona Department of Transportation's environmental analysis requirements; 2) provides a comparison of the social, economic, and environmental impacts that may result from implementation of the proposed action—construction and operation of a major transportation facility; and 3) identifies measures to avoid, reduce, or otherwise mitigate adverse impacts.

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over, Ana Morago, if you're here we'll take you at that time.

(Recessed from 12:00 p.m. until 12:28 p.m.)

THE FACILITATOR: Thank you.

Ana Morago.

If you'd like to speak and have not yet registered, please go out to the front desk registration.

Thank you. Amy Bratt.

MS. BRATT: Good afternoon. My name is Amy Bratt, and I'm with the Greater Phoenix Chamber of Commerce. The Chamber support of this freeway goes back over 25 years to the first time the voters approved the transportation funds to build it. For us, this is a no-brainer. The project is an opportunity to bolster this low economic recovery efforts that have occurred to date in our region. The 30,000 jobs created during the five- to six-year construction period, and the $2 billion investment in land, professional services, materials, and equipment will be a significant boost to our economy. Putting people to work and moving goods and services are the key elements of commerce.

To the end -- or to that end, on behalf

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of our 2,600 members, the greater Phoenix Chamber of Commerce agrees it is time to build the South Mountain Freeway. We support investments in transportation projects that will improve mobility and contribute to economic development, environmental quality and jobs. We need the jobs, and we want the investment.

It's time to relieve the congestion in the southern portion of our metropolitan region, and allow for free movement of people and commerce. As we supported it 25 years ago, we support it again today. Thank you so much for the opportunity to provide comment.

THE FACILITATOR: Thank you. Kate Gallego.

MS. GALLEGO: Hello, I'm Kate Gallego, South Mountain resident. Former chair of the Environmental Quality Commission in Phoenix, and I'm here in support of the freeway. I think it will relieve congestion and stop some of the cut-through traffic. It will bring important economic development to Laveen and job creation, creating over 30,000 jobs.

It's an important part of our transportation network. It needs to be part of a

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respectfully to each other.

THE FACILITATOR: Thank you.

Joseph Perez. Joseph Perez.

MR. PEREZ: I'm Joseph Perez. Thank you for allowing me the opportunity to make a comment to you about your Draft Environmental Impact Statement. I am a Gila River Indian Community member. I'm also a partner with Pangia [phonetic] and I lead a little bit over 1,200 landowners who exist in the Pecos Road Land Area that have put forward the initiative with the Gila River Indian Community for a revote to try to bring the alignment down on the reservation, which hopefully will be resolved tomorrow in a special council meeting.

I'm here today to comment on the draft EIS in the sense that the work that has been done pertaining to the Gila River Indian Community, and the cultural aspects was done through the community's cultural department. And they've worked closely and for a long time, I believe over 12 years, doing that aspect of the EIS. Unfortunately, where it stands right now, there is no other alternative for the freeway, because the only other alternative would be on the Gila River Indian Community. I believe that will have to be resolved with the people of the

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1	**Alternatives**	In accordance with 40 Code of Federal Regulations § 1502.14, the Arizona Department of Transportation and Federal Highway Administration explored and evaluated all reasonable alternatives. Page 2-10 of the Final Environmental Impact Statement discusses the path forward should alternatives on Gila River Indian Community land become available for study. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

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community or in tribal council.

My main focus today is that the impact that the freeway would have is across the board. I believe your statement covers that. I believe your study covers that. What I would like to comment about is that we believe there will be other opportunities -- another opportunity for another alignment. We hope that that is taken into consideration when that opportunity comes.

In terms of my culture, that is across the board. You're talking about Native Americans, Pimas, O'odhams, Pee Posh, Maricopas that live within the community. They all call themselves community members. We've all been raised differently. We all see the world through the way that our grandparents should have raised us. I'm considered an O'odham. I consider what we have doesn't end at our border. The no-build that many people will talk about, hemda [phonetic], and say that that is what they're trying to protect. What I want you to understand in terms of the cultural aspects of your Draft Environmental Impact Statement is that hemda [phonetic] doesn't stop at the border; it doesn't stop at the border of the Gila River Indian Community; it doesn't stop with us community members, it transcends everything that

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our world encompasses; it transcends everything that we do.

And so with that in mind, I, as a community member, apologize for the disrespect that you get, for the disrespect that ADOT gets in everything. We should not be that way. We should practice a better way to be with you.

And that's what I want to thank you about for today. Thank you.

THE FACILITATOR: Thank you. Terry Morris.

MR. MORRIS: Hello, I'm Terry Morris. I'm a fourth-generation Arizonan, and listening to Mr. Perez just now changed my train of thought a little bit. I had -- my main concern about this project is the -- I believe the lack of attention to the Indian communities in the Maricopa County, as evidenced by the lack of posters in the other room. There's a lot of information over there in the other room, but not very much that I can see that pertain to the impact on the Native American communities.

I'm also very concerned about the threatened and endangered wildlife that can be affected. I am an avid hiker, and there are not very many preserve hikes left, where you're not in the

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Since 2004 Pangea a development company has been 2004 organizing over 1,200 individual land owners on the Gila River Indian Community (GRIC), this land is owned by these individual Native Americans and not under the regulatory control of the GRIC government.

Pangea is in the final stages of leasing approximately 5,500 acres of this land just south of Pecos road. This land is scheduled to be developed as a fully master planned community, which will include residential, commercial, retail, manufacturing, sports facilities, amusement park and entertainment venues.

The Loop 202 is a catalyst for this development and the current alignment on Pecos road is acceptable for Pangea and the over 1,200 individual land owners but an alignment that is on the GRIC and on the allotted land would benefit all parties and would save South Mountain from any destruction as well as substantially reduce the overall cost of building the Loop 202 (not have to cut through South Mountan).

Our review of the Draft Environmental Impact Statement (DEIS) has determined that the research conducted and current recommendation is satisfactory from a development perspective for Pangea and the landowners. Pangea and the landowners encourage and support ADOT and the Maricopa Association of Governments (MAG) to build the South Mountain Loop 202 freeway as quickly as possible for the many reasons identified with the DEIS.

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In addition to supporting the building of the South Mountain Loop 202, the landowners and Pangea request that ADOT and MAG investigate and further study a schedule for construction which would start at the junction of the San Tan Freeway and Interstate-10 or the east end of the E-1 Alternative alignment as opposed to the W59 Alternative or west side of Phoenix at Interstate-10.

This schedule of construction would directly benefit the landowners, Pangea, the citizens of Ahwatukee, Maricopa County and the State of Arizona in the following ways:

1. Immediate and much needed economic development to the GRIC and directly to the landowners.
2. Directly reduce the over 60% unemployment rate of GRIC members.
3 Directly reduce the over 65% of GRIC members that live under the poverty level of the State of Arizona by providing jobs and revenue from their land leases with Pangea.
4. Provide residential opportunity for over 8,000 GRIC members that currently live within the greater Phoenix Metro area and can not obtain housing on the GRIC.
5. Provide direct business development opportunity for GRIC members within the Pangea development.
6. Provide immediate short-term (6 months) and long-term (20 years) construction business

Code	Issue	Response
1	**Construction**	As noted in the Draft and Final Environmental Impact Statements, construction sequencing and duration could change based on several factors, including funding availability, traffic volumes, coordination with other major freeway projects, earthwork balancing, utility relocation schedules, and regional priorities. The project team will take the request under advisement.

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and job opportunity for non-Native companies within the greater Phoenix Metro area.
7. Provide a new business and job opportunity base that would directly support the Ahwatukee area and provide much needed positive benefits of the Loop 202 directly to Ahwatukee.
8. Provide an new, immediate and long term tax based for the State of Arizona and Maricopa County that is estimated to provide $21,000,000 of retail transaction and privilege tax over the next 10 years due to the Pangea development.
9. As there are no master planned communities greater than 500 acres scheduled for the Laveen area or along W59 Alternative alignment, the Pangea development has already started and construction of the Loop 202 on the east side would immediately and directly benefit the GRIC, Maricopa County and the State.
10. The positive public relations benefits of starting construction on the east end far outweigh any positive benefits of starting on the west end.

Pangea and the landowners once again ask that a revision of the DEIS be conducted to study the direct impacts of construction starting on the east of the E-1 Alternative and the benefits for all parties involved.

Pangea will continue to support the landowners in their on-going public voter Initiative on the GRIC, as the current status of the Initiative is not ended. The current actions of the GRIC Tribal Elections Office is not supported by evidence gathered by the police department, as the investigation provided evidence of only 21 signatures that could be invalidated, not the 174 the Tribal Elections Office removed from the Initiative.

2

Pangea and the landowners also request that the DEIS be revised to include the study data for an alignment on the GRIC for the following reasons:

1. GRIC Resolution GR-80-98, adopted on June 17, 1998 by Tribal Council resolved that the Gila River Borderlands area (Regional Planning Study for the Gila River Borderlands Planning area/ Gila River Borderlands Study) be considered the land use plan for the Gila Borderlands area.
2. This Resolution stands to this day and has never been rescinded by any action from the GRIC Tribal Council and is not rescinded or affected by the referendum vote of February 2012 for "No Build".
3. The Resolution approved the GRIC Loop 202 alignment identified within the study document as the land use plan for transportation for the freeway system on the GRIC.
4. The Resolution identifies over 60 meetings were held within the seven Districts, with Elderly, Community Council Standing Committees, Corporations, Departments and other Community Entities and the Community's Planning and Zoning Commission publicized and conducted public hearings on the Gila Borderlands Study.
5. The Resolution identifies that the Economic Development and Natural Resources Standing Committees reviewed the Gila Borderland Study and approved if for action by Tribal Council.
6. The Resolution identifies that the Community Council also reviewed the Gila Borderlands

Code	Issue	Response
2	**Alternatives**	In accordance with 40 Code of Federal Regulations § 1502.14, the Arizona Department of Transportation and Federal Highway Administration explored and evaluated all reasonable alternatives. Page 2-10 of the Final Environmental Impact Statement discusses the path forward should alternatives on Gila River Indian Community land become available for study. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

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Study and approved it as the land use plan for the Community.
7. The referendum conducted in February 2012 and approved by voters did not eliminate the the land use plan and Loop 202 on Reservation alignment.

It is only prudent and within the best interest of the GRIC, Community members, Pecos road landowners, the residences of Ahwatukee, Maricopa County and the State of Arizona to include this data as the information should be available for the public to view and tax dollars of the public was used to gather this data. More importantly, this data would greatly assist members of the GRIC in understanding more about the freeway and the impact it would have on the Community.

Pangea hopes that the above request be implemented in the final draft of the EIS as this project is vital for all parties involved.

Thank you.

Joseph M. Perez, Partner
Pagnea

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want to go hike in a park where there's a huge eight-lane freeway cut through the southwest region.

So Save Our Mountains Foundation would like to encourage you, and whoever in the state needs to make this happen, to negotiate better with the Gila River Indian community and the Indian community at large, and we hope that they will also come to the table to talk, and that we can make a freeway happen where it doesn't chop into the preserve and part of what forms a crown and glory for the City of Phoenix. We don't have oceans, we don't have beaches, but we do have a beautiful preserve system.

Thank you very, very much.

THE FACILITATOR: Thank you, Ms. Rothwell.

Michael Goodman.

MR. GOODMAN: Thank you. I'm Michael Goodman. I'm also with the Phoenix Mountains Preservation Council, and I am a member of the ADOT Citizens Advisory Team. Pretty much I agree with what has already been said, so I'll be pretty brief. I did finish reading the EIS, and with regards to the E-1 section, I was highly disappointed. I know during the so-called 12 years we've been studying this, we had a number of reports, I guess the E-1 was

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probably about, what, four or five years of that time period. And I found that with almost every report, somebody who understood what was going on had a question for the consultants to explain something or other that they seemed to have left out or just didn't want to talk about.

And it was -- it got to be very frustrating, we never were quite able to get all the answers we wanted. And the saying from the consultants kept being, well, wait until the draft. Well, the draft's out and I've read it and still many of the questions that people ask simply weren't answered or we were -- or I notice that there's things that had been mentioned that there's outdated information. There was just a lack of information or it just seemed that anything that didn't support what ADOT and MAG wanted, which is to blow up South Mountain, somehow got left out of the draft.

1

And for that reason, I am opposed to the freeway if it has to go through South Mountain Preserve.

2

Thank you.

THE FACILITATOR: Thank you, Mr. Goodman. John Mockus. Did I pronounce that right, sir?

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Code	Issue	Response
1	**Environmental Impact Statement Process**	The Arizona Department of Transportation and Federal Highway Administration, in cooperation with the U.S. Army Corps of Engineers, the U.S. Bureau of Indian Affairs, and the Western Area Power Administration, prepared the Draft Environmental Impact Statement and Section 4(f) Evaluation in accordance with the National Environmental Policy Act of 1969 [42 United States Code § 4332(2)(c)], Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 United States Code § 303, as amended), and Section 404 of the Clean Water Act of 1977 (33 United States Code § 1251). The Draft Environmental Impact Statement and Section 4(f) Evaluation 1) satisfies Federal Highway Administration and Arizona Department of Transportation's environmental analysis requirements; 2) provides a comparison of the social, economic, and environmental impacts that may result from implementation of the proposed action—construction and operation of a major transportation facility; and 3) identifies measures to avoid, reduce, or otherwise mitigate adverse impacts. The comment references regular inquiry pertinent to information to be disclosed in the Draft Environmental Impact Statement and directly tied to the alternatives development and screening process of the Draft Environmental Impact Statement. In those instances, information from analyses either had yet to be fully formed and/or disclosure prior to the issuance of the Draft Environmental Impact Statement would have been pre-decisional.
2	**Section 4(f) and Section 6(f)**	The proposed freeway would pass through the park's southwestern edge. Section 4(f) of the Department of Transportation Act extends protection to significant publicly owned public parks, recreation areas, and wildlife and waterfowl refuges, as well as significant historic sites, whether they are publicly or privately owned. This protection stipulates that those facilities can be used for transportation projects only if there is no prudent and feasible alternative to using the land and the project includes all possible planning to minimize harm to the land [see Final Environmental Impact Statement, Chapter 5, *Section 4(f) Evaluation*].The project team examined alternatives to avoid the Phoenix South Mountain Park/Preserve, but did not identify any feasible and prudent alternatives to avoid the use of the park. Use of a portion of the mountains for the purposes of the proposed freeway represents two-tenths of one percent of the total mountain range (31.3 acres of the park's approximately 16,600 acres; see Final Environmental Impact Statement pages S-39 and 5-31). Since 1988, and as part of this environmental impact statement process, several measures have been undertaken and will be undertaken to further reduce effects on the mountains. These measures, including narrowing the design footprint, acquiring replacement land immediately adjacent to the mountains, and the provision of highway crossings, are outlined in text beginning on page 5-23 of the Final Environmental Impact Statement. Phoenix South Mountain Park/Preserve would remain the largest municipally owned park in the United States. The activities that make the park a highly valued resource (recreational activities, interaction with the Sonoran Desert) would remain. Nine-tenths of a mile of the proposed freeway would pass through the park's southwestern edge (see Final Environmental Impact Statement page 5-13).

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My name is Maxine Lakin, past Parks and Recreation Chairman as well as past Chairman of the Phoenix Mountains Preservation Council.

The Phoenix Mountains Preservation Council is an organization put into place by Arizona visionaries, and for the last 40 years has continued to monitor and anticipate the impact that rapid population growth would have on our precious Mountain Preserve system.

PMPC is steadfastly opposed to any alignment of the Loop 202 South Mountain Freeway that allows for trespass onto the Mountain Preserve or for any excavation into the South Mountain what so ever. The Mountain preserves are unique and are for **people and wildlife**, not for vehicle trespass. PMPC does not agree with many of the DEIS assumptions, finding them objectionable and deficient in the following areas.

(1) Unacceptable Pre-Decisional Actions: ADOT has made some pre-decisional actions with the purchase of property before the Draft Environmental Impact Statement (DEIS) was released. PMPC questions the legality of this action and the entire DEIS when it appears ADOT has already made considerable financial investment to establish the alignment for the South Mountain Freeway rather than follow the prescribed process.

(2) Dismal Wildlife Connectivity: The DEIS does not meet the minimal requirements for coordination and analysis of wildlife resources. The consultation with the Arizona Game and Fish Department confirmed in 2009 that the current connection to the Estrella mountains allows for passage of mule deer, javelina, bobcat and mountain lion. The mountain ridge area slated for demolition meets the definition of the

Code	Issue	Response
1	**Alternatives**	The comment suggests the environmental impact statement process was biased by a history of property acquisitions within the Study Area. More specifically, properties falling within the limits of the Preferred Alternative, as identified in the Final Environmental Impact Statement, were targeted for acquisition. As noted in text on page 3-54 of the Final Environmental Impact Statement, the Arizona Department of Transportation began acquiring land for the original alignment in 1988. Between 1988 and 2001, the Arizona Department of Transportation acquired approximately 293 acres. Most of this land (258 acres) is located in the Eastern Section along Pecos Road. In 2006, the Arizona Department of Transportation began protective and hardship land acquisition in the alignment right-of-way footprint for the W59 and E1 Alternatives. Between 2006 and October 2013, the Arizona Department of Transportation purchased 326 acres (303 in the Western Section and 23 in the Eastern Section). The process for hardship and advanced acquisitions is explained in text on page 4-50 of the Final Environmental Impact Statement. The comment infers that by taking such action, the objective equal consideration of the alternatives studied in detail in the Draft and Final Environmental Impact Statements is tainted. Advanced acquisitions in parallel to a National Environmental Policy Act environmental determination process is not unprecedented and is common practice. In this case, property acquisitions by the Arizona Department of Transportation for purposes of implementing the proposed action are done at risk as communicated to the agency by the Federal Highway Administration. If another action alternative were to be ultimately selected, the agency would likely have to place the acquired properties on the market for sale and purchase. The Arizona Department of Transportation attempts to balance the risk against its mission of timely delivery of transportation infrastructure to the driving public. Further, Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
2	**Biology, Plants, and Wildlife**	The section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-136 of the Final Environmental Impact Statement, discloses by what means the proposed action and its alternatives would affect vegetation, wildlife, and wildlife habitat. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the Sonoran desert tortoise. The information used to prepare the analysis in the Draft Environmental Impact Statement (page 4-122) was based on 2011 information retrieved from the Arizona Game and Fish Department (Gopherus agassizii, draft unpublished abstract compiled and edited by the Heritage Data Management System, Phoenix). Current information on threats and connectivity strategies was included in the Biological Evaluation. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). Connectivity is planned to allow wildlife movement beneath the freeway in multiuse crossings (see page 4-137 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use as well as culverts designed for

(Response 2 continues on next page)

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	Sonoran desert tortoise habitat. There is no evidence of further efforts to ascertain wildlife connectivity or habitat needs.
3	Unreasonable Taking of Mountain Preservation Lands: The DEIS states in Figure 5-7 of Public Parkland that the avoidance of taking over 30 acres of the Preserve is not "prudent and feasible". The taking of this mountainside will destroy important archeological, spiritual, cultural and recreational sites with no realistic or reasonable mitigation possible in the study. The study also failed to recognize and address new two trails on the southwest end of the Preserve.
4	
5	Outdated Data Projections Used: The DEIS is based on outdated data projections that are now six to eight years old. **IN ALL** their studies, the DEIS provides NO alternative analysis to the demolition of the southwest ridges of South Mountain.
6	
7	Over 3 million visitors come to South Mountain Park/Preserve annually, according to the City of Phoenix statistics. Destroying any part of the mountain to align a high-capacity freeway will only have a negative impact on tourism and the many unique resources the park offers.
	We urge ADOT to stop providing studies that do not accurately or thoroughly address the impact this freeway has on South Mountain. It's time to stop the 20 million dollar and more in wasted taxpayer's money to study the environmental impact and design for an alignment that no longer makes sense.

Code	Issue	Response
2 (cont.)		connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
3	**Section 4(f) and Section 6(f)**	Chapter 5 of the Draft and Final Environmental Impact Statements presents the Section 4(f) Evaluation for the South Mountains in terms of the resource's protection as a Section 4(f) resource in terms of a regional park, historic property and traditional cultural property. The evaluation included examination of feasible and prudent avoidance alternatives which concluded no such alternatives were available to the direct use of the resource. A review from the U.S. Department of the Interior on the Draft Environmental Impact Statement concluded "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources." The complete letter can be found in Appendix 7, Volume III, on page B4 of the Final Environmental Impact Statement.
4	**Section 4(f) and Section 6(f)**	South Mountain's newest trails are the Bursera and Pyramid Trails (see Final Environmental Impact Statement page 5-8). The E1 Alternative is approximately 1 mile south of the Pyramid Trail and even farther from the Bursera Trail; thus, it would not affect either trail. The trails have walk-in access from Chandler Boulevard and 19th Avenue, with on-street parking. This walk-in access would be north of and adjacent to the planned extension of Chandler Boulevard and, thus, would not be directly affected. The walk-in access point and the part of the Pyramid Trial at the access point are located adjacent to a residential neighborhood and the City of Phoenix's planned Chandler Boulevard Extension. These trails are typically used for high-intensity recreational activities such as running, hiking, and biking, not noise- or viewshed-sensitive activities. All proposed action alternatives would span existing and proposed trails to avoid impacts. However, during construction (if an action alternative were selected), trails that would be spanned or would be near potential freeway construction would be closed for limited times for safety reasons. Closures would necessitate that trail users detour around construction sites to rejoin the trails farther along their length. According to Phoenix South Mountain Park/Preserve rangers, the Gila Trail—although well-defined—is not a designated trail within the park. That said, the Gila Trail would not be affected by the proposed freeway or by the Chandler Boulevard Extension. The Final Environmental Impact Statement Appendix page A665 contains information directly from the Phoenix General Plan and early coordination with the City of Phoenix Parks Department. The trails in the preserve are exceptions to this statement and were always meant as such. The trails within 1/4 mile of the proposed alternatives were treated separately, as in the case of the Maricopa County Regional Trails System. Should an alternative be selected, the Arizona Department of Transportation and Federal Highway Administration would work closely with the City of Phoenix during final design to ensure the connectivity of trails is maintained, whether they are eligible as Section 4(f) resources or not.

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5	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
6	**Alternatives**	Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Gila River Indian Community (Figure 3-6 on page 3-10 of the Draft Environmental Impact Statement illustrates a representation of such alternatives). Ultimately the other alternatives were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to study alternatives on their land (see Final Environmental Impact Statement page 3-25). Therefore, the Arizona Department of Transportation, with concurrence from Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.
7	**Section 4(f) and Section 6(f)**	City of Phoenix planning efforts since the mid-1980s illustrate an awareness of the potential for the proposed freeway to affect Phoenix South Mountain Park/Preserve. In 1989, the South Mountain Park Master Plan was adopted by the Phoenix City Council. The master plan shows the freeway alignment as adopted by the State Transportation Board in 1988. In 1990, the South Mountain Preserve Act was ratified by the Arizona Legislature. The Act did not apply to roadways through a designated mountain preserve if the roadway was in the State Highway System prior to August 15, 1990. The proposed freeway was in the State Highway System prior to 1990. Records prior to the Act suggest a primary reason for the exception was to allow the proposed freeway to go through Phoenix South Mountain Park/Preserve (see Final Environmental Impact Statement page 5-14). The project team examined alternatives to avoid the park, but did not identify any feasible and prudent alternatives to avoid impacts. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). The Arizona Department of Transportation continues to work with park stakeholders to minimize impacts and address concerns. Measures to minimize harm to the park were developed (see Final Environmental Impact Statement, starting on page 5-23).

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MS. LAKIN: Thank you.
THE FACILITATOR: Begin, please.
MS. LAKIN: Wait until I -- I'm not used to these, you know.
My name is Maxine Lakin; I'm past president of the Parks and Recreation, also of the Phoenix Mountain Preservation Council. The Phoenix Mountain Preservation Council is an organization put into place by Arizona visionaries and for the last 40 years has continued to monitor and anticipate the impact that the rapid population growth would have on our precious mountain preserve system.
PMPC is steadfastly opposed to any alignment of the Loop 202 South Mountain Freeway that allows for trespassing onto the mountain preserve or for any excavation into the South Mountain whatsoever. The mountain preserves are unique, and are for people in wildlife, not for vehicle trespass. PMPC does not agree with many of the DEIS assumptions, finding them objectionable and deficient in the following areas: unacceptable, pre-decision action. ADOT has made some pre-decisional actions with the purchase of property before the Draft Environmental Impact Statement was released. PMPC questions the legality of this action

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Code	Issue	Response
1	**Alternatives**	The comment suggests the environmental impact statement process was biased by a history of property acquisitions within the Study Area. More specifically, properties falling within the limits of the Preferred Alternative, as identified in the Final Environmental Impact Statement, were targeted for acquisition. As noted in text on page 3-54 of the Final Environmental Impact Statement, the Arizona Department of Transportation began acquiring land for the original alignment in 1988. Between 1988 and 2001, the Arizona Department of Transportation acquired approximately 293 acres. Most of this land (258 acres) is located in the Eastern Section along Pecos Road. In 2006, the Arizona Department of Transportation began protective and hardship land acquisition in the alignment right-of-way footprint for the W59 and E1 Alternatives. Between 2006 and October 2013, the Arizona Department of Transportation purchased 326 acres (303 in the Western Section and 23 in the Eastern Section). The process for hardship and advanced acquisitions is explained in text on page 4-50 of the Final Environmental Impact Statement. The comment infers that by taking such action, the objective equal consideration of the alternatives studied in detail in the Draft and Final Environmental Impact Statements is tainted. Advanced acquisitions in parallel to a National Environmental Policy Act environmental determination process is not unprecedented and is common practice. In this case, property acquisitions by the Arizona Department of Transportation for purposes of implementing the proposed action are done at risk as communicated to the agency by the Federal Highway Administration. If another action alternative were to be ultimately selected, the agency would likely have to place the acquired properties on the market for sale and purchase. The Arizona Department of Transportation attempts to balance the risk against its mission of timely delivery of transportation infrastructure to the driving public. Further, Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.

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and the entire DEIS, when it appears ADOT has already made considerable financial investment to establish the alignment for the South Mountain Freeway, rather than follow prescribed process.

(2) The DEIS does not meet the animal requirements for coordination and analysis of wildlife resources. The consultation with the Arizona Game & Fish Department confirmed in 2009 that the current connection to the Estrella Mountains allows for passage of the mule deer, javelina, bobcat, and mountain lion. The mountain ridge area slated for demolition meets the definition -- sorry, Sonoran Desert Tortoise habitat. There is no evidence of further effort to determine wildlife connectivity on habitat needs.

(3) Unreasonable taking of mountain preservation lands. The DEIS states in Figures 5 and 7 of public park land that the avoidance of taking over 30 acres of the preserve is not prudent and feasible. The taking of this mountainside will destroy important archaeology, spiritual, cultural, and recreational sites, with no realistic or reasonable mitigation possible in the study. The study also fails to recognize and address two trails on the southwest end of the preserve. (4)

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Code	Issue	Response
2	**Biology, Plants, and Wildlife**	The section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-136 of the Final Environmental Impact Statement, discloses by what means the proposed action and its alternatives would affect vegetation, wildlife, and wildlife habitat. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the Sonoran desert tortoise. The information used to prepare the analysis in the Draft Environmental Impact Statement (page 4-122) was based on 2011 information retrieved from the Arizona Game and Fish Department (Gopherus agassizii, draft unpublished abstract compiled and edited by the Heritage Data Management System, Phoenix). Current information on threats and connectivity strategies was included in the Biological Evaluation. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). Connectivity is planned to allow wildlife movement beneath the freeway in multiuse crossings (see page 4-137 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use as well as culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
3	**Section 4(f) and Section 6(f)**	The religious and cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26 as well as in the Summary of the Draft Environmental Impact Statement. The description in the Draft and Final Environmental Impact Statements is based on input received from the Gila River Indian Community and its members and other Indian Nations and their members. The Final Environmental Impact Statement includes discussion on efforts to avoid use of Phoenix South Mountain Park/Preserve, starting on page 5-16. Measures to minimize harm to the park as a result of the proposed freeway start on page 5-23. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). The activities that make the park such a highly valued resource (recreational activities, interaction with the Sonoran Desert) would remain.
4	**Section 4(f) and Section 6(f)**	South Mountain's newest trails are the Bursera and Pyramid Trails (see Final Environmental Impact Statement page 5-8). The E1 Alternative is approximately 1 mile south of the Pyramid Trail and even farther from the Bursera Trail; thus, it would not affect either trail. The trails have walk-in access from Chandler Boulevard and 19th Avenue, with on-street parking. This walk-in access would be north of and adjacent to the planned extension of Chandler Boulevard and, thus, would not be directly affected. The walk-in access point and the part of the Pyramid Trial at the access point are located adjacent to a residential neighborhood and the City of Phoenix's planned Chandler Boulevard Extension. These trails are typically used for high-intensity recreational activities such as running, hiking, and biking, not noise- or viewshed-sensitive activities. All proposed action alternatives would span

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Outdated data projections used, based on outdated date projections that are now six to eight years old. In all the studies, the DEIS provides no alternative analysis to the demolition of the southwest ridge. Over 3 million visitors come to South Mountain Park Preserve annually.

THE FACILITATOR: Excuse me, Ms. Lakin.

MS. LAKIN: Destroying any part of the mountain to allaying a high-capacity freeway will only have a negative impact on tourism, and the many unique resources. We are not against this freeway, we are against going through South Mountain Preserve. Thank you.

THE FACILITATOR: Thank you, Ms. Lakin.

We'll now proceed with the non-pre-registered folks.

One more comment before we continue. For those of you who see your name on the screen, if you're in the back parts of the room, if you want to make your way up to get people to either microphone, that will help us through the day. Feel free to move up. At this point Suzanne Rothwell.

Thank you.

MS. ROTHWELL: Good morning. Thank you for the opportunity to speak. Is this working? No.

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4 (cont.)		existing and proposed trails to avoid impacts. However, during construction (if an action alternative were selected), trails that would be spanned or would be near potential freeway construction would be closed for limited times for safety reasons. Closures would necessitate that trail users detour around construction sites to rejoin the trails farther along their length. According to Phoenix South Mountain Park/ Preserve rangers, the Gila Trail—although well-defined—is not a designated trail within the park. That said, the Gila Trail would not be affected by the proposed freeway or by the Chandler Boulevard Extension. The Final Environmental Impact Statement Appendix page A665 contains information directly from the Phoenix General Plan and early coordination with the City of Phoenix Parks Department. The trails in the preserve are exceptions to this statement and were always meant as such. The trails within 1/4 mile of the proposed alternatives were treated separately, as in the case of the Maricopa County Regional Trails System. Should an alternative be selected, the Arizona Department of Transportation and Federal Highway Administration would work closely with the City of Phoenix during final design to ensure the connectivity of trails is maintained, whether they are eligible as Section 4(f) resources or not.
5	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
6	**Alternatives**	Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Gila River Indian Community (Figure 3-6 on page 3-10 of the Final Environmental Impact Statement illustrates a representation of such alternatives). Ultimately the other alternatives were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to study alternatives on its land (see Final Environmental Impact Statement page 3-25). Therefore, the Arizona Department of Transportation, with concurrence from Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.

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PMPC is steadfastly opposed to any alignment of the Loop 202 South Mountain Freeway that allows for trespass onto the Mountain Preserve or for any excavation into the South Mountain what so ever. These mountain preserves ensures a lifestyle that 80% of Arizona voters consistently support. The mountain preserves are unique and are for people and wildlife, not for vehicle trespass. PMPC does not agree with many of the DEIS assumptions finding them objectionable and deficient in the following analysis areas.

(1) Unexceptable Pre-Decisional Actions: ADOT has made some pre-decisional actions with the purchase of property before the Draft Environmental Impact Statement (DEIS) was released. Phoenix Mountains Preservation Council (PMPC) questions the legality of this action and the entire DEIS when it appears ADOT has already made considerable financial investment to establish the alignment for the South Mountain Freeway rather than follow the prescribed process.

(2) Dismal Wildlife Connectivity: The DEIS does not meet the minimal requirements for coordination and analysis of wildlife resources. The Arizona Game and Fish Department was consulted in 2009 during scoping. The current connection to the Estrella Mountains allows for passage of mule deer, javelina, bobcat, and mountain lion. There is no evidence of further efforts to ascertain wildlife connectivity needs or possible mitigation. The Sonoran desert tortoise provides additional evidence of inadequate cumulative analysis given its status as a U.S. Fish & Wildlife Service's candidate species. The mountain ridge area slated for demolition meets the definition for the tortoise's habitat.

(3) Unreasonable Taking of Mountain Preservation Lands: The DEIS states in Figure 5-7 Public Parkland the avoidance of taking over 30 acres of the Preserve is "not prudent and feasible". The taking of this mountainside will destroy important archeological, spiritual, cultural and recreational sites with no realistic or reasonable mitigation possible in the study. The study

(4) failed to recognize and address new two trails, Gila and Bursera Trails, created in the southwest end of the Preserve in 2010.

(5) Outdated Data Projections Used: The DEIS is based on outdated data projections that are now six to eight years old. The analysis does not acknowledge the impact the major economic downturn had and it brings into question the validity of projected growth levels put forth in the DEIS. In all the alternative studies, the DEIS does not provide one alternative

(6) analysis to the demolition of the southwest ridges of South Mountain. Furthermore, nowhere in this study is there an assessment of hazardous material truck traffic nor any mention of

(7) managing this truck traffic and the consequences of a serious hazard waste incident.

Over 3 million visitors come to South Mountain Park/Preserve annually, according to City of Phoenix statistics. Destroying any part of the mountain to align a high-capacity freeway will only have a negative impact on tourism and the many unique resources the park offers.

We urge ADOT to stop providing studies that do not accurately or thoroughly address the impact this freeway has on South Mountain. It's time to stop the $20 million and more in wasted tax payer's money to study the environmental impact and design for an alignment that no longer makes sense.

Code	Issue	Response
1	**Alternatives**	The comment suggests the environmental impact statement process was biased by a history of property acquisitions within the Study Area. More specifically, properties falling within the limits of the Preferred Alternative, as identified in the Final Environmental Impact Statement, were targeted for acquisition. As noted in text on page 3-54 of the Final Environmental Impact Statement, the Arizona Department of Transportation began acquiring land for the original alignment in 1988. Between 1988 and 2001, the Arizona Department of Transportation acquired approximately 293 acres. Most of this land (258 acres) is located in the Eastern Section along Pecos Road. In 2006, the Arizona Department of Transportation began protective and hardship land acquisition in the alignment right-of-way footprint for the W59 and E1 Alternatives. Between 2006 and October 2013, the Arizona Department of Transportation purchased 326 acres (303 in the Western Section and 23 in the Eastern Section). The process for hardship and advanced acquisitions is explained in text on page 4-50 of the Final Environmental Impact Statement. The comment infers that by taking such action, the objective equal consideration of the alternatives studied in detail in the Draft and Final Environmental Impact Statements is tainted. Advanced acquisitions in parallel to a National Environmental Policy Act environmental determination process is not unprecedented and is common practice. In this case, property acquisitions by the Arizona Department of Transportation for purposes of implementing the proposed action are done at risk as communicated to the agency by the Federal Highway Administration. If another action alternative were to be ultimately selected, the agency would likely have to place the acquired properties on the market for sale and purchase. The Arizona Department of Transportation attempts to balance the risk against its mission of timely delivery of transportation infrastructure to the driving public. Further, Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
2	**Biology, Plants, and Wildlife**	The section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-136 of the Final Environmental Impact Statement, discloses by what means the proposed action and its alternatives would affect vegetation, wildlife, and wildlife habitat. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the Sonoran desert tortoise. The information used to prepare the analysis in the Draft Environmental Impact Statement (page 4-122) was based on 2011 information retrieved from the Arizona Game and Fish Department (Gopherus agassizii, draft unpublished abstract compiled and edited by the Heritage Data Management System, Phoenix). Current information on threats and connectivity strategies was included in the Biological Evaluation. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). Connectivity is planned to allow wildlife movement beneath the freeway in multiuse crossings (see page 4-137 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use as well as culverts

(Response 2 continues on next page)

Code	Comment Document

Code	Issue	Response
2 (cont.)		designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
3	**Section 4(f) and Section 6(f)**	The religious and cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26 as well as in the Summary of the Draft Environmental Impact Statement. The description in the Draft and Final Environmental Impact Statements is based on input received from the Gila River Indian Community and its members and other Indian Nations and their members. The Final Environmental Impact Statement includes discussion on efforts to avoid use of Phoenix South Mountain Park/Preserve, starting on page 5-16. Measures to minimize harm to the park as a result of the proposed freeway start on page 5-23. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). The activities that make the park such a highly valued resource (recreational activities, interaction with the Sonoran Desert) would remain.
4	**Section 4(f) and Section 6(f)**	South Mountain's newest trails are the Bursera and Pyramid Trails (see Final Environmental Impact Statement page 5-8). The E1 Alternative is approximately 1 mile south of the Pyramid Trail and even farther from the Bursera Trail; thus, it would not affect either trail. The trails have walk-in access from Chandler Boulevard and 19th Avenue, with on-street parking. This walk-in access would be north of and adjacent to the planned extension of Chandler Boulevard and, thus, would not be directly affected. The walk-in access point and the part of the Pyramid Trial at the access point are located adjacent to a residential neighborhood and the City of Phoenix's planned Chandler Boulevard Extension. These trails are typically used for high-intensity recreational activities such as running, hiking, and biking, not noise- or viewshed-sensitive activities. All proposed action alternatives would span existing and proposed trails to avoid impacts. However, during construction (if an action alternative were selected), trails that would be spanned or would be near potential freeway construction would be closed for limited times for safety reasons. Closures would necessitate that trail users detour around construction sites to rejoin the trails farther along their length. According to Phoenix South Mountain Park/Preserve rangers, the Gila Trail—although well-defined—is not a designated trail within the park. That said, the Gila Trail would not be affected by the proposed freeway or by the Chandler Boulevard Extension. The Final Environmental Impact Statement Appendix page A665 contains information directly from the Phoenix General Plan and early coordination with the City of Phoenix Parks Department. The trails in the preserve are exceptions to this statement and were always meant as such. The trails within 1/4 mile of the proposed alternatives were treated separately, as in the case of the Maricopa County Regional Trails System. Should an alternative be selected, the Arizona Department of Transportation and Federal Highway Administration would work closely with the City of Phoenix during final design to ensure the connectivity of trails is maintained, whether they are eligible as Section 4(f) resources or not.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
5	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
6	**Alternatives**	Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Gila River Indian Community (Figure 3-6 on page 3-10 of the Final Environmental Impact Statement illustrates a representation of such alternatives). Ultimately the other alternatives were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to study alternatives on its land (see Final Environmental Impact Statement page 3-25). Therefore, the Arizona Department of Transportation, with concurrence from Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.

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7	**Hazardous Materials**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement). The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. The Department of Public Safety also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on page 4-157 of the Final Environmental Impact Statement). The Arizona Department of Transportation maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Department of Public Safety on incidents within their jurisdiction. Requirements for shippers are maintained by the Arizona Department of Transportation's Enforcement Compliance Division. In the event of an incident with a hazardous materials issue on a State or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, who responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Opposition to South Mountain Freeway Construction
Date: Friday, June 14, 2013 8:08:05 AM

From: Hnmusician@aol.com [mailto:Hnmusician@aol.com]
Sent: Thursday, June 13, 2013 4:38 PM
To: Projects
Subject: Opposition to South Mountain Freeway Construction

Phoenix Mountains Preservation Council
Opposition to South Mountain Freeway Construction

PMPC is an organization put into place by Arizona visionaries, and for the last 40 years PMPC has continued to monitor and anticipate the impact that rapid population growth would have on our precious Mountain Preserve system.

PMPC is steadfastly opposed to any alignment of the Loop 202 South Mountain Freeway that allows for trespass onto the Mountain Preserve or for any excavation into the South Mountain what so ever. These mountain preserves ensures a lifestyle that 80% of Arizona voters consistently support. The mountain preserves are unique and are for people and wildlife, not for vehicle trespass. PMPC does not agree with many of the DEIS assumptions finding them objectionable and deficient in the following analysis areas.

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(4)

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(Responses continue on next page)

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Code	Issue	Response
3	**Section 4(f) and Section 6(f)**	Cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The description in the Draft and Final Environmental Impact Statements is based on input received from the Gila River Indian Community and its members and other Indian Nations and their members. The Final Environmental Impact Statement includes discussion on efforts to avoid use of Phoenix South Mountain Park/Preserve, starting on page 5-16. Measures to minimize harm to the park as a result of the proposed freeway start on page 5-23. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). The activities that make the park such a highly valued resource (recreational activities, interaction with the Sonoran Desert) would remain.
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(Responses continue on next page)

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6	**Alternatives**	Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Gila River Indian Community (Figure 3-6 on page 3-10 of the Final Environmental Impact Statement illustrates a representation of such alternatives). Ultimately the other alternatives were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to study alternatives on its land (see Final Environmental Impact Statement page 3-25). Therefore, the Arizona Department of Transportation, with concurrence from Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.

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Code	Comment Document

From:	Projects
To:	ADOT
Subject:	FW: Question Regarding: Filing written comments Re: Loop 202 S Mountain Freeway DEIS
Date:	Friday, July 19, 2013 10:42:47 AM
Attachments:	image001.png
Importance:	High

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

From: Howard Shanker [mailto:howard@shankerlaw.net]
Sent: Friday, July 19, 2013 10:28 AM
To: Projects
Cc: Steve Brittle
Subject: Question Regarding: Filing written comments Re: Loop 202 S Mountain Freeway DEIS
Importance: High

We would like to file our comments on the Draft EIS for the SMF via hand delivery (on or before July 24). Can you please let me know where (and/or to whom) the comments should be delivered. Thank you. I look forward to your prompt response.

Howard M. Shanker
The Shanker Law Firm, PLC
www.ShankerLaw.net

Offices
700 E. Baseline Rd., Bldg. B
Tempe, Arizona 85283
Phone: (480) 838-9300
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201 E. Birch Avenue, Ste. 10
Flagstaff, Arizona 86001

Indian Law *Environmental & Natural Resources* *Personal Injury* *Civil Litigation* *Adoption*

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Code	Issue	Response

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Code	Comment Document

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

The Shanker Law Firm, PLC

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HOWARD M. SHANKER
ADMITTED IN ARIZONA, WASHINGTON, D.C., PENNSYLVANIA (INACTIVE); HOPI AND PASCUA YAQUI TRIBAL COURTS; U.S. COURT OF FEDERAL CLAIMS; NINTH CIRCUIT; FEDERAL CIRCUIT COURT OF APPEALS; AND U.S. SUPREME COURT

TAMERA C. SHANKER
ADMITTED IN ARIZONA; HOPI, PASCUA YAQUI, AND TOHONO O'ODHAM TRIBAL COURTS; AZ FEDERAL DISTRICT COURT; NINTH CIRCUIT; AND U.S. SUPREME COURT

1

July 23, 2013

VIA HAND-DELIVERY

Arizona Dep't of Transportation
Environmental Planning Group
1611 W. Jackson Street
Phoenix, Arizona 85007
Att: Yvonne M. Gasca

Re: Comments on the Loop 202 South Mountain Freeway Draft Environmental Impact Statement ("DEIS")

Dear Ms. Gasca:

These comments on the DEIS, including this letter of transmission and all of the reports/attachments hereto, are submitted by and on behalf of:

Protecting Arizona Resources and Children, Inc. (PARC)
The Foothills Community Association
The Foothills Club West Community Association
The Lakewood Community Association
The Calabrea Community Association
Don't Waste Arizona, Inc. (DWAZ)
Gila River Alliance for a Clean Environment (GRACE)
Gila River Environmental Youth (GREY)
Patricia Lawlis; Timothy Lank; Chad Blostone;
Michael Hinz; Chris Boettcher
Phoenix Mountains Preservation Council (PMPC)

Commenters can be reached through counsel:

Howard M. Shanker
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Offices in Flagstaff and Tempe
(877) 848-9300
howard@shankerlaw.net

Code	Issue	Response
1		Initial comments summarize the comments to follow. Responses to specific comments appear below.

Code	Comment Document

2

Based on a review of the data, it appears that the DEIS is no more than a thinly veiled, very expensive attempt to manipulate the public into believing that construction of the preferred alternative(s) for the Loop 202 South Mountain Freeway is a good thing. This DEIS, and the actions that created it, represent, *inter alia*, a gross abuse of the public trust, a violation of the processes required by the National Environmental Policy Act ("NEPA") and Section 4(f) of the Transportation Act, and an approximately $3 billion waste of tax payers' money. Modern history is replete with examples of fraud, waste, and/or abuse on a large scale. Unlike many of these schemes, however, the South Mountain Freeway project does not just involve the misuse and/or misappropriation of large sums of money. The South Mountain Freeway will have a significant negative impact on the health of thousands of people, including children, who live and/or go to school near the proposed right-of-way. It will require the relocation of hundreds of homes, and dry up lakes and golf courses in the Ahwatukee area. The project will pollute the air, bombard residents with noise, negatively impact recreational opportunities, devalue homes, re-route large numbers of commercial trucks through an historic bedroom community, and destroy a large segment of the South Mountain Park – a valuable natural resource that is sacred to the Gila River Indian Community and other tribes in the area.

3

Notwithstanding the negative impacts and cost, construction and utilization of the proposed South Mountain Freeway will result in capacity deficiencies at levels comparable to the No Action Alternative on freeways and arterials throughout the Metropolitan Area. That is, even if we assume, *arguendo*, that all of the data presented in the DEIS is accurate, according to ADOT's own estimation, the Loop 202 South Mountain Freeway, if built, will not improve traffic flow in areas of congestion on freeways and surface streets in the metropolitan Phoenix area. Regrettably, this is not just hyperbole. Indeed, the consultants/experts who helped to provide the included reports address each of these issues (and more) with specificity. As discussed herein, these issues were either ignored in the DEIS or were presented in the DEIS in a false and/or misleading light.

4

The DEIS utilizes bad data, inappropriate modeling techniques, and presents misguided and misleading conclusions throughout in a Procrustean effort to support selection of the "preferred alternative." Even the population projections used to demonstrate need for the project are based on bad data. The DEIS takes an exceptionally high growth period – using 2005 census data – and assumes such growth will continue unabated for the next 30 years. Census data from 2010, which was readily available to ADOT, however, objectively confirms that ADOT's projections were fatally flawed and grossly exaggerated from the outset. The DEIS expressly puts off analyses of whole categories of impacts until the "design phase" of construction, even though such analysis is an essential aspect of the decision-making process that preparation of a DEIS is supposed to promote. Moreover, ADOT identifies only one action alternative for the

Code	Issue	Response
2	**Environmental Impact Statement Process**	The Arizona Department of Transportation, the project sponsor, working in close consultation with the Federal Highway Administration, the lead federal agency for the proposed action, and in cooperation with the U.S. Army Corps of Engineers, the U.S. Bureau of Indian Affairs, and the Western Area Power Administration, prepared the Draft and Final Environmental Impact Statements and Section 4(f) Evaluations for the South Mountain Freeway in accordance with: the National Environmental Policy Act of 1969 [42 United States Code § 4332(2)(c)], Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 United States Code § 303, as amended), and Section 404 of the Clean Water Act of 1977 (33 United States Code § 1251). The Draft and Final Environmental Impact Statements and Section 4(f) Evaluations: 1) satisfy the Federal Highway Administration's and Arizona Department of Transportation's environmental analysis requirements; 2) provide a comparison of the social, economic, and environmental impacts that may result from implementation of the proposed action—construction and operation of a major transportation facility; and 3) identify measures to avoid, reduce, or otherwise mitigate adverse impacts. The Draft and Final Environmental Impact Statements includes sufficient preliminary design information to compare alternatives. Responses to specific comments appear below.
3		Responses to specific comments appear below.
4		Responses to specific comments appear below.

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eastern alignment in the DEIS. NEPA requires a detailed analysis of all viable alternatives. Section 4(f) of the Transportation Act mandates, in pertinent part, that the Secretary of Transportation reject any project that requires the use of park land (South Mountain) unless: (1) there is no feasible and prudent alternative to the use of such land; and (2) such program includes all possible planning to minimize harm to such park.[1] In the instant case, the only action alternative considered by ADOT requires blasting through South Mountain. As discussed in the attached reports, there are many other feasible and prudent alternatives that do not impact park land that ADOT refused/failed to consider/select – including but not limited to the no action alternative. As a practical matter, ADOT simply rejected a number of otherwise viable alternatives because they were outside the "study area" – a restrictive geographic boundary with no apparent factual or scientific basis or justification.

5

The only conclusion to be drawn is that the NEPA process for the South Mountain Loop 202 Freeway is not intended or designed to promote informed decision making and public participation.[2] Indeed, it appears that the selection of both the eastern and western alignments was a foregone conclusion, with ADOT attempting to only facially comply with its statutory obligations. This conclusion is further supported by the fact that ADOT began acquiring property along the Pecos Road alignment in 1988. To date, ADOT has spent at least $43 million on purchasing properties along the Pecos Road alignment. ADOT has been purchasing properties along the 59th Avenue alignment since 1987. To date, ADOT has spent, at least, $45.5 million on properties along the 59th Avenue alignment – and nothing along the other western alignment alternatives.

6

The following people/organizations, *inter alia*, have provided reports on behalf of the commenters that are attached hereto:

1. George Thurston, Sc.D: Dr. Thurston is a full Professor at the New York University Medical School. Dr. Thurston identifies, in part: Kyrene de la Estrella; Kyrene de los Lagos; Kyrene del Milenio; Kyrene Akimel A-al; Desert Vista High School; Keystone Montessori; Summit School of Ahwatukee; Horizon Community Learning Center; St. John Bosco Interparish Catholic School; Betty Fairfax High School; Cheatham Elementary School; Country Gardens Charter School; Sunridge Elementary

[1] The DEIS also fails to consider, *inter alia*, the "constructive use" of Pecos Park/recreation area and the public school playgrounds located within 0.5 miles of the proposed right-of-way – the "hot spot" zone for greatest health/air impacts.

[2] Documents identified in the DEIS were, more often than not, not available at the identified locations and/or online. ADOT was often unresponsive or slow to respond in providing requested documents necessary to provide informed comments on the DEIS.

Code	Issue	Response
5		Responses to specific comments appear below.
6		Responses to specific comments appear below.

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School; and Western Valley Middle School as all being within the area of greatest negative health impacts from the proposed Freeway.[3]

Dr. Thurston concludes that, ". . . the increased exposure to residents living or going to school near to the proposed South Mountain Freeway will be at substantially increased risk of adverse health effects if the Freeway is built as proposed, and I further note that these serious health impacts are ignored or not sufficiently addressed in the DEIS. In particular, if the Freeway is built as planned, children with asthma will be at much greater risk of experiencing asthma exacerbations (e.g., asthma attacks, wheezing, cough, etc.). Healthy children will be at significantly higher risk of getting new-onset asthma, and all children living near the proposed Freeway will likely have their lung growth and development inhibited from what it would have been without the Freeway. In adults, the primary health threat from the proposed Freeway air pollution will be increased risks of chronic cardiovascular illness (e.g., PAD) acute myocardial infarctions (MIs), and premature mortality."

7

2. Kevin Kane: Mr. Kane is a Ph.D. candidate and instructor at Arizona State University's School of Geographical Sciences and Urban Planning. Mr. Kane addresses the agency's utilization of faulty population projections to support the very purpose and need for the Freeway. The DEIS relies on aggressive growth rates based on 2005 census data, even though 2010 census data was readily available. ADOT also projects that vehicle miles traveled (VMT) per person would grow. Not only were ADOT's VMT projections based on exaggerated population figures, but contrary to ADOT's findings, both national and state studies have shown that VMTs are actually declining on a *per capita* basis. Mr. Kane concludes, in part, that "MAG's modeling, which is relied upon in the DEIS to establish the purpose and need for the Freeway expansion fails to accurately identify short-range growth and uses outdated data to estimate long-range growth. It reports its projections in a manner that indicates that they are certain to happen, which is not supported by the data and modeling techniques used. Using accurate data to objectively evaluate purpose and need based on socioeconomic factors supports the no build option."

8

3. Herman Basmaciyan, P.E.: Mr. Basmaciyan is a Registered Civil and Traffic Engineer in the State of California and a Registered Engineer (in retired status) in the states of Washington, Arizona and Florida. He has over 50 years of experience in traffic and transportation engineering, traffic modeling and forecasting, and the preparation of traffic impact studies. Mr. Basmaciyan identifies myriad deficiencies in the DEIS, including the faulty population projections used to justify the project. He identifies

[3] Although not listed in Dr. Thurston's report, it appears that Kyrene de la Sierra, Kings Ridge Preparatory Academy, and Western Valley Elementary School are also within this "hot zone" for negative health effects from the proposed freeway.

Code	Issue	Response
7		Responses to specific comments appear below.
8		Responses to specific comments appear below.

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various alternatives that should have been considered in the DEIS but were not. Indeed, only one route is considered for the eastern alignment. Mr. Basmaciyan further finds, in part, that "[e]ven assuming arguendo that the demographics used to demonstrate the need for the project are accurate (they are not), none of the Action Alternatives considered will alleviate the anticipated capacity deficiencies identified in the Purpose and Need. Despite the expenditure of about $2 billion to $3 billion to build the South Mountain Freeway and despite the displacement of many residences and business establishments, there will be capacity deficiencies at levels comparable to the No Action Alternative on freeways and arterials throughout the Metropolitan Area and on the South Mountain Freeway itself"

Further, according to Mr. Basmaciyan, "[b]ased on these traffic and circulation considerations, none of the Action Alternatives should have been selected as the preferred Alternative. Indeed, when correct socio-economic data is used, the No Action Alternative largely achieves the desired outcomes without exorbitant costs and/or negative impacts."

9

4. SWCA Environmental Consultants: The SWCA team reviewed the DEIS for its discussion on water, air, noise and socio-economic impacts and provided a comment "matrix". The conclusions included in the matrix are too voluminous to outline here. SWCA did, however, confirm, in part, that: (1) there is no technical or scientific rationale or justification for why the "Study Area" is defined the way it is; (2) otherwise viable alternatives were eliminated simply because they did not fit into the arbitrarily defined "Study Area"; (3) ADOT used the wrong modeling program and faulty data in presenting its analysis of impacts of air pollution; and (4) there is essentially no discussion of the impact construction would have on the wells that currently serve the Lakewood and Foothills communities – this project will likely dry up the lakes and golf courses in Ahwatukee.

10

5. Richard Haddow: Mr. Haddow is a former District Environmental Coordinator with the Arizona Department of Transportation (ADOT). According to Mr. Haddow, in part, "[t]he use of data, the methodology employed, and the conclusions presented in the DEIS are absolutely without technical merit and do not comply with the fundamental concepts and purpose of an environmental impact statement. The DEIS does not protect or properly inform the citizens of the level of risk to public health by building the freeway." Further, according to Mr. Haddow, the DEIS completely fails to consider the terrain that will be impacted by the project. According to Mr. Haddow, in part, "[n]otwithstanding that this NEPA process has taken over 12 years, ADOT has not conducted any studies on atmospheric and/or ambient quality/conditions in the Ahwatukee area. As a result, there is no valid baseline data to input into air quality models that predict how bad the pollution in the area will be. Sites listed for reference to determine air quality for the citizens are nowhere near the impacted area and should not be used to determine air quality north of the Pecos Road alignment. Similarly, there are no temperature soundings for accurate air shed profiling. There are no air toxics

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measurements taken to understand the current components of the ambient air quality, and there are no wind speed and direction instruments installed as necessary to apply good science for modeling. . ."

11

6. Stephen Brittle: Mr. Brittle is the President and Co-Founder of Don't Waste Arizona, Inc. (DWAZ), a statewide non-profit environmental organization that was formed in 1990. Mr. Brittle was a member of Maricopa County Local Emergency Planning Committee for ten years. He is also a private sector consultant who has worked on various environmental and hazardous materials issues. Mr. Brittle provides comments on, in part, the CANAMEX route (one reason why the proposed Freeway will simply act as a truck bypass for high polluting commercial trucks originating in Mexico), Environmental Justice issues, Air Toxics, and hazardous materials transportation. He, again, finds the DEIS lacking on all fronts. According to Mr. Brittle, in part, "the DEIS fails to mention and analyze the risks from a catastrophic release of hazardous chemicals due to a transportation incident . . . In the matter of evacuation of Ahwatukee, the GRIC community near the freeway, and Laveen, a detailed traffic flow analysis and evacuation plan . . . must be prepared. . . If the analysis shows that the community . . . cannot be evacuated within 5-10 minutes, then the No Build option is the only logical and humane result. . . Since Ahwatukee is not six miles wide from the Pecos Road to South Mountain, it is easy to conclude that, in the event of a catastrophic release of chlorine from a 17-ton tanker of chlorine gas, all of Ahwatukee would have to either evacuate or shelter in place. . . Further, an ALOHA modeling indicates that buildings within two miles of the point where the chlorine release occurred would have high enough levels of chlorine gas infiltrate into them to become lethal, which means that shelter in place strategies would not work. . ." Mr. Brittle also questions why HDR, the consultants who prepared the DEIS for ADOT, did not include any analysis of the risks associated with hazardous materials transport – HDR was the same contractor who prepared the November 26, 2008, SPR 624 Hazardous Materials Transportation in Arizona Literature Review with Findings Report for ADOT.

Thank you for your consideration. As outlined herein and supported through the attached reports/comments, there is no valid justification for the construction of the South Mountain Loop 202 Freeway.

NEPA requires a fully informed decisional process through, in part, the preparation of a DEIS. The DEIS, however, treats the crucial decision to proceed with a $3 billion tax payers' funded project, not as an impending choice to be pondered, but as a foregone conclusion to be rationalized. The DEIS provides flawed analyses, generalities, and heavy-handed self-justifications. This is a direct violation of applicable law and a gross abuse of the public trust. No reasoned decision could be made on the basis of the DEIS that, for example, improvements to existing highways and arterials would not better serve regional transportation needs; that public transportation alternatives are not viable;

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or that abandonment of the project is impractical.

If you have any questions or concerns, please feel free to contact me directly.

Sincerely,

THE SHANKER LAW FIRM, PLC

Howard M. Shanker
For the Firm

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2 *Response to ADOT Draft Environmental Impact Statement (DEIS) 1. Purpose and Need A. Need Based on Socioeconomic Factors* by Kevin Kane dated July 24, 2013.

3 Comments by Don't Waste Arizona, Inc. President, Stephen Brittle.

4 *Review and Critique of DEIS for Loop 202 (South Mountain Freeway)* by Herman Basmaciyan, P.E. dated July 17, 2013.

5 SWCA Comments on ADOT South Mountain DEIS (April 2013).

6 South Mountain Freeway 202 DEIS Comments by Rick Haddow.

7 *Comments on the SMF DEIS Re: Cultural Resources Impacts* by Samantha Skenedore, Of Counsel: The Shanker Law Firm, PLC.

Additional Comments:

1 Patricia Lawlis Comments on the Draft Environmental Impact Statement (DEIS) for the proposed South Mountain Freeway (SMF), July 2013.

2 Comment 1-10.

3 Comments on DEIS Discussion of Section 4(F) of the Transportation Act.

4 Reevaluate Purpose and Need Statement.

5 Lakewood Community Association's Concerns & Response to DEIS for Loop 202 (South Mountain Freeway) dated July 20, 2013.

6 Comments of Nicoli V. Kuminoff on the DEIS for South Mountain Freeway, dated July 21, 2013.

7 Comments by Hugh S. Mason dated July 21, 2013, resident of Phoenix and the Ahwatukee area and Associate Professor at Arizona State University, School of Life Sciences.

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8	Comment by Phoenix Mountains Preservation Council

Attachments:

1	Brown and Caldwell Study dated August 24, 1995
2	Correspondence Foothills Golf Re: Water
3	Hydrologist Statement
4	Well Completion Report for the Foothills Golf Club North and South Wells dated April 23, 1996.
5	South Mountain Land Acquisitions - The spreadsheet was created by ADOT on June 11, 2013. It has W in the right side if it is a parcel in the western alignment; it has an E in the right side if it is a parcel in the eastern alignment. Parcels 7-11316 and 7-10612 are two parcels in the western alignment that were not included in the spreadsheet. The parcel transmittal sheet for each is also attached.

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REPORTS

One

The Adverse Human Health Effects of Air Pollution that Result from Traffic-Related Air Pollution by George D. Thurston, Sc.D. dated July 18, 2013.

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The Adverse Human Health Effects of Air Pollution that Result from Traffic-Related Air Pollution

SUBMITTED ON BEHALF OF PARC ET AL. IN RESPONSE TO ADOT DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) REGARDING THE SOUTH MOUNTAIN FREEWAY

July 18, 2013

George D. Thurston, Sc. D.
3 Catherine Court
Chester, NY 10918

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Background & Qualifications

I am a full Professor at the New York University (NYU) School of Medicine in the Department of Environmental Medicine. I have also served as the Deputy Director of the NYU Particulate Matter Health Research Center, and am presently the Director of the Program in Exposure Assessment and Health Effects in my department at the School of Medicine.

I received my undergraduate degree in Environmental Engineering from Brown University in 1974, and my Doctorate of Science (Sc.D.) in Environmental Health Sciences from the Harvard University School of Public Health in 1983. I served on the New York State Department of Environmental Conservation's Air Management Advisory Committee from 1991 to 1996, and was Chairman of the Health and Environment Panel of the Canadian Joint Industry/Government Study of Sulfur in Gasoline and Diesel Fuels in 1997.

I have published extensively regarding the human health effects of inhaled air pollutants, particularly in relation to asthma attacks, hospital admissions, and human mortality. I have been called upon by both the U.S. House of Representatives and the U.S. Senate multiple times in recent years to provide testimony before them regarding the human health effects of air pollution.

I have served as an advisor to the U.S. EPA regarding the human health effects of air pollution as a member of the Clean Air Scientific Advisory Committee (CASAC) panel on Sulfur Oxides and Nitrogen Oxides, and as a contributing author of various EPA Integrated Science Assessments (ISAs), which are relied upon by the EPA to set air pollution air quality standards in the US. A copy of my professional curriculum vitae is attached to this letter, and it accurately represents my relevant education, training, and experience.

12

Introduction

Traffic is an increasingly dominant contributor to air pollution in Phoenix, and elsewhere in the United States. Cars, buses, trucks and other motorized vehicles are amongst the largest sources of air pollution that have been clearly linked to adverse health effects (e.g., see HEI, 2010). These adverse effects of traffic related air pollution have been documented in cities around the world, across the nation, and in Phoenix, AZ. Most people are exposed to air pollution from road traffic on a daily basis, whether as a result of residing at homes located near highways, or driving, walking, or standing along busy streets. Vehicle engines are known to produce a number of air pollutants that pose risks to public health. When engines burn fuel (gasoline or diesel), chemicals such as fine particulate matter, ultrafine particles (UFP), nitrogen oxides, carbon monoxide, volatile organic

Code	Issue	Response
12	**Air Quality**	The contribution of mobile sources (traffic) to air quality in the Study Area is addressed beginning on page 4-68 of the Final Environmental Impact Statement.

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compounds (VOCs), and elemental carbon (EC) black carbon soot are all emitted. As summarized by the U.S. EPA (2009), especially steep gradients in black carbon soot mass have been observed along roadways with high diesel traffic (e.g., Zhu et al., 2002). These primary emissions, such as UFP number concentrations and EC, are highest near roadways (Levy et al., 2003; Reponen et al., 2003; Zhu et al., 2005). For example, a personal monitoring study that I conducted in Bronx County, New York determined that personal EC concentrations, and especially the fraction of $PM_{2.5}$ mass that is as EC (which is an urban tracer for diesel particulate matter, DPM), decreases linearly as a function of the distance of primary residence to busy roadways as shown below in Figure 1 (Spira-Cohen et al., 2010).

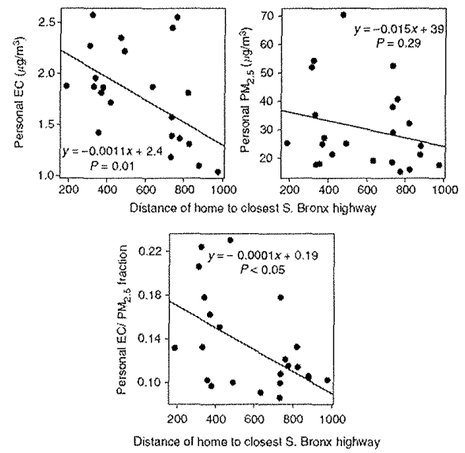

Figure 1. Living closer to a major roadway is significantly associated with larger mean personal elemental carbon (EC) soot concentration (distances in feet) (Spira-Cohen et al., 2010).

In addition to near roadway effects, some of the fuel used by engines evaporates without having been burned, and this also creates secondary pollution downwind, such as ozone, which has also been associated with increased risk of adverse health effects, including increased risk of death. Overall, traffic related emissions are a key contributor to the formation of soot and smog and the many adverse health effects they can cause.

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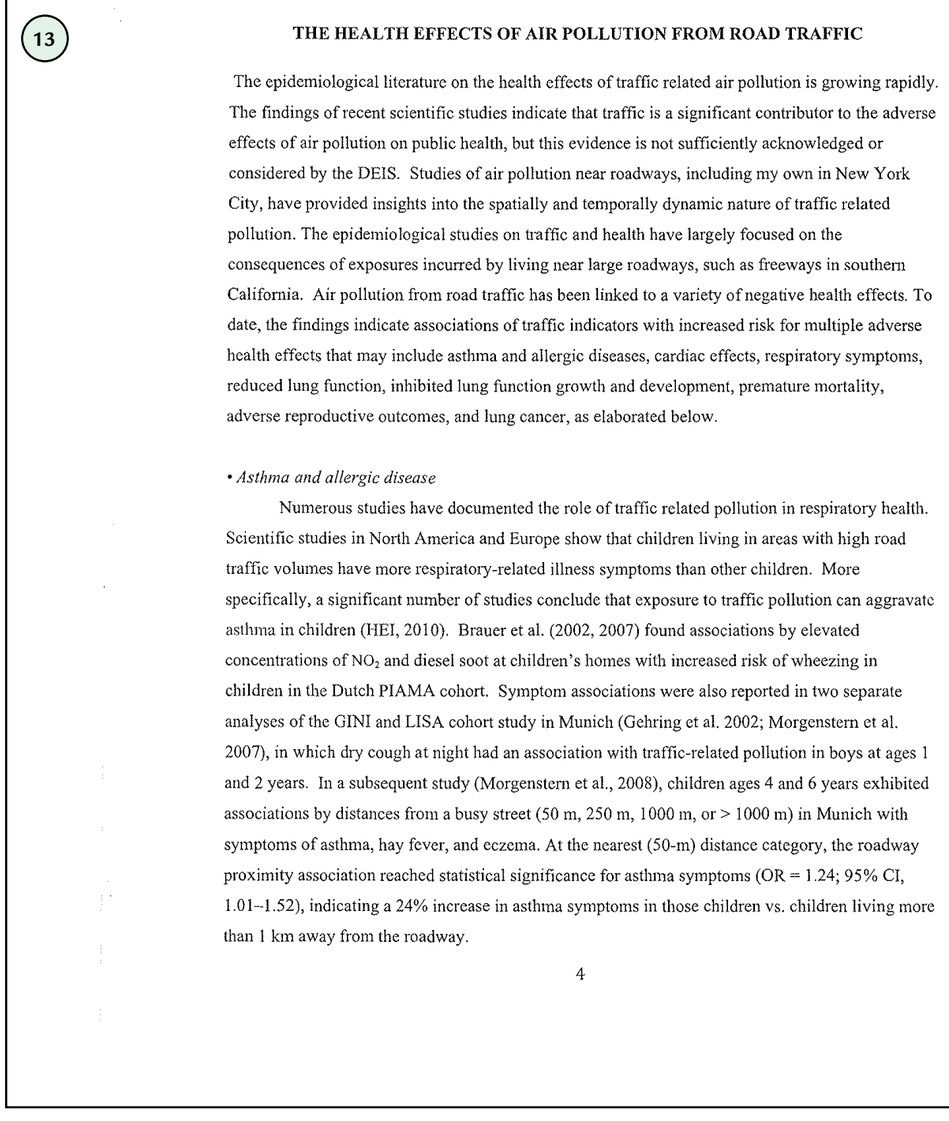
13	

THE HEALTH EFFECTS OF AIR POLLUTION FROM ROAD TRAFFIC

The epidemiological literature on the health effects of traffic related air pollution is growing rapidly. The findings of recent scientific studies indicate that traffic is a significant contributor to the adverse effects of air pollution on public health, but this evidence is not sufficiently acknowledged or considered by the DEIS. Studies of air pollution near roadways, including my own in New York City, have provided insights into the spatially and temporally dynamic nature of traffic related pollution. The epidemiological studies on traffic and health have largely focused on the consequences of exposures incurred by living near large roadways, such as freeways in southern California. Air pollution from road traffic has been linked to a variety of negative health effects. To date, the findings indicate associations of traffic indicators with increased risk for multiple adverse health effects that may include asthma and allergic diseases, cardiac effects, respiratory symptoms, reduced lung function, inhibited lung function growth and development, premature mortality, adverse reproductive outcomes, and lung cancer, as elaborated below.

• *Asthma and allergic disease*

Numerous studies have documented the role of traffic related pollution in respiratory health. Scientific studies in North America and Europe show that children living in areas with high road traffic volumes have more respiratory-related illness symptoms than other children. More specifically, a significant number of studies conclude that exposure to traffic pollution can aggravate asthma in children (HEI, 2010). Brauer et al. (2002, 2007) found associations by elevated concentrations of NO_2 and diesel soot at children's homes with increased risk of wheezing in children in the Dutch PIAMA cohort. Symptom associations were also reported in two separate analyses of the GINI and LISA cohort study in Munich (Gehring et al. 2002; Morgenstern et al. 2007), in which dry cough at night had an association with traffic-related pollution in boys at ages 1 and 2 years. In a subsequent study (Morgenstern et al., 2008), children ages 4 and 6 years exhibited associations by distances from a busy street (50 m, 250 m, 1000 m, or > 1000 m) in Munich with symptoms of asthma, hay fever, and eczema. At the nearest (50-m) distance category, the roadway proximity association reached statistical significance for asthma symptoms (OR = 1.24; 95% CI, 1.01–1.52), indicating a 24% increase in asthma symptoms in those children vs. children living more than 1 km away from the roadway.

4

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13	**Health Risk Assessment**	**The Role of Health Risk Assessment in a National Environmental Policy Act Context** The Federal Highway Administration's National Environmental Policy Act documents are developed under two guiding regulations: the Council on Environmental Quality's National Environmental Policy Act regulations applicable to all federal agencies (40 Code of Federal Regulations Parts 1500–1508) and the Federal Highway Administration's implementing regulations governing Federal Highway Administration National Environmental Policy Act documents (23 Code of Federal Regulations Part 771). In its mobile source air toxics guidance, the Federal Highway Administration discusses 40 Code of Federal Regulations Part 1502.22 and acknowledges that while much work has been done to assess the overall health risk of mobile source air toxics, analytical tools and techniques for assessing project-specific health outcomes as a result of lifetime exposures to mobile source air toxics remain limited. These limitations impede the ability to evaluate the potential health risks attributable to exposure to mobile source air toxics as part of the decision-making process in the National Environmental Policy Act context. However, as with any analysis that the Federal Highway Administration conducts for National Environmental Policy Act purposes, the Federal Highway Administration's approach for mobile source air toxic analysis in National Environmental Policy Act documents is informed not just by 40 Code of Federal Regulations Part 1502.22, but by all applicable Council on Environmental Quality requirements. The appropriateness of air toxics health risk assessment as an analysis method for National Environmental Policy Act documents is discussed below, in the context of Council on Environmental Quality requirements for these documents. In addition to the 40 Code of Federal Regulations Part 1502.22 provisions regarding uncertainty and limitations discussed in the Federal Highway Administration's MSAT Interim Guidance Appendix C, three other provisions of the Council on Environmental Quality regulations are particularly relevant to the topic of health risk assessment: *40 Code of Federal Regulations § 1500.1(b): NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.* *40 Code of Federal Regulations § 1502.1: An environmental impact statement is more than a disclosure document. It shall be used by Federal officials in conjunction with other relevant material to plan actions and make decisions.* *40 Code of Federal Regulations § 1502.2: (a) Environmental impact statements shall be analytic rather than encyclopedic. (b) Impacts shall be discussed in proportion to their significance.(c) Environmental impact statements shall be kept concise and shall be no longer than absolutely necessary to comply with NEPA and with these regulations.*

(Response 13 continues on next page)

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Venn et al. (2001) investigated the relation between proximity of the family home to the nearest main road, estimated objectively using geographical information system software, and the risk of wheeze in the past year in a case-control sample of 6,147 primary schoolchildren (age 4 to 11 yr.) and a random cross-sectional sample of 3,709 secondary schoolchildren (age 11 to 16 yr.) in Nottingham, United Kingdom. Among children living within 150 m of a main road, the risk of wheeze increased with increasing proximity by an odds ratio (OR) of 1.08 (95% confidence interval [CI] 1.00 to 1.16) per 30-m increment in primary schoolchildren, and 1.16 (1.02 to 1.32) in secondary schoolchildren. Most of the increased risk was localized to within 90 m of the roadside. Among primary schoolchildren, effects were stronger in girls than boys (p(interaction) = 0.02). Living within approximately 90 m of a main road is associated with a roadway proximity-related increase in the risk of wheezing illness in children.

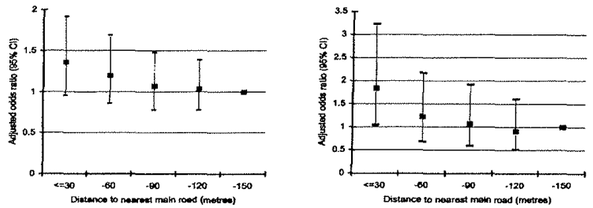

Figure 2. Living Near a Main Road Increases the Risk of Wheezing Illness in Primary (left) and Secondary (right) School Children (Venn et al., 2001)

In my own work in the South Bronx, and shown below in Figure 3, I have found that respiratory symptoms (such as cough and wheeze) can double in number per day in children with asthma (vs. a day with low traffic air pollution), as measured by the levels of elemental carbon (EC) soot measured by samplers carried by the children each day.

Code	Issue	Response
13 (cont.)		Section 1500.1(b) states that information for decision making must be of high quality and based on accurate scientific analysis. Air toxics health risk assessments can involve large uncertainties. The mobile source air toxic health risk assessment uncertainty builds on itself—each step of the analysis involves uncertainties, including modeling traffic and then modeling emissions, and using this estimated output to model dispersion/concentrations, which provide information for estimating or assuming exposures to those concentrations, and finally predicting health outcomes. Major uncertainties are associated with traffic and emissions projections over a 70-year period, and dispersion models are typically held to a "factor of 2" performance standard. Health impacts of mobile source air toxics in the U.S. Environmental Protection Agency Integrated Risk Information System are based on a 70-year lifetime exposure, which introduces significant uncertainty (e.g., on average, people in the United States change residence approximately once every 8 years and change jobs once every 3). Finally, as noted above, the U.S. Environmental Protection Agency's Integrated Risk Information System provides toxicity (risk) values for various pollutants and routes of exposure; in a health risk assessment, the Federal Highway Administration would compare calculated concentrations of mobile source air toxic pollutants to the Integrated Risk Information System values to estimate health risk. In the Integrated Risk Information System, the U.S. Environmental Protection Agency states the toxicity values are believed to be accurate to within an order of magnitude (a factor of 10). The total cumulative uncertainty involved in highway project health risk assessment is much larger than the change in emissions attributable to projects (typically a few percentage points). In this context, the information would not necessarily have a strong nexus to the requirements for high-quality information and accurate scientific analysis.

(Response 13 continues on next page)

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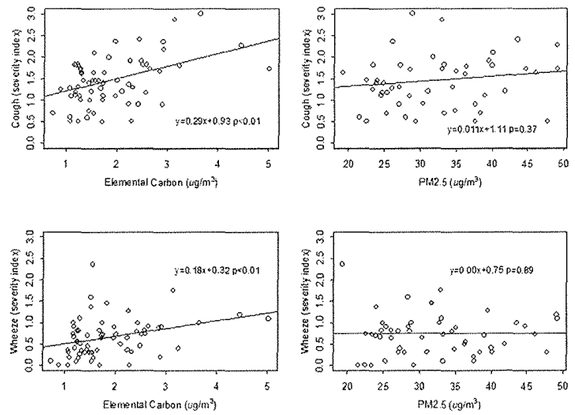

Figure 3. Days with higher traffic air pollution (i.e., higher elemental carbon (EC) soot) is associated with increased asthma symptoms (adapted from Spira-Cohen et al., 2010).

Overall, the 2010 Health Effects Institute (HEI) Publication 17 found (on page xv.) that: "the Panel concluded that the evidence is sufficient to support a causal relationship between exposure to traffic-related air pollution and exacerbation of asthma." This conclusion from the HEI Publication 17 is also acknowledged in the South Mountain Freeway DEIS (on pg. 4-75), but not sufficiently considered or applied to the proposed project impact assessment.

I agree with the above HEI Publication 17 conclusion, and I point out that this conclusion is of direct relevance to the proposed South Mountain Freeway, as there are a host of schools, that have children with asthma in them every school day, that would be adversely affected by a worsening of their asthma problems because they are located within a very short distance of the proposed freeway, including the following (distance from center of freeway):

- Kyrene de la Estrella, 2620 E. Liberty Lane (0.2 mi.)
- Kyrene de los Lagos, 17001 S. 34th Way (0.1 mi.)
- Kyrene del Milenio, 4630 E. Frye Road (0.5 mi.)
- Kyrene Akimel A-al, 2720 E. Liberty Lane (0.2 mi.)
- Desert Vista High School, 16440 S. 32nd St. (0.4 mi.)

Code	Issue	Response
13 (cont.)		Section 1500.1(b) also directs agencies to focus their National Environmental Policy Act analysis and documentation on issues that are truly significant to the action in question. In the context of mobile source air toxics, the Federal Highway Administration must consider whether changes in mobile source air toxic emissions attributable to a project have the potential for significant health risk. Using cancer risk as an example, the U.S. Environmental Protection Agency estimates that the overall risk of cancer in the United States is approximately 330,000 in a million, and that air toxics (from all sources) are responsible for a risk of approximately 50 in a million. In its most recent mobile source air toxics rule-making, the U.S. Environmental Protection Agency estimated mobile source air toxic cancer risk, after implementation of emissions controls, at approximately 5 in a million (or 0.0015 percent of overall cancer risk from any cause). For the Preferred Alternative, the mobile source air toxic emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxic emissions between the Preferred and No Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxic emissions would decrease by more than 80 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see the discussion beginning on page 4-77 of the Final Environmental Impact Statement). In summary, available information from the U.S. Environmental Protection Agency indicates that mobile source air toxics are a small component of overall cancer risk, and the analysis for the Final Environmental Impact Statement indicates both that the Preferred Alternative would result in a small change in the emissions contributing to this risk and that emissions will decline by a large amount regardless of alternative. As described above and in the air quality technical report, results from the health risk assessment would be influenced more by the uncertainty introduced into the process through assumptions and speculations rather than by genuine insight into the actual health impacts directly attributable to mobile source air toxic exposure associated with a project. Therefore, outcomes of such a health risk assessment do not provide useful information for decision makers, as required by Section 1502.1. The Federal Highway Administration emissions analysis meets the requirement to produce information that is useful for both disclosure and decision making because it allows the public and decision makers to see which alternative has less mobile source air toxic emissions, with much less uncertainty than a health risk assessment.

(Response 13 continues on next page)

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Code	Issue	Response
13 (cont.)		Given the uncertainty of a mobile source air toxic health risk assessment, the Federal Highway Administration instead addresses the potential impacts of mobile source air toxics through an emissions assessment in its National Environmental Policy Act documents. For smaller projects with a lower likelihood of a meaningful impact, this discussion is qualitative. For larger projects, emissions analysis is conducted. The Federal Highway Administration approach is consistent with the Council on Environmental Quality's direction in Section 1502.2(b) to discuss impacts in proportion to their significance. The results of an emissions analysis can be summarized concisely in a National Environmental Policy Act document and provide useful information for decision makers (e.g., an alternative that has lower emissions is likely to be "better" from a mobile source air toxics health risk standpoint than one that has higher emissions). While the U.S. Environmental Protection Agency and the Federal Highway Administration both agree on the usefulness of addressing mobile source air toxics in National Environmental Policy Act documents for highway projects, the agencies disagree about the value of health risk assessment as a method for doing so.

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Code	Issue	Response
13 (cont.)		Another consideration with respect to health impacts is that the Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the Preferred Alternative would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the roadway network. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. The Federal Highway Administration determined that a supplemental environmental impact statement is not required at this time because there were no changes to the proposed action that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement nor is there new information relevant to environmental concerns and bearings on the proposed action or its impacts that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement.

Code	Comment Document

• Keystone Montessori, 1025 E. Liberty Lane (0.2 mi.)
• Summit School of Ahwatukee, 4515 East Muirwood Drive (0.6 mi.)
• Horizon Community Learning Center, 16233 South 48th Street (0.4 mi.)
• St. John Bosco Interparish Catholic School, 16035 S 48th St. (0.5 mi.)
• Betty Fairfax High School, 8225 S. 59th Ave. (0.1 mi.)
• Cheatham Elementary School, 4725 W. South Mountain Avenue (0.4 mi.)
• Country Gardens Charter School, 6313 West Southern Ave. (0.5 mi.)
• Sunridge Elementary School, 6244 West Roosevelt St. (0.4 mi.)
• Western Valley Middle School, 6250 West Durango St. (0.4 mi.)

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Clearly, the proposed highway will cause new and additional noise and air pollution impacts to many school-age children during the school week, exacerbating their respiratory symptoms, especially for children with asthma, as discussed above, and putting children who do not have asthma at greater risk of getting the disease. Moreover, as shown in Figure 4 below, there are many homes located near these schools, in which many of the students will reside. Thus, these children's exposure will be even greater, as they will be exposed to much higher traffic air pollution and noise throughout the entire day. Not only will this increase their risk of asthma symptoms, there is now evidence indicating that it can also increase the risk of healthy children contracting asthma.

While the HEI Publication 17 Review of the health effects of traffic air pollution concluded that the evidence showing associations between exposure to traffic air pollution and the onset of new asthma in healthy children was only suggestive at that time (i.e. not enough to conclude causality), that report was published in January 2010, before more definitive evidence of this relationship was published. Notably, McConnell et al (2010) later published a study of the relationship of new-onset asthma with traffic-related pollution near homes and schools of children participating in the highly regarded California Children's Health Study. Physician diagnosis of new-onset asthma (n = 120) was identified during 3 years of follow-up of a cohort of 2,497 kindergarten and first-grade children who were asthma- and wheezing-free at study entry into the Southern California Children's Health Study. The researchers assessed traffic-related pollution exposure based on a line source dispersion model of traffic volume, distance from home and school, and local meteorology. They found that asthma risk increased with modeled traffic-related pollution exposure from roadways near homes [HR 1.51; 95% confidence interval (CI), 1.25–1.82] and near schools (HR 1.45; 95% CI, 1.06–1.98). Thus, these findings more definitively indicate that the risk of new asthma was increased by

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14	**Noise, Air Quality**	With regard to noise impacts, schools were included in the categories of activities considered in the noise pollution analysis for the project in keeping with 23 Code of Federal Regulations Part 772 (see page 4-80 of the Draft Environmental Impact Statement). As stated in the Draft and Final Environmental Impact Statements, sensitive receivers, including schools, would be affected by implementation of the project. These impacts, however, will be mitigated as discussed beginning on page 4-91 of the Final Environmental Impact Statement. The noise analysis was updated for the Final Environmental Impact Statement (beginning on page 4-88). It is important to note that no substantial differences between the analyses in the Draft and Final Environmental Impact Statements resulted from the update. With regard to the use of chemicals in the context of the project, such use would not likely result in the exposure of children to hazardous materials as children are not expected to be employed in project construction. As detailed in the section of Chapter 4 related to *Temporary Construction Impacts*, windbreaks, when applicable, will be used to prevent accidental dust pollution. It is anticipated that these precautions will mitigate any potential exposure to dust suppressants (see page 4-173 of the Final Environmental Impact Statement). See Federal Highway Administration's position on the preparation of a health risk assessment as presented in the last response.
15	**Health Effects**	A common theme in public comments on the proposed project has been the potential impacts of the project on children's health, primarily through vehicle emissions and noise. Many commenters raised concerns about the proximity of the project to schools or other aspects of the project that may affect children. In addition, the U.S. Environmental Protection Agency requested that the Final Environmental Impact Statement address Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. Throughout the Final Environmental Impact Statement, potential impacts on and subsequent mitigation for human health are disclosed and identified, as inherent in the environmental impact statement process. The Final Environmental Impact Statement incorporates an assessment of the potential impacts of the proposed project on all populations, including children. The Final Environmental Impact Statement addresses potential impacts of the project on children in the Chapter 4 environmental consequences analyses. The U.S. Environmental Protection Agency's Toxicity and Exposure Assessments for Children's Health report (see page 4-73 of the Final Environmental Impact Statement) indicated that indoor air concentrations of benzene are usually higher than outdoor levels and that indoor air in smokers' homes is a significant contributor to children's exposures. It mentioned children when identifying the effects of acute exposure to naphthalene. The Final Environmental Impact Statement acknowledges and fully discloses public scoping comments that raised the topic of health effects on neighborhoods and adjacent schools (see page 4-31 of the Final Environmental Impact Statement).

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approximately 50% among children exposed to roadway pollution, vs. children who went to school and/or lived further away from the roadways. It is now clear that living and/or going to school near a major roadway is a significant risk to healthy children of developing asthma.

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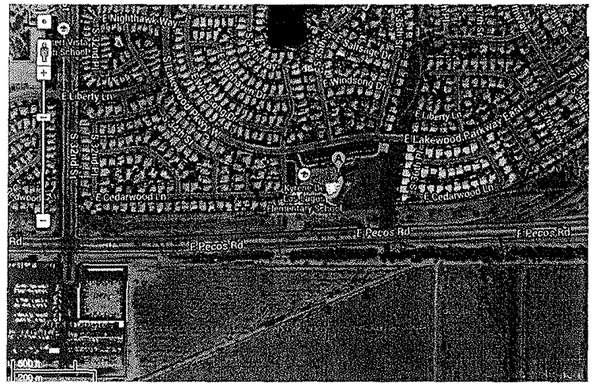

Figure 4. More children, like those attending Kyrene de los Lagos Elementary (shown here), will reside and go to school with much higher traffic noise and air pollution exposures if the proposed South Mountain Freeway is built.

In Phoenix, a recent study by Grineski et al (2010) found an association between traffic-related air pollution (as indicated by nitrogen dioxide, NO_2) and increased children's daily asthma hospital admissions in that city. As shown in Figure 1 from this study, NO_2 air pollution is strongly associated with traffic pollution in the Phoenix area, as concentrations consistently peak following the morning and evening rush hours (e.g., 8AM and 8PM). The authors found, similar to other studies, that there was an increased risk of asthma hospitalization on days of high traffic-related NO_2 air pollution, but also that the risk estimates for asthma hospital admissions were 2.25(95% CI: 1.47–3.46) times greater for black children as compared to white children. In addition, the study found that, among all Hispanic children, those without health insurance have 1.9 (95% CI: 1.3-3.0) times greater risk than those with private insurance of being admitted to the hospital for asthma from NO_2 exposure, and the same finding held for Hispanic children without insurance vs. Hispanic children with Medicaid. Thus, traffic related air pollution adversely affects children in the Phoenix area, and most severely those children lacking health insurance.

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Code	Issue	Response
15 (cont.)		The Final Environmental Impact Statement evaluates Clean Air Act criteria air pollutant concentrations in Maricopa County and the Phoenix area (see pages 4-75 to 4-77 of the Final Environmental Impact Statement). With regard to air quality impacts, the Final Environmental Impact Statement addresses children's health impacts within the broader discussion regarding health impacts under the National Ambient Air Quality Standards. Clean Air Act Section 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety and are requisite to protect the public health. As noted by the U.S. Environmental Protection Agency in its 2013 rulemaking for particulate matter, Clean Air Act Section 109's legislative history demonstrates that the primary standards are "to be set at the maximum permissible ambient air level... which will protect the health of any [sensitive] group of the population" (78 *Federal Register* 3086 and 3090) (quoting S. Rep. No. 91-1196, 91st Cong., 2 Sess. 10 [1970]) (alterations in original). Accordingly, the Final Environmental Impact Statement National Ambient Air Quality Standards-based evaluation of criteria air pollutants includes a health-based review of sensitive populations, including children, given the National Ambient Air Quality Standards inherent consideration of those factors. Furthermore, the National Ambient Air Quality Standards-based assessment ensures adequate consideration of health-based issues as "[t]he requirement that primary standards provide an adequate margin of safety was intended to address uncertainties associated with inconclusive scientific and technical information ... and to protect against hazards that research has not yet identified" (78 *Federal Register* 3090). Sensitive receivers for air and noise are already included in the air quality and noise analyses in accordance with State and federal guidance. Both sections, *Air Quality* and *Noise*, beginning on Final Environmental Impact Statement pages 4-68 and 4-88, respectively, have addressed requirements under the National Environmental Policy Act. As stated on page 4-89 of the Final Environmental Impact Statement, over 220 sensitive receivers were evaluated at exterior locations from a traffic noise perspective. All of the receivers represent noise-sensitive land uses in proximity to the proposed project, including homes, schools, and parks, and these receivers would have higher noise levels than similar facilities more distant from the proposed action. Each modeled school was reexamined to determine whether noise impacts would result from the proposed freeway and whether appropriate mitigation of these impacts was provided. Of the nine schools modeled in the analysis for the Final Environmental Impact Statement, all were predicted to exceed the Federal Highway Administration noise abatement criteria (see Table 4-40, beginning on page 4-93). Mitigation, in the form of noise walls, was proposed for all schools. After applying this mitigation, all schools except one were mitigated according to the Arizona Department of Transportation noise policy. According to Arizona Department of Transportation policy, noise mitigation should achieve a reduction of 5 to 7 A-weighted decibels and result in a noise level of less than 64 A-weighted decibels for residential and similar areas. These criteria were not reached for one school (receiver 67, Santa Maria Elementary School) because the policy limits wall heights to 20 feet. A wall taller than 20 feet would be required to bring levels at this receiver down to 64 A-weighted decibels. However, a 5-A-weighted decibels reduction would be provided by the 20-foot wall proposed in this area. It is important to note that this receiver would be affected only by the W71 Alternative, which is not the Preferred Alternative.

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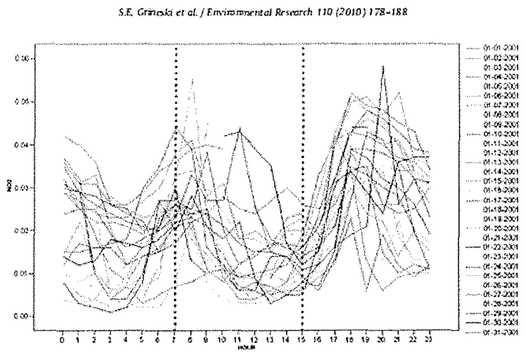

Figure 5. NO_2 in the Phoenix Area are highest following rush hour periods, documenting the large role of traffic-related pollution in air pollution impacts in the Phoenix Metro area

• *Reduced lung function*

Research by Svendsen et al. (2012) has found both long-term and short-term reductions in lung function (i.e., ability to inhale and exhale air) as a result of traffic-related air pollution exposure. For example, investigators examined 5,654 children enrolled in the El Paso, Texas, public school district by questionnaire in 2001. School-level and residence-level exposures to traffic-related air pollutants were estimated using a land use regression model. For 1,529 children with spirometry, residential levels of traffic-related ambient air pollution were associated with a 2.4% decrement in forced vital capacity (95% confidence interval (CI): -4.0, -0.7) after adjustment for demographic, anthropomorphic, and socioeconomic factors and spirometer/technician effects.

In my own work in the South Bronx, NY, I have found reduced lung function among elementary school children occurs on days of elevated traffic-related EC concentrations (Spira-Cohen et al, 2011). As shown in the plots below, the impact of diesel traffic related EC was larger and more significant that particles in general ($PM_{2.5}$).

Code	Issue	Response
15 (cont.)		The Arizona Department of Transportation noise policy also states that noise abatement shall be considered if "substantial increases" (defined as a 15 A-weighted decibels or greater increase) are predicted. Of the nine schools modeled, substantial increases were predicted at six schools. As discussed above, however, noise walls would reduce noise levels at all schools according to the Arizona Department of Transportation noise policy, with the exception of Santa Maria Elementary School, which would be affected only by the W71 Alternative, which is not the Preferred Alternative. According to the Federal Highway Administration's 1995 Highway Traffic Noise Analysis and Abatement Policy and Guidance, in most cases, if the exterior area can be protected, the interior will also be protected. Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations § 93.123(a). The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Through analysis, the Federal Highway Administration has determined that the proposed project would not produce disproportionate impacts on children.

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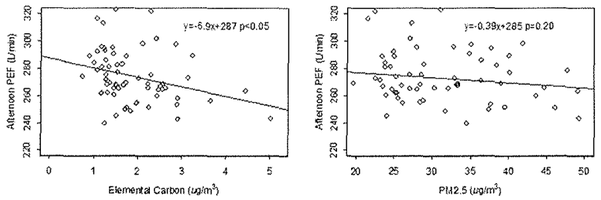

Figure 6. Lung Function in Children Decreases with Increasing Exposure to Traffic Related EC.

• *Reduced Lung Development and Growth*

Traffic-related air pollution has also been indicated to inhibit the growth of young lungs among children over the long-term of exposure. Schultz et al (2012) followed more than 1,900 children in the Swedish birth cohort BAMSE with repeated questionnaires, dynamic spirometry, and IgE measurements until 8 years of age. Outdoor concentrations of particulate matter with an aerodynamic diameter less than 10 μm (PM_{10}) from road traffic were estimated for residential, day care, and school addresses from birth and onward using dispersion modeling. The relationship between time-weighted average exposure during different time windows and FEV at 8 years was analyzed by linear regression, adjusting for potential confounding factors, including short-term exposure to air pollution. The authors found that a 5th to 95th percentile difference in traffic-related average PM_{10} exposure during the first year of life was associated with a reduced FEV1 of 259.3 ml (95% confidence interval, 2113 to 25.6) at 8 years of age. Clearly, exposure to traffic-related air pollution reduces the ability for children to properly grow and develop their full lung capacity.

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• *Cardiac effects*

Exposure to air pollution from road traffic has also been linked to a number of other health issues including heart attack, coronary artery disease and increased risk of death from cardiac conditions in adults. For example, Peters et al. (2000) compared patient implanted defibrillator discharge interventions among 100 patients with such devices in eastern Massachusetts, according to variations in concentrations of particulate matter, black carbon, and gaseous air pollutants that were measured daily for the years 1995 through 1997. Patients with ten or more interventions experienced increased arrhythmias in association with nitrogen dioxide, carbon monoxide, black carbon, and fine particle mass. A stronger association was found for NO_2 and black carbon than for $PM_{2.5}$. Consistent positive associations were observed with black carbon, CO, and NO_2 (noted markers for

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13	local traffic-related pollution), with the strongest associations observed for NO_2. A 26-ppb increase in nitrogen dioxide was associated with nearly a doubling of defibrillator interventions (odds ratio = 1.8; 95% confidence interval = 1.1–2.9). These results indicate that exposure to elevated levels of these traffic-related air pollutants are associated with potentially life-threatening arrhythmias. In January 2010, the HEI Publication 17 Report (HEI, 2010) concluded that the evidence supporting the effects of traffic-related air pollution on cardiac morbidity and mortality were suggestive, but that was also concluded before newer, more definitive evidence was published. In my own work (Lall et al, 2010) in New York City, daily $PM_{2.5}$ speciation measurements collected in Mid-town Manhattan were analyzed via Positive Matrix Factorization source apportionment to determine the original source of different components of air pollution. Daily and distributed-lag Generalized Linear Models of Medicare respiratory and cardiovascular hospital admissions during 2001-2002 considered $PM_{2.5}$ mass and $PM_{2.5}$ from five sources: transported sulfate, residual oil, traffic, steel/construction and soil. Traffic-related $PM_{2.5}$ was significantly associated with an increase in the risk of cardiovascular hospital admissions. Investigations have also found biological markers of cardiac effects by traffic-related air pollution. Hoffmann et al. (2007) conducted a cross-sectional analysis of data collected at baseline for 4,494 residents of Germany followed from 2000 to 2003. The age of participants ranged from 45-74 yrs. of age. The authors estimated 1-yr avg. exposure to $PM_{2.5}$ in 2002 (the midpoint of the baseline exam). They found a 43% (95% CI: -15 to 115) increase in coronary-artery calcification (CAC) per 10 $\mu g/m^3$ increase in $PM_{2.5}$. The strength of association was similar across demographic and clinical characteristics subgroups. The authors reported a more consistent association of CAC with traffic exposure (i.e., distance from a major roadway) than with $PM_{2.5}$ mass in general, indicating a stronger role by traffic particles. In a subsequent analysis of these data, Hoffmann et al. (2009) examined the association between Ankle-Brachial Index (ABI, an index of Peripheral Arterial Disease, PAD) and $PM_{2.5}$ in this population. In both studies, residing near a major roadway was the strongest predictor of atherosclerotic disease progression. • *Premature mortality* Premature mortality, especially for cardiac causes, has been widely found to be associated with traffic-related air pollution. In my own research in New York City, We analyzed daily deaths and emergency hospitalizations for CVDs among persons ≥ 40 years of age for associations with $PM_{2.5}$, its chemical components, nitrogen dioxide (NO_2), carbon monoxide (CO), and sulfur dioxide for the

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13	years 2000-2006 using a Poisson time-series model adjusting for temporal and seasonal trends, temperature effects, and day of the week (Ito et al, 2011). We estimated excess risks per interquartile-range increases at lags 0 through 3 days for warm (April through September) and cold (October through March) seasons. We found that increased CVD mortality and increased CVD hospitalizations were both associated with increased exposure to traffic–related elemental carbon and NO_2 throughout the year in New York City, NY. Similarly, Beckermann et al. (2012) assessed the association between the occurrence of Ischemic Heart Disease (IHD) and air pollutants in Toronto, Ontario, Canada. Confounding was controlled with individual and neighborhood-level covariates. After adjusting for multiple covariates, nitrogen dioxide(NO_2) (a pollutant derived from traffic, as per Figure 5 above) was significantly associated with increased IHD risk, relative risk (RR) = 1.33 (95% confidence interval [CI]: 1.2, 1.47). Subjects living near major roads and highways had a trend toward an elevated risk of IHD, RR = 1.08 (95% CI: 0.99, 1.18). In Phoenix, research by Mar et al (2000) evaluated the association between mortality outcomes in elderly individuals and particulate matter (PM) of varying aerodynamic diameters (in micrometers) [PM10, PM2.5, and PMCF (PM_{10} minus $PM_{2.5}$)], and selected particulate and gaseous phase pollutants in Phoenix, Arizona, using 3 years of daily data (1995–1997). Although source apportionment and epidemiologic methods have been previously combined to investigate the effects of air pollution on mortality, this was the first study to use detailed PM composition data in a time–series analysis of mortality. These authors found that total and cardiovascular disease mortality was significantly associated with air pollution factors associated with motor vehicle emissions. Total mortality was significantly associated with CO and NO_2 ($p < 0.05$). Increase cardiovascular mortality was significantly associated with CO, NO_2, SO_2, $PM_{2.5}$, PM_{10}, PMCF ($p < 0.05$), and EC soot (related to diesel truck emissions). Thus, the evidence indicating that the risk of cardiac illness and mortality from exposure to traffic-related air pollution has expanded since the HEI Publication 17 report in 2010, and I conclude that adults are at increased risk of cardiac illness and/or mortality from increased exposure to traffic-related air pollution exposure. *Other Potential Health Effects* There are a host of other adverse health effects that could result from human exposures to the air pollution emitted by the proposed Freeway that, while less well proven, are also not sufficiently

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acknowledged by the DEIS. These other potential adverse effects of air pollution exposure from traffic-related air pollution exposure may include increased risk of lung cancer (especially from increased exposure to diesel particulate matter) and adverse birth outcomes (e.g., low birth weight, small for gestational age, and perinatal mortality). In my own research in the largest cohort studied to date, we have found an increased risk of lung cancer to be associated with increased exposure to $PM_{2.5}$ air pollution (Pope et al, 2002). For these outcomes, as noted by the HEI Publication 17, there is presently only "limited evidence of associations, but the data were either inadequate or insufficient to draw firmer conclusions." While not as well proven as the above effects of exposure to traffic-related air pollution, the risk of lung cancer from traffic air pollution is considered too lightly in the DEIS, and possible adverse birth outcomes are not even discussed in Chapter 4's "Air Quality" section of the draft DEIS.

Conclusions

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Based upon my review of the published scientific and medical literature, including my own relevant research, I conclude that the increased exposure to residents living or going to school near to the proposed South Mountain Freeway will be at substantially increased risk of adverse health effects if the freeway is built as proposed, and I further note that these various health impacts are ignored or not sufficiently addressed in the draft DEIS. In particular, if the freeway is built as planned, children with asthma will be at much greater risk of experiencing asthma exacerbations (e.g., asthma attacks, wheezing, cough, etc.). Healthy children will be at significantly higher risk of getting new-onset asthma, and all children living near the proposed Freeway will likely have their lung growth and development inhibited from what it would have been without the Freeway. In adults, the primary health threat from the proposed Freeway air pollution will be increased risks of chronic cardiovascular illness (e.g., PAD), acute myocardial infarctions (MIs), and premature mortality.

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16		References

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Reponen T, Grinshpun SA, Trakumas S, Martuzevicius D, Wang ZM, LeMasters G, Lockey JE, Biswas P. 2003. Concentration
gradient patterns of aerosol particles near interstate highways in the greater Cincinnati airshed. J Environ Monit 5:557–562.

Svendsen ER, Gonzales M, Mukerjee S, Smith L, Ross M, Walsh D, Rhoney S, Andrews G, Ozkaynak H, Neas LM. GIS-modeled indicators of traffic-related air pollutants and adverse pulmonary health among children in El Paso, Texas. Am J Epidemiol. 2012 Oct 1;176 Suppl 7:S131-

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Spira-Cohen A, Chen LC, Kendall M, Sheesley R, Thurston GD. (2010). Personal exposures to traffic-related particle pollution among children with asthma in the South Bronx, NY. J Expo Sci Environ Epidemiol. 2010 Jul;20(5):446-56. Epub 2009 Oct 28.

Spira-Cohen A, Chen LC, Kendall M, Lall R, Thurston GD. Personal Exposures to Traffic-Related Air Pollution and Acute Respiratory Health Among Bronx School Children with Asthma. Environ Health Perspect. 2011 Apr;119(4):559-65 (Epub. Dec. 2010 ahead of print)

U.S. EPA (2009). Integrated Science Assessment for Particulate Matter. EPA/600/R-08/139F. National Center for Environmental Assessment-RTP Division. Office of Research and Development. U.S. Environmental Protection Agency. Research Triangle Park, NC. December, 2009.

Venn AJ, Lewis SA, Cooper M, Hubbard R, and Fritton J. (2001) Living Near a Main Road and the Risk of Wheezing Illness in Children. Am J Respir Crit Care Med. 2001 Dec 15;164(12):2177-80.

Zhu Y, Hinds WC, Kim S, Sioutas C. 2002. Concentration and size distribution of ultrafine particles near a major highway. J Air Waste Manag Assoc 52:1032–1042.

Zhu Y; Kuhn T; Mayo P; Hinds WC (2005). Comparison of Daytime and Nighttime Concentration Profiles and Size Distributions of Ultrafine Particles near a Major Highway. Environ Sci Technol, 39: 2531-2536.

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Curriculum Vitae

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http://www.med.nyu.edu/biosketch/gdt1/research

Education

Degree	Field	Institution
Diploma	Academic	Barrington High School, RI
Sc.B. (Honors)	Environmental Engineering	Brown University
A.B.	Environmental Studies	Brown University
S.M.	Environmental Health Sciences	Harvard Univ. Schl. of Public Health
Sc.D.	Environmental Health Sciences	Harvard Univ. Schl. of Public Health

Postdoctoral Training

Specialty	Mentor	Place of Training
Environ. Epidemiology	Dr. H. Ozkaynak	Harvard Univ., Kennedy Schl. of Gov., Camb., MA

Internships and Residencies N/A

Clinical and Research Fellowships N/A

Licensure and Certification N/A

Academic Appointments

1987-1993	Assistant Professor, Dept. of Environmental Medicine, New York University School of Medicine, New York City, NY.
1993-2006	Associate Professor (Tenured), Dept. of Environmental Medicine, New York University School of Medicine, New York City, NY.
2007-present	Professor (Tenured), Dept. of Environmental Medicine, New York University School of Medicine, New York City, NY.
2007-present	Affiliated Faculty, Environmental Studies Program, College of Arts and Sciences, New York University, New York City, NY.
2012-present	Affiliated Faculty, Marron Institute on Cities and the Urban Environment, New York University, New York City, NY
2012-present	Faculty Mentoring Champion, Dept. of Environmental Medicine, New York University School of Medicine, New York City, NY.

Hospital Appointments: N/A

Other Professional Positions and Visiting Appointments:
Oak Ridge Institute for Science and Education Fellow (2008-2010)

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Major Administrative Responsibilities

Year	*Title, Place of Responsibility*
1995-2004	Director, Community Outreach and Environmental Education Program, NYU-NIEHS Center of Excellence, Nelson Inst. of Environ. Med., NYU School of Medicine, Tuxedo, NY
2002-2012	Deputy Director, NYU Particulate Matter Research Center, Nelson Inst. of Environmental Medicine, NYU School of Medicine, Tuxedo, NY
2007-2008	Director, Environmental Epidemiology Core, NYU-NIEHS Center of Excellence, Department of Environmental Medicine, Tuxedo, NY
2010-present	Co-Leader, Metals Research Focus Group, NYU-NIEHS Center of Excellence, Department of Environmental Medicine, Tuxedo, NY.
2012-present	Director, Program in Exposure Assessment and Human Health Effects, Department of Environmental Medicine, NYU School of Medicine.
2012-present	Chair, Appointments and Promotions Committee, Department of Environmental Medicine, NYU School of Medicine.

Teaching Experience

Year	*Name of course*	*Type of Teaching/Contact Hrs.*	
1984-1994	Air Poll. Transport Modeling	(G48.2048)	Course Director
2006-present	Weather, Air Pollution, and Health	(G48.1010)	Course Director
1986-present	Aerosol Science	(G48.2033)	Course Director
1984-2010	Environmental Contamination	(G48.2305)	Lecturer
1984-present	Environ. Hygiene Measurements	(G48.2035)	Lecturer/Lab
1990-1998	Environmental Toxicology	(G48.1006)	Lecturer
1993-1995	Environmental Epidemiology I	(G48.2039)	Lecturer
2001-2003	NYU Summer Institute, Wagner School		Lecturer
2006-present	Environmental Epidemiology I	(G48.2039)	Lecturer
2006-present	Science, Health & Envir. Journalism	(G54.1017.0)	Lecturer
2009-2011	Global Environmental Health	(U10.2153.1)	Course Director
2009-2012	Global Issues in Environ. Health	(G48.1011)	Course Director
2009-present	Earth Systems Science (undergrad)	(V36.0200)	Lecturer
2011-present	Principles of Environmental Health	(G48.1004)	Course Director

Awards and Honors

November 1999	Orange Environment Citizens Action Group, OE Award for Excellence in Translating Science to the Public
December 2000	NYU School of Medicine Dean's Research Incentive Award
October 2012	Recipient of the "Haagen Smit Prize" for Best Paper, Atmospheric Environment. http://geo.arc.nasa.gov/sgg/singh/winners12.html
March 2013	Recipient of the "Top Science Paper of the Year – Science" Award from ES&T http://pubs.acs.org/doi/full/10.1021/es400924t

Major Committee Assignments

New York University Committees

2007-present: University Sustainability Task Force
2010-2012: University Faculty Senate Alternate
2012-present: University Faculty Senator

NYU School of Medicine Departmental Committees

1992-1998:	Sterling Forest Library Committee, Member, NYU SOM Dept of Environ. Medicine
1991-1994	Health & Safety Committee, Member, NYU SOM Dept. of Environ.. Medicine
1992-2004	Community Outreach and Education Comm., Chairman, NYSOM Dept. of Environ. Med.

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1999-2004 Dept. Chairman's Internal Advisory Comm., Member, NYUSOM Dept. of Environ. Med.
2005-present Dept. Academic Steering Committee, Member, NYUSOM Dept. of Environ. Medicine
2007-2012 Dept. Appointments & Promotions Comm., Member, NYUSOM, Dept. of Environ. Medicine
2012-present Dept. Appointments & Promotions Comm., Chair, NYUSOM, Dept. of Environ. Medicine

Advisory Committees

Regional

1983-1984 Massachusetts Acid Rain Advisory Board, Member, Mass. Dept. of Env. Protection
1984-1986 Committee on Environ. And Occup. Health. , NY State American Lung Association
1991-1996 Air Management Advisory Comm., Member of Health Effects Subcom., NY State DEC
1995-1999 Engineering Advisory Board, Member, Tuxedo, NY
1997-1998 Advisory Committee to the Mayor on the Port of Newburgh, Member, Newburgh, NY
1996-1999 CUES Asthma Working Group, Member, New York Academy of Medicine
2008-2010 New York City Community Air Study (NYCCAS) Advisory Panel

National

1995-1999 Comm. on Health Effects of Waste Incineration, Member, National Academy of Sciences
1995-1999 National Air Conservation Commission, Member, American Lung Association
2000-2004 National Action Panel on Environment, Member, American Lung Association
2005-present National Clean Air Committee, Member, American Lung Association
2007-2010 U.S. EPA Clean Air Science Advisory Committee (CASAC) for SOx and NOx
Mar. 2012 EPA Panelist for "Kickoff Workshop to Inform EPA's Review of the Primary NO_2 NAAQS"

International

1996-1997 Sulfur in Gasoline Health and Environment Panel, Chairperson, Health Canada
Sept. 2007 Illness Cost of Air Pollution Expert Committee, Canadian Medical Association
2008-2012 Global Burden of Disease (GBD), Committee on the Human Health Effects of Outdoor Air Pollution, World Health Organization (WHO)

Grant Review Committees (National)

March 1989 EPA Air Chemistry and Physics Extramural Grants Review Panel (*ad hoc member*)
Oct. 1989 NIEHS P30 Center Special Review Panel (*ad hoc member*)
July 1992 NIH R01 Epidemiology & Disease Control Study Section (*ad hoc member*)
Nov. 1992 NIEHS P20 Center Development Grant Special Study Section, (*ad hoc member*)
June 1996 EPA Special Review Panel of the Health Effects Institute (HEI) (*ad hoc member*)
March 1997 EPA Office of Res. and Development External Grant Review Panel (*ad hoc member*)
April 1997 NIEHS Community-Based Participatory Res. R01 Special Study Sect. (*ad hoc member*)
July 1997 EPA National Environ. Research Lab Intramural Research Review Panel (*ad hoc member*)
June 1998 EPA Office of Res. and Development External Grant Review Panel (*ad hoc member*)
July 1998 EPA Climate Policy and Programs Division Grant Application Review (*ad hoc member*)
Oct. 1998 Mickey Leland Center for Air Toxics Grant Review Panel (*ad hoc member*)
April 2000 NIEHS P30 Center Special Review Panel (*ad hoc member*)
July 2001 NIEHS Community-Based Participatory Res. R01 Special Study Sect. (*ad hoc member*)
Dec. 2001 NIEHS Program Project P01 Site Visit Review Panel (*ad hoc member*)
April 2003 NIH R21 Fogarty Health, Env. and Economic Development Study Sect. (*ad hoc member*)
Nov. 2003 U.S. EPA STAR Grant Panel (Epidemiologic Research on Health Effects of Long-Term Exposure to Ambient Particulate Matter and Other Air Pollutants) (*member*)
October 2004 NIEHS Program Project P01 Review Panel (*ad hoc member*)
June 2005 NIH Special Emphasis Panel (ZRG1 HOP Q 90 S) (*ad hoc member*)
Nov. 2005 NIH Infectious Disease, Reproductive Health, Asthma/Allergy, and Pulmonary (IRAP) Conditions Study Section Review Panel (*ad hoc member*)

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Feb. 2006	NIH Infectious Disease, Reproductive Health, Asthma/Allergy, and Pulmonary (IRAP) Conditions Study Section Review Panel (*ad hoc member*)
June 2006	NIH Infectious Disease, Reproductive Health, Asthma/Allergy, and Pulmonary (IRAP) Conditions Study Section Review Panel (*ad hoc member*)
Dec. 2006	NIEHS Special Emphasis Panel on Genetics, Air Pollution, and Respiratory Effects (ZES1 TN-E FG P) (*member*)
Nov. 2007	NIH Special Emphasis Panel on Community Participation in Research (ZRG1 HOP-S) (*member*)
June 2009	NIH Study Section Review Panel on Challenge Grants in Health & Science Research
March 2011	U.S. EPA Science to Achieve Results (STAR) Graduate Fellowship Review Panel – Clean Air Panel (*chair*)
Sept. 2011	NIH Special Epidemiology Study Section (ZRG1 PSE K 02 M) (*member*)
Oct. 2012	NIH Cardiac and Sleep Epidemiology (CASE) Study Section (*ad hoc member*)
June 2013	NIH Special NHLBI Dataset Study Section (ZRG1 PSEQ 56) (*member*)
July 2013	NIH "Career Awards" Study Section (ZES1 LWJ-D, K9) (*member*)

Memberships, Offices, And Committee Assignments In Professional Societies

Year	*Society/Committees*
1980-1996	Air and Waste Management Association (Comm. on Health Effects and Exposure,)
1992-Present	American Thoracic Society (ATS): Environmental and Occup. Health (EOH) Assembly, 1995-1999, 2012-present: ATS EOH Long Range Planning Committee; 1993-1994, 2002-2004: ATS Program Committee 2006-2007 Chairman of the ATS-EOH Nominating Committee 2010-present: ATS Environmental Health Policy Committee, member 2012-present: ATS Environmental Health Policy Committee, Vice-Chairman
1990-present	International Society of Exposure Analysis
1992-present	International Society for Environmental Epidemiology (Annual Meeting Program Committee: 1998, 2000, 2003, 2004, 2006) (ISEE Conference Planning Committee: 2006-present)
2007-present	New York Academy of Sciences (membership given in appreciation for a 1/23/07 NYAS forum presentation)

Editorial Positions

Journal Board Membership

Year	*Name of Board*
1993-2008	International Society of Exposure Analysis (J. of Exp. Anal. and Environ. Epid.)

Ad Hoc Manuscript Reviewer

Years	*Journal*
1996-1998	American Journal of Epidemiology
1994	Archives of Environmental Health
1995-present	Atmospheric Environment
1995-present	Environmental Health Perspectives
1994-present	Environmental Research
2004-present	Environmental Science and Technology
2011-present	Epidemiology
1993-present	Journal of Exposure Analysis and Environmental Epidemiology
1994-present	Journal of the Air and Waste Management Association
1996-present	Journal of the American Medical Association

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1997-present	Journal of Occupational and Environmental Medicine
1997-present	Journal of Respiratory and Critical Care Medicine
2006-present	Thorax

Scientific Report Reviewer

August, 1986	Reviewer for the National Academy of Sciences, Board on Environmental Studies and Toxicology report "The Airliner Cabin Environment: Air Quality and Safety"
October, 2002	Reviewer for the National Academy of Sciences, Board on Environmental Studies and Toxicology report "Estimating the Public Health Benefits of Proposed Air Pollution Regulations"

Mentoring of Graduate Students, Residents, Post-Doctoral Fellows in Research

Under direct supervision:

Student Name	*Type of Position*	*Time Period*	*Present Position*
Mark Ostapczuk	Masters	1984-1986	Industrial Hyg., Barr Labs, Pomona, NJ
Kazuhiko Ito	Masters/Doctoral	1984-1990	Scientist, NYC Dept. of Health, NYC, NY
Peter Jaques	Masters/Doctoral	1988-1998	Assoc. Prof., Clarkson Univ., Potsdam, NY
R. Charon Gwynn	Masters/Doctoral	1992-1999	Epidemiologist, Columbia Univ., NY
Ramona Lall	Masters/Doctoral	2000-2007	Research Sci. IV, NYC Dept. of Health, NY
Ariel Spira-Cohen	Masters/Doctoral	2003-2009	Research Sci. III, NYC Dept. of Health, NY
Kevin Cromar	Masters/Doctoral	2008-2012	Assistant Professor, NYU School Of Medicine
Lital Yinon	Doctoral	2011-present	Doctoral Candidate, NYU School of Medicine

In advisory function (thesis committee):

Student Name	*Advisory Role*	*Time Period*	*Student's Supervisor*
Shao-Keng Liang	Doctoral Committee member	1990-1994	Dr. J. Waldman, UMDNJ, Rutgers
Jerry Formisano	Doctoral Committee member	1997-2000	Dr. M. Lippmann, NYU SOM
Yair Hazi	Doctoral Committee member	1993-2001	Dr. B. Cohen, NYU SOM
Samantha Deleon	Doctoral Committee member	1997-2003	Dr. K Ito, NYU SOM
Chun Yi Wu	Doctoral Committee member	2000-2004	Dr. L.C. Chen, NYU SOM
Carlos Restrepo	Doctoral Committee member	2002-2004	Dr. R. Zimmerman, Wagner, NYU
Shaou-I Hsu	Doctoral Committee member	2000-2009	Dr. M. Lippmann, NYU-SOM
Steven Schauer	Doctoral Committee member	2007-2009	Dr. B. Cohen, NYU-SOM
Christine Ekenga	Doctoral Committee Chair	2009-2011	Dr. G. Friedman-Jimenez, NYU-SOM
Rebecca Gluskin	Doctoral Committee Chair	2009-2012	Dr. Kazuhiko Ito, NYU SOM
Jiang Zhou	Doctoral Committee Chair	2008-2012	Dr. Kazuhiko Ito, NYU SOM

Teaching Awards Received

N/A

Major Research Interests

1) Air Pollution Epidemiology: The study of real-world air pollution exposures and human health effects in the general population and in study cohorts of suspected susceptible individuals (e.g., children, older adults, and those with asthma).

2) Aerosol Science: The study of ambient particulate matter aerosol exposures, including designing and implementing air monitoring equipment to collect human exposures to air pollution.

3) Environmental Exposure Assessment: The study of methods to assess human exposures and health effects from air pollution, especially the development of source apportionment models to separate human effects on the basis of pollution source, as well as the design of epidemiological

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models and methods that better incorporate potential confounders/effect modifiers in the air pollution-health link, such as weather and genetic influences on health.

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Grants Received

Prior:

Agency	Title	Grant #	Period	Total Direct Costs	Role	% Effort
USEPA	Effects of Acute Exposure to Summertime Haze Episodes on the Health of Humans	R811563	05/01/84-09/30/87	$538,586	CO-I	50%
NIH	Acid Aerosol Exposure: Effect on Respiratory Morbidity	R01 ES04612	09/25/87-08/31/92	$846,966	PI	30%
USEPA	Acid Aerosol Chamber Experiments	OD2524AEX	7/2/90-7/31/9	$5,810	PI	9%
USEPA	Analysis of Acid Aerosol Experiments	00422248NAEX	8/1/90-9/30/9	$3,364	PI	5%
USEPA	Air Pollutants and Human Health	R814023	05/18/87-05/17/91	$690,921	CO-I	50%
USEPA	Development and Field Applic. of an Automated Sequential Weekly Average H+ Sampler	Subcontract to EPA Grant CR816740-03	6/1/92-2/28/9	$13,156.	PI	15%
NIH	Acid Aerosol Exposure: Effect on Respiratory Morbidity	R01 ES04612	09/01/92-08/31/95	$377,298.	PI	30%
HEI	Retrospective Characterization of Ozone Exposures	Health Effects Institute Grant	11/1/93-10/31/94	$98,238	CO-I	10%
NIH	Temperature and Air Pollution Effects on Human Mortality	R01 ES05711	6/1/92-5/31/9	$371,993	PI	30%
NYUSOM	Environmental Effects on Human Mortality and Morbidity	Bridge Grant	9/1/95-8/31/9	$48,400	PI	-
USEPA	Effects of Exposure to Ambient Air Pollutants on Human Health	R808325	10/1/91-09/30/96	$870,565	CO-I	50%
USEPA	Investigation of Acid Aerosol Exposures in Metropolitan Settings	Subcontract to Grant No. CR822050	11/1/93-10/31/96	$200,499	PI	10%
USEPA	An Evaluation of Potential Confounders in PM10 Mortality Associations	R825271	11/25/96-11/24/01	$219,410	CO-I	10%
USEPA	Acidic PM and Daily Human Mortality in Three U.S. Cities	#R825264	11/25/96-11/24/00	$232,671	PI	15%
NYS-ERDA	Environmental Monitoring, Evaluation, and Protection Program	6084-ERTER-ES00	12/01/99-11/30/02	$341,926	PI	20%
HEI	Children's Asthma Incidence and Personal Exposures to Diesel Particles and Traffic in NYC		01/01/02-12/31/02	$154,800	PI	30%
USEPA	Influence of Alternate Indicators of Exposure to PM and PM Components in Statistical Associations with Mortality and Hospital Admissions	R827358	03/01/99-02/28/03	$183,089	PI	30%

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NIH	NIEHS Center Supplement: Health Issues Related to the World Trade Center Disaster, Outreach Project	ES00260-S1	04/01/02-03/31/03	Total=$ 936,487 Outreach=$172,031	CO-PI PI	10% 15%
NIH	Effects of Ambient Air Pollutants on Annual Mortality	RO1 ES09560	9/15/99-8/31/03	$471,408	PI	30%
USEPA	Particle Exposures of High-Risk Sub Populations	R827164	10/01/98-09/30/03	$1,327,240	CO-I	10%
USEPA	A Source Oriented Evaluation o the Combined Effects of Fine Particles and Co-pollutants	R827997	02/01/00-01/31/04	$291,407	CO-I	15%
NIH	NIEHS Center Grant: Outreach and Education Program	ES00260	04/01/00-03/31/05	Total=$5,000,000 Outreach=$240,365	CO-I PI	5% 5%
USEPA	EPA PM Health Effects Center Project 6: "A Prospective Study of Asthma Susceptibility to PM; Epidemiologic Investigations of Key PM Components and Biomarkers of Effects & Community Outreach Project	R827351	06/01/99-05/31/05	Total=$6,000,000 Project 6=$134,923 Outreach=$77,779	CO-PI PI PI	15% 10% 10%
NIH	Genetic/Epigenetic Susceptibility to Superfund Chemicals: Outreach Project	ES010344	05/08/00-03/31/06	$156,812	CO-I	5%
USEPA	Env. Issues in the South Bronx. Thurston Project: S. Bronx Backpack Study	X1982152	08/01/00-09/30/06	Total=$921,922 Project=$307,131	CO-I PI	5% 15%
NIH	NIEHS Center Supplement: Health Issues Related to the World Trade Center Disaster, Source Attribution (Project 4) & Community Outreach	ES00260-S2	04/01/02-03/31/04	Total=$660,000 Project 4=$69,999 Outreach=$172,03	Co-PI PI PI	10% 10% 15%
USEPA	The role of traffic-related pollution in PM health effects associations among inner-city children with asthma	16511	09/01/06-08/31/09	$51,516	PI	-
California Air Resources Board (CARB)	Spatio-temporal Analysis of Air Pollution and Mortality in California Based Upon the ACS Cohort (Thurston: Consulting Project)		06/01/07-5/31/10	Project=$13,634	Co-I	4%
USEPA	Real time modeling of weather, air pollution, health outcome indicators in NYC.	RD-83362301-0	12/07-11/10	$130,496	Co-I	5%
NIH	Fine Particles and Out-of-Hospital Cardiac Arrest in New York City	R01ES014387-01A2	04/09-12/11	$200,000	C0-I	10%
Health Effects Institute (HEI)	Characteristics of PM Associated with Health Effects. *Thurston Project*: "Study Of PM Components and U.S. Human Mortality In The ACS Cohort.	4750	01/01/07-3/31/11	Total=$3,247,567 Project=$355,920	Co-I PI	5% 20%

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Current:

Agency	Title	Grant #	Period	Total Direct Costs	Role	% Effort
New York State DOT	Mobile Source Air Toxics (MSATs) Mitigation Measures		09/01/10 06/31/13	SubProject=$89,062	Co-I	10%
Robert Wood Johnson Foundation	The Effect of Peak-Shaving Regulations on the Activity, Toxic Emissions, and Health Impacts of Local Power Plants	Public Health Law Research	1/12-7/13	$151,500	Co-I	10%
NIH	Long-term Air Pollution Exposure and Mortality in the NIH-AARP Cohort.	R01ES019584-01A1	1/01/12-10/30/15	$1,070,000	MPI	20%
The Public Health Research Institute of Abu Dhabi	Development of a Public Health Research Institute in Abu Dhabi. *Thurston Project*: "Air Pollution in Abu Dhabi".		3/2012-2/2017	$9,993,960	Co-I	10%
NIH	Dietary Influence on Mortality from Air Pollution Exposure in the NIH-AARP Cohort (R21)	1R21ES021194-01	7/12-6/14	$150,000	MPI	8%

Patents
None

Boards and Community Organizations
1990-1995 St. Mary's Episcopal Church, Tuxedo, NY, Vestry member
1992-present Monroe-Woodbury Soccer Club, Coach (Board Member: 1999-2000)
1994-present Orange County Citizen's Foundation, Member
1999-2009 Y2CARE Monroe-Woodbury, NY School District Residents Action Group, Founder
2005-present St. Mary's Episcopal Church, Tuxedo, NY, Community Outreach Committee, Member
2006-present EPISCOBUILD-Newburgh, NY Habitat for Humanity Advisory Board, Member
2012-present St. Mary's Episcopal Church, Tuxedo, NY, Vestry member

Military Service
None

International Scientific Meetings Organized

May 28-30, 2003 "Workshop on the Source Apportionment of PM Health Effects." U.S. EPA PM Centers, Harriman, NY.
Aug. 1-4, 2004 "Sixteenth Conference of the International Society for Environmental Epidemiology," Kimmel Conference Center, Washington Square, New York University, New York City, NY.

Scientific Forums for the Public Organized

June 2001 "Science and Community Interaction Forum on the Environment." Held at Hostos Community College, Bronx, , New York City, NY.

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October 2001 "Forum on Environmental Health Issues Related to the World Trade Center Disaster." Held at NYU Law School, Washington Square, New York City, NY.

October 2002 "2nd Annual Forum on the Environmental Health Issues Related to the World Trade Center Disaster." Held at Manhattan Borough Community College, New York City, NY.

October 2003 "3nd Annual Forum on the Environmental Health Issues Related to the World Trade Center Disaster." Held at NYU Lower Manhattan Campus, New York City, NY.

Invited U.S. House and Senate Congressional Testimony

Feb. 5, 1997 "Human Health Effects of Ambient Ozone Exposures" Statement before the Committee on Environment and Public Works, Subcommittee On Clean Air, Wetlands, Private Property, And Nuclear Safety, U.S. Senate, Washington, DC. http://epw.senate.gov/105th/thurston.htm

April 16, 1997 "Human Health Effects of Ambient Ozone and Particulate Matter Exposures." Statement before the Government Reform and Oversight Committee of the U.S. House of Representatives, Washington, D.C.

May 8, 1997 "Human Health Effects of Ambient Ozone and Particulate Matter Exposures." Statement before the Subcommittee on Health and Environment, Committee on Commerce of U.S. House of Representatives, Washington,. D.C.

July 29, 1997, "The Human Health Effects of Ambient Ozone And Particulate Matter Air Pollution." Statement before the Subcommittee on Commercial and Administrative Law of the Judiciary Committee of the U.S. House of Representatives, Washington,. D.C. http://judiciary.house.gov/legacy/commercial.htm

October 22, 1997 "Ozone and Particulate Matter Air Pollution Health Effects." Statement before the U.S. Senate Committee on Environment and Public Works Subcommittee on Clean Air, Wetlands, Private Property, and Nuclear Safety. Washington, DC. http://epw.senate.gov/105th/thursto2.htm

July 15, 1999: "The Mandated Release of Government-Funded Research Data." Statement before the Committee On Government Reform, Subcommittee on Government Management, Information And Technology, U.S. House of Representatives

July 26, 2001 "The Human Health Effects Of Air Pollution From Utility Power Plants." Statement before the Committee on Environment and Public Works, U.S. Senate, Washington, D.C. http://www.c-spanvideo.org/program/PlantE

Feb 11, 2002: "The Air Pollution Effects of The World Trade Center Disaster." Statement before the Committee On Environment And Public Works, Subcommittee On Clean Air, Wetlands, And Climate Change. United States Senate, New York, NY. http://www.c-spanvideo.org/program/Qualitya

March 5, 2002 "The Use of the Nationwide Registries to Assess Environmental Health Effects." Statement before the Committee On Health, Education, Labor, And Pensions, Subcommittee On Public Health, U.S. Senate, Washington, DC.

Sept. 3, 2002 "The Clean Air Act and The Human Health Effects of Air Pollution from Utility Power Plants." Statement before the U.S. Senate Committee on Health, Education, Labor, and Pensions, Subcommittee on Public Health, Washington, D.C. http://www.c-spanvideo.org/program/AirStand

April 1, 2004 "The Human Health Benefits Of Meeting the Ambient Ozone And Particulate Matter Air Quality Standards." Statement before the Committee on Environment and Public Works, Subcommittee on Clean Air, Climate Change, and Nuclear Safety, U.S. Senate, Washington, D.C.

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http://epw.senate.gov/epwmultimedia/epw040104.ram

July 19, 2006 "The Science And Risk Assessment Of Particulate Matter (PM) Air Pollution Health Effects." Statement before the Committee on Environment and Public Works, U.S. Senate, Washington, D.C.
http://epw.senate.gov/hearingstatements.cfm?id=258766

May 7, 2008 "Science And Environmental Regulatory Decisions." Statement before the Committee On Environment And Public Works of The U.S. Senate, Subcommittee on Public Sector Solutions to Global Warming, Oversight, and Children's Health Protection, U.S. Senate, Washington, D.C.
http://www.c-spanvideo.org/program/RegulatoryD
http://epw.senate.gov/public/index.cfm?FuseAction=Hearings.Hearing&HearingID=a1954f70-802a-23ad-4192-fc2995dda7f4

October 4, 2011 "The Science of Air Pollution Health Effects and the Role of CASAC in EPA Standard Setting" Statement before the Subcommittee on Energy and the Environment, Committee on Science, Space and Technology, U.S. House Of Representatives, Washington, DC.
http://science.house.gov/hearing/energy-and-environment-subcommittee---hearing-quality-science-quality-air

Other Invited Presentations

Regional Presentations

April 21, 1993 "Summertime Smog and Hospital Admissions for Respiratory Illness", Environmental and Occupational Health Sciences Institute Seminar Series Lecture, UMDNJ-Robert Wood Johnson Medical School, Piscataway, NJ.

Dec .14, 1995 "Health Effects of Acidic Aerosols", NY State Dept. of Health, Wadsworth Center Seminar, Albany, NY

Jan. 18, 1996 "Outdoor Air Pollution and Asthma in Children " American Lung Association Press Briefing, New York, NY.

June 1, 1996 "Asthma and Urban Air Pollution", WHEACT, Harlem Hospital, New York, NY.

July17, 1996 "Asthma and Outdoor Air Pollution", Making the Connection: Urban Air Toxics & Public Health. Northeast States for Coordinated Air Use Management (NESCAUM), Roxbury, MA

Feb. 11, 1997 "Outdoor Air Pollution and Asthma", Bellevue Hospital Asthma Clinic *Grand Rounds*. New York City, NY.

Feb. 26, 1998 "Scientific Research for Ozone and Fine Particulate Standards ", Pace University School of Law, White Plains, NY

Nov. 30, 1998 "Outdoor Air Pollution and Asthma", Center for Urban and Environmental Studies (CUES), NY Academy of Medicine,, New York, NY

Feb. 22, 1999 "Asthma and Air Pollution", Cornell University, Ithaca, NY

April 28, 2001 "Asthma and Air Pollution in New York City", NYC Council Environmental Candidate School, NY League of Conservation Voters, New York, NY.

Nov. 1, 2001 "Air Quality and Environmental Impacts Due to the World Trade Center Disaster", Testimony before the Comm. on Environ. Protection, NYC Council, New York, NY.

Nov. 13, 2001 "WTC Pollution Impacts in Lower Manhattan", Stuyvesant High School Parents Association General Meeting, Stuyvesant High School, New York, NY

Feb. 28, 2002 "Lung Cancer Effects of Long-Term Exposure to Ambient Fine Particulate Matter", Mailman School of Public Health, Columbia University, New York, NY.

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April 5, 2002 "Air Pollution Impacts of the WTC Disaster", 23rd Annual Scientific Conference of the NY/NJ Education and Research Center: "Worker Health and Safety: Lessons Learned in the Aftermath of Sept. 11, 2001," Mt. Sinai School of Medicine, NYC, NY

April 21, 2002 "Adverse Health Effects of Power Plant Air Pollution on Children" Earth Day 2002, 14th Street Y, New York City, NY.

May 23, 2002 "Human Health Effects of Power Plant Pollution", Rockland County Conservation Association, Suffern, NY

May 31, 2002 "Environmental Health Impacts of the World Trade Center Disaster", University of Rochester Medical School, Rochester, NY.

Sept. 19, 2002 "Community Air Pollution Related to the World Trade Center Disaster". NYC Council Forum: The Environmental Health Consequences of 9/11: Where Do We Stand One Year Later? Borough of Manhattan Community College, New York City, NY.

Oct. 3, 2002 "Community Exposures to Particulate Matter Air Pollution from the World Trade Center Disaster", Mount Sinai School of Medicine *Grand Rounds*, New York City, NY.

April 11, 2003 "Environmental Impacts of the World Trade Center Disaster", NIEHS Public Interest Liaison Group, New York City, NY.

April 21, 2003 "Asthma and Air Pollution", Airborne Threats to Human Health, NIEHS Town Hall Meeting, Syracuse, NY.

May 7, 2003 "Asthma and Air Pollution in NY City" Environmental Candidate School for New York City Council Candidates, Wagner School, NYU, New York City, NY.

July 21, 2003 "Health Effects of Particulate Matter Air Pollution", Ozone Transport Commission, Philadelphia, PA.

Nov. 18, 2004 "Ambient Air Pollution Particulate Matter (PM): Sources and Health Impacts". U.S. Environmental Protection Agency, Region 2, New York City, NY.

Feb. 17, 2005 "Community Air Pollution Aspects Of The Demolition Of 9-11 Contaminated Buildings". Testimony before the Committee On Lower Manhattan Redevelopment, New York City Council, New York City, NY.

Oct. 19, 2005 Air Pollution Health Effects: Consideration of Mixtures. Fall Meeting of the Mid-Atlantic Chapter of the Society of Toxicology (MASOT), East Brunswick, NJ.

Dec.7, 2006 Asthma and Air Pollution Effects in the South Bronx. New York City Child Health Forum, The Children's health Fund, Harlem, NYC, NY.

Jan. 18, 2007 Air Pollution Effects in New York City. NYU Environmental Sciences Seminar Lecture, Washington Square, NYC, NY.

Jan. 23, 2007 The South Bronx Backpack Study: Asthma and Air Pollution in NYC. Presented at the forum "High Asthma Rates in the Bronx: What Science Now Knows and Needs to Learn." New York Academy of Sciences, 7 World Trade Center, NYC, NY.

Oct. 2, 2009 "Diesel Air Pollution and Asthma in New York City". Brown Superfund Research Program. http://www.brown.edu/Research/SRP/thurston%20oct%202.pdf , Brown University, Providence, RI.

June 19, 2012 "The Backpack Study of Asthma and Diesel Air Pollution in the South Bronx". Region 1 U.S. EPA, Citizen Science Workshop, New York City, NY.

National Presentations

Oct. 20, 1987. NIEHS Symposium on the Health Effects of Acid Aerosols: "Re-examination of London, England, Mortality in Relation to Exposure to Acidic Aerosols During 1963-1972 Winters" RTP, NC.

Aug. 13, 1991 "Kuwait Mortality Risks from SO_2 and Particles: Insights from the London Fogs"' The Kuwait Oil Fires Conf., American Academy of Arts and Sciences, Cambridge, MA.

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Jan. 24, 1994	"Air Pollution Epidemiology: Is the Model the Message?" The First Colloquium on Particulate Air Pollution and Human Morbidity and Mortality". Beckman Center of the NAS, Irvine, CA.
May 23, 1994	" Epidemiological and Field Studies". American Thoracic Society Annual Meeting, Boston, MA.
May 25, 1994	"Epidemiological Evidence Linking Outdoor Air Pollution and Increased Hospital Admissions for Respiratory Ailments" American Thoracic Society Annual Meeting, Boston, MA.
May 6, 1996	"Associations Between PM_{10} & Mortality in Multiple US Cities". Second Colloquium on Particulate Air Pollution and Health. Park City, Utah.
Sept. 5, 1996	"Particulate Matter Exposure Issues for Epidemiology" U.S. EPA Particulate Matter Workshop, RTP, NC
April 3, 1997	"Health Effects of Ambient Ozone & Particulate Matter" Air and Waste Assoc. Regional Conference On Impacts of EPA's Proposed Changes to Ozone and PM Standards, Oak Brook, IL
April 22, 1998	"The New EPA Standards for Ambient PM and Ozone" American Lung Association Annual Meeting, Chicago, IL.
Dec. 21, 1999	"Global Overview of Human Death and Illness due to Air Pollution". California Air Resources, Sacramento, CA.
March 24, 2000	"Estimating Ancillary Impacts, Benefits and Costs Of Proposed GHG Mitigation Policies For Public Health" Resources for the Future, Wash., DC.
June 24, 2002	"Investigations Into the Environmental Health Impacts Related to the WTC Disaster" Air And Waste Management Annual Meeting, Baltimore, MD.
July 15, 2002	"Air Pollution and Human Health" NIEHS Built Environment Conference, RTP, NC
July 26, 2002	"The Human Health Effects of Power Plant Emissions and Associated Air Pollution", The Environment & Health Forum, Physicians for Social Responsibility, Washington, DC.
October 7, 2002	"Community Exposures to Particulate Matter Air Pollution from the World Trade Center Disaster" Plenary Speaker at the American Association for Aerosol Research, Charlottesville, North Carolina.
Nov. 11, 2002	"Characterization of Community Exposures to World Trade Center Disaster Airborne and Settled Dust Particulate Matter Air Pollution", American Public Health Association Annual Meeting, Philadelphia, PA.
Dec. 5, 2002	"Susceptibility of Older Adults to Air Pollution", EPA Workshop on Differential Susceptibility of Older People to Environmental Hazards. National Academy of Sciences, Washington, DC.
Feb. 3, 2003	"Health Effects of Particulate Matter Air Pollution", National Air Quality Conference, U.S. EPA, San Antonio, Texas
May 17, 2003	"Assessing the Influence of Particle Sources and Characteristics on Adverse Health Effects of PM", PG18 - New Tools to Evaluate the Health Effects of Air Pollution in Epidemiologic Studies. American Thoracic Society Annual Meeting, Seattle, WA.
Sep. 10, 2003	"Nature and impact of World Trade Center Disaster fine particulate matter air pollution at a site in Lower Manhattan after September 11." Annual Meeting of the American Chemical Society, New York, NY.
October 20, 2003	"Translating Air Pollution Risks to the Community" Annual Meeting of the NIEHS Center Directors, Baltimore, MD.
May 18, 2004	"The Health Imperative for Implementation of the Clean Air Act" State and Territorial Air Pollution Program Administrators/ Association of Local Air Pollution Control Officials (STAPPA/ALAPCO) National Conference, Point Clear, Alabama.

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Oct. 18, 2004 "NIEHS Centers' Investigations of the World Trade Center Collapse Pollution Exposures and Effects: A Public Health Collaboration" National Institute of Environmental Health Sciences Center Directors' Meeting, Research Triangle Park, NC.

May 25, 2005 "PM/Sulfate and Coal Combustion Particle Effects: Epidemiologic and Toxicologic Evidence", American Thoracic Society Annual Meeting, San Diego, CA

Oct. 24, 2005 "The Science Behind the Particulate Matter (PM) Standards" State and Territorial Air Pollution Program Administrators/ Association of Local Air Pollution Control Officials (STAPPA/ALAPCO) National Conference, Alexandria, Virginia.

Oct. 14, 2008 "Diesel Air Pollution and Asthma Exacerbations in a Group of Children with Asthma" Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Pasadena, California.

Feb. 26, 2010 "What studies are appropriate to use to estimate health impacts from specific sources such as diesel PM?" CARB Symposium: "*Estimating Premature Deaths from Long-term Exposure to $PM_{2.5}$*", Sacramento, CA.

May 6, 2011 "Lung Cancer Risks from Exposure to Fine Particle Air Pollution" NYU Cancer Institute Symposium: "Cancer and the Environment", NYC, NY.

May 16, 2012 "The Human Health Effects of Air Pollution" The Air We Breathe: Regional Summit on Asthma and Environment at Allegheny General Hospital, Pittsburgh, PA.

International Presentations

May 1, 1987 "Acid Aerosols: Their Origins, Occurrence, and Possible Health Effects", Canadian Environmental Health Directorate Seminar, Health and Welfare Canada, Ottawa, Canada

July 2, 1987 "Health Effects of Air Pollution in the US", University of Sao Paulo, Sao Paulo, Brasil

Feb. 5, 1991 "Results from the Analysis of Toronto Summer Sulfate and Aerosol and Acidity Data", Workshop on Current Use and Future Directions of Hospital-Based Data in the Assessment of the Effects of Ambient Air Pollution on Human Health. Health and Welfare Canada, Ottawa, Canada.

April 23, 1997 "An Evaluation of the Role of Acid Aerosols in Particulate Matter Health Effects", Conference on the Health Effects of Particulate Matter in Ambient Air. Air & Waste Management Association, Prague, Czech Republic.

May 12, 1998 "The Health Effects of PM and Ozone Air Pollution", Air Pollution: Effects on Ontario's Health and Environment. Ontario Medical Association, Toronto, Canada

Nov. 1, 1999 "Climate Change and the Health Impacts of Air Pollution". The Public Health Opportunities and Hazards of Global Warming Workshop at the U.N. Framework Convention on Climate Change, Conference of Parties (COP5), Bonn, Germany.

August 31, 2000 "Particulate Matter Air Pollution and Health in three Northeastern Cities", World Congress on Lung Health, Florence, Italy

January 29, 2001 "PM Exposure Assessment and Epidemiology", NERAM International Colloquia: Health and Air Quality: Interpreting Science for Decision Makers. Ottawa, Canada.

Feb. 4-5, 2002: "Air Pollution Exposure Assessment Approaches in U.S. Long-Term Health Studies", Workshop on Exposure Assessment in Studies on the Chronic Effects of Long-term Exposure to Air Pollution, World Health Organization, Bonn, Germany

May 2, 2002 "Health Effects of Sulfate Air Pollution" Air Pollution as a Climate Forcing Workshop, East-West Center, Honolulu, Hawaii

Sept. 24, 2003 "Identification and Characterization of World Trade Center Disaster Fine Particulate Matter Air Pollution at a Site in Lower Manhattan Following September 11." Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Perth, Australia.

Dec. 1, 2003 "Terrorism and the Pulmonary Effects of the World Trade Center Disaster Particulate Matter Air Pollution", British Thoracic Society, London, England.

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Sept 14, 2005 "Results And Implications of The Workshop on the Source Apportionment of PM Health Effects", Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Johannesburg, South Africa.

Sept. 4, 2006 "A Source Apportionment of U.S. Fine Particulate Matter Pollution for Health Effects Analysis", Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Paris, France.

Sept. 4, 2007 "Applying Attributable Risk Methods to Identify Susceptible Subpopulations", Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Mexico City, Mexico.

Aug. 27, 2009 "Ischemic Heart Disease Mortality Associations with Long-Term Exposure to $PM_{2.5}$ Components", Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Dublin, Ireland.

Dec. 1, 2010 "The Hidden Air Quality Health Benefits of Climate Change Mitigation". The Energy and Resources Institute (TERI), Lodhi Road, New Delhi, India.

July 17, 2012 "Recent Findings on the Mechanisms and Health Risks of Particulate Matter Air Pollution", European Centre for Environment & Human Health, Truro, England.

Aug. 29, 2012 "Health Effects of PM Components: NYU NPACT Epidemiology Results and their Integration with Toxicology Results", Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Columbia, SC.

Scientific Meeting Sessions Chaired

May 1, 1996 "Epidemiological Findings", 2nd Colloquium on Particulate Air Pollution & Health. Park City, UT.

May 14, 1996 "Particulate Toxicity", American Thoracic Society Annual Meeting, New Orleans, LA.

Jan. 30, 1998 "Evaluation of PM Measurement Methods". $PM_{2.5}$: A Fine Particulate Standard Specialty Conference. Los Angeles, CA.

August 18, 1998 "Communities and Airports: How to Co-Exist?", Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Boston, MA.

April 28, 1998 "Clean Air Act Update", American Thoracic Society Annual Meeting, Chicago, IL.

Oct. 21, 1998 "Health Effects and Regulatory Issues in PM", Particulate Methodology Workshop,. U.S. EPA Center, for Statistics and the Env., Univ. of Washington, Seattle, WA.

April 26, 1999 "Pulmonary Smoking and Air Pollution Epidemiology." American Thoracic Society Annual Meeting, San Diego, CA

Sept. 6, 1999 "Personal exposures to Gases and Particles", Annual Conference of the International Society for Environmental Epidemiology (ISEE), Athens, Greece.

March 31, 2000 "Epidemiology: Particles, Co-pollutants & Morbidity and Mortality", Workshop on Inhaled Environmental/Occupational Irritants and Allergens: Mechanisms of Cardiovascular Responses, American Thoracic Society, Scottsdale, AZ

Jan. 26, 2000 "Epidemiology of Particulate Matter Air Pollution", PM2000 Specialty Conference, Air & Waste Management Assoc., Charleston, SC

May 8, 2000 "Outdoor Air Pollution: Epidemiologic Studies", American Thoracic Society Annual Meeting, Toronto, Canada

Sept. 5, 2001 "Mortality Epidemiology Studies", Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Garmisch, Germany.

May 20, 2002 "After September 11: Bio-terrorism and The Environmental Health Aftermath of The World Trade Center Disaster", Plenary Session. American Thoracic Society Annual Meeting, Atlanta, GA.

April 1, 2003 "Epidemiology: Short-Term and Long-Term Health Effects", Conference on Particulate Matter: Atmospheric Sciences, Exposure, and the Fourth Colloquium on PM and Human Health, Pittsburgh, PA

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May 19, 2003 "Particulate Air Pollution and Diseases in Adults", American Thoracic Society Annual Meeting, Seattle, WA.

May 21, 2003 "Air Pollution as a Cause of Childhood Asthma and Chronic Airway Disease", American Thoracic Society Annual Meeting, Seattle, WA.

Sept. 2003 "Unexplained Medical Symptoms", Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Perth, Australia.

Sept. 25, 2005 "Technology and Health", Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Johannesburg, South Africa.

June 22, 2006 "Characteristics of PM and Related Considerations", Annual Meeting of the Air and Waste Management Association, New Orleans, LA.

Sept. 3, 2006 "Air Pollution Mechanisms", Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Paris, France.

Sept. 20, 2006 "Linkage and Analysis of Air Quality and Health Data", EPA & CDC Symposium on Air Pollution Exposure and Health, RTP, NC

Sept. 5, 2007 "Radiation Exposures and Health Risks", 2007 Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Mexico City, Mexico

Aug. 26, 2009 "Exploring the Range of Methodological Approaches Available for Environmental Epidemiology." 2009 Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Dublin, Ireland

March 23, 2010 "Exposure to and Health Effects of Traffic Pollution", 2010 American Association for Aerosol Research Conference on Air Pollution and Health, San Diego, CA.

Sept. 16, 2011 "Susceptibility to Air Pollution", 2011 Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Barcelona, Spain.

Aug. 27, 2012 "Source Apportionment Of Outdoor Air Pollution: Searching For Culprits". 2012 Annual Meeting of the International Society for Environmental Epidemiology (ISEE). Columbia, SC.

Bibliography

Invited Journal Editorials

Thurston GD and Bates DM, Air Pollution as an Underappreciated Cause of Asthma Symptoms, 2003. JAMA, 290:14, pp. 1915-1916 (2003).

Thurston G.D. (2006). Hospital admissions and fine particulate air pollution. JAMA. Oct 25; 296(16):1966.

Thurston G. (2007). Air pollution, human health, climate change and you. Thorax. 2007 Sep; 62 (9): 748-9.

Thurston GD, Balmes JR; Particulate matter and the environmental protection agency: setting the right standard. Environmental Health Policy Committee of the American Thoracic Society. Am J Respir Cell Mol Biol. 2012 Dec;47(6):727-8. doi: 10.1165/rcmb.2012-0414ED.

Book Chapters

Thurston, G.D. and Leber, M. The relationship between asthma and air pollution. In: *Emergency Asthma* (ed.: B. Brenner), pp. 127-144. Marcel-Dekker, New York, NY (1999).

Thurston, G.D. and Ito, K. Epidemiological studies of ozone exposure effects. In: *Air Pollution and Health* (ed.: S. Holgate and H. Koren). Academic Press. London. pp. 485-510 (1999).

Chen, LC, Thurston, G, and Schlesinger, RB. Acid Aerosols as a Health Hazard. In: *Air Pollution and Health* (ed.: J. Ayres, R. Maynard, and R. Richards). Air Pollution reviews: Vol. 3. Imperial College Press. London. pp. 111-161 (2006).

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Thurston, G.D. and Wallace, L. Air Pollution: Outdoor and Indoor Sources. In: *Environmental and Occupational Medicine*, 4th Edition (Eds.: W. Rom and S. Markowitz). Lippincott, Williams, and Wilkins, Philadelphia (2006).

Thurston, G.D. Air Pollution. In: *Encyclopedia of Public Health* (ed. K. Heggenhougen) Elsevier Press. (2007).

Thurston, G.D and Bell, M. Aerosols, global climate, and the human health co-benefits of climate change mitigation. In *Aerosol Handbook* (2nd edition, in press) (eds.: Lev S. Ruzer and Naomi H. Harley). CRC Press (2012)

National Academy Committee Books Co-Authored

National Research Council (NRC), *Waste Incineration & Public Health.* Committee on Health Effects of Waste Incineration. Board on Environmental Studies and Toxicology. National Academy Press, Washington, DC (2000).

International Reports Co-Authored

Health Canada, *Health and Environmental Impact Assessment Panel Report*, "Joint Industry/Government Study: Sulfur in Gasoline and Diesel Fuels". Ottawa, Canada. (1997).

World Health Organization (WHO), *Exposure assessment in studies on the chronic effects of long-term exposure to air pollution.* Report EUR/03/5039759. Geneva, Switzerland (2003).

Peer Reviewed Journal Articles/Letters

Thurston, G.D. General Discussion: Atmospheric dispersion modeling - A critical review. J. Air Pollut. Control Assoc. 29: 939 (1979).

Thurston, G.D. Discussion of multivariate analysis of particulate sulfate and other air quality variables by principal components - part I. Annual data from Los Angeles and New York. Atmos. Environ. 15: 424-425 (1981).

Thurston, G.D., J.D. Spengler and P.J. Samson. An assessment of the relationship between regional pollution transport and trace elements using wind trajectory analysis. Receptor Models Applied to Contemporary Pollution Problems, Ed. E. Frederick, Air Pollution Control Association, Pittsburgh, PA (1982).

Spengler, J.D. and G.D. Thurston. Mass and elemental composition of fine and coarse particles in six U.S. cities. J. Air Poll. Control Assoc. 33: 1162-1171 (1983).

Currie, L., R. Gerlach, C. Lewis, W.D. Balfour, J. Cooper, S. Dattner, R. DeCesar, G. Gordon, S. Heisler, P. Hopke, J. Shah and G. Thurston. Inter-laboratory comparison of source apportionment procedures: Results for simulated data sets. Atmos. Environ. 18: 1517-1537 (1984).

Thurston, G.D. and J.D. Spengler. A quantitative assessment of source contributions to inhalable particulate matter in metropolitan Boston, Massachusetts. Atmos. Environ. 19: 9-25 (1985).

Thurston, G.D. and N.M. Laird. Letters: Tracing aerosol pollution. Science 227: 1406-1407 (1985).

Thurston, G.D. and J.D. Spengler. A multivariate assessment of meteorological influences on inhalable particle source impacts. J. Clim. and Appl. Met. 24: 1245-1256 (1985).

Ozkaynak, H., J.D. Spengler, A. Garsd and G.D. Thurston. Assessment of population health risks resulting from exposures to airborne particles. Aerosols: Second U.S.-Dutch International Symposium, Lewis Publishing Co., December 1985 (Peer Reviewed).

Ozkaynak, H., A.D. Schatz, G.D. Thurston, R.G. Isaacs and R.B. Husar. Relationships between aerosol extinction coefficients derived from airport visual range observations and alternative measures of airborne particle mass. J. Air Pollut. Control Assoc. 35: 1176-1185 (1985).

Thurston, G.D. and P.J. Lioy. Receptor modeling and aerosol transport. Atmos. Environ. 21: 687-698 (1987).

Ozkaynak, H., and G.D. Thurston. Associations between 1980 U.S. mortality rates and alternative measures of airborne particle concentration. Risk Analysis 7: 449-460 (1987).

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Lioy, P.J., D. Spektor, G. Thurston, N. Bock, F. Speizer, C. Hayes and M. Lippmann. The design considerations for ozone and acid aerosol exposure and health investigation: The Fairview Lake Summer Camp-Photochemical Smog Case Study. Environ. Int'l. 13: 27-83 (1987).

Spektor, D.M., M. Lippmann, P.J. Lioy, G.D. Thurston, K. Citak, D.J. James, N. Bock, F.E. Speizer and C. Hayes. Effects of ambient ozone on respiratory function in active normal children. Am. Rev. Resp. Dis. 137: 313-320 (1988).

Lippmann, M. and G.D. Thurston. Exposure Assessment - Input into risk assessment. Arch. Environ. Health 43: 113-123 (1988).

Spektor, D.M., M. Lippmann, G.D. Thurston, P.J. Lioy, J. Stecko, G. O'Connor, E. Garshick, F.E. Speizer, and C. Hayes. Effects of ambient ozone on respiratory function in healthy adults exercising outdoors. Am. Rev. Resp. Dis. 138: 821-828 (1988).

Ito, K. and G.D. Thurston. Characterization and reconstruction of historical London England acidic aerosol concentrations. Environ. Health Presp. 79: 35-42 (1989).

Thurston, G.D., K. Ito, M. Lippmann, and C. Hayes. Re-examination of London mortality in relation to exposure to acidic aerosols during 1962-1973 winters. Environ. Health Persp. 79: 73-82 (1989).

Waldman, J.M., P.J. Lioy, G.D. Thurston and M. Lippmann. Spatial and temporal patterns in summertime sulfate aerosol acidity and neutralization within a metropolitan area. Atmos. Environ. 24B: 115-126 (1990).

Echalar, E., P. Artaxo and G.D. Thurston. Source apportionment of aerosols in the industrial area of Cubatao, Brazil. In: Aerosols: Science, Industry, Health and Environment (S. Masuda and K. Takahashi, Eds.), pp. 942-945, Pergamon Press (1990).

Spektor, D.M., V.A. Hofmeister, P. Artaxo, J. Brague, F. Echelar, D.P. Nogueria, C. Hayes, G.D. Thurston and M. Lippmann. Effects of heavy industrial pollution on respiratory function in the children of Cubatao, Brazil: A preliminary report. Environ. Health Persp. 94: 51-54 (1991).

Waldman, J.M., S.K.C. Liang, P.J. Lioy, G.D. Thurston, and M. Lippmann. Measurements of sulfate aerosol and its acidity in the SO_2 source region of Chestnut Ridge, PA. Atmos. Environ. 25A: 1327-1333 (1991).

Spektor, D.M., G.D. Thurston, J. Mao, D. He, C. Hayes, and M. Lippmann. Effects of single and multiday ozone exposures on respiratory function in active normal children. Environ. Res. 55: 107-122 (1991).

Thurston, G.D. and H. Ozkaynak. Letters: Air pollution and mortality. Science 225: 382-383 (1992).

Thurston, G.D., J.F. Gorczynski Jr., P. Jaques, J. Currie and D. He. An automated sequential sampling system for particulate acid aerosols: Description, characterization and field sampling results. J. Exposure Anal. Environ. Epidemiol. 2: 415-428 (1992).

Thurston, G.D., K. Ito, P. Kinney and M. Lippmann. A multi-year study of air pollution and respiratory hospital admissions in three New York State metropolitan areas: Results for 1988 and 1989 summers. J. Exposure Anal. and Environ. Epidemiol. 2: 429-450 (1992).

Jaques, P.A., G.D. Thurston, P.L. Kinney, and J.E. Gorczynski, Jr. Precision of an ambient sequential acid aerosol sampling system. Appl. Occup. Environ. Hyg. 8: 313-316 (1993).

Kinney, P.L. and G.D. Thurston. Field evaluation of instrument performance: Statistical considerations. Appl. Occup. Environ. Hyg. 8: 267-271 (1993).

Ito, K., G.D. Thurston, C. Hayes, and M. Lippmann. Associations of London, England daily mortality with particulate matter, sulfur dioxide, and acidic aerosol pollution. Arch. Environ. Health 48: 213-220 (1993).

Thurston, G.D., K. Ito, M. Lippmann and D.V. Bates. Respiratory hospital admissions and summertime haze air pollution in Toronto, Ontario: Consideration of the role of acid aerosols. Environ. Res. 65: 271-290 (1994).

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Thurston, G.D., J.E. Gorczynski, J.H. Currie, D. He, K. Ito, M. Lippmann, J. Waldman and P. Lioy. The nature and origins of acid aerosol pollution measured in Metropolitan Toronto, Ontario. Environ. Res. 65:254-270 (1994).

Kinney, P.L., Ito, K., and Thurston, G.D. A sensitivity analysis of mortality/PM10 associations in Los Angeles. Inhal. Toxicol. 7:59-69 (1995).

Thurston, G.D. and Kinney, P.L. Air pollution epidemiology: Considerations in time-series modeling. Inhal. Toxicol. 7:71-83 (1995).

Ito, K., Kinney, P., Christie, E., and Thurston, G.D. Variations in PM10 concentrations within two metropolitan areas and their implications to health effects analyses. Inhal. Toxicol. 7:735-745 (1995).

Waldman, J. M., Koutrakis, P., Allen, G.A., Thurston, G.D., Burton, R.M., and Wilson, W.E. Human Exposures to Particle Strong Acidity. Inhal. Toxicol. 7:657-670 (1995).

Thurston, G. Measurement methods to determine compliance with ambient air quality standards for suspended particles: Discussant. J. Air & Waste Manage. Assoc. 45:667-668 (1995).

Kinney, P.L., Thurston, G.D., and Raizenne, M. (1996) The effects of ambient ozone on lung function in children: a reanalysis of six summer camp studies. Environ. Health Perspect. 104:170-174.

Thurston, G.D. A critical review of PM10-mortality time-series studies. J. Exposure Anal. and Environ. Epidemiol. 6:3-22 (1996).

Ozkaynak, H., Xue, J., Zhou, H., Spengler, J.D., and Thurston, G.D. Intercommunity Differences in Acid Aerosol (H^+)/Sulfate (SO_4^{+}) Ratios. J. Exposure Anal. and Environ. Epidemiol. 6:57-78 (1996).

Ito, K. and Thurston, G.D. Daily PM10/mortality associations: An investigation of at-risk subpopulations. J. Exposure Anal. and Environ. Epidemiol. 6:79-96 (1996).

Lippmann, M. and Thurston, G.D. Sulfate concentrations as an indicator of ambient particulate matter air pollution for health risk evaluations. J. Exposure Anal. and Environ. Epidemiol. 6:123-146 (1996).

Thurston, G. D., Lippmann, M., Scott, M.B., and; Fine, J.M. Summertime haze air pollution and children with asthma. Am. J. Respir. and Crit. Care Med. 155:654-660 (1997).

Thurston, G.D. Mandating the release of health research data: issues and implications. *Tulane Environmental Law Journal.* 11(2):331-354 (1998).

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REPORTS

Two

Response to ADOT Draft Environmental Impact Statement (DEIS) 1. Purpose and Need A. Need Based on Socioeconomic Factors by Kevin Kane dated July 24, 2013.

Code	Issue	Response

Code	Comment Document

RESPONSE TO ADOT DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
1. PURPOSE AND NEED
A. NEED BASED ON SOCIOECONOMIC FACTORS

Comments prepared by Kevin Kane[1] on behalf of PARC, et al.
July 24, 2013

Introduction

The Arizona Department of Transportation (ADOT) justifies the purpose and need for the construction of the South Mountain Freeway in Chapter 1 of the DEIS. Most of the conclusions rely on socioeconomic projections for the year 2035 conducted by the Maricopa Association of Governments (MAG) and the Arizona Department of Economic Security (DES).

19

The DEIS justification of the purpose and need for the Loop 202/South Mountain Freeway ("Freeway") is fatally flawed. This report demonstrates how the use of outdated input data, the extension of short-term trends to long-term growth, and the failure to account for uncertainty in future projections all contribute to the DEIS' flawed conclusions. If appropriate data, inputs, and interpretation of model results are used, it becomes evident that there is no purpose or need for the freeway based on socioeconomic factors.

Background: Establishing Need Based on Socioeconomic Factors

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The DEIS relies on projections of future population, land use, employment, and housing produced by MAG, with additional Input from the DES. MAG projections are detailed in three reports: an original 2007 report[2], the documentation to support the projections in this report[3], and a 2009 update of the same model extending the projections an additional five years to 2035[4].

The MAG land use model allocates households and employment to locations in Maricopa County as of 2035 using a proprietary model called DRAM/EMPAL. Starting with current population, employment, land use, and an estimated growth rate, the model assigns people and jobs to available locations based on the location's attractiveness and the expected travel costs. The output is in the form of maps of projected land use at five-year intervals until 2035. The

[1] Kevin Kane is a PhD student and instructor at Arizona State University's School of Geographical Sciences and Urban Planning. His specialties include geographic analysis of city growth and Phoenix residential development patterns during the recession. A Curriculum Vita listing his qualifications can be found as Exhibit 1.
[2] Maricopa Association of Governments, *Socioeconomic Projections of Population, Housing, and Employment by Municipal Planning Area and Regional Analysis Zone.* Phoenix, 2007. http://www.azmag.gov/Documents/pdf/cms.resource/MAG_Projections-2007-MPA-and-RAZ-April-2007.pdf
[3] Maricopa Association of Governments, *Socioeconomic Projections Documentation.* Phoenix, 2007. http://www.azmag.gov/Documents/IS_2011-01-18_2007-Socioeconomic-Projections-Documentation.pdf
[4] Maricopa Association of Governments, *Extension of MAG 2007 Socioeconomic Projections to 2035 for Population, Housing, and Employment by Municipal Planning Area and Regional Analysis Zone.* Phoenix, 2009. http://www.azmag.gov/Documents/pdf/cms.resource/MAG_Projections-2007-to-2035-Extension.pdf

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19	**Purpose and Need**	The Arizona Department of Transportation and Federal Highway Administration used appropriate data, inputs, and model results in assessing whether a purpose and need exist for the proposed action. Data, inputs, and model results were used throughout the environmental impact statement process. The Draft Environmental Impact Statement—particularly in Chapter 1, *Purpose and Need*, and Chapter 3, *Alternatives*—explains how the process of establishing a purpose and need for the proposed action followed nationally accepted guidance and policy. Examples of how the purpose and need analyses were applied include: · the section, *Context of the Purpose and Need in the EIS Process*, on page 1-1 · the sidebar, *"A proposed action's purpose and need documentation should:"*, on page 1-1 · the sidebar, "*How are MAG data used in the DEIS?*", on page 1-4 · the sidebar, "*What is the MAG regional demand model?*", on page 1-5 · the sidebar, "*How will the economic downturn affect growth rates?*", on page 1-11 · the section, *Need Based on Regional Transportation demand and Existing and Projected Transportation System Capacity Deficiencies*, beginning on page 1-13 · the section, *Conclusions*, on page 1-21 · the section, *Reconfirm the Purpose and Need for the Proposed Action*, on page 3-1 · the section, *Responsiveness of the Proposed Freeway to Purpose and Need Criteria*, beginning on page 3-27 The models, methods, and assumptions used throughout the Draft Environmental Impact Statement account for reasonably foreseeable future conditions and dismiss speculative considerations. As an example, the Maricopa Association of Governments, as the federally designated regional transportation planning agency, is nationally recognized as a leader in air quality modeling and traffic modeling and forecasting. The models used account for the assumptions made in the comment. The Maricopa Association of Governments model and its application are "state of the practice" exceeding National Environmental Policy Act thresholds relative to sound science. The National Environmental Policy Act recognizes that: · data and projections can change throughout the process · it is important for the process to account for those changes as they become available · if a reasonable person could conclude that the updated information would lead to substantially different results, the decision-making attributes of the National Environmental Policy Act could be affected
20	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available.

(Response 20 continues on next page)

Code	Comment Document
20	TransCAD traffic modeling software then uses these maps to estimate travel patterns and traffic volume based on the predicted location of households and businesses in 2035. Socioeconomic modeling is common practice among planning organizations, and it is often statutorily mandated. In fact, the MAG model adds several elements that are not present in earlier DRAM/EMPAL models such as integrating zoning restrictions and municipalities' land use plans to estimate how to allocate households and employment. However, several major flaws can exist in modeling techniques that often result in inaccurate or misleading projections of future travel need: - Models are extremely sensitive to input data - Models rely on extending short-term economic trends over long time periods - Models lack confidence intervals – they report only a single projected value, implying a much greater amount of certainty than is actually available In the case of the MAG model and the proposed Freeway extension, these flaws are so significant that they call the purpose and need for the project as established in the DEIS into question. <u>Use of Outdated Input Data</u> The first page of Chapter 1 of the DEIS states; "At the beginning of the EIS process, the need for a major transportation facility was reexamined to determine whether such a facility is still needed." However, the DEIS fails to re-evaluate the purpose and need as of its effective date of April 2013, instead relying on projections that were released to the public when the Freeway was proposed in 2004-2005. By ignoring the effects of the real estate collapse and global recession, which had profound effects on Phoenix's growth, ADOT fails to effectively analyze purpose and need. The original report[2] relies principally on base year 2005 data to project land use at five year increments until 2030. The updated report[4] extended these projections to 2035, but used the same data sources. The conclusions in the DEIS are based principally on: i. 2005 Special Census for population ii. 2000 Census housing unit count, updated to 2005 using estimated residential completions iii. 2005 employment iv. 2005 existing land use coverage The documentation of MAG's projections also states that, "the model takes into account short-term economic conditions, but not long-range employment trends"[5]. In other words, MAG admits that a shortcoming of the model it uses is the extension of short-range trends to long-range growth. Notwithstanding, MAG not only uses short-range trends to predict long-range growth, it fails to accurately identify short-range trends. 2010 Census data is currently available and should have been included in the DEIS. In Table 1, actual 2010 figures are used to check the accuracy of the projections found in the DEIS: [5] See Ref. 3, pg. 20 - 2 -

Code	Issue	Response
20 (cont.)		The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. The Maricopa Association of Governments' control total for Maricopa County is consistent with the "ADOA—Medium Series" reported in Table 3 of the comment.

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Table 1

TOTAL POPULATION	2005 Actual Population	2010 Projected Population	2005-2010 Projected Annual Growth Rate	2010 Actual Population	2005-2010 Actual Annual Growth Rate
Maricopa County	3,681,025	4,216,499	2.75%	3,817,117	0.73%
Study Area	1,309,001	1,606,100	4.18%	1,422,105	1.67%
Central West	512,836	615,229	3.71%	562,805	1.88%
South Central	82,434	84,976	0.61%	72,331	-2.58%
Southeast	588,349	681,077	2.97%	617,139	0.96%
Southwest Valley	125,382	224,818	12.39%	169,830	6.26%

As indicated in Table 1, MAG estimates of 2005-2010 annual population growth in the County and the Study Area as reflected in the DEIS are ***more than double*** the actual population growth experienced. Table 2 uses 2010 Census data to compare projected with actual growth in the number of housing units:

Table 2

TOTAL HOUSING UNITS	2005 Actual Units	2010 Projected Units	2005-2010 Projected Annual Growth Rate	2010 Actual Units	2005-2010 Actual Annual Growth Rate
Maricopa County	1,479,767	1,685,134	2.63%	1,639,279	2.07%
Study Area	471,484	589,087	4.55%	478,340	0.29%
Central West	173,619	213,113	4.18%	174,920	0.15%
South Central	33,389	34,134	0.44%	28,909	-2.84%
Southeast	223,968	264,045	3.35%	224,256	0.03%
Southwest Valley	40,508	77,795	13.94%	50,255	4.41%

While the MAG estimates of housing growth in Maricopa County are less overstated than population growth, the Study Area experienced virtually no housing growth over this period. Indeed, independent analysis of Phoenix from 2006-2012 indicates that three Phoenix neighborhoods within the Study Area – Ahwatukee Foothills, Estrella, and Laveen – are in the top five for decrease in residential completions over this period[6]. MAG estimates dramatically overstate growth in the study area and fail to accurately predict short-term growth.

Extension of Short-Term Economic Trends to Long-Range Growth

MAG admits that a shortcoming of the model it uses is the extension of short-range trends to long-range growth. Notwithstanding, MAG not only uses short-range trends to predict long-range growth, it fails to accurately identify short-range trends (as shown in Tables 1 and 2 above). The DEIS includes a lengthy discussion of the historical indicators of growth in Phoenix and a sidebar on page 1-11 that states, "the critical factors underlying these indicators remain unchanged" and further provides that short-term economic conditions are not relevant to long-term planning horizons. This conclusion conveniently omits structural economic changes resulting from the recent real estate collapse and global recession and is internally inconsistent.

[6] See Exhibit 2. Kane, K., et al., *Residential Development Revisited: Zoning, Neighborhood Effects, and the Recession in Phoenix, Arizona.* Urban Geography, Under Review.

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Although not acknowledged in the DEIS, the Arizona Department of Administration (ADOA) produced population estimates in 2012[7]. ADOA bases its projections on fertility, mortality, and net migration. ADOA projects populations by county for each year until 2050. Unlike the MAG model used in the DEIS, ADOA relies on the most recent available population count (2010 U.S. Census). Furthermore, by considering the fact that future fertility, mortality, and net migration in Maricopa County may vary, ADOA provides a range of possible future population counts by considering multiple possible input values. Thus, their population projections are reported as a Medium Series (the baseline estimate), alongside a Low Series and a High Series in order to reflect this variation.

Table 3 provides a comparison of various methods of projecting population in 2035. The DEIS figures (1) are compared with the various ADOA projections (3-5). In addition, we update the MAG/DEIS projections using actual 2010 census data, but using MAG's growth rate (2).

Table 3: Maricopa County Population Projections for 2035

	2035 Maricopa County Population Projections	
	SOURCE	**ESTIMATE**
(1)	MAG	6,545,000
(2)	MAG + 2010 US Census	5,925,065
(3)	ADOA - Low Series	5,222,906
(4)	ADOA - Medium Series	5,776,252
(5)	ADOA - High Series	6,232,206

**2010 US Census Actual Population: 3,817,117*

Table 3 indicates that there is a substantial range in possible outcomes when attempting to use short-range trends to predict long-range population growth. The original MAG projections (1) are far in excess of the updated figure using the same growth rate (2), indicating that using outdated input data inflates estimates. Furthermore, the original MAG projections are above all three ADOA estimates, indicating that the DEIS uses a more aggressive growth rate than even the highest growth population scenario predicted by the ADOA.

ADOA figures of county-wide population growth represent an improvement given their use of newer data and providing a range of values, though they do not provide data for population in the Freeway Study Area or include projections of housing units or Vehicle Miles Travelled (VMT). Using Geographic Information System (GIS) software, we are able to demonstrate the impact of using outdated input data on population projections for the Freeway Study Area and its component regions. We again update MAG/DEIS projections using 2010 U.S. Census data in combination with their predicted growth rates. This is done for population (Table 4) and housing units (Table 5).

[7] See Exhibit 7. Arizona Department of Administration, Office of Employment and Population Statistics, *Arizona State and County Population Projections 2012-2050: Methodology Report,* Phoenix, 7 December 2012. http://www.workforce.az.gov/population-projections.aspx

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Table 4: MAG Population Projections, Updated with 2010 U.S. Census Data

TOTAL POPULATION	2010 Projected	2010 Actual	2035 Projected	2010-2035 Projected Annual Growth Rate	2035 Projected - Using 2010 Actual
Maricopa County	4,216,499	3,817,117	6,545,000	1.77%	5,925,065
Study Area	*1,606,100*	*1,422,105*	*2,577,760*	1.91%	2,282,452
Central West	615,229	562,805	809,191	1.10%	740,239
South Central	84,976	72,331	88,589	0.17%	75,406
Southeast	681,077	617,139	871,138	0.99%	789,357
Southwest Valley	224,818	169,830	808,842	5.25%	611,008

Table 5: MAG Housing Unit Projections, Updated with 2010 U.S. Census Data

TOTAL HOUSING UNITS	2010 Projected	2010 Actual	2035 Projected	2010-2035 Projected Annual Growth Rate	2035 Projected - Using 2010 Actual
Maricopa County	1,685,134	1,639,279	2,676,294	1.87%	2,603,468
Study Area	589,087	478,340	983,560	2.07%	798,653
Central West	213,113	174,920	292,760	1.28%	240,293
South Central	34,134	28,909	35,669	0.18%	30,209
Southeast	264,045	224,256	344,570	1.07%	292,647
Southwest Valley	77,795	50,255	310,561	5.69%	200,620

Tables 4 and 5 indicate that long range growth estimates in parts of the Study Area are especially sensitive to input data. For example, even if the dramatic 5.69% annual growth rate in Southwest Valley housing units were to continue, the fact that the actual number of housing units in 2010 was far less than the MAG report projected it would be for that year has a very significant impact on 2035 projections (200,620 versus 310,561).

These updated projections of population growth highlight the problems in extending short-range growth rates to long-term trends. The problem is magnified when short-range growth rates are faulty, as is the case with the projections used in the DEIS. If the information relied upon in the DEIS is unable to accurately predict short-range growth, the same methodology should not be relied upon to justify the purpose and need for major transportation infrastructure based on socioeconomic factors. This is especially true given the tendency to significantly overstate growth in the DEIS.

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Uncertainty of Estimates of Population and Vehicle Miles Travelled (VMT)

The final major shortcoming in combined land use – transportation projection is the failure to integrate uncertainty into projections. Municipal projections of population, housing, employment, and vehicle miles travelled rarely include a confidence interval based on generally accepted statistical practices, which is necessary in order for a policymaker to understand the likelihood of particular future scenarios. While some studies allude to the notion there is a variety of potential future outcomes, such as the low, medium and high estimates in the ADOA population projections, the projections contained in the DEIS are presented as certain outcomes.

Code	Issue	Response
21	**Purpose and Need**	The study used state-of-the-practice, scientific community methods and similarly accepted methods, including the use of a standard input-output economic model and of assumptions based on traffic data and projections. The analysis is not required to project ranges, and the results are reasonably foreseeable based on what data are provided from the U.S. Environmental Protection Agency-approved Maricopa Association of Governments model as well as local plans. Further, methods, assumptions, and data were developed early in the environmental impact statement process and peer-reviewed by the Federal Highway Administration, the Arizona Department of Transportation, and other federal, state, and local agencies. Peer reviewers concluded that the methods, assumptions, and data are appropriate. Potential factors that could influence changes in the analysis and study findings are listed on page 4-1 of the Final Environmental Impact Statement.

Code	Comment Document
21	Basic statistical techniques can provide the policymaker with not only a range of possible values, but also a percentage that expresses the statistical likelihood of each outcome. Furthermore, a common critique of ADOT is that follow-up plans have not been provided for previous highway projects in order to evaluate the accuracy of past projections. A 2006 review of 183 highway projects in major world cities shows a dramatic tendency of agencies to overstate future demand. Half of all projects overstated traffic demand by more than 20%, and one-fourth of all projects overstated traffic demand by more than 40%[8].
22	The uncertainty of traffic projections for toll roads has also been used by credit ratings agencies which finance projects based on expected toll revenue. A Standard & Poor's review of 104 tollway projects finds substantial "optimism bias" – on average, projects over-projected travel demand in the first five years by more than 20%. The same study analyzed the traffic forecasting used in a confidential sample of these projects, finding that projections of traffic volumes 30 years into the future by different consultants varied by 204% based on modeling techniques and assumptions used[9].
21	One study empirically modeled the uncertainty stemming from the use of an earlier version of the DRAM/EMPAL land use-transportation model, the same basic model used by MAG. While the outcome of this study is unique to Austin, Texas, researchers ran the model hundreds of times to create simulated confidence intervals and found that, for projections 20 years into the future, errors set around a 70% confidence interval were: - 38% for peak-period VMT - 50% for residential density - 37% for employment density The projected VMT in Austin, Texas generated by DRAM/EMPAL was 6 million/day, though researchers could only be 70% certain that actual VMT would be between 3.7 million and 8.4 million[10]. While the Austin, Texas results are unique to that city, Table 5 compares the manner in which these results were reported to the DEIS 2035 estimates for Maricopa County. Because it is not possible to calculate a confidence interval using available data, the missing values below indicate what such a report would look like. Statistically, it would be possible to say that there is a certain percent (15%, in this example) chance of 2035 VMT being above the upper bound or below the lower bound. Meanwhile, wide range in projections of the Austin, Texas study illustrates that there is a fairly strong probability that future VMT is far greater or far lower than anticipated, including the very real possibility of a decrease in VMT.

[8] See Exhibit 3. Flyvbjerg, B., M.K.S. Holm, and S.L. Buhl, *How (in)accurate are demand forecasts in public works projects?* Journal of the American Planning Association, 2005. **71**(2): p. 131.
[9] See Exhibit 4. Bain, R., *Error and optimism bias in toll road traffic forecasts.* Transportation, 2009. **36**(5): p. 469-482.
[10] See Exhibit 5. Krishnamurthy, S. and K.M. Kockelman, *Propogation of Uncertainty in Transportation-Land Use Models: An Investigation of DRAM-EMPAL and UTPP Predictions in Austin, Texas.* Transporation Research Record, 2003. **1831**: p. 219-229.

Code	Issue	Response
22	**Alternatives**	The Draft Environmental Impact Statement does not consider toll roads as an alternative warranting detailed study in the Draft Environmental Impact Statement and as such, a comparison of performance between toll roads and the proposed action is inappropriate. The study used state-of-the-practice, scientific community methods and similarly accepted methods, including the use of a standard input-output economic model and of assumptions based on traffic data and projections. The analysis is not required to project ranges, and the results are reasonably foreseeable based on what data are provided from the U.S. Environmental Protection Agency-approved Maricopa Association of Governments model as well as local plans. Further, methods, assumptions, and data were developed early in the environmental impact statement process and peer-reviewed by the Federal Highway Administration, the Arizona Department of Transportation, and other federal, state, and local agencies. Peer reviewers concluded that the methods, assumptions, and data are appropriate. Potential factors that could influence changes in the analysis and study findings are listed on page 4-1 of the Final Environmental Impact Statement.

Code	Comment Document

Table 6

Projected VMT	% Chance Below Lower Bound	Projected Lower Bound	Projected Value	Projected Upper Bound	% Chance Above Upper Bound
Austin, Texas*	15%	3,700,000	6,000,000	8,400,000	15%
Maricopa County**	15%	???	185,000,000	???	15%
Freeway Study Area**	15%	???	42,000,000	???	15%

Source: * Krishnamurthy and Kockelman 2003, **DEIS

21

By providing only a single value, the DEIS projections are misleading in suggesting that the only possible outcome is a substantial increase in VMT. By failing to provide a confidence interval, the DEIS projections provide only minimal guidance to policymakers about the likelihood of possible future outcomes.

Additionally, DEIS statements indicating that the "factors underlying these indicators" remain unchanged, particularly in the case of VMT, are inaccurate. Recent studies have indicated long-term trends away from driving as a primary means of commuting, citing telecommuting, online shopping, increased fuel prices, and most importantly a generational shift away from vehicle ownership. These changes are not likely to be reflected in MAG modeling, especially trends that have emerged in the last several years since the model was last updated. This would include any number of changes due to the global recession which would almost certainly tend to decrease VMT. An independent report uses US DOT data to show that, despite continual projected increases by planning agencies, VMT per capita has actually decreased by 1.0% per year since 2004[11].

These strong national and regional trends would indicate that, assuming arguendo, an increase in population, VMT is more likely to decrease than increase. Decreased VMT per capita combined with the DEIS' overstated population growth projections means that there is a very high likelihood that future VMT will be well below the projected figures found in the DEIS.

Conclusion

23

In effect, the modeling relied on by the DEIS to justify purpose and need based on socioeconomic factors extends aggressive, pre-recession growth rates decades into the future while ignoring recent data that reflects deep-seated regional and national structural changes that have become apparent in the last several years. MAG's modeling, which is relied upon in the DEIS to establish the purpose and need for the Freeway expansion fails to accurately identify short-range growth and uses outdated data to estimate long-range growth. It reports its projections in a manner that indicates that they are certain to happen, which is not supported by the data and modeling techniques used. Using accurate data to objectively evaluate purpose and need based on socioeconomic factors supports the no build option.

[11] See Exhibit 6. Dutzik, T. and P. Baxandall, *A New Direction: Our Changing Relationship with Driving and the Implications for America's Future*, 2013, U.S. PIRG Education Fund Frontier Group.

Code	Issue	Response
23	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.

Code	Comment Document

EXHIBIT 1

24

KEVIN KANE
Curriculum Vitae

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Arizona State University, Research Associate Summer 2012 – Present
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Thomson Reuters (Chicago), Senior Consultant 2009 – 2011
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York, Abigail, Joseph Tuccillo, Christopher Boone, Bob Bolin, Lauren Gentile, Briar Schoon, and **Kevin Kane.** In Press. Zoning and Land Use: A Tale of Incompatibility and Environmental Injustice in Early Phoenix. *Journal of Urban Affairs.*

PUBLICATIONS – UNDER REVIEW

Kane, Kevin, Abigail M. York, Joseph Tuccillo, Lauren Gentile, and Yun Ouyang. Residential Development Revisited: Zoning, Local Effects, and the Recession in Phoenix, Arizona.

Ó hUallacháin, B. and **Kevin Kane.** Do Inventors in Less Inventive Regions Substitute Networks for Thin Agglomerative Economies of Scale?

Kane, Kevin, Abigail M. York, Joseph Tuccillo, Lauren Gentile, and Yun Ouyang. A Spatio-Temporal View of Historical Growth in Downtown Phoenix, Arizona.

CONFERENCE PRESENTATIONS

Kane, Kevin and Rachel Weber. Street Lights or Subsidies? Municipal Investment and Property Tax Appreciation in Chicago's Tax Increment Financing Districts. *Meeting of the Association of American Geographers*, Los Angeles, California. April 9-13, 2013.

Tuccillo, Joseph, **Kevin Kane**, Yun Ouyang, and Abigail York. Urban Land-Use Institutions and Parcel-Scale Change in Phoenix, Arizona, 1915-2002. *Long-Term Ecological Research All Scientists' Meeting*. Estes Park, Colorado, September 9-13, 2012. (poster awarded honorable mention at CAP-LTER annual meeting, January 2013)

Ó hUallacháin, B. and **Kevin Kane**. Interregional Dynamics of Emerging Technologies in the United States. *Meeting of the Association of American Geographers*, New York City, New York. February 23-28, 2012.

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SCHOLARSHIPS AND AWARDS

Central Arizona-Phoenix Long-Term Ecological Research (CAP-LTER) Graduate Research Funding Grant	Spring 2013
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EXHIBIT 2

RESIDENTIAL DEVELOPMENT REVISITED: ZONING, LOCAL EFFECTS, AND THE RECESSION IN PHOENIX, ARIZONA[1]

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Abstract: Where people choose to live and the type of city their decisions create has formed the basis of decades of scholarly endeavor. While the typical notion of a tradeoff between access and space remains important, sprawl, gentrification, polycentricity, land use institutions (zoning), and the composition of the immediately surrounding area (local effects) can all impact residential choice. We propose a logistic regression model to investigate determinants of single-family residential development at the parcel-level in Phoenix, Arizona during the 2002-2006 real estate boom and the 2006-2012 global recession. Results show a preference for cheaper land and agricultural conversion farther from urban subcenters during the boom, while zoning, though relatively inconsistent with actual land use, is an indicator of future development. Development trajectories change dramatically during the bust, disproportionately impacting agricultural conversions and previously fast-growing areas while highlighting the depth of impact that the financial environment has on land use change. [Key words: residential location, land use policy, urban sprawl, recession]

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25		Abstract reviewed.

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How (In)accurate Are Demand Forecasts in Public Works Projects?: The Case of Transportation
Flyvbjerg, Bent;Skamris Holm, Mette K;Buhl, SÃ ?ren L
American Planning Association. Journal of the American Planning Association; Spring 2005; 71, 2;
ABI/INFORM Complete
pg. 131

EXHIBIT 3

How (In)accurate Are Demand Forecasts in Public Works Projects?

The Case of Transportation

Bent Flyvbjerg, Mette K. Skamris Holm, and Søren L. Buhl

This article presents results from the first statistically significant study of traffic forecasts in transportation infrastructure projects. The sample used is the largest of its kind, covering 210 projects in 14 nations worth U.S.$59 billion. The study shows with very high statistical significance that forecasters generally do a poor job of estimating the demand for transportation infrastructure projects. For 9 out of 10 rail projects, passenger forecasts are overestimated; the average overestimation is 106%. For half of all road projects, the difference between actual and forecasted traffic is more than ±20%. The result is substantial financial risks, which are typically ignored or downplayed by planners and decision makers to the detriment of social and economic welfare. Our data also show that forecasts have not become more accurate over the 30-year period studied, despite claims to the contrary by forecasters. The causes of inaccuracy in forecasts are different for rail and road projects, with political causes playing a larger role for rail than for road. The cure is transparency, accountability, and new forecasting methods. The challenge is to change the governance structures for forecasting and project development. Our article shows how planners may help achieve this.

Bent Flyvbjerg is a professor of planning at Aalborg University, Denmark. He is founder and director of the university's research program on large-scale infrastructure planning. His latest books are *Megaprojects and Risk* (Cambridge University Press, 2003, with Nils Bruzelius and Werner Rothengatter), *Making Social Science Matter* (Cambridge University Press, 2001), and *Rationality and Power* (University of Chicago Press, 1998). **Mette K. Skamris Holm** is a former assistant professor of planning at Aalborg University. She now works as a planner with Aalborg Municipality. **Søren L. Buhl** is an associate professor of mathematics at Aalborg University. He is associate statistician with the university's research program on large-scale infrastructure planning.

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Despite the enormous sums of money being spent on transportation infrastructure, surprisingly little systematic knowledge exists about the costs, benefits, and risks involved. The literature lacks statistically valid answers to the central and self-evident question of whether transportation infrastructure projects perform as forecasted. When a project underperforms, this is often explained away as an isolated instance of unfortunate circumstance; it is typically not seen as the particular expression of a general pattern of underperformance in transportation infrastructure projects. Because knowledge is wanting in this area of research, until now it has been impossible to validly refute or confirm whether underperformance is the exception or the rule.

In three previous articles (Flyvbjerg, Holm, et al., 2002, 2003, 2004), we answered the question of project performance as regards costs and cost-related risks. We found that projects do not perform as forecasted in terms of costs: almost 9 out of 10 projects fall victim to significant cost overrun. We also investigated the causes and cures of such inaccurate cost projections (see Flyvbjerg, Bruzelius, et al., 2003). In this article we focus on the benefit side of investments and answer the question of whether projects perform as forecasted in terms of demand and revenue risks. We compare forecasted demand with actual demand for a large number of projects. Knowledge about cost risk, benefit risk, and compound risk is crucial to making informed decisions about projects. This is not to say that costs and benefits are or should be the only basis for deciding whether to build. Clearly, forms of rationality other than economic rationality are at work in most infrastructure projects and are balanced in the broader frame of public decision making. But the costs and benefits of infrastructure projects often run in the hundreds of millions of dollars, with risks correspondingly high. Without knowledge of such risks, decisions are likely to be flawed.

As pointed out by Pickrell (1990) and Richmond (1998), estimates of the financial viability of projects are heavily dependent on the accuracy of traffic demand forecasts. Such forecasts are also the basis for socioeconomic and environmental appraisal of transportation infrastructure projects. According to the experiences gained with the accuracy of demand forecasting in the transportation sector, covering traffic volumes, spatial traffic distribution, and distribution between transportation modes, there is evidence that demand forecasting—like cost forecasting, and despite all scientific progress in modeling—is a major source of

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26		Article excerpt reviewed.

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EXHIBIT 4

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27

Error and optimism bias in toll road traffic forecasts

Robert Bain

Published online: 28 February 2009
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Abstract Traffic forecasts are employed in the toll road sector, inter alia, by private sector investors to gauge the bankability of candidate investment projects. Although much is written in the literature about the theory and practice of traffic forecasting, surprisingly little attention has been paid to the predictive accuracy of traffic forecasting models. This paper addresses that shortcoming by reporting the results from the largest study of toll road forecasting performance ever conducted. The author had access to commercial-in-confidence documentation released to project financiers and, over a 4-year period, compiled a database of predicted and actual traffic usage for over 100 international, privately financed toll road projects. The findings suggest that toll road traffic forecasts are characterised by large errors and considerable optimism bias. As a result, financial engineers need to ensure that transaction structuring remains flexible and retains liquidity such that material departures from traffic expectations can be accommodated.

Keywords Toll road · Traffic forecast · Optimism bias · Forecasting error

Introduction

The global trend for investor-financed toll road concessions brings traffic forecasts—and their predictive accuracy—into sharp relief. All too often, aggressive financial structuring leaves little room for traffic usage to depart from expectations before projects experience distress and debt repayment obligations become threatened. Thus the accuracy of traffic forecasts is of considerable interest to practitioners in the toll road sector yet, until recently, very little was published in the literature about the predictive performance of traffic and revenue forecasting models. That literature is reviewed here.

The review starts by examining an early, small-scale study of toll road traffic forecasting accuracy from the USA. Building on and extending this analysis, the majority of the paper is devoted to recent toll road traffic forecasting research conducted by the

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EXHIBIT 5

Propagation of Uncertainty in Transportation-Land Use Models: An Investigation of DRAM-EMPAL and UTPP Predictions in Austin, Texas

by

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The following paper is a pre-print and the final publication can be found in
Transportation Research Record No. 1831: 219-229, December 2003.
Presented at the 82nd Annual Meeting of the Transportation Research Board,
January 2003

ABSTRACT

This work examines the propagation of uncertainty in outputs of a standard integrated model of transportation and land use. Austin-calibrated DRAM-EMPAL predictions of residence and work locations are used as inputs to a UTPP-type four-step travel demand model (TDM), and the resulting travel times are fed forward into the future period's land use models. Covariance in inputs (including model parameters and demographic variables) was accommodated through multivariate Monte Carlo sampling of 200 scenarios. Variances in land use and travel predictions were then analyzed, over time, and as a function of input values. Results indicate that output variations were most sensitive to the exponent of the link performance function, the split of trips between peak and off-peak and several trip generation & attraction rates. 20 years in the future, final uncertainty levels (as measured by coefficients of variation) due solely to input and parameter estimation errors are on the order of 38% for total regional peak-period VMT, 45% for peak-period flows, and 50% and 37% for residential and employment densities, respectively. This means that central point estimates of key model outputs are very likely (more than 30%) to fall 38% to 50% below or above the mean value. In the Austin example, 15% of the 200 region's simulated peak-period VMT estimates fell below 3.7 million miles (per day) and 15%

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28		Article excerpt reviewed.

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exceeded 8.4 million miles. Such substantial variation is due solely to standard model parameter and input uncertainties. Other uncertainty about the future and human behavior also exists and will add further variation.

Keywords
Uncertainty propagation, integrated transportation-land use model, travel demand model

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29	EXHIBIT 6

A New Direction

Our Changing Relationship with Driving and the Implications for America's Future

U.S. PIRG Education Fund
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Spring 2013

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Executive Summary

The Driving Boom—a six decade-long period of steady increases in per-capita driving in the United States—is over.

Americans drive fewer total miles today than we did eight years ago, and fewer per person than we did at the end of Bill Clinton's first term. The unique combination of conditions that fueled the Driving Boom—from cheap gas prices to the rapid expansion of the workforce during the Baby Boom generation—no longer exists. Meanwhile, a new generation—the Millennials—is demanding a new American Dream less dependent on driving.

Transportation policy in the United States, however, remains stuck in the past. Official forecasts of future vehicle travel continue to assume steady increases in driving, despite the experience of the past decade. Those forecasts are used to justify spending vast sums on new and expanded highways, even as existing roads and bridges are neglected. Elements of a more balanced transportation system—from transit systems to bike lanes—lack crucial investment as powerful interests battle to maintain their piece of a shrinking transportation funding pie.

The time has come for America to hit the "reset" button on transportation policy—replacing the policy infrastructure of the Driving Boom years with a more efficient, flexible and nimble system that is better able to meet the transportation needs of the 21st century.

The Driving Boom is over.

- Americans drove more miles nearly every year between the end of World War II and 2004. (See Figure ES-1, next page.) By the end of this period of rapid increases in per-capita driving—which we call the "Driving Boom"—the average American was driving 85 percent more miles each year than in 1970.

- Americans drive no more miles in total today than we did in 2004 and no more per person than we did in 1996.

- On the other hand, Americans took nearly 10 percent more trips via public transportation in 2011 than we did in 2005. The nation also saw increases in commuting by bike and on foot.

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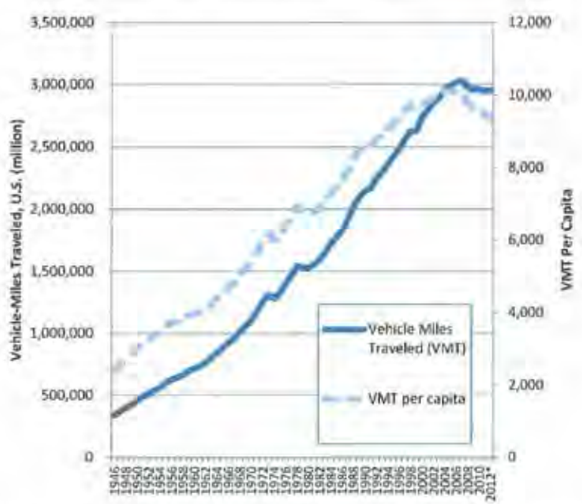
Figure ES-1. Total and Per-Capita Vehicle-Miles Traveled, U.S.



* 2012 data from U.S. Department of Transportation's (U.S. DOT) *Traffic Volume Trends* series of reports; data from previous years from U.S. DOT's *Highway Statistics* series of reports.

- A return to the steady growth in per-capita driving that characterized the Driving Boom years is unlikely given the aging of the Baby Boom generation, the projected continuation of high gas prices, anticipated reductions in the percentage of Americans in the labor force, and the peaking of demand for vehicles and driver's licenses and the amount of time Americans are willing to spend in travel.

The Millennial generation has led the recent change in transportation trends—driving significantly less than previous generations of young Americans. Millennials are already the largest generation in the United States and their choices will play a crucial role in determining future transportation infrastructure needs.

- The Millennials (people born between 1983 and 2000) are now the largest generation in the United States. By 2030, Millennials will be far and away the largest group in the peak driving age 35-to-54 year old demographic, and will continue as such through 2040.

Code	Issue	Response

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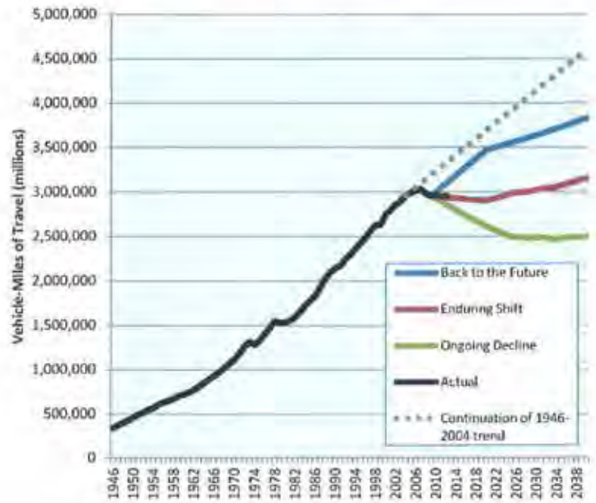
Figure ES-2. Aggregate Vehicle-Miles Traveled in the United States under Several Scenarios of Future Travel Growth, 1946-2040



- Young people aged 16 to 34 drove 23 percent fewer miles on average in 2009 than they did in 2001—a greater decline in driving than any other age group. The severe economic recession was likely responsible for some of the decline, but not all.
- Millennials are more likely to want to live in urban and walkable neighborhoods and are more open to non-driving forms of transportation than older Americans. They are also the first generation to fully embrace mobile Internet-connected technologies, which are rapidly spawning new transportation options and shifting the way young Americans relate to one another, creating new avenues for living connected, vibrant lives that are less reliant on driving.
- If the Millennial-led decline in per-capita driving continues for another dozen years, even at half the annual rate of the 2001-2009 period (illustrated by the *Ongoing Decline* scenario in Figure ES-2 above), total vehicle travel in the United States could remain well below its 2007 peak through at least 2040—despite a 21 percent increase in population. If

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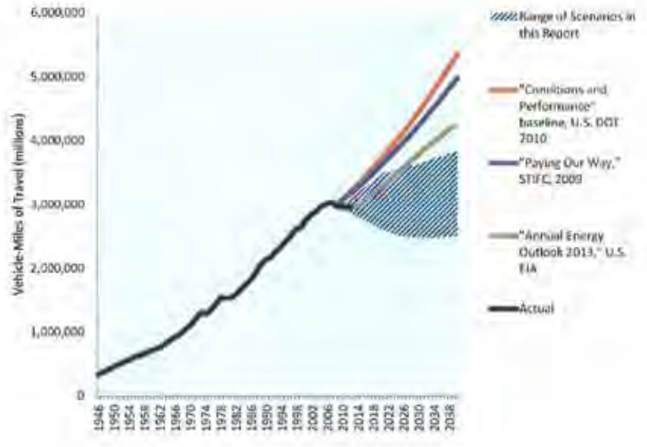
Millennials retain their current propensity to drive less as they age and future generations follow (*Enduring Shift*), driving could increase by only 7 percent by 2040. If, unexpectedly, Millennials were to revert to the driving patterns of previous generations (*Back to the Future*), total driving could grow by as much as 24 percent by 2040.

- All three of these scenarios yield far less driving than if the Driving Boom had continued past 2004. Driving declines more dramatic than any of these scenarios would result if future per-capita driving were to fall at a rate near that of recent years or if annual per-capita reductions continue through 2040.
- Regardless of which scenario proves true, the amount of driving in the United States in 2040 is likely to be lower than is assumed in recent government forecasts. This raises the question of whether changing trends in driving are being adequately factored into public policy. (See Figure ES-3.)

The recent reduction in driving has already delivered important benefits for

Figure ES-3. Recent Official Forecasts of Vehicle Travel Compared to Range of Scenarios, 1946-2040



U.S. DOT = U.S. Department of Transportation
STIFC = Surface Transportation Infrastructure Financing Commission
U.S. EIA = U.S. Energy Information Administration

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the nation, while raising new challenges. Future driving trends will have major implications for transportation policy and other aspects of American life.

- **Traffic congestion has fallen.** According to data from the Texas Transportation Institute, Americans spent 421 million fewer hours stuck in traffic in 2011 than they did in 2005. Further reductions in driving could lead to additional easing of congestion without massive investments in new highway capacity, as long as roads are maintained in a state of good repair.

- **America is less dependent on oil.** In 2011, gasoline consumption for transportation hit a 10-year low. Further reductions in driving consistent with the *Ongoing Decline* scenario—coupled with expected vehicle fuel economy improvements—could result in the nation using half as much gasoline or other fuels in our cars and trucks by 2040 as we use today.

- **Our roads are getting less use … but the gas tax is bringing in less income.** Reduced vehicle travel (particularly in large trucks) reduces the wear and tear on our nation's roads, reducing maintenance needs. Reduced driving, however, also reduces the amount of revenue brought in by the already-strained gasoline tax.

The recent reduction in driving and embrace of less auto-dependent ways of living by Millennials and others creates a golden opportunity for America to adopt transportation policies that use resources more efficiently, preserve our existing infrastructure, and provide support for Americans seeking alternatives to car travel.

A new vision for transportation policy should:

- **Plan for uncertainty.** With future driving patterns uncertain, federal, state and local transportation officials should evaluate the costs and benefits of all transportation projects based on several scenarios of future demand for driving. Decision-makers should also prioritize those projects that are most likely to deliver benefits under a range of future circumstances.

- **Support the Millennials and other Americans in their desire to drive less.** Federal, state and local policies should help create the conditions under which Americans can fulfill their desire to drive less. Increasing investments in public transportation, bicycling and pedestrian infrastructure and intercity rail—especially when coupled with regulatory changes to enable the development of walkable neighborhoods—can help provide more Americans with a broader range of transportation options.

- **Revisit plans for new or expanded highways.** Many highway projects currently awaiting funding were initially conceived of decades ago and proposed based on traffic projections made before the recent decline in driving. Local, state and federal governments should revisit the need for these "legacy projects" and ensure that proposals for new or expanded highways are still a priority in light of recent travel trends.

- **Refocus the federal role.** The federal government should adopt a more strategic role in transportation policy, focusing resources on key priorities (such as repair and maintenance of existing infrastructure and the expansion of transportation options) and evaluating projects competitively on the basis of their benefits to society.

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- **Use transportation revenue where it makes the most sense.** Transportation spending decisions should be based on overall priorities and a rigorous evaluation of project costs and benefits—not on the source of the revenue.
- **Do our homework.** Federal and state governments should invest in research to evaluate the accuracy and usefulness of transportation models and better understand changing transportation trends in the post-Driving Boom era.

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EXHIBIT 7

ARIZONA DEPARTMENT OF ADMINISTRATION

Office of Employment and Population Statistics

Arizona State and County Population Projections, 2012-2050: Methodology Report

December 7, 2012

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30		Report reviewed.

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1. BACKGROUND

Arizona State and County Population Projections (2012 edition) are prepared in accordance with Sections 1, 4 and 5 of Executive Order 2011-04 signed by Governor Janice Brewer:

> Section 1: The Arizona Department of Administration (ADOA) shall be the agency designated to produce the official population estimates and projections for the State of Arizona.
>
> Section 4: ADOA shall produce the official population projections for each year for a minimum of the next 25-year period. The projections shall be dated as of July 1 and shall include projections for the State, its counties, its incorporated jurisdictions, and the unincorporated balance of each county.
>
> Section 5: ADOA shall release the State and county projections as soon as possible following the release of detailed decennial census data by the U.S. Department of Commerce, Bureau of the Census, but no later than December 31 in years ending in 2. These projections shall be updated twice at three year intervals, prior to the release of the next decennial census data and no later than December 31 in the years ending in 5 and 8.

Executive Order 2011-04 also directs the use of these projections:

> Section 10: Population estimates and projections produced by ADOA in accordance with this Executive Order shall be used by all State agencies for all purposes, including those required by federal law, which necessitates the development of population estimates or population projections.

2. METHODOLOGY

The Arizona Population Projections Model is a Cohort-Component model. This model is used to project population for 10 race/ethnic groups in 16 geographical areas (Arizona state and its 15 counties) over a projection period of 40 years. The 10 race/ethnic groups are the combinations of five race groups by Hispanic origin. The five race groups are: White, Black, Native American, Asian (including Native Hawaiian and Pacific Islander), and Other (including two or more races). Each of these races is delineated into Hispanic origin and non-Hispanic origin to make a total of 10 race/ethnic groups.

A component methodology accounts for each aspect of demographic change (fertility, mortality, and migration). These components, each projected separately, are combined to produce population projections by age, sex, race, and ethnic group.

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REPORTS

Three

Comments by Don't Waste Arizona, Inc. President,
Stephen Brittle

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Don't Waste Arizona, Inc. (DWAZ) is a non-profit environmental organization dedicated to the protection and preservation of the environment in Arizona. DWAZ is especially concerned about environmental justice, civil rights protections, risks from hazardous materials and toxics, and air pollution. DWAZ is headquartered at 6205 South 12th Street, Phoenix, AZ 85042, and may be reached at (602) 268-6110. DWAZ has members in the affected areas. DWAZ is allied with PARC, et al for the purposes of preparing comments in opposition to the freeway, and the use of these comments by these allies is allowed and unrestricted. DWAZ joins with PARC et al in these comments, and any and all co-parties are allowed to use these in litigation. Stephen Brittle, President of Don't Waste Arizona, is also a member of PARC.

The following comments on the DEIS for the South Mountain Freeway were prepared for DWAZ, PARC, et al. . . .

31

General Comments:

The 4f analysis is done wrong, and uses old and outdated information and data.

32

There is no analysis of having alternative to the freeway in the form of a road connecting Laveen to the I-10 west for the purposes of giving Laveen area residents a better access to the I-10. This would actually serve Laveen area residents' needs better because it would eliminate most of the traffic from trucks.

Too many of the details are left to the "design phase" when they should be examined at this stage of the process.

The intersection with I-10 west near 59rh Avenue fails in many ways. What about the severe traffic congestion that already occurs there during rush hour, as well as pollution impacts? Where is the current data showing traffic patterns?

Why haven't there been any new concurrences since 2008?

Have there been any new agreements since 2005-2007?

The following are comments related to impacts to air pollution and air quality:

Truck Traffic from Mexico and High-Sulfur Diesel; Truck Bypass Negated

The modeling of air pollution impacts in the DEIS do not include the additional air pollution from truck traffic, and also from truck traffic originating in Mexico that would be using high sulfur diesel fuel that has been banned in the US. The DEIS briefly mentions the issue, but it claims it has no way to know what impact the change in the bypass route would be. That is patently absurd and unacceptable. The number of trucks coming over the border from Mexico is on record, and even if these trucks have hazardous materials in their cargoes is on record. HDR and ADOT simply have to get the

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31	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration followed all requirements of Section 4(f) of the Department of Transportation Act that are found in 49 United States Code § 303. The methodology employed follows 23 Code of Federal Regulations § 774 and standard industry practice. Under the National Environmental Policy Act, it is common for new data to avail itself and to therefore update the environmental impact statement as new data does become available. Reviewers have noted that newer trails in the South Mountains (Bursera and Pyramid Trails) were not discussed in the Draft Environmental Impact Statement. This information has been considered, investigated, and the effects of the proposed freeway on these facilities has been addressed (see Final Environmental Impact Statement, page 5-9). This new information has not changed the findings of the Section 4(f) analysis in the Draft Environmental Impact Statement. A thorough feasible and prudent avoidance analysis of the South Mountains was conducted as presented in Chapter 5 of the Final Environmental Impact Statement and concluded avoidance to the direct use of the resource was not feasible and prudent. In support of this response, consider the following review from the U.S. Department of the Interior on the Draft Environmental Impact Statement comment: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources." The complete letter can be found in Appendix 7, Volume III, on page B4 of the Final Environmental Impact Statement. The Section 4(f) analysis for the proposed action was properly performed.
32	**Purpose and Need**	The establishment of the purpose and need for the proposed action must follow 40 Code of Federal Regulations 1502.13. The comment reflects a concern about need related to west valley travel. Chapter 1, *Purpose and Need*, describes a regional transportation problem warranting a transportation solution. The alternatives considered and evaluated in Chapter 3, *Alternatives*, consider a comprehensive set of alternatives and take into account the need as presented in Chapter 1. During the modal screening process (see text beginning on page 3-3 of the Final Environmental Impact Statement), expansion of the arterial street system was considered. The reasons this alternative was eliminated are presented in Table 3-2 on page 3-5 of the Final Environmental Impact Statement. According to 23 Code of Federal Regulations § 771.111(f), "the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope ..." The proposed action should satisfy the project need and should be considered in the context of the local area's socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need.

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34 The intersection with I-10 west near 59rh Avenue fails in many ways. What about the severe traffic congestion that already occurs there during rush hour, as well as pollution impacts? Where is the current data showing traffic patterns?

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33	**Design**	Federal Highway Administration Order 6640.1A *FHWA Policy on Permissible Project Related Activities During the National Environmental Protection Agency Process* clarifies the Federal Highway Administration's policy regarding the permissible project-related activities that may be advanced prior to the conclusion of the National Environmental Policy Act process. Preliminary design may occur to define the general project location and design concepts. It includes, but is not limited to, preliminary engineering and other activities and analyses, such as environmental assessments, topographic surveys, metes and bounds surveys, geotechnical investigations, hydrologic analysis, hydraulic analysis, utility engineering, traffic studies, financial plans, revenue estimates, hazardous materials assessments, general estimates of the types and quantities of materials, and other work needed to establish parameters for the final design. Prior to completion of the National Environmental Policy Act review process, any such preliminary engineering and other activities and analyses must not materially affect the objective consideration of alternatives in the National Environmental Policy Act review process. The current level of engineering is used to determine the limits of environmental and construction impacts that would be attributable to the proposed freeway. Location and the profile of the freeway would be evaluated to minimize potential changes to the freeway as the design level would progress. The current level of engineering is an accepted industry standard for determining impacts. (See Final Environmental Impact Statement sidebar on page 3-40 for more discussion.)
34	**Traffic**	An assessment of existing traffic operational characteristics and future traffic operational characteristics without the proposed freeway is presented in the Final Environmental Impact Statement, beginning on page 1-13. This includes current and future traffic volumes and durations of level of service E or F conditions (congestion) along Interstate 10 between State Route 101L and Interstate 17. An assessment of future traffic conditions with and without the proposed freeway is presented in the Final Environmental Impact Statement, beginning on page 3-27. Observations from Figures 3-15 and 3-16 indicate that conditions would be similar or slightly better with the proposed freeway in place. The traffic conditions presented in these sections are consistent with the environmental impact analysis for elements such as air quality and noise, and the results of those analyses can be found in their respective sections of Chapter 4 of the Final Environmental Impact Statement. The air and noise analyses were updated for the Final Environmental Impact Statement (see sections beginning on pages 4-68 and 4-88, respectively). It is important to note that no substantial differences between the analyses for the Draft and Final Environmental Impact Statements resulted from the update.
35	**Cultural Resources**	National Historic Preservation Act Section 106 consultation is summarized in Table 4-46 beginning on page 4-136 of the Draft Environmental Impact Statement. There have been a number of concurrences since 2008.
36		The comment is not specific enough in its reference to "agreements" to allow an accurate response.

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37	**Air Quality**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; truck traffic would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement). Trucks crossing from Mexico to Arizona are restricted to the commercial zones within 25 miles of the border. The Federal Motor Carrier Safety Administration is administering a United States-Mexico cross-border, long-haul trucking pilot program. The program tests and demonstrates the ability of Mexico-based motor carriers to operate safely in the United States beyond the municipalities and commercial zones along the United States-Mexico border (see <fmcsa.dot.gov/intl-programs/trucking/trucking-program.aspx>). Petróleos Mexicanos (better known as Pemex), the Mexican state-owned petroleum company, has guaranteed 15 parts per million in its sulfur diesel fuel in the border region (see <http://transportpolicy.net/index.php?title=Mexico:_Fuels:_Diesel_and_Gasoline>). As explained on page 4-77 of the Final Environmental Impact Statement, the emissions analysis conducted for the project shows that future mobile source air toxics emissions will be lower than current levels. This analysis included projected truck traffic.

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data and analyze it. This should be examined as a cumulative impact, an indirect impact, and a direct impact.

There is a reason why the idea of a truck bypass around the urban core of Maricopa County came up in the first place, all those years ago. It is because there have been chronic issues about air quality in the Phoenix metro area, so bad and for so long that public policy makers suggested as one of the strategies to reduce particulate matter from truck exhaust in urban Maricopa County was to designate a bypass for truck traffic around the urban area.

This bypass is also now the designated route of the Canamex Highway. It is Interstate 8 (south of Casa Grande) to State Highway 85, to Interstate 10, west of the Phoenix metro area. This was formally adopted by MAG (Maricopa Association of Governments on April 25, 2001. In the resolution of decision, the wording about air quality and for particulate matter under ten microns in diameter (PM-10) reveals the intent of the decision, , "BE IT RESOLVED that the Maricopa Association of Governments recommends the future designation of the CANAMEX Corridor within the Maricopa region to include I-8 between I-10 and SR 85, SR 85 between I-8 and I-10, and the US 93 / US 60 Wickenburg Bypass, with the connection between the SR 85 / I-10 junction and the Wickenburg Bypass to be designated following additional study but constrained to a location **outside of the air quality nonattainment area for particulate matter under ten microns in diameter (PM-10) as specified in the "Revised MAG 1999 Serious Area Particulate Plan for PM-10 for the Maricopa County Nonattainment Area" (February 2000)**
[See http://www.azmag.gov/Documents/pdf/cms.resource/FinalCANAMEXResolution_670.pdf]

38 The decisions about the truck bypass route came as part of a series of actions by MAG and the Arizona legislature to bring Maricopa County into compliance with the PM standards of the National Ambient Air Quality Standards (NAAQS) under the Clean Air Act and to stave off sanctions for noncompliance.

39 **Attainment Status Designation: Serious Nonattainment**

Maricopa County was reclassified as a serious PM_{10} nonattainment area on June 10, 1996. On July 9, 1999, the Maricopa Association of Governments (MAG) submitted to EPA the MAG 1999 Serious Area Particulate Plan for PM_{10} (Executive Summary), addressing both the 24-hour and annual standards.

A revised state implementation plan (SIP) was submitted in February 2000. (A state implementation plan is a plan that shows how the state will implement the Clean Air Act and meet the requirements of the National Ambient Air Quality Standards (NAAQS), i.e. comply with the standards for levels of air pollution allowed in the air) The Plan, based on new most stringent measures, included an extension request for attainment no later than December 31, 2006. On January 10, 2002, EPA announced approval of Arizona's

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38	**Trucks**	It is agreed that the truck bypass for the Phoenix metropolitan area would not include the proposed freeway. As with all other freeways in the Maricopa Association of Governments region, trucks would use the proposed freeway for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce (see page 3-64 of the Final Environmental Impact Statement). The trucking industry depends on the efficient and fast movement of freight and on travel-time savings. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85. The comment offers no source or evidence. In April 2001, the Maricopa Association of Governments Regional Council formally adopted the route depicted in the map on page 3-64 as the CANAMEX Corridor within Maricopa County. As noted on page 3-64 of the Final Environmental Impact Statement, in the Maricopa County area the CANAMEX Corridor is to follow Interstate 10 from Tucson to Interstate 8 near Casa Grande, Interstate 8 west to State Route 85 near Gila Bend, State Route 85 north to Interstate 10 northwest of Buckeye, Interstate 10 west to Wickenburg Road, Wickenburg Road to Vulture Mine Road west of Wickenburg, and then connect with the planned U.S. Route 93/U.S. Route 60 Wickenburg Bypass.
39	**Air Quality**	In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the U.S. Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).

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39	plan to attain the standards for PM_{10} in the metropolitan Phoenix area by 2006. EPA's approval granted a 5-year extension of the attainment date for both the 24-hour and annual PM_{10} standards to December. 31, 2006. Both decisions were published in the Federal Register on July 25, 2002 (67 FR 48718). On July 2, 2002, EPA found that more work was needed to achieve attainment of the 24-hour standard in the area of the Salt River monitoring site (43rd Avenue/Broadway). This resulted in the Revised PM10 State Implementation Plan for the Salt River Area in September 2005. [http://www.azdeq.gov/environ/air/plan/download/sr-sip.pdf] Despite the most stringent measures and best available control measures adopted and implemented earlier, the nonattainment area failed to attain the NAAQS by the extended deadline of December 31, 2006. This failure triggered a special requirement under Section 189(d) of the Clean Air Act that SIP revisions provide for annual reductions of PM_{10} or PM_{10} precursors of not less than 5 percent of the most recent emissions inventory, until the NAAQS is attained, be submitted to EPA by December 31, 2007. This SIP revision was prepared by the Maricopa Association of Governments and submitted to EPA by the deadline. The primary sources of particulate pollution in the area are construction activities, **paved road dust**, unpaved roads and parking lots, agricultural activities, windblown dust from disturbed vacant lots, construction sites, and agricultural fields, fires and open burning, dust from off-road recreational vehicles, leaf blowers, and **exhaust from cars**. (Emphasis added.) [http://www.maricopa.gov/aq/divisions/planning_analysis/state_implementation_plan.aspx]
40	If the South Mountain Freeway is built, the bypass route, which has few amenities, would be a longer route and it is not a full freeway for the entire distance, while the South Mountain Freeway and Truck Bypass would be a modern highway. There is no law that would force trucks to use the longer original bypass route, so it is entirely likely most or even all these trucks would now come through Phoenix, negating the whole bypass strategy that had been agreed upon 12 years ago, and negating that public policy decision. By completing the South Mountain Freeway, this would all be negated, but the reversal of this public policy decision and the effects it might have on air pollution are never mentioned in the DEIS. Further, trucks originating in Mexico will be fueled with diesel that doesn't meet the CARB diesel standards adopted by Arizona over a decade ago. In Mexico, there is no regulation about the sulfur in diesel fuel. In Arizona, the law was changed to allow only diesel fuel to be sold that has had 98% of the sulfur removed. This was another part of the strategy to bring Maricopa County into compliance with the particulate matter standards required by the Clean Air Act (CAA).There was extensive modeling of the effect of adopting the CARB diesel standards and a discussion of this at the Arizona legislature, where it passed, so the data is in government hands. The CARB diesel standards for Arizona were adopted by EPA by rule in August 2008, which makes them part of the SIP.

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40	**Trucks**	The use of the proposed action by truck traffic is disclosed in the Draft Environmental Impact Statement (see page 3-64). Creating a truck bypass is not a goal of the proposed action and not established as part of the purpose and need as disclosed in full in Chapter 1, *Purpose and Need*, of the Draft Environmental Impact Statement. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicle using the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that trucks will represent approximately 10 percent of the total traffic on the proposed action, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. Further, it is not expected that the entire 21 percent of through-truck traffic (by tonnage) using Interstate 10 would divert from Interstate 10 to use the proposed freeway (see Final Environmental Impact Statement page 3-64). Trucking destinations in the Phoenix metropolitan area would still prompt trucks to enter congested areas. Drivers choosing to travel on the proposed freeway versus Interstate 10 would not receive substantial travel-time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85. Trucks crossing from Mexico to Arizona are restricted to the commercial zones within 25 miles of the border. The Federal Motor Carrier Safety Administration is administering a United States-Mexico cross-border, long-haul trucking pilot program. The program tests and demonstrates the ability of Mexico-based motor carriers to operate safely in the United States beyond the municipalities and commercial zones along the United States-Mexico border (see <fmcsa.dot.gov/intl-programs/trucking/trucking-program.aspx>). Petróleos Mexicanos (better known as Pemex), the Mexican state-owned petroleum company, has guaranteed 15 parts per million in its sulfur diesel fuel in the border region (see <http://transportpolicy.net/index.php?title=Mexico:_Fuels:_Diesel_and_Gasoline>). As explained on page 4-77 of the Final Environmental Impact Statement, the emissions analysis conducted for the project shows that future mobile source air toxics emissions will be lower than current levels. This analysis included projected truck traffic.

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"August 4, 2008: Final rule regarding BACM and MSM demonstrations.

Final rule to again approve the best available control measures (BACM) and most stringent measures (MSM) demonstrations in the Phoenix Area's PM-10 plan in response to a 9th Circuit Court of Appeals remand to re-evaluate the feasibility of implementing California Air Resources Board (CARB) diesel fuel as a BACM. *The correct docket number (as stated at the top of the document) is EPA-R09-OAR-2006-0571."*

http://www.epa.gov/region9/air/phoenixpm/

Also, we know exactly the number of trucks arriving from Mexico and their destinations in the US, so this is data that is available for the DEIS.

Once this additional pollution is honestly quantified and factored in, there would be a huge net increase in air pollution from the South Mountain Freeway and Truck Bypass, and associated increases in asthma, heart disease, premature death, and other adverse health impacts. This would lead to the No Build option being chosen as the only option.

The DEIS does mention, in Chapter 4, part 1, page 68:
"Heavy-duty Diesel Emissions Standards
In December 2000, EPA issued its final rule in a two-part strategy to reduce diesel emissions from heavy-duty trucks and buses. The standards pertain to diesel engines found in such vehicles (weighing over 8,500 pounds), beginning in model year 2004. Additional standards and procedures were implemented in 2007.

EPA required diesel fuel refiners to produce diesel fuels (for highway vehicle use) that have a sulfur content of no more than 15ppm, effective October 2006, a 97percent reduction from the previous 500ppm level."

So ADOT and HDR have to aware of the issue regarding high sulfur diesel, but the impacts of truck traffic from Mexico using high sulfur diesel fuel and the additional pollution is not addressed.

41

Air Toxics Already a Crisis but Not Mentioned

In the DEIS, Chapter 4 part 1 page 64, it is stated,
"Local Emissions of Priority MSATs (mobile sources of air toxics)
It is possible to estimate the relative contributions (by weight of emissions) of the different local sources of priority M SATs using EPA-compiled information. In June 2009, EPA released the results of its National-Scale Air Toxics Assessment for 2002."

In the DEIS, Chapter 4 part 1 page 68-69, it is stated,
"Mobile Source Air Toxics

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41		Quotes from Draft Environmental Impact Statement

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41	Controlling air toxic emissions became a national priority with the passage of the Clean Air Act Amendments of 1990, whereby Congress mandated that EPA regulate 188 air toxics, also known as HAPs. EPA has assessed this expansive list in its latest rule on the Control of Hazardous Air Pollutants from Mobile Sources(Federal Register 72(37): 8430, February 26, 2007), and identified a group of 93 compounds emitted from mobile sources that are listed in its Integrated Risk Information System <www.epa.gov/iris/>. In addition, EPA identified seven compounds with significant contributions from mobile sources that are among the national- and regional-scale cancer risk drivers from its 1999 National Air Toxics Assessment <www.epa.gov/ttn/atw/nata1999/>. These are acrolein; benzene; 1,3-butadiene; DPM plus diesel exhaust organic gases; formaldehyde; naphthalene; and POM. While F H WA considers these the priority MSATs, the list is subject to change and may be adjusted in consideration of future EPA rules." "Information Availability Constraints in Analyzing Project-Specific MSATs Impacts This section includes a basic analysis of the likely M SATs emissions impacts of the proposed action and the No -Action Alternative. Available technical tools do not, however, enable the prediction of project-specific health impacts of the emissions changes associated with the action alternatives. Because of these limitations, the following discussion is included in accordance with Council on Environmental Quality (CEQ) regulations [40 C.F.R .§ 1502.22(b)] regarding incomplete or unavailable information. 40 C.F.R. § 1502.22(b) addresses situations where analysis of an impact in a NEPA document is restricted by missing or incomplete information, and requires the NEPA document to 1) state that there is missing or incomplete information, 2) discuss the relevance of this information, 3) summarize what is known about the impact in question, and 4) in the face of what is known and not known, present the federal agency's evaluation of the likely impact. In F H WA's view, information is incomplete or unavailable to credibly predict the project-specific health impacts attributable to changes in MSAT emissions associated with a proposed set of freeway alternatives. The outcome of such an assessment, adverse or not, would be influenced more by the uncertainty introduced into the process through assumption and speculation rather than any genuine insight into the actual health impacts directly attributable to MSAT exposure associated with a proposed action." **But there is already very complete and specific data related to all of this that was excluded and is not properly reviewed or analyzed, and it is much more recent.**
42	In 2005, there was an extensive air monitoring of certain toxic chemicals (air toxics) conducted by EPA and ADEQ in a joint effort named the Joint Air Toxics Assessment Program (JATAP). This was conducted at specific sites in Maricopa County that modeling showed would likely be hot spots for air toxics, including a site on the Gila River Indian Community (GRIC), that would be adjacent to the South Mountain Freeway and Truck Bypass. [These JATAP study results are posted at:

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42	**Air Quality**	The Joint Air Toxics Assessment Project compares monitored values to the Environmental Protection Agency's one-in-a-million risk threshold, but this numerical benchmark is not a "standard" in the sense that it represents a pass/fail threshold (like the National Ambient Air Quality Standards). This issue is discussed in Appendix F of the Air Quality Technical Report, where examples are provided where the U.S. Environmental Protection Agency itself has promulgated emissions control regulations that result in residual risk of more than one in a million (i.e., the Environmental Protection Agency considered it "acceptable" to adopt regulations that did not reduce risk to a level below one in a million). Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics.

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42	http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/3dc283e6c5d6056f88257426007417a2/bd0cae65f8ca89368825790d0056f0e4/$FILE/Final%20Rpt_Phoenix%20Air%20Toxics_JATAP%202005.pdf.] The monitoring sites included a site near St. Johns on the Gila River Indian Community (GRIC), and some of the other monitoring sites were in west Phoenix and South Phoenix. The JATAP monitoring results were reported in 2006, during a time the data for the DEIS was being gathered. The JATAP monitoring results found levels of certain toxic chemicals associated with vehicular emissions were above the standard of a one in a million chance of cancer in a lifetime of exposure in the west Phoenix, south Phoenix, and GRIC sites. The JATAP monitoring at the St. Johns monitoring site on the GRIC found certain air toxics attributed to "mobile sources," or vehicular traffic burning hydrocarbons. These findings of the air toxics were many times the "accepted" cancer risk standard set by USEPA. The St. Johns monitoring site's annual mean concentrations of mobile source air toxics (MSATs): • benzene at 4.7 times the accepted cancer risk standard; • 1,3 butadiene at 3.9 times the accepted cancer risk standard The JATAP study also found other air toxics associated with transportation exhaust. Acetaldehyde, formaldehyde, ethylbenzene, m,p-Xylene, o-Xylene, and toluene were detected at high levels at the St. Johns monitoring site.
43	Residents of the GRIC living around and adjacent to the monitoring site are currently being subjected to all of these carcinogens, not just one. And if a freeway were to be built near this monitoring site on the GRIC, there would be more air toxics in addition to the ones detected at levels that far exceed the USEPA risk standard. At the West Phoenix monitoring site, which is the same 43rd Avenue and Broadway site that has had many exceedances of the particulate matter standards, even higher levels of air toxics were found. This site is about a mile or so downwind from the proposed route of the South Mountain Freeway, and air toxics levels would be impacted by the freeway. The West Phoenix monitoring site's annual mean concentrations of mobile source air toxics (MSATs): • benzene at 18.7 times the accepted cancer risk standard; • 1,3 butadiene at 21.5 times the accepted cancer risk standard
42	The JATAP study also found other air toxics associated with transportation exhaust. Formaldehyde, ethylbenzene, m,p-Xylene, o-Xylene, and toluene were detected at high levels at the West Phoenix monitoring site.

Code	Issue	Response
43	**Air Quality**	The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, constructing the freeway would have a marginal effect on total mobile source air toxics emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative) (see discussion beginning on page 4-72 of the Final Environmental Impact Statement). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No-Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the South Mountain Freeway would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the freeway under consideration. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.

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43	One of the JATAP's findings presented to the EPA National Air Monitoring Conference in November 2006 was, "**Annual average concentrations of formaldehyde, acetaldehyde, benzene and 1,3 butadiene were on the high end of the range reported in EPA funded assessments of other US cities**." This finding relates to any future proposed freeway in the JATAP study area, which includes in entirety the route of the proposed South Mountain Freeway and Truck Bypass. In the December 2006 ANALYSIS OF AIR TOXICS COLLECTED AS PART OF THE JOINT AIR TOXICS ASSESSMENT PROJECT FINAL REPORT, Page 3-6, it states this with more precision: **"How Do Air Toxics Concentrations Compare with Typical National Levels? Phoenix area urban concentrations of1,3-butadiene, acetaldehyde, formaldehyde, chloroform, benzene, and tetrachloroethene were typically on the high end of the national urban scale (i.e., above the 75th percentile). Other air toxics concentrations were typically within the interquartile range of national concentrations (25th to 75th percentile)."**
44	**So the air toxics are already worse than many other areas of the United States, and the proposed freeway would add even more.** Obviously, adding more vehicular traffic emissions by building a freeway where there had not been one would add to this toxic burden. And because this is an ethnic minority community, Native Americans, there are civil rights and environmental justice issues involved, also. ADOT and the Maricopa Association of Governments (MAG) were not stakeholders or involved in the JATAP, so these agencies had no control over the science or the direction of the JATAP, and certainly had no authority to stop the project from finding data that would not support building the South Mountain Freeway and Truck Bypass. But the JATAP results are barely mentioned in the DEIS, then discounted and misrepresented. Instead there is a strange and unsubstantiated missive about the uncertainty of the risk from these air toxics standards, and associated modeling methodologies, which is simply not true. ADOT is quite suspect in these regards. The cancer risk standards have been promulgated and published by EPA after extensive research and study, and they are well-known and peer-reviewed.
45	In EPA's own words: "The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing comprehensive evaluation of air toxics in the U.S. EPA developed the NATA as a state-of-the-science screening tool for State/Local/Tribal Agencies to prioritize pollutants, emission sources and locations of interest for further study in order to gain a better understanding of risks. NATA assessments do not incorporate refined information about emission sources, but rather, use general information about sources to develop estimates of risks which are more likely to overestimate impacts than underestimate them. NATA provides estimates of the risk of cancer and other serious health effects from breathing (inhaling) air toxics in order to inform both national and more localized efforts to identify and prioritize air toxics, emission source types and locations which are of greatest potential concern in terms of contributing to population risk. This in turn helps air pollution experts focus limited analytical resources on areas and or populations

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44	**Air Quality**	The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause substantial adverse effects. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The Draft Environmental Impact Statement provided the results of modeling for each of the seven priority mobile source air toxics, in both the Eastern and Western Subareas, and compared relative mobile source air toxics emissions that would result from three different potential alternatives (W59, W71, W101) as compared with the No-Action Alternative. It also included modeling of mobile source air toxics emissions in the overall mobile source air toxics study area assuming the W59 Alternative (see pages 4-70 to 4-74 of the Draft Environmental Impact Statement) along with implementation of recent U.S. Environmental Protection Agency mobile source air toxics rules. During the period when the project has been under review, the U.S. Environmental Protection Agency has issued two rules on controlling mobile source air toxics emissions from motor vehicles (66 *Federal Register* 17229 [March 29, 2001] and 72 *Federal Register* 8427 [February 26, 2007]). In those rules, the U.S. Environmental Protection Agency examined the impacts of existing and newly promulgated mobile source control programs, including its reformulated gasoline program, its national low emission vehicle standards, its Tier 2 motor vehicle emissions standards and gasoline sulfur control requirements, and heavy duty engine and vehicle standards and on-highway diesel fuel sulfur control requirements. As a result, the U.S. Environmental Protection Agency adopted controls on gasoline and passenger vehicles that significantly reduce emissions of benzene and other mobile source air toxics such as 1,3-butadiene; formaldehyde; acetaldehyde; acrolein; and naphthalene; as well as significant reductions in emissions of particulate matter from passenger vehicles. On March 3, 2014, the U.S. Environmental Protection Agency also promulgated new "Tier 3" vehicle and fuel regulations, which will produce additional reductions of mobile source air toxics pollutants. Since these reductions have not yet been incorporated into the U.S. Environmental Protection Agency's emissions model, they are not accounted for in the South Mountain Freeway analysis. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement).

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45	where the potential for health risks are highest. Assessments include estimates of cancer and non-cancer health effects based on chronic exposure from outdoor sources, including assessments of non-cancer health effects for Diesel Particulate Matter (PM). Assessments provide a snapshot of the outdoor air quality and the risks to human health that would result if air toxic emissions levels remained unchanged." [http://www.epa.gov/nata/] As for the JATAP itself, the modeling conducted before the monitoring indicated certain issues that might be clarified: "Objectives for Monitoring NATA results indicate that, overall, VOCs and carbonyls are the biggest risk drivers – Particulate metals significant in some areas •Additional monitoring needed to compare with model results – Annual average concentrations of key HAPs – Spatial gradients – **Potential hot spots (near freeway environments)** (Emphasis added.) – Diurnal variability – Source identification through fingerprinting – Which HAPs contribute most to the risk?" In the DEIS, Chapter 4 part 1, page 75, it states, "Mobile Source Air Toxic Hot Spots Given concerns about the possibility of MSAT exposure in the near-road environment, The HEI dedicated a number of research efforts at trying to find an MSAT "hotspot." In 2011, three studies were published that tested this hypothesis. In general, the authors confirm that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near road exposures were often no different or no higher than background or ambient levels of exposure and, hence, no true hot spots were identified. Additional information may be found at <pubs.healtheffects.org/getfile.php?u=659> page 137, <pubs.healtheffects.org/getfile.php?u=656> page 143, and <pubs.healtheffects.org/getfile.php?u=617> page 87, where monitored on-road emissions were higher than emission levels monitored at near-road residences, but **the issue of hot spots was not ultimately discussed**." (Emphasis added.). Yes, the JATAP, its purpose, its results, its recommendations, all would be a reason to not build the freeway, to determine No Build as the only acceptable alternative. So the JATAP is barely mentioned and misrepresented, and the EPA's Air Toxics program is downplayed and obfuscated, and an inconclusive study that admittedly doesn't discuss the issue of hot spots gets the focus. In NEPA, if a project causes a negative, a problem, ways to eliminate or mitigate the damage have to examined and assessed. In this case, not building a freeway near a site that has already been identified as being at a higher risk due to the same sorts of toxic air pollution found by freeways would be the only logical conclusion. **So no wonder ADOT and HDR excluded the JATAP results and included a propaganda missive against the EPA's Air Toxics Program.** 8

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44 (cont.)		For mobile source air toxics, the project would have a negligible effect on emissions in the mobile source air toxics study area. The Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No-Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the South Mountain Freeway would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the freeway under consideration. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.
45	**Health Risk Assessment**	**The Role of Health Risk Assessment in a National Environmental Policy Act Context** The Federal Highway Administration's National Environmental Policy Act documents are developed under two guiding regulations: the Council on Environmental Quality's National Environmental Policy Act regulations applicable to all federal agencies (40 Code of Federal Regulations Parts 1500–1508) and the Federal Highway Administration's implementing regulations governing Federal Highway Administration National Environmental Policy Act documents (23 Code of Federal Regulations Part 771). In its mobile source air toxics guidance, the Federal Highway Administration discusses 40 Code of Federal Regulations Part 1502.22 and acknowledges that while much work has been done to assess the overall health risk of mobile source air toxics, analytical tools and techniques for assessing project-specific health outcomes as a result of lifetime exposures to mobile source air toxics remain limited. These limitations impede the ability to evaluate the potential health risks attributable to exposure to mobile source air toxics as part of the decision-making process in the National Environmental Policy Act context. However, as with any analysis that the Federal Highway Administration conducts for National Environmental Policy Act purposes, the Federal Highway Administration's approach for mobile source air toxic analysis in National Environmental Policy Act documents is informed not just by 40 Code of Federal Regulations Part 1502.22, but by all applicable Council on Environmental Quality requirements. The appropriateness of air toxics health risk assessment as an analysis method for National Environmental Policy Act documents is discussed below, in the context of Council on Environmental Quality requirements for these documents. In addition to the 40 Code of Federal Regulations Part 1502.22 provisions regarding uncertainty and limitations discussed in the Federal Highway Administration's MSAT Interim Guidance Appendix C, three other provisions of the Council on Environmental Quality regulations are particularly relevant to the topic of health risk assessment:

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45 **(cont.)**		*40 Code of Federal Regulations § 1500.1(b): NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.* *40 Code of Federal Regulations § 1502.1: An environmental impact statement is more than a disclosure document. It shall be used by Federal officials in conjunction with other relevant material to plan actions and make decisions.* *40 Code of Federal Regulations § 1502.2: (a) Environmental impact statements shall be analytic rather than encyclopedic. (b) Impacts shall be discussed in proportion to their significance.(c) Environmental impact statements shall be kept concise and shall be no longer than absolutely necessary to comply with NEPA and with these regulations.* Section 1500.1(b) states that information for decision making must be of high quality and based on accurate scientific analysis. Air toxics health risk assessments can involve large uncertainties. The mobile source air toxic health risk assessment uncertainty builds on itself—each step of the analysis involves uncertainties, including modeling traffic and then modeling emissions, and using this estimated output to model dispersion/concentrations, which provide information for estimating or assuming exposures to those concentrations, and finally predicting health outcomes. Major uncertainties are associated with traffic and emissions projections over a 70-year period, and dispersion models are typically held to a "factor of 2" performance standard. Health impacts of mobile source air toxics in the U.S. Environmental Protection Agency Integrated Risk Information System are based on a 70-year lifetime exposure, which introduces significant uncertainty (e.g., on average, people in the United States change residence approximately once every 8 years and change jobs once every 3). Finally, as noted above, the U.S. Environmental Protection Agency's Integrated Risk Information System provides toxicity (risk) values for various pollutants and routes of exposure; in a health risk assessment, the Federal Highway Administration would compare calculated concentrations of mobile source air toxic pollutants to the Integrated Risk Information System values to estimate health risk. In the Integrated Risk Information System, the U.S. Environmental Protection Agency states the toxicity values are believed to be accurate to within an order of magnitude (a factor of 10). The total cumulative uncertainty involved in highway project health risk assessment is much larger than the change in emissions attributable to projects (typically a few percentage points). In this context, the information would not necessarily have a strong nexus to the requirements for high-quality information and accurate scientific analysis. Section 1500.1(b) also directs agencies to focus their National Environmental Policy Act analysis and documentation on issues that are truly significant to the action in question. In the context of mobile source air toxics, the Federal Highway Administration must consider whether changes in mobile source air toxic emissions attributable to a project have the potential for significant health risk. Using cancer risk as an example, the U.S. Environmental Protection Agency estimates that the overall risk of cancer in the United States is approximately 330,000 in a million, and that air toxics (from all sources) are responsible for a risk of approximately 50 in a million. In its most recent mobile source air toxics rule-making, the U.S. Environmental Protection Agency estimated mobile source air toxic cancer risk,

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45 (cont.)		after implementation of emissions controls, at approximately 5 in a million (or 0.0015 percent of overall cancer risk from any cause). For the Preferred Alternative, the mobile source air toxic emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxic emissions between the Preferred and No Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxic emissions would decrease by more than 80 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see the discussion beginning on page 4-77 of the Final Environmental Impact Statement). In summary, available information from the U.S. Environmental Protection Agency indicates that mobile source air toxics are a small component of overall cancer risk, and the analysis for the Final Environmental Impact Statement indicates both that the Preferred Alternative would result in a small change in the emissions contributing to this risk and that emissions will decline by a large amount regardless of alternative. As discussed above and in the air quality technical report, results from the health risk assessment would be influenced more by the uncertainty introduced into the process through assumptions and speculations rather than by genuine insight into the actual health impacts directly attributable to mobile source air toxic exposure associated with a project. Therefore, outcomes of such a health risk assessment do not provide useful information for decision makers, as required by Section 1502.1. The Federal Highway Administration emissions analysis meets the requirement to produce information that is useful for both disclosure and decision making because it allows the public and decision makers to see which alternative has less mobile source air toxic emissions, with much less uncertainty than a health risk assessment. Given the uncertainty of a mobile source air toxic health risk assessment, the Federal Highway Administration instead addresses the potential impacts of mobile source air toxics through an emissions assessment in its National Environmental Policy Act documents. For smaller projects with a lower likelihood of a meaningful impact, this discussion is qualitative. For larger projects, emissions analysis is conducted. The Federal Highway Administration approach is consistent with the Council on Environmental Quality's direction in Section 1502.2(b) to discuss impacts in proportion to their significance. The results of an emissions analysis can be summarized concisely in a National Environmental Policy Act document and provide useful information for decision makers (e.g., an alternative that has lower emissions is likely to be "better" from a mobile source air toxics health risk standpoint than one that has higher emissions).

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45 (cont.)		While the U.S. Environmental Protection Agency and the Federal Highway Administration both agree on the usefulness of addressing mobile source air toxics in National Environmental Policy Act documents for highway projects, the agencies disagree about the value of health risk assessment as a method for doing so. Another consideration with respect to health impacts is that the Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the Preferred Alternative would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the roadway network. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. The Federal Highway Administration determined that a supplemental environmental impact statement is not required at this time because there were no changes to the proposed action that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement nor is there new information relevant to environmental concerns and bearings on the proposed action or its impacts that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement.

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The impacts of the South Mountain Freeway on MSAT levels in the affected areas near the freeway should be examined as a cumulative impact, an indirect impact, and a direct impact

Further investigation reveals that when the JATAP results were announced, the presentation, *Joint Air Toxics Assessment Project (JATAP) for the Project (JATAP) for the Maricopa/Pinal Urban Area, Maricopa/Pinal Urban Area, Arizona*
Presented by: Mike Sundblom, Arizona Department of Environmental Quality
Christella Armijo, Salt River Pima Maricopa Indian Community
Hilary Hafner, Sonoma Technology, Inc.
To: EPA National Air Monitoring Conference
Date: November 8, 2006
found on-line at:
http://www.epa.gov/ttnamti1/files/2006conference/sundblomarmijo.pdf
revealed other issues relating to this proposed freeway and truck bypass. At
http://yosemite.epa.gov/oar/communityassessment.nsf/05426cd645cac06b85256ddb00510ac3!OpenForm&ParentUNID=8CB9AE50D0156C4B852576A5002C4867, the following is posted:

Maricopa County, Arizona, Joint Air Toxics Assessment Project (JATAP)

As a result of this project, will further data be collected, monitoring be conducted, or additional problem identification studies undertaken? Will refinements be made to modeling or exposure and/or toxicity assumptions?

(46)

If the project is complete, what recommendations were made to reduce risk and/or emissions or otherwise mitigate the impacts of the problems identified as a result of this project? *Examples of recommendations include: encouraging control of HAP from mobile sources, educating a community about the impacts of indoor air pollution, encouraging appropriate action to reduce diesel truck exhaust, and encouraging community involvement with State and EPA resources to reduce HAP emissions.*

If the project is complete, were reduction activity emissions or risk reductions calculated?

Are reduction factors being developed?

What are the expected reductions achieved by the individual activities?

Will the results of this project contribute to regulatory development, enforcement actions, or voluntary actions?

Code	Issue	Response
46	**Air Quality**	The Joint Air Toxics Assessment Project was funded by the U.S. Environmental Protection Agency; it would be the U.S. Environmental Protection Agency's decision whether to collect further data or studies related to the Joint Air Toxics Assessment Project. See: Phoenix, Arizona Air Toxics Assessment-Final Comprehensive Report (September 30, 2011)

Code	Comment Document
46	**Additional Comments:** **Are future projects/efforts planned or refined as a result of this project?** Together, these projects are building toward a much needed air toxics risk assessment for the Phoenix urban area. At this early stage, the project is oriented toward technical assessment work; as the work progresses, EPA should use the opportunity of providing grant funding to ensure that our priorities, including community involvement and early reduction programs, are addressed. **Are there any major uncertainties or cautions regarding the project process or findings?** **Are there any lessons learned that would benefit other projects?**
45	Focusing on: " *Examples of recommendations include: encouraging control of HAP from mobile sources, educating a community about the impacts of indoor air pollution, encouraging appropriate action to reduce diesel truck exhaust, and encouraging community involvement with State and EPA resources to reduce HAP emissions."* Controlling HAP from mobile sources and encouraging appropriate action to reduce diesel truck exhaust relate directly to the proposed South Mountain Freeway and Truck Bypass, as the only way to successfully accomplish that would be to not build the freeway. **It appears that ADOT, through its contractor, HDR, deliberately misrepresented the JATAP monitoring results and its recommendations from the DEIS precisely because it strongly supports the No Build conclusion for the Record of Decision of the NEPA process for the proposed freeway. There can be no other logical conclusion.** (This also explains the aforementioned lack of data and analysis of the impacts of the emissions from the high diesel fuel truck traffic from Mexico that would be driving along the South Mountain Freeway and Truck Bypass.)
47	***There are also Environmental Justice concerns raised by this. Chapter 4, page 9, the DEIS feigns concerns about environmental justice and notes that one of the "fundamental environmental justice principles [that] apply to the transportation project development process" is "to avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations." [http://azdot.gov/SouthMountainFreeway/PDF/south-mountain-loop-202-docs/EIS/chapter4/chapter4part1.pdf]***

Code	Issue	Response
47	**Environmental Justice and Title VI and Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative).With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

Code	Comment Document
47	***Thus, the failure to properly analyze and/or address the air toxics information from the JATAP study is a deliberate violation of the very Environmental Justice issues that ADOT and FHWA claim to be observing.*** The conclusion is that ADOT and HDR would sacrifice human health and safety to accomplish their goal of building the South Mountain Freeway and Truck Bypass, and would rather see people on the GRIC suffer and die from cancer than simply conduct an honest and objective NEPA process. Again, that appears to be a premeditated violation of the civil rights of the GRIC residents near the St. Johns JATAP monitoring site.
48	**Other Air Toxics Point Sources Impacted by the South Mountain Freeway** On top of the MSATs, there are also local point sources of these air toxics. In particular, the petroleum tank farm complex at 51st Avenue and Van Buren to about 57th Avenue and Van Buren receives transmix from California through a pipeline. There, the transmix is "refined" into diesel fuel and gasoline at this Phoenix location, and these fuels are also loaded into tanker trucks from large storage tanks sited there. The new South Mountain Freeway would be an immediately adjacent truck bypass route towards Casa Grande and the new train complex near Red Rock/Picacho Peak. The DEIS never mentions this, but the extra air pollution from this potential truck traffic from the petroleum tank farm complex in Phoenix using the South Mountain Freeway heading south should be investigated, examined, and quantified, as well the extra air pollution caused by the new truck traffic and the "refining" of more transmix and off-gassing of air toxics from loading and unloading of trucks that would also occur. This would also increase the releases of air toxics into the air into the study area and impact background levels of these air toxics. It is already established that the area has air toxics hot spots. The impacts of the South Mountain Freeway on MSAT levels in the affected areas near the freeway should be examined as a cumulative impact, an indirect impact, and a direct impact with this in mind also.
49	**More Air Quality Issues: The Straw That Broke the Camel's Back** The portion of Maricopa County that is characterized as the Phoenix metro area has had problems for decades meeting the air quality standards for particulate matter (PM) and other criteria pollutants. (Ozone levels are too high in the East Valley and Fountain Hills, for example.) There have been several exceedances of the standards for PM set by EPA under the authorities given the agency by the Clean Air Act (CAA). The problem has been so bad over the years that every possible delay and postponement allowed under the CAA to come up with a plan to meet regulatory levels of particulate matter have now been exhausted. So, currently, EPA is examining sanctions that include blocking a billion dollars in highway funds.
50	Any exceedances of the particulate matter standards of the NAAQS could bring sanctions under the enforcement provisions of the Clean Air Act, including the loss of a billion dollars in highway funds.. This could cost a billion dollars to start with, starting even before the freeway is completed, caused by the construction of the freeway: blasting,

Code	Issue	Response
48	**Air Quality**	As explained on pages 4-69 and 4-77 of the Draft and Final Environmental Impact Statements, respectively, the emissions analysis conducted for the project shows that future mobile source air toxics emissions will be lower than current levels. This analysis included projected truck traffic.
49	**Air Quality**	Information on the attainment status of Maricopa County with the National Ambient Air Quality Standards begins on pages 4-59 and 4-68 of the Draft and Final Environmental Impact Statements, respectively. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the U.S. Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information). According to the air quality analyses conducted for the proposed freeway, no violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Therefore, no loss of federal funds would occur.
50	**Air Quality**	40 Code of Federal Regulations § 93.111(c) was followed to conduct a qualitative analysis for particulate matter (PM_{10}) for the proposed action. This analysis complied with National Environmental Policy Act requirements for the development of the Draft Environmental Impact Statement. In December 2010, the U.S. Environmental Protection Agency established transportation conformity guidance for performing quantitative particulate matter ($PM_{2.5}$ and PM_{10}) hot-spot analyses for transportation projects and established a 2-year grace period. U.S. Environmental Protection Agency conformity guidance continues to allow qualitative particulate matter (PM_{10}) hot-spot conformity analyses for analyses that were started before or during the grace period and if the final environmental document for the project is issued no more than 3 years after issuance of the draft environmental document. A particulate matter (PM_{10}) qualitative analysis was performed for this project because the initial air

(Response 50 continues on next page)

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50	excavating, moving massive amounts of dirt, etc. Enough of the dust could disperse and drift along the Salt River bed for the mile or so to the 43rd Avenue and Broadway air monitor, which is the monitoring site where the vast majority of the particulate matter exceedances have been recorded. That could trigger an exceedance of the particulate matter standards, which could cost literally, the billion dollars in highway funds. This should be examined as a cumulative impact, an indirect impact, and a direct impact. And the sand and gravel industry (including cement and asphalt operations) in Maricopa County is poised to take sand and gravel from the Salt River bed in the path of the freeway and use it for the freeway's construction. This would be an economic bonanza for the sand and gravel industry, as the distance from excavation to its construction use would be very insignificant. The production of all the asphalt and cement for the freeway would contribute enormous amounts of PM. Several of these sand, gravel, cement, and asphalt plants are located in the same vicinity of the monitor at 43rd Avenue and Broadway. The cumulative effect could certainly trigger PM exceedances at the monitor at 43rd Avenue and Broadway. The DEIS never mentions this, but it should be analyzed and modeled. This should further be examined as a cumulative impact, an indirect impact, and a direct impact. And after the freeway is built, there would likely still be ongoing exceedances. Almost every one of these PM exceedances have been detected at the air quality monitor at 43rd Avenue and Broadway Road, and others have occurred along the Salt River bed in previous years. There were even higher levels recorded at the air monitor at 22nd Avenue and Lower Buckeye Road, but this was moved to 43rd Avenue and Broadway years ago. It was moved from the 22nd Avenue and Lower Buckeye Road because there was going to be significant amounts of dust and PM put into the air when the Rio Salado Habitat Restoration was being built, so much so that more exceedances would have occurred at the 22nd Avenue and Lower Buckeye Road monitor. Also, there was a sand and gravel operation at 19th Avenue and the Salt River bed that had excess emissions of PM that triggered a penalty for it from EPA, so the monitor location was moved to protect the polluter. These exceedances resulted in EPA requiring a special Salt River SIP for the Salt River bed to address the excess PM. In preparing the Salt River SIP, there was extensive air monitoring and modeling. Those models do not include any freeway emissions, but as noted on pages 9 and 10, Roads & Trackout as accounted for in this Salt River SIP do not include any new air pollution from the South Mountain Freeway and Truck Bypass. Roads & Trackout also could be as much as 63.7% of the PM in the air on a calm day. The addition of particulate matter pollution from this freeway would be considerable, that should be modeled at a minimum, and quantified, and the entire calculations for the Salt River SIP would have to be redone including this new data to determine if the models show exceedances of the PM standard could occur. That would support the No-Build Option. http://www.epa.gov/region9/air/phoenixpm/pdf/SaltRiver-tech-support.pdf 12

Code	Issue	Response
50 (cont.)		quality technical analysis report for the proposed action was produced in October 2005. The Arizona Department of Transportation and Federal Highway Administration have updated the qualitative analysis to a quantitative analysis for the Final Environmental Impact Statement to ensure that a state-of-the-art analysis is completed for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Sand and gravel mining in the area is regulated by the Maricopa County Air Quality Department. The transportation conformity rule in 40 Code of Federal Regulations § 93.123(c)(5) states that hot-spot analyses are not required to consider construction-related activities that cause temporary increases in emissions. Temporary increases are defined as those that occur only during the construction phase and last 5 years or less at any individual site. Although the duration of the overall construction period of the entire 22- to 24-mile proposed action would be 5 to 6 years, according to page 3-60 of the Final Environmental Impact Statement, any particular portion of the Study Area would not see construction lasting for 5 to 6 years. Construction would be phased based on the factors appearing on page 3-59 of the Final Environmental Impact Statement. Any particular area of the project would not be expected to see construction activities beyond an approximate 2-year period; therefore, the construction effects described above would be temporary and would not require additional analysis. Secondary impacts to air quality are addressed in Table 4-54 on page 4-172 of the Final Environmental Impact Statement. Cumulative impacts to air quality are on page 4-179 of the Final Environmental Impact Statement.

Code	Comment Document
50	The placement of a freeway about a mile to a mile and a half **upwind** from a monitor that has had all these high levels seems foolish and short sighted. And of course, the impacts and risks of this are not even mentioned in the DEIS. This should be examined as a cumulative impact, an indirect impact, and a direct impact. The DEIS does not examine the dust that would be kicked up during the construction phase, when thousands of tons of dirt would be moved around upwind of the monitor. The proposed path of the South Mountain Freeway would take it over the Salt River bed. To construct the bridges would involve extensive earthmoving. Also, blasting South Mountain would also release enormous amounts of dust (PM), and the natural wind currents and prevailing wind patterns would push this PM toward the air monitor at 43rd Avenue and Broadway.
51	The South Mountain Freeway could therefore be **the most expensive freeway ever built.** Not only the construction costs, and the $20 million already spent on the bogus DEIS, but then there would be the loss of the billion dollars in highway funds. This is a gift that keeps on giving, or taking, as there would be subsequent billions lost through the years due to perennial PM exceedances.
52	**Increases in Particulate Matter Levels Correlate to Increased Mortality** In ***Fine Particulate Air Pollution and Mortality in 20 U.S. Cities, 1987–1994***, Jonathan M. Samet, M.D., Francesca Dominici, Ph.D., Frank C. Curriero, Ph.D., Ivan Coursac, M.S., and Scott L. Zeger, Ph.D., published in the New England Journal of Medicine in December 2000, [http://www.nejm.org/doi/full/10.1056/NEJM200012143432401] a direct correlation to increases in particulate matter in ambient air and death was determined. Phoenix and 19 other cities were studied, all with the same types of results. After taking into account potential confounding by other pollutants, the study found consistent evidence that the level of PM_{10} is associated with the rate of death from all causes and from cardiovascular and respiratory illnesses. The estimated increase in the relative rate of death from all causes was 0.51 percent (95 percent posterior interval, 0.07 to 0.93 percent) for each increase in the PM_{10} level of 10 µg per cubic meter. The estimated increase in the relative rate of death from cardiovascular and respiratory causes was 0.68 percent (95 percent posterior interval, 0.20 to 1.16 percent) for each increase in the PM_{10} level of 10 µg per cubic meter. Yet the DEIS never mentions this well-known data. The increases in particulate matter pollution that will be caused by the South Mountain Freeway should be modeled and included in the environmental impact analysis.
53	**Traffic Congestion Issues at West I-10 Junction Adds to PM Issues** The junction of the South Mountain Freeway on its west end with Interstate 10 may have been an idea conceived many years ago, but the traffic congestion that exists at the area between 59th and 51st Avenues on that freeway during morning and evening rush hours is already more than extreme. It is like a parking lot. Yet there is no mention in the DEIS

Code	Issue	Response
51	**Air Quality**	According to the air quality analyses conducted for the proposed freeway, no violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Therefore, no loss of federal funds would occur.
52	**Air Quality**	The Arizona Department of Transportation conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
53	**Traffic**	Construction of the proposed freeway would include widening along Interstate 10 to facilitate entrance and egress of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26 on page 3-49 and Figure 3-29 on page 3-53 of the Final Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 were developed in accordance with the Federal Highway Administration's Interstate System Access Informational Guide and have received an initial determination of operational and engineering acceptability from the Federal Highway Administration. Detailed microsimulation models were developed for each of the action alternatives as well as for the No-Action Alternative. The results of the analysis concluded that the action alternatives would not have adverse impacts on the traffic operational characteristics along Interstate 10 and would provide as good or better performance as the No-Action Alternative. An assessment of future traffic conditions with and without the proposed freeway is presented in the Final Environmental Impact Statement beginning on page 3-27. The traffic conditions presented in these sections are consistent with the environmental impacts analysis for elements such as air quality and noise, and the results of those analyses can be found in the respective sections of Chapter 4 of the Final Environmental Impact Statement. The air and noise analyses were updated for the Final Environmental Impact Statement (see sections beginning on pages 4-68 and 4-88, respectively). It is important to note that no substantial differences between the analyses for the Draft and Final Environmental Impact Statements resulted from the update. Secondary impacts to air quality are addressed in Table 4-54 on page 4-172 of the Final Environmental Impact Statement. Cumulative impacts to air quality are on page 4-179 of the Final Environmental Impact Statement.

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of the cumulative impacts and effects of traffic congestion at that proposed junction, the effects on traffic flow in the vicinity of the interchange of the SMF and I-10 west. Without modeling that information, it cannot be determined if the freeway will cause more congestion or relieve it, but that step cannot wait until the design phase for that analysis because this step might/will show that the effects on traffic flow in the vicinity of the interchange of the SMF and I-10 west would be negative and traffic congestion worsened. This should be examined as a cumulative impact, an indirect impact, and a direct impact.

54

The overarching and consistent problem with the DEIS is that it utilizes such old and out-dated data from 2004-2007 for its analyses and conclusions that it is not viable or reliable. More recent data about traffic patterns, growth patterns, economic development patterns, etc. must be utilized to get correct projections to establish the need, if there even is one, for the freeway. There was an economic crisis in 2007 that caused major changes in the growth and economy of the Phoenix metropolitan area, and there has been some recovery, but many factors have changed substantially enough that the most up to date information has to be gathered and analyzed for the EIS.

55

A long line of vehicles sitting with engines idling while waiting to get on Interstate 10 at the junction with the SMF would also likely impact the air monitor at 43rd Avenue and Broadway. That could cost a billion dollars in sanctions more than once. What ADOT is doing is playing Russian Roulette with the highway money, with every day a potentially loaded with an air quality violation at the hot spot monitor at 43rd Avenue and Broadway. This should be examined as a cumulative impact, an indirect impact, and a direct impact.

56

There is much talk about the problems at the Broadway Curve, which is near the confluence of Highway 60, the 143, and Interstate 10. Let us be reminded that the Maricopa Association of Governments (MAG) and ADOT caused this problem through their shortsightedness and design problems. The planning of these agencies caused these traffic congestion nightmares. So now these same agencies, failed agencies, want to do this South Mountain Freeway. Will we be talking about the new junction in west Phoenix in the same way as the Broadway Curve? 100 trucks per hour and auto traffic trying to merge onto I-10 west during rush hour?

57

ADOT already completely ignored the recommendations of the original SMCAT, the group ADOT formed to skirt the proper NEPA scoping, in choosing the proposed alignment. The SMCAT, after months of study, had recommended that the SMF connect to the 101 on the west. So ADOT ignored even the recommendations of its own group and planned the SMF to connect with the I-10 at the currently proposed alignment.

This leaves a large question: If ADOT did that at that time long ago, what is to stop it from completely ignoring the current SMCAT should SMCAT vote for a "NO BUILD" option?

Code	Issue	Response
54	**Traffic**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
55	**Air Quality**	The Arizona Department of Transportation conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Secondary impacts to air quality are addressed in Table 4-54 on page 4-172 of the Final Environmental Impact Statement. Cumulative impacts to air quality are on page 4-179 of the Final Environmental Impact Statement.
56	**Traffic**	Construction of the proposed freeway would include widening along Interstate 10 to facilitate entrance and egress of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26 on page 3-49 and Figure 3-29 on page 3-53 of the Final Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 were developed in accordance with the Federal Highway Administration's Interstate System Access Informational Guide and have received an initial determination of operational and engineering acceptability from the Federal Highway Administration.
57	**Public Involvement**	The Arizona Department of Transportation conducted agency and public scoping process and has included agency and public input in the project development process. See Chapter 6 of the Final Environmental Impact Statement; agency scoping is presented beginning on page 6-2 and public involvement on page 6-6. The South Mountain Citizens Advisory Team and its engagement in the process was a part of the overall outreach program. The South Mountain Citizens Advisory Team's own bylaws are clear in its advisory and partial role in the outreach process. While the South Mountain Citizens Advisory Team recommended the W101 Alternative, all stakeholders' input was accounted for—including regional leaders, municipalities, members of the public, and members of the South Mountain Citizens Advisory Team—before identifying the W59 Alternative as the Preferred Alternative (see Final Environmental Impact Statement pages 3-65 and 3-68). The Final Environmental Impact Statement has detailed discussion regarding the relative merits and problems with the four action alternatives evaluated in the Western Section.

Code	Comment Document
58	**The following are comments related to impacts to hazardous materials:** **DEIS Ignores Risks from Hazardous Materials Transportation Incidents Due to the South Mountain Freeway and Truck Bypass; WQARF Site** The DEIS, starting on page 152, states, "AFFECTED ENVIRONMENT A hazardous materials evaluation for the construction and operation of the proposed freeway was conducted to determine whether: ➢ contaminated soils would be present near potential hazardous materials sites ➢ underground storage tanks would need removal or relocation because of freeway construction ➢ wells and dry wells would be present, providing unintended conduits for preexisting or accidental releases from the construction process to groundwater supplies ➢ during construction activities, workers could encounter soil contaminated with hazardous materials that had not previously been identified" It doesn't mention **at all** the transportation of hazardous materials on the new freeway and their associated risks, or the fact that the area where the freeway would connect with I-10 West crosses a site that was identified in the 1980s as contaminated and added to the list of the state of Arizona's Water Quality Assurance Revolving Fund (WQARF), which is the state's equivalent of a Superfund Site. The site has known groundwater contamination and soil contamination. **Risks from Hazardous Materials Transportation Incidents Due to the South Mountain Freeway and Truck Bypass** But the introduction of hazardous materials and their associated risks into Ahwatukee Foothills by the proposed South Mountain Freeway and Truck Bypass and its truck traffic would be significant. There are no industries using and emitting toxic chemicals in Ahwatukee Foothills that have reporting requirements under either the Toxics Release Inventory of the Emergency Planning and Community Right to Know Act (EPCRA) or the reporting of fixed facility hazardous materials (chemical) inventories required under the emergency planning provisions of EPCA. The latter, Tier Two chemical inventory reports, are annually required, and are reported to the fire department of jurisdiction (Phoenix Fire Department), the local emergency planning committee (Maricopa County LEPC), and the state emergency response commission (AZSERC). (The requirement for retail gas stations to file Tier Two reports was removed many years ago as long as these stations are in compliance with their reporting under the regulations for underground storage tanks.) 15

Code	Issue	Response
58	**Hazardous Materials**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement). The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. The Department of Public Safety also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on page 4-157 of the Final Environmental Impact Statement). The Arizona Department of Transportation maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Department of Public Safety on incidents within their jurisdiction. Requirements for shippers are maintained by the Arizona Department of Transportation's Enforcement Compliance Division. The project team is aware of the Hazardous Materials Commodity Flow Studies that the Arizona State Emergency Response Commission maintains. These studies are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing Emergency Response Plans. If the plan is amended, it is made available to the Arizona Department of Transportation. In the event of an incident with a hazardous materials issue on a state or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, who responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary.

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58	The Maricopa County LEPC and the AZSERC are the two emergency planning agencies tasked with developing and updating a comprehensive emergency response plan for Maricopa County and the state of Arizona, respectively. The plan, by statute, requires: "Each emergency plan shall include (but is not limited to) each of the following: (1) Identification of facilities subject to the requirements of this subchapter that are within the emergency planning district, **identification of routes likely to be used for the transportation of substances on the list of extremely hazardous substances referred to in section 11002(a) of this title, and identification of additional facilities contributing or subjected to additional risk due to their proximity to facilities subject to the requirements of this subchapter, such as hospitals or natural gas facilities**. (2) **Methods and procedures to be followed by facility owners and operators and local emergency and medical personnel to respond to any release of such substances.** (3) Designation of a community emergency coordinator and facility emergency coordinators, who shall make determinations necessary to implement the plan. (4) **Procedures providing reliable, effective, and timely notification by the facility emergency coordinators and the community emergency coordinator to persons designated in the emergency plan, and to the public, that a release has occurred** (consistent with the emergency notification requirements of section 11004 of this title). (5) **Methods for determining the occurrence of a release, and the area or population likely to be affected by such release.** (6) A description of emergency equipment and facilities in the community and at each facility in the community subject to the requirements of this subchapter, and an identification of the persons responsible for such equipment and facilities. (7) **Evacuation plans, including provisions for a precautionary evacuation and alternative traffic routes.** (8) **Training programs, including schedules for training of local emergency response and medical personnel**. (9) Methods and schedules for exercising the emergency plan. Due to the unique nature of Ahwatukee Foothills, which is a residential area, and not zoned for heavy industrial uses, few hazardous materials transportation issues and risks exist there because none of these chemicals, other than gasoline and diesel, are being transported into the area, other than incidentally adjacent on Interstate 10, which is east of the area. A catastrophic release of hazardous chemicals along the I-10 corridor would have only an indirect effect on Ahwatukee Foothills. 16

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58 (cont.)		The West Van Buren Water Quality Assurance Revolving Fund site was identified and considered during development of the Draft Environmental Impact Statement (see page 4-165 of the Final Environmental Impact Statement, and the Draft Initial Site Assessment prepared for the proposed project). These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected medium (groundwater) and the construction zone (near-surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165. The efforts to address security concerns at the petroleum tank farm are discussed on page 3-24 of the Draft Environmental Impact Statement. These included numerous meetings with the Arizona Department of Homeland Security and others and included discussions of barriers to screen the facility from the traveling public and prevent attacks or crashes involving the facility. As noted in the Draft Environmental Impact Statement, these precautions were not necessary after the alignment was shifted from the W55 to the W59 Alternative. The road network in the Maricopa Association of Governments travel demand model includes the Interstate 8 and State Route 85 corridor. So, while the roads are not in the Study Area for the proposed action, traffic and trip distributions along the corridor are included in the traffic analysis for the proposed action. Any traffic that would shift from the Interstate 8 and State Route 85 corridor to the proposed action would be included in the vehicle mix considered in the analysis. A truck driver traveling from Tucson to Los Angeles and choosing to use Interstate 10 and the proposed freeway would travel 15 miles less than one choosing to use the designated truck bypass along Interstate 8 and State Route 85. Choosing to travel on the proposed action versus Interstate 8 and State Route 85 would not translate to any substantial travel-time benefits because the trip would require entering the Phoenix metropolitan area and be subject to potential delays and congestion. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85. The 2008 hazardous material report referenced in the comment was prepared to assist the Arizona Department of Transportation in refining its policies and process for determining hazardous materials routing in the state. It was a preliminary document and intended to form a basis of understanding about how other states' planning processes address this issue. The report was not intended to provide specific recommendations for hazardous materials routing, but rather to provide the Arizona Department of Transportation with information to consider in making possible adjustments to its planning process. The recommendations of the report have been taken under advisement by the Arizona Department of Transportation.

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58	To determine the additional risks of hazardous materials transportation, the Maricopa County LEPC and the AZSERC would also need and utilize hazardous materials commodity flow studies to determine the types and amounts of hazardous materials **being transported** through or within the county and/or state to meet their respective planning requirements. Of course, the AZSERC does exactly that periodically, and the data and emergency planning is updated. But that data and the relevant analysis is absent in the DEIS. The planning for response to an incident involving the release into the environment of a hazardous material involves using Aereal Locations of Hazardous Atmospheres (ALOHA), RMP*Comp, and Computer Aided Management of Emergency Operations (CAMEO). All are USEPA approved and provided emergency planning screening tools. RMP*Comp is used to predict the effects of a release that would exceed the ALOHA model limit of six miles. The worst case scenario release for chlorine was the only hazardous material being transported on the highways that, in the event of a catastrophic release, would exceed the six-mile ALOHA modeling limit, so RMP*Comp is used to assess the radius of impact for the worst-case chlorine release. ALOHA, RMP*Comp, and CAMEO are all distributed by the USEPA and are software programs provided and periodically updated by USEPA to determine the distance from a release point there would be a danger to human health and safety. ALOHA can also calculate the levels of a released chemical that could infiltrate nearby buildings, the levels of those chemicals that will likely be in these buildings, and the time it would take for the released chemical(s) to reach their maximum concentration. As stated in the reports of the various hazardous materials commodity flow studies conducted in Arizona, ALOHA modeling already indicates, "a catastrophic release of gasoline from a tanker truck could cause areas up to 1.0 mile away to be affected at LOC 3 (a concentration where the general population could experience severe health effects and death) and areas as far as 3.1 miles away to be affected at LOC 1 (enough to cause discomfort in the general population). Credible and catastrophic releases of sulfuric acid would create an evacuation radius of 0.5 miles from the highway and railroad." (LOC means level of concern; LOCs range from 3 down to 1.) The petroleum tank farm complex at 51st Avenue and Van Buren to about 57th Avenue and Van Buren receives transmix from California through a pipeline. There, the transmix is "refined" into diesel fuel and gasoline at this Phoenix location. The new South Mountain Freeway would be an immediately adjacent truck bypass route towards Casa Grande and the new train complex near Red Rock/Picacho Peak. The DEIS never mentions this, but the extra potential truck traffic from the petroleum tank farm complex in Phoenix using the South Mountain Freeway heading south should be investigated, examined, and quantified, and the additional risks of a hazardous materials transportation incident involving diesel or gasoline should be also investigated, examined, and quantified. This should be examined as a cumulative impact, an indirect impact, and a direct impact.

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58	Ahwatukee Foothills already has some emergency planning needs due to the transportation of gasoline into and within the area. There should already be planning for an incident involving gasoline within a mile of current arterial traffic, including Pecos Road. Schools within a mile of Pecos should have an evacuation plan. The proposed South Mountain Freeway and Truck Bypass would only add **exponentially** to emergency planning needs and risks as more truck traffic of this chemical and others that are potentially more dangerous in the event of a catastrophic release would be transported immediately adjacent to schools, parks, shopping areas, and other vulnerable facilities in Ahwatukee Foothills. **The freeway would be the sole source of these new risks from a hazardous materials incident, thus this would be a very significant impact directly caused by the freeway, and a full analysis of the risks and effects must be examined in the NEPA process.** The data and calculations of risk and distance from certain chemicals carried on the highways are documented in the July 9, 2009, report, *The Hazardous Materials Commodity Flow Study Report I-19 Corridor from I-10 to Mexico Border, Arterial Highways and Railways, Pima and Santa Cruz Counties, Arizona*; the October 30, 2006 report, *Hazardous Materials Commodity Flow Study Report I-8 and I-10 Corridors, Arterial Highways and Railways, Yuma, Maricopa, Pinal, Pima and Cochise Counties, Arizona*; and the December 5, 2008 *Hazardous Material Commodity Flow Study I-10 Corridor from SR 85 to California* prepared for the AZSERC. Previous commodity flow study reports would show the same sorts of information. One piece of data that is missing is the Hazardous Materials Commodity Flow Study Report for the I-8 to SR 85 to I-10 route that was selected as a truck bypass around 2006. (Part of the idea of this particular truck bypass was to route truck traffic away from the Phoenix metro area as a measure to reduce particulate matter air pollution.) This also is part of the CANAMEX highway system that has been approved via treaties with Mexico and Canada, and this truck bypass has now been officially designated as the route of the CANAMEX. "SR 85 is the official truck bypass route around metropolitan Phoenix and has also been designated as part of the official CANAMEX corridor through the North American Free Trade Agreement (NAFTA). In addition to the importance of this route to the trucking industry, this corridor also provides access from the western portion of metropolitan Phoenix to the cities of Yuma and San Diego." [http://www.azdot.gov/highways/valley_freeways/SR85/Access.asp] "SR 85 and B-8 form a corridor that provides a major north-south connection between Interstate 10 west of the metropolitan area of Phoenix and I-8. The project limits of this access management study stretch approximately 36 miles and include the entire length of SR 85 from Gila Bend to I-10 and a portion of B-8 that connects SR 85 with I-8 on the east side of the town of Gila Bend. The route traverses through lands owned by the Bureau of Land Management, trust lands that are administered by the Arizona State Land Department, Arizona Game and Fish land (Robbins Butte State Wildlife Area), Maricopa

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58	to withhold this data, analysis, and discussion, which normally are indeed utilized in DEISs and the NEPA process. Frankly, that HDR obviously knew all of this, and therefore likely so did ADOT, in light of the SPR 64 report to ADOT, the omission and exclusion of this data from the DEIS may be a criminal act of negligence and/or fraud, akin to not warning people that they are entering an area where above ground nuclear testing could happen at any minute. From the beginning of the NEPA process regarding the South Mountain Freeway and Truck Bypass, Ahwatukee Foothills residents and others have consistently and vociferously raised concerns about the added risks to their community from the transportation of hazardous materials on the new South Mountain Freeway and Truck Bypass, and in doing so they have consistently voiced concerns regarding the additional problems with hazardous materials response in the affected area, as well as evacuation and shelter in place issues. Frankly, there is also a risk from the consequences of a hazardous materials transportation incident to the communities on the north side of the pass at South Mountain, and Laveen would be at a particularly heightened risk also. Therefore, the same types of impacts that threaten Ahwatukee Foothills would apply to these other communities, but at least these others have alternate escape routes that the community of Ahwatukee Foothills does not have.
59	As of 2010, the 35.8 square-mile community of Ahwatukee Foothills has a population of 77,249. So if there is a catastrophic release from a 17-ton chlorine tanker along the Pecos Road alignment, almost all of these 77,249 would be at risk of death or severe injury. In Laveen, there are 35,502 residents who would be at a similar risk. There would also be risks to the residents of the Gila River Indian Community along the Pecos alignment. All of these above mentioned communities would be forever at risk of a very terrible, certain, and quick death from a chlorine release if this freeway gets built. All of these communities would have to be forever on hair trigger alert. They, as communities, would need periodic training and drills to protect them, as well as infrastructure in the form of siren systems and other alert systems, telephone ring down systems, and much more.
60	We know that over a hundred trucks per hour would be the number at the beginning of the freeway's opening, just from localized traffic information, but when the I-8 to SR 85 to I-10 truck bypass is negated, there will be much more truck traffic. That number can be quantified, and that is something the DEIS should have done with the millions of dollars already wasted on it. But HDR and ADOT skirt that by claiming in the DEIS that that information is not known and the impacts are unclear. That is patently absurd; that is precisely the sort of data that is quite available, and must be examined, studied, and analyzed.
61	Ahwatukee Foothills has its own unique layout and design, sometimes characterized as a large cul-de-sac, and in the event of a hazardous materials incident requiring shelter in place, or especially involving evacuation, there would be particular problems and risks. Due to the proximity of schools, parks, and other public facilities, as well as densely populated residential areas within areas of risk in the event of an incident involving the release into the environment of hazardous materials, there would have to be extensive

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59	**Hazardous Materials**	The situation described in the comment, would be an indirect effect of the construction of a new freeway such as the proposed action. According to 40 Code of Federal Regulations 1508.8, indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Reasonably foreseeable actions are those that are likely to occur or probable, rather than those that are merely possible.
60	**Traffic**	The road network in the Maricopa Association of Governments travel demand model includes the Interstate 8 and State Route 85 corridor. So, while the roads are not in the Study Area for the proposed action, traffic and trip distributions along the corridor are included in the traffic analysis for the proposed action. Any traffic that would shift from the Interstate 8 and State Route 85 corridor to the proposed action would be included in the vehicle mix considered in the analysis. A truck driver traveling from Tucson to Los Angeles and choosing to use Interstate 10 and the proposed freeway would travel 15 miles less than one choosing to use the designated truck bypass along Interstate 8 and State Route 85. Choosing to travel on the proposed action versus Interstate 8 and State Route 85 would not translate to any substantial travel time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
61	**Hazardous Materials**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement). The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. The Department of Public Safety also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on page 4-157 of the Final Environmental Impact Statement). The Arizona Department of Transportation maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Department of Public Safety on incidents within their jurisdiction. Requirements for shippers are maintained by the Arizona Department of Transportation's Enforcement Compliance Division.

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	planning and drills for shelter in place and evacuation, an assessment of the types and amounts of hazardous materials traffic and the chemicals involved, and much more. Siren systems and appropriate training and drills would have to be instituted to mitigate the additional risks.
62	In addition to this, the fact that the proposed freeway would eliminate the exits from the community at 32nd Street and Pecos would only exacerbate an already difficult position that this community would be in if there were an evacuation or the need for a response to a catastrophic hazardous materials incident. Regular traffic is already voluminous at that intersection: • Pecos (west approach) - Total 22,313 veh/day (2012 count) including 11,727 westbound and 10,586 eastbound volumes. • Pecos (east approach) - Total 28,178 veh/day (2012 count) including 14,331 westbound and 13,847 eastbound volumes • 32nd Street (north approach) - Total 7,807 veh/day (2011 count) including 3,761 northbound and 4,406 southbound volumes. With that access to Pecos Road being removed by the freeway, all of that traffic would have to find another way out and further clog and congest other exit routes. Yet there is no mention or analysis of these issues in the DEIS.
63	What the DEIS fails to mention and analyze about the risks from a catastrophic release of hazardous chemicals due to a transportation incident MUST be fully reviewed and analyzed in the EIS. In the matter of evacuation of Ahwatukee Foothills, the GRIC community near the freeway, and Laveen, a detailed traffic flow analysis and evacuation plan utilizing street maps of Ahwatukee Foothills must be prepared to determine if it is feasible at all, especially in the case of Ahwatukee Foothills. **If the analysis shows that the community of Ahwatukee cannot be evacuated within 5-10 minutes, then the No Build option is the only logical and humane result.** The caveat of evacuation within 5-10 minutes is due to the very real threat to the community due to a catastrophic release of chlorine gas from a 17-ton tanker truck during a transportation incident.
	The October 30, 2006 report, *Hazardous Materials Commodity Flow Study Report I-8 and I-10 Corridors, Arterial Highways and Railways, Yuma, Maricopa, Pinal, Pima and Cochise Counties, Arizona*, also mentions the risk from a release of **chlorine gas** and the risks of a catastrophic release during a transportation incident. As stated, RMP*Comp is an USEPA approved emergency planning screening tool used when ALOHA predicts the effects of a release would exceed the ALOHA model limit of six miles. The worst case scenario release for chlorine was the only material to exceed the six-mile ALOHA limit.
	Since Ahwatukee Foothills is not six miles wide from Pecos Road to South Mountain, it is easy to conclude that, in the event of a catastrophic release of chlorine from a 17-ton tanker of chlorine gas, **all of Ahwatukee Foothills** would have to either evacuate or shelter in place. Further, an ALOHA modeling indicates that buildings within two miles of the point where the chlorine release occurred would have high enough levels of chlorine gas infiltrate into them to become lethal, which means that shelter in place strategies would not work. The only option would be evacuation, but as chlorine gas

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61 (cont.)		In the event of an incident with a hazardous materials issue on a state or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, who responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary
62	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange was eliminated based on undesirable residential displacements and cost. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). In the event of an incident with a hazardous materials issue on a state or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, who responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary.
63	**Hazardous Materials**	There are no requirements in 23 Code of Federal Regulations 771 Environmental Impact and Related Procedures or in the Federal Highway Administration Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents to address releases of hazardous chemicals due to a transportation incident in National Environmental Policy Act documents for transportation projects like the proposed action. As discussed above, reasonably foreseeable actions are those that are likely to occur or probable, rather than those that are merely possible. If the proposed action is the Selected Alternative in a record of decision, planning for emergency situations would be initiated. If the plan is amended, it is made available to the Arizona Department of Transportation.

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63	flows rapidly at ground level because it is heavier than air, it is unlikely that people would survive long enough to evacuate. Depending on the size of the hole or the rupture of the tanker of chlorine, the tanker could completely empty in a minute or so. And these chlorine truck tankers are quite vulnerable to bullets and other physical trauma. For an objective examination of issues related to a catastrophic release from a chlorine tanker truck, see *Mathematical Modeling and Decision Analysis for Terrorism Defense: Assessing Chlorine Truck Attack Consequence and Countermeasure Cost Effectiveness,* Anthony Michael Barrett. It notes: "Adapting our modeling system to ruptures emptying a tank via flashing two-phase flow through an orifice [80], forming horizontal jets, indicates that such releases could result in approximately the same number of fatalities as an instantaneous release, if such a release takes 10 minutes or less. " page 42 "People in vehicles may be as well off staying where they are, turning off the air-supply fan and sealing the vents, as heading into a nearby building. It may also be dangerous for them to try to drive away, since they may unintentionally drive into higher-concentration areas." "Without fast and effective defense response, release of 17 tons of chlorine from a tank truck in a generic urban area with 2.5 m/s wind and Pasquill stability class F, could result in approximately 4000 (half within ~10 minutes) to 30,000 fatalities (half within ~20 minutes), depending on dose-response model." " Rapid release of the entire cargo of 17 tons of chlorine from one tank truck could result in the formation of a toxic cloud stretching over tens of city blocks within a few minutes. Predicted fatalities are strongly sensitive to wind speed, atmospheric stability class, amount of chlorine released, and dose-response model parameters. Without defensive response, under highest-fatality weather conditions, using the Withers and Lees dose-response model, we estimate approximately 8000 fatal exposures, with 50% occurring within 15 minutes. With other dose-response models, under the same weather conditions, no-defense-response fatality estimates range from approximately 4000 to approximately 30,000 fatalities. Total fatalities under median-fatality weather conditions are approximately 10-20% of total fatalities under highest-fatality weather conditions, depending on dose-response model." "If chlorine is released outdoors, exposure risk is much higher for people outdoors than indoors. We assumed that people in the area were 7% outdoors and 93% indoors, but the fraction of estimated fatalities that are people outdoors in the no-response case, under highest-fatality weather conditions, ranges from 60-90%. Most fatalities indoors are people on the first few floors, so it greatly can reduce hazard for those indoors if air intakes are at roof level instead of on each floor. Changes in mass of chlorine released result in roughly proportional increases in outdoor fatalities, though disproportionately high increases in indoor fatalities, probably because larger-mass releases lead to larger

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61	and longer-lasting clouds. Changes in some parameters, such as indoor and outdoor population densities, would produce proportional changes in fatality estimates in the no-defense-response case. If implemented quickly and widely enough, rapid public responses such as sheltering-in-place and evacuation could significantly reduce fatalities from a chlorine attack. However, practical response times may be significantly longer, with the result that the reduction in mortality would be small. Under highest-fatality weather conditions, with the Withers and Lees dose-response model, to achieve a 50% reduction in fatalities for people outdoors at the time of attack by taking shelter in nearby buildings, people would need to move indoors approximately ten minutes after a chlorine release. However, estimated delays from chlorine exposure effectively add four to seven minutes to ingress time, increasing fatalities by ~1000. To achieve a 50% reduction in fatalities for people indoors at the time of the attack, building air intakes would need to be shut approximately two to six minutes after the attack depending on building air exchange rates before and after shutdown, though later 45 shutdowns can increase fatalities by trapping poison inside. To achieve a 50% reduction in estimated outdoor fatalities, evacuation crosswind at 50 m/min would need to begin after approximately 12 minutes if chlorine exposure does not cause movement delays. Achieving a 50% reduction in estimated outdoor fatalities with only a security perimeter would require a distance between the chlorine release and people outdoors of approximately 1200 m. For mitigation measure cases, trends in sensitivities to weather conditions and dose-response model are generally similar to those for no-defense-response cases. Fatality estimates for the models and scenario we consider in this chapter are much higher than the numbers of fatalities in the 2006-2007 chlorine attacks in Iraq. When our estimates are adjusted to correspond to the conditions in those attacks, as estimated from publicly available information, we obtain fatality predictions roughly similar to, but often higher than, the numbers actually seen in Iraq. We expect that our models and assumptions are biased towards overestimating fatalities. We suggest readers use caution in applying our results, and place less importance on specific values of our model predictions than on trends in those prediction (pages 44-46) [http://research.create.usc.edu/cgi/viewcontent.cgi?article=1010&context=nonpublished_reports] Chlorine gas in even small concentrations is harmful. A person encountering chlorine gas will have a hard time seeing as the chlorine reacts with the moisture in the eye to create hydrochloric acid. The eyes will tear up and make seeing very difficult. At high enough levels, severe scarring and blindness will result. The same formation of hydrochloric acid will occur in the throat and lungs. People won't be able to take a deep breath or breathe without choking, as mucous membranes in the respiratory system will be quite irritated and will start to weep. Lungs will blister, and the ability to pass oxygen to the blood through the lung membranes will be compromised

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63 immediately. Walking, much less running, will be very difficult. A half blinded, gasping person who cannot take a deep breath is not going to be a match for a cloud of chlorine, and any evacuation, or rescue on any scale, after the arrival of the chlorine gas will be virtually impossible. Handicapped and elderly people, as well as children, would be at a particular disadvantage. People outside would have no place to go to for sheltering in place. Shelter in place strategies, i.e. having people shelter in a building, stop ventilation systems, and block up and seal all air flow, will have to be successful before the chlorine gas arrives. Otherwise, those sheltering will bottle themselves up with a harmful gas.

ALOHA modeling indicates that certainly all buildings within a mile of the chlorine release from a 17-ton tanker truck would have such high levels of chlorine gas infiltrate into them that most people there would die, or be very severely injured. Some models put that circle of assured death at closer to two miles away. There are schools and residential areas on the north side of the Pecos Road alignment within a mile of the proposed South Mountain Freeway and Truck Bypass, and many more within two miles of the freeway alignment. There would be thousands of people at an extreme risk.

64 The prevailing winds push across GRIC land toward the north, toward South Mountain, and also to the west through the 51st Avenue pass. Chlorine fumes from an incident on the Pecos Road alignment will certainly be most likely to blow the cloud into all of Ahwatukee Foothills, then on to the GRIC at 51st Avenue, then into Laveen.

63 ALOHA modeling has a six mile limit to its calculation, but in this case, that limit is more than Ahwatukee Foothills is wide, north to south. All 77,000+ people there would be at a severe risk with no way out.

64 There is a pass at 51st Avenue where the proposed truck bypass/freeway is planned. The prevailing winds do push through this from the south, mostly, and there is a westerly breeze that eventually pushes the air from Ahwatukee Foothills to and through that pass. After the chlorine cloud takes out Ahwatukee Foothills, it will drift through the pass, killing and harming any people on the GRIC in its path who have not evacuated or sheltered already. Then it would seep towards Laveen, where it would also wreak havoc. Laveen residents have many options to evacuate, roads east and west, but there is still lack of easy travel there. The time before the chlorine cloud got there might give Laveen area residents and visitors more time, and the dissipation of the chlorine by the time it reached that distance from the source, several miles, could better enable shelter in place strategies.

63 However, if the chlorine incident happened at the 51st Avenue pass and/or Laveen, the one to two mile kill zone and six+ miles of harm would apply there with just a few minutes to take appropriate action to evacuate or shelter in place.

All these communities would be forever just minutes from annihilation. All these communities would need extensive education and drills, special planning, and additional resources, such as telephone ring down systems, siren and flashing light warning systems, and other notification strategies.

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64	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns experience flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006 through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007 through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

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There is the additional problem of handling the people outdoors at parks, bicycling, hiking, shopping, and other activities if such an incident occurred. Strategies would have to be determined well in advance. Law enforcement personnel and emergency responders would need to be trained, drilled, equipped properly, and otherwise prepared for this scenario. If the 17-ton tanker of chlorine empties in minutes, there won't be much the emergency responders can do to stop the leak, but patch kits are available for that purpose. A rupture or hole may be too large to patch, and that size of opening would vent all the chlorine anyway by the time any responders arrived. With such limited freeway access and egress, that becomes a response hindrance also.

(65)

One responder strategy would be to try to "knock down" the cloud of chlorine with water. To prepare for that, the freeway would have to have a hydrant system with enormous amounts of water and water pressure, as no fire truck would have enough water to last very long. All that water and chlorine would make plenty of hydrochloric acid. The hydrochloric acid would eat away and decay the responding vehicles and equipment, the concrete on the freeway, its culverts, degrade the asphalt pavement, and ruin any metal cables and metal where the acid solution washed to. The freeway would have to be designed so that such an incident would not also destroy it.

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There would also be residual effects. The January 2005 chlorine disaster in Graniteville, South Carolina illustrates some of these. Following the chlorine disaster, Avondale Mills (textile company) officials had spent more than $140 million on cleaning, repairs and damage mitigation from the textile mills machinery that was corroded so severely by the chlorine gas that it had to be replaced, only to find that new equipment brought to the plant quickly corroded because chlorine was still present and reacting with other agents.

That the corrosive effects of the chlorine from such a large release would last so long needs to be taken into account into assessing the costs associated with such an incident. The chlorine reacted with moisture to form hydrochloric acid, but even after time, one would expect that this would diminish. In assessing the damages from a large-scale chlorine release, emergency responders and emergency planning agencies should look for this lasting effect. The corrosive effects could harm pavement, concrete, industrial infrastructure, and even residential structures and the electrical wiring. A much more detailed decontamination, including pH samplings, should be undertaken in the recovery phase of operations to prevent such devastation.

Chlorine gas also has other effects on the infrastructure and electronics. The dryness of the Phoenix area might somewhat mitigate the tendency of airborne chlorine gas to form hydrochloric acid with moisture, but the chlorine and the moisture in the air form weak acids that can affect cell phones, car ignitions, and a host of other devices. Arizona has a moist season, monsoon in the summer, and it has normal rainfall events, and if there is sufficient moisture in the air, hydrochloric acid will form. Dry acid deposition from a chlorine disaster would also be a lingering source of problems.

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65	**Hazardous Materials**	According to the Arizona Department of Transportation's 2012 Roadway Design Guide, "Within the highway design philosophy and the Arizona Department of Transportation project team approach to project development, the roadway designer has the responsibility to contribute the most desirable design parameters consistent with safety, service, environment, and cost effectiveness and to apply these parameters with sound engineering judgment." In general, to limit costs but still protect public safety, roads are not designed for the worst possible incident, but they are designed to accommodate most foreseeable incidents with moderate damage. This is similar to the National Environmental Policy Act's direction that an environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible.

Code	Comment Document

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NEPA requires examination of cultural, social, and economic impacts, and the new hazardous materials traffic and risks caused by the South Mountain Freeway and Truck Bypass would certainly affect all of these topic areas.

67

Despite all of this, there is nothing in the DEIS that even mentions the hazardous materials transportation and risks issue! This raises many issues, from the $20+ million spent on this deficient study, to the scoping for the DEIS that was designed to restrict citizen input rather than allowing and encouraging it, to the blatant ignoring of actual, well documented statements of these concerns about the risks from hazardous materials transportation incidents by citizens participating in this particular NEPA process.

But it is evident that ADOT knew that there would be hazardous materials being transported on this proposed highway. A tunnel through South Mountain was rejected as an option by ADOT because that would prevent placarded traffic (traffic with hazardous materials) from traveling on the freeway. [Chapter five, page 20. "The inclusion of a tunnel could result in hazardous materials restrictions along the entire proposed action. Therefore, hazardous cargo carriers would have to continue to use existing routes."]

DEIS Ignores WQARF Site

Hazardous Materials has been mostly limited in the DEIS to a discussion of hazardous materials that might be encountered in the soils during construction. Yet, despite this alleged concern, the fact that the proposed path of the freeway crosses contaminated property near Interstate 10 near 55th Avenue is neither mentioned nor examined, much less the financial liability the taxpayers might be assuming by purchasing the contaminated property. That would certainly be an enormous economic impact. Since the 1980s, there has been well-documented groundwater contamination in the area around 51st avenue and Van Buren to 59th Avenue and Van Buren, enough so that it was added to the list of the state of Arizona's Water Quality Assurance Revolving Fund (WQARF), which is the state's equivalent of a Superfund Site.

From: http://www.azdeq.gov/environ/waste/sps/download/phoenix/wvb.pdf

"Site History:
1987: The November 13 Decision Record created the Van Buren Tank Farm WQARF area. The amended decision record dated December 11 changed the name to the West Van Buren Area."

"The West Van Buren WQARF (site) is located in the western portion of Phoenix, Arizona. The site is bounded approximately by Interstate 10 to the north, 7th Avenue to the east, Buckeye Road to the south and 75th Avenue to the west. In addition, a finger shaped plume exists between 7th Avenue and 27th Avenue between Buckeye Road and Lower Buckeye Road."
(http://www.azdeq.gov/environ/waste/sps/download/phoenix/wvb.pdf)

"Contaminants:

Code	Issue	Response
66	**Hazardous Materials**	According to 46 *Federal Register* 18026 (March 23, 1981), the environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible. Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement).
67	**Hazardous Materials**	If the proposed action is the Selected Alternative in the record of decision, planning for emergency situations would be initiated. If the plan is amended, it is made available to the Arizona Department of Transportation. Hazardous materials transport is described on page 4-157 of the Final Environmental Impact Statement. Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement).
	Public Involvement	The effort represents the Arizona Department of Transportation's most extensive public involvement program undertaken in the Phoenix area leading up to publication of the Draft Environmental Impact Statement in April 2013. Examples, such as holding over 200 presentations were made to neighborhood groups, homeowners' associations, chambers of commerce, village planning committees, trade associations, and other interested parties, can be found in text beginning on page 6-6 of the Final Environmental Impact Statement. The purposes of the outreach were in accordance with requirements established under the National Environmental Policy Act and include: obtain public input to assist in developing a well planned, researched, and defensible environmental impact statement for the proposed action; provide ongoing information on the study and obtain input from the primary stakeholders and broader public; identify key issues and concerns of the public and ensure that these are appropriately considered during the process; develop and implement a process that maintains open and continuing communications among the public, Arizona Department of Transportation, Federal Highway Administration, and the project team; and use multiple communication tools to effectively engage all population segments, thereby ensuring equal access to the environmental impact statement process.

Code	Comment Document
	NEPA requires examination of cultural, social, and economic impacts, and the new hazardous materials traffic and risks caused by the South Mountain Freeway and Truck Bypass would certainly affect all of these topic areas. Despite all of this, there is nothing in the DEIS that even mentions the hazardous materials transportation and risks issue! This raises many issues, from the $20+ million spent on this deficient study, to the scoping for the DEIS that was designed to restrict citizen input rather than allowing and encouraging it, to the blatant ignoring of actual, well documented statements of these concerns about the risks from hazardous materials transportation incidents by citizens participating in this particular NEPA process. But it is evident that ADOT knew that there would be hazardous materials being transported on this proposed highway. A tunnel through South Mountain was rejected as an option by ADOT because that would prevent placarded traffic (traffic with hazardous materials) from traveling on the freeway. [Chapter five, page 20. "The inclusion of a tunnel could result in hazardous materials restrictions along the entire proposed action. Therefore, hazardous cargo carriers would have to continue to use existing routes."]
68	
	DEIS Ignores WQARF Site Hazardous Materials has been mostly limited in the DEIS to a discussion of hazardous materials that might be encountered in the soils during construction. Yet, despite this alleged concern, the fact that the proposed path of the freeway crosses contaminated property near Interstate 10 near 55th Avenue is neither mentioned nor examined, much less the financial liability the taxpayers might be assuming by purchasing the contaminated property. That would certainly be an enormous economic impact. Since the 1980s, there has been well-documented groundwater contamination in the area around 51st avenue and Van Buren to 59th Avenue and Van Buren, enough so that it was added to the list of the state of Arizona's Water Quality Assurance Revolving Fund (WQARF), which is the state's equivalent of a Superfund Site. From: http://www.azdeq.gov/environ/waste/sps/download/phoenix/wvb.pdf "Site History: 1987: The November 13 Decision Record created the Van Buren Tank Farm WQARF area. The amended decision record dated December 11 changed the name to the West Van Buren Area." "The West Van Buren WQARF (site) is located in the western portion of Phoenix, Arizona. The site is bounded approximately by Interstate 10 to the north, 7th Avenue to the east, Buckeye Road to the south and 75th Avenue to the west. In addition, a finger shaped plume exists between 7th Avenue and 27th Avenue between Buckeye Road and Lower Buckeye Road." (http://www.azdeq.gov/environ/waste/sps/download/phoenix/wvb.pdf) "Contaminants:
69	
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Code	Issue	Response
68	**Hazardous Materials**	As disclosed on page 4-157 of the Final Environmental Impact Statement, the Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The comment infers the only reason for elimination of tunnels as a reasonable option was due to the potential to restrict hazardous materials transport. On the referenced page of the Draft Environmental Impact Statement, there are seven other reasons associated with design, operational, maintenance, costs and impacts cited for the elimination of the tunnels as a reasonable option. Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible.
69	**Hazardous Materials**	Analysis of hazardous materials followed state-of-the-practice methods as reviewed by the U.S. Environmental Protection Agency and as used in a multitude of environmental studies for transportation projects across the country. Methods and results are presented on page 4-152 of the Draft Environmental Impact Statement. In summary, during the environmental impact statement process, properties potentially having hazardous waste on site are identified. These sites are considered during the corridor selection process and are ranked according to the likelihood of further assessment or potential cleanup activities being needed. The risk ranking method is used to inform the design team about which properties would likely need further assessment during the property acquisition phase of the project if an action alternative were to become the Selected Alternative. No sites were identified as "high risk." Some sites were identified as "high priority." High-priority sites are those with high potential for releasing hazardous materials to the soil or groundwater, or those that have a recorded release issue. Examples of high-priority sites include current service stations, bulk fueling terminals, sites listed in the environmental database, or a known release that has not been remediated. (See page 4-152 of the Draft Environmental Impact Statement.) The corridor analysis revealed sites that would need further assessment during the property acquisition phase of the project, if an action alternative were to become the Selected Alternative. The Arizona Department of Transportation employs a phased approach to site assessment that allows time for cleanup of any sites found to have hazardous waste issues. The project team concluded from the level of analysis conducted during the environmental impact statement process that the types of sites likely to be acquired contain common hazardous waste issues like underground storage tanks, asbestos and lead paint in buildings, and other commonly found issues (see page 4-153 of the Draft Environmental Impact Statement). The Arizona Department of Transportation maintains a process for addressing these issues in accordance with all applicable environmental laws and regulations.

(Response 69 continues on next page)

Code	Comment Document
69	The current contaminants of concern in groundwater include tetrachloroethene (PCE),trichloroethene (TCE), 1,1-dichloroethane (1,1-DCA), cis-1,2-dichloroethene (cis-1,2-DCE), 1,1-dichloroethene(1,1-DCE) and chromium. Contaminants of concern at the site may change as new data become available." By purchasing this contaminated land for the freeway, the state of Arizona would assume the liability for the clean up of these contaminants, along with the liability for adverse health impacts suffered by workers in the area. This would be an enormous economic impact. This is a type of corporate welfare, as it would remove the liability costs from the various polluters and current property owners that have ground and groundwater pollution issues and transfer it to the people of Arizona. This would be a huge economic impact. This should be examined as a cumulative impact, an indirect impact, a direct impact, and an economic impact.
70	There are other issues and other data not included in the DEIS that relate to truck traffic and hazardous materials. What would be the effect on traffic flow and congestion in the event of a hazardous materials incident of any type or volume?
	The following are comments related to impacts to environmental justice:
	The DEIS section titled TITLE VI AND ENVIRONMENTAL JUSTICE [Section 4(f) Evaluation Chapter 4 Affected Environment, Environmental Consequences, and Mitigation 4-29] starts with: "The U.S. Environmental Protection Agency (EPA) and FHWA define environmental justice as "fair treatment for people of all races, cultures, and incomes, regarding the development of environmental laws, regulations, and policies." Environmental justice principles and procedures are followed to improve all levels of transportation decision making. Title VI prohibits discrimination on the basis of race, color, or national origin. The 1994 Executive Order12898 on environmental justice addresses minority and low-income populations. The rights of women, the elderly, and the disabled are protected under related statutes. This Presidential Executive Order and other related statutes fall under the umbrella of Title VI. The U.S. Department of Transportation Order 5610.2(a) requires that environmental justice principles be considered in all the Department's programs, policies, and activities. Three fundamental environmental justice principles apply to the transportation project development process: ➢ to avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations ➢ to ensure the full and fair participation by all potentially affected communities in the transportation decision-making process ➢ to prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations." Then the section goes on to identify some of the low-income and minority communities that would be affected, but it ignores all of the adverse, disproportionate impacts on them.
71	

Code	Issue	Response
69 (cont.)		The construction contractor would be required to comply with a host of regulations that protect the environment from undue impacts, including those from hazardous materials. Examples are the support yards or staging areas that are temporarily used for construction equipment. To control any releases of hazardous waste, fueling and maintenance areas for trucks would be required to have spill protection measures and stormwater management plans in place (see pages 4-111, 4-112, 4-153, and 4-154 of the Draft Environmental Impact Statement). The West Van Buren Water Quality Assurance Revolving Fund site was identified and considered during development of the Draft Environmental Impact Statement (see page 4-165 of the Final Environmental Impact Statement, and the Draft Initial Site Assessment prepared for the proposed project). These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected medium (groundwater) and the construction zone (near-surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165.
70	**Hazardous Materials**	The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. The Department of Public Safety also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on page 4-157 of the Final Environmental Impact Statement). The Department of Public Safety would determine, based on the incident, whether a partial or full closure of the facility would be required in the event of a hazardous materials spill. The Arizona Department of Transportation maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Department of Public Safety on incidents within their jurisdiction. Requirements for shippers are maintained by the Arizona Department of Transportation's Enforcement Compliance Division.
71	**Environmental Justice and Title VI**	The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

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It concludes:
No undue hardship or disproportionate adverse impacts on populations afforded protection under Title VI, Executive Order 12898, the U.S. Department of Transportation Order 5610.2(a), and other related statutes would occur and, therefore, no mitigation would be required.

Nothing could be farther than the truth.

72

Air Toxics:
The JATAP monitoring at the St. Johns monitoring site on the GRIC found certain air toxics attributed to "mobile sources," or vehicular traffic burning hydrocarbons. These findings of the air toxics were many times the "accepted" cancer risk standard set by USEPA.

The St. Johns monitoring site's annual mean concentrations of mobile source air toxics (MSATs):

- benzene at 4.7 times the accepted cancer risk standard;
- 1,3 butadiene at 3.9 times the accepted cancer risk standard

The JATAP study also found other air toxics associated with transportation exhaust. Acetaldehyde, formaldehyde, ethylbenzene, m,p-Xylene, o-Xylene, and toluene were detected at high levels at the St. Johns monitoring site.

Residents of the GRIC living around and adjacent to the monitoring site are currently being subjected to all of these carcinogens, not just one. And if a freeway were to be built near this monitoring site on the GRIC, there would be more air toxics in addition to the ones detected at levels that far exceed the USEPA risk standard.

At the West Phoenix monitoring site, which is the same 43rd Avenue and Broadway site that has had many exceedances of the particulate matter standards, even higher levels of air toxics were found. This site is about a mile or so downwind from the proposed route of the South Mountain Freeway, and air toxics levels would be impacted by the freeway.

The West Phoenix monitoring site's annual mean concentrations of mobile source air toxics (MSATs):

- benzene at 18.7 times the accepted cancer risk standard;
- 1,3 butadiene at 21.5 times the accepted cancer risk standard

The JATAP study also found other air toxics associated with transportation exhaust. formaldehyde, ethylbenzene, m,p-Xylene, o-Xylene, and toluene were detected at high levels at the West Phoenix monitoring site.

One of the JATAP's findings presented to the EPA National Air Monitoring Conference in November 2006 was, "**Annual average concentrations of formaldehyde,**

Code	Issue	Response
72	**Air Quality**	The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause substantial adverse effects. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The Draft Environmental Impact Statement provided the results of modeling for each of the seven priority mobile source air toxics, in both the Eastern and Western Subareas, and compared relative mobile source air toxics emissions that would result from three different potential alternatives (W59, W71, W101) as compared with the No-Action Alternative. It also included modeling of mobile source air toxics emissions in the overall mobile source air toxics study area assuming the W59 Alternative (see pages 4-70 to 4-74 of the Draft Environmental Impact Statement) along with implementation of recent U.S. Environmental Protection Agency mobile source air toxics rules. The updated emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). For mobile source air toxics, the project would have a negligible effect on emissions in the mobile source air toxics study area. The Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No-Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the South Mountain Freeway would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the freeway under consideration. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.

(Response 72 continues on next page)

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72 **acetaldehyde, benzene and 1,3 butadiene were on the high end of the range reported in EPA funded assessments of other US cities."**

In the December 2006 ANALYSIS OF AIR TOXICS COLLECTED AS PART OF THE JOINT AIR TOXICS ASSESSMENT PROJECT FINAL REPORT, Page 3-6, it states this with more precision:
"How Do Air Toxics Concentrations Compare with Typical National Levels? Phoenix area urban concentrations of1,3-butadiene, acetaldehyde, formaldehyde, chloroform, benzene, and tetrachloroethene were typically on the high end of the national urban scale (i.e., above the 75th percentile). Other air toxics concentrations were typically within the interquartile range of national concentrations (25th to 75th percentile)."

This finding relates to any future proposed freeway in the JATAP study area, which includes in entirety the route of the proposed South Mountain Freeway and Truck Bypass. It also has huge environmental justice implications because, in other words, some of the worst air in the country, in terms of air toxics, was found in the JATAP study, and the high readings on the GRIC are among these highest readings.

So the air toxics are already worse than most other areas of the United States, and the proposed freeway would add even more. Obviously, adding more vehicular traffic emissions by building a freeway where there had not been one would add to this toxic burden. Yet despite its claims about environmental justice, these real environmental problems are not mentioned, nor is a plan to mitigate these impacts ever mentioned.

The JATAP also showed serious air toxics problems at the West and South Phoenix monitoring sites, and these monitoring sites are in the midst of other low-income and ethnic minority communities, mostly of Hispanic origin. These would be exacerbated by the addition of another source of mobile toxics, also. The JATAP and its results mentioned "toxic hot spots near freeways" specifically because freeways cause toxic hotspots for air toxics.

73 One must conclude that the DEIS itself is an extreme example of environmental injustice, despite its assertions.

72 ***Thus, the failure to properly analyze and/or address the air toxics information from the JATAP study is a deliberate violation of the very Environmental Justice issues that ADOT and FHWA claim to be observing.***

73 The conclusion is that ADOT and HDR would sacrifice human health and safety to accomplish their goal of building the South Mountain Freeway and Truck Bypass, and would rather see people on the GRIC, West and South Phoenix suffer and die from cancer than simply conduct an honest and objective NEPA process. Again, that appears to be a premeditated violation of the civil rights of the GRIC residents near the St. Johns JATAP monitoring site, as well as the low-income and ethnic minority communities of west and South Phoenix.

Code	Issue	Response
72 (cont.)		Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The West Phoenix monitoring site is not the same as the West 43rd Avenue monitoring site.
73	**Environmental Justice and Title VI**	The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

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Hazardous Materials Incidents

The GRIC areas along the proposed freeway have extremely limited access and egress. A hazardous materials transportation incident such as a spill of gasoline, sulfuric acid, or chlorine and the potential consequences of that are detailed in the comments regarding the DEIS' complete failure to even mention the risks from a hazardous materials incident, much less mitigating the risks. Such an incident would certainly harm and/or doom the residents of the GRIC around the 51st Avenue pass, as well as the low-income, minority residents in portions of South and west Phoenix. This is another severe example of environmental injustice, as no consideration is made for the Native Americans on the GRIC, their lifestyle, and no plan or means for preparing for response to such a disaster is even mentioned in the DEIS. This is beyond the pale; it is akin to casually planning to set up small scale genocide. That is certainly an environmental injustice.

75

No Real Outreach to Environmental Justice Organizations

There is mention in the DEIS of a myriad of organization and tribes that were approached about the DEIS, but not one environmental justice group in South or West Phoenix, or on the GRIC, were ever contacted. That has to be a deliberate step, as some of these groups even tried to approach ADOT and were rebuffed.

All of this pattern of environmental racism is consistent with the theme of keeping out of the DEIS any mention of a negative against the construction of the freeway, even if it means, lying, obfuscating, ignoring data and organizations, and pretending problems don't exist, even when they are identified as some of the worst in the United States.

The following are comments related to impacts related to the CANAMEX highway:

The DEIS uses figures purposefully to overstate population and job growth based on the 2005 numbers. As disclosed at the meeting ADOT was aware of the discrepancies, but chose not to update with the 2010 census figures. Doesn't this discrepancy require correction before the final EIS ?

There are some issues with the traffic studies in chapter three, they are quite convoluted:

FOR THE E-1 Alignment

1) ADOT and MAG cite the organic population growth(postulated in 2005) in the East valley as creating traffic flows along the 60 west bound to the i-10, and along the south mountain 202 (Pecos Road) also west bound and flowing to the 10. There is no indication of growth or traffic volumes originating along I-10 between Riggs Road and Pecos road because they are outside the study area…However these flows also course along I-10 into

Code	Issue	Response
74	**Hazardous Materials**	According to 46 *Federal Register* 18026 (March 23, 1981), the environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible. The section Hazardous Materials beginning on page 4-152 of the Draft Environmental Impact Statement, discusses in sufficient detail the issues of hazardous spills, and the text box "Transport of Hazardous Materials on the Regional Freeway System" on page 4-154, describes response procedures to hazardous spills. The chance of spills in the referenced area is no different and no higher than the chance near Ahwatukee or Laveen or Estrella Villages. Therefore, there is no disproportionately high potential for spills to occur at specific locations of the freeway. The comment also makes reference to indigenous populations. As shown in Table 4-10 of the Draft Environmental Impact Statement, "*Environmental Justice and Title VI Population percentages, Affected Study Area Jurisdictions*" on page 4-30, indigenous populations are accounted for in the impact analyses. Further, Chapter 2, *Gila River Indian Community Coordination*, discloses the comprehensive nature of consultation and coordination efforts with the Gila River Indian Community. Important to note is the history of impact study on Gila River Indian Community land. For much of the project, the tribe did not, as is its right as a sovereign nation (see page 2-1), permit any form of impact analyses on its resources, nor did it wish to have any information about the Gila River Indian Community disclosed in the Draft Environmental Impact Statement. In 2007, right-of-entry was granted, but expired 1 year later. In 2010, the permit was reissued to study an alignment on Gila River Indian Community land (which is discussed in Chapter 3, *Alternatives*), but was later withdrawn once consideration by the tribe for a Gila River Indian Community-located alignment was withdrawn. But despite the Gila River Indian Community's directive to neither study nor report on tribal resources and assets, the potential for such impacts is highly unlikely. Populations would not be directly affected by the proposed action. While the action may pose indirect impacts such as restricted access to place of tradition, adequate mitigation has been committed to ensure access would not be impeded. Further, in addition to the overall public outreach efforts, tribal members also had specific access to Gila River Indian Community-specific outreach. As outlined in Chapter 2, the Gila River Indian Community-specific outreach efforts were exhaustive.
75	**Public Involvement**	As noted in the section *Conclusions* on page 6-29 of the Final Environmental Impact Statement, the Arizona Department of Transportation and Federal Highway Administration exceeded National Environmental Policy Act requirements pertaining to public outreach. The measures are described in Chapter 6, *Comments and Coordination*, as well as throughout the Final Environmental Impact Statement. The Arizona Department of Transportation made effort to make all population sectors and representatives aware of the proposed action. Organizations, by default, are invited to participate in the environmental impact statement process. The public hearing for the proposed action was widely advertised. Newspaper ads in six newspapers of area-wide distribution ran advertisements at least twice each. Announcements occurred on five radio stations and six television stations. Mailers were sent on May 6, 2013 to 73,564 individuals (approximately 311 on the Gila River Indian Community) who had previously expressed an interest in the project. The Arizona Department of Transportation utilized the Government Delivery system to distribute to over 12,000 recipients. E-newsletters were distributed on three different occasions. All materials were also provided to the Gila River Indian Community Public Information Officer.

Code	Comment Document

Hazardous Materials Incidents

The GRIC areas along the proposed freeway have extremely limited access and egress. A hazardous materials transportation incident such as a spill of gasoline, sulfuric acid, or chlorine and the potential consequences of that are detailed in the comments regarding the DEIS' complete failure to even mention the risks from a hazardous materials incident, much less mitigating the risks. Such an incident would certainly harm and/or doom the residents of the GRIC around the 51st Avenue pass, as well as the low-income, minority residents in portions of South and west Phoenix. This is another severe example of environmental injustice, as no consideration is made for the Native Americans on the GRIC, their lifestyle, and no plan or means for preparing for response to such a disaster is even mentioned in the DEIS. This is beyond the pale; it is akin to casually planning to set up small scale genocide. That is certainly an environmental injustice.

No Real Outreach to Environmental Justice Organizations

There is mention in the DEIS of a myriad of organization and tribes that were approached about the DEIS, but not one environmental justice group in South or West Phoenix, or on the GRIC, were ever contacted. That has to be a deliberate step, as some of these groups even tried to approach ADOT and were rebuffed.

76

All of this pattern of environmental racism is consistent with the theme of keeping out of the DEIS any mention of a negative against the construction of the freeway, even if it means, lying, obfuscating, ignoring data and organizations, and pretending problems don't exist, even when they are identified as some of the worst in the United States.

The following are comments related to impacts related to the CANAMEX highway:

77

The DEIS uses figures purposefully to overstate population and job growth based on the 2005 numbers. As disclosed at the meeting ADOT was aware of the discrepancies, but chose not to update with the 2010 census figures. Doesn't this discrepancy require correction before the final EIS ?

78

There are some issues with the traffic studies in chapter three, they are quite convoluted:

FOR THE E-1 Alignment

1) ADOT and MAG cite the organic population growth(postulated in 2005) in the East valley as creating traffic flows along the 60 west bound to the i-10, and along the south mountain 202 (Pecos Road) also west bound and flowing to the 10. There is no indication of growth or traffic volumes originating along I-10 between Riggs Road and Pecos road because they are outside the study area…However these flows also course along I-10 into

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76	**Impacts**	The environmental impact statement process and the Draft Environmental Impact Statement documenting the process represent a transparent, disclosed examination of the potential for the proposed action to cause significant, adverse environmental impact and to propose mitigation where necessary. Throughout the Draft Environmental Impact Statement, adverse impacts are disclosed. Compliance with the environmental impact statement process is described throughout the entire Draft Environmental Impact Statement and is summarized in Figure S-3, Environmental Impact Statement Process, on page S-3.
77	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
78	**Traffic**	The road network for the Maricopa Association of Governments regional travel demand model includes all of Maricopa County and a substantial portion of Pinal County. While a road may not be within the Study Area for the proposed action, because it is included in the Maricopa Association of Governments travel demand model road network, its influence is considered in the traffic analysis for the proposed action. Location #7, Pecos Road to Wild Horse Pass Boulevard, shown on Figure 1-8 on page 1-15 of the Final Environmental Impact Statement, illustrates the anticipated growth along Interstate 10 from locations south of Pecos Road (including the Riggs Road to Pecos Road section identified in the comment). Between 2012 and 2035, the Interstate 10 traffic volume is projected to increase from around 96,000 to 134,000 vehicles per day (a 40 percent increase).

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Maricopa county This increased traffic growth created the gridlock at the Broadway curve, and will be even more constricted by 2035..

This congestion according to ADOT is to be relieved by the SM202 alignment and is a pillar to support the E-1 Alignment.

79 The traffic flows exhibited in chapter 3 of the DEIS only describe how traffic originates on the 60 and SM202 and flows into or along the i-10. They merely describe how this creates constriction at the Broadway curve. There is no analysis of the traffic flows along I-10 and where they exit. This missing element creates a critical miss (in my opinion) to the purpose and need.

80 The majority of Traffic Westbound on I-10 flows onto 143 N to the airport and the 202 (red mountain) or to SR 51 North. These flows demonstrate a Northern flow of traffic North/ East Phoenix or even Western Scottsdale and Tempe, they do not flow through to downtown or I-17. Arterial Street traffic in downtown Phoenix in the AM does not support the argument that the traffic flows into or even past downtown into the West Valley.

81 This is demonstrated by showing a statistically insignificant (7 %) reduction in traffic at the Broadway curve using the current flawed assumptions. Adjusting for actual through flows to the 143 and SR 51 I believe the reduction in congestion at the curve to be less than 2 or 3 %.

82 The majority of traffic analysis is within the Western alignment where the West valley traffic needs relief to access I-10 along the northern route of the alignment….but this local commuter savings is not effected by the E-1 alignment. The E-1 alignment will not be utilized by this commuter traffic and will be utilized primarily as a truck bypass as acknowledged by ADOT on 6-11-13.

83 As for the CANAMEX

2) Chapter three cites statistics that "more than one third", or 34 % of the nations freight flows through Phoenix, today. There is no data cited to support that number. If correct it is understated for 2035 projections

84 Further the study is lacking because there is no analysis of the current or enhanced increase in freight volume resulting from the port activity in Guyamas and Puerto Colonet and the Union Pacific rail efforts moving that freight form those ports into Tucson and then north to Phoenix.

Tucson is now recognized internationally as a "Virtual Port". As of 2013 Union Pacific has agreed to move and receive 50,000 additional containers to be dispersed via truck and train north and East (correction from west). The ports of Long Beach and LA thus being obviated by the Ports and Rail lines in Mexico (Arizona Daily Star and SALEO Southern Arizona Logistics

31

Code	Issue	Response
79	**Traffic**	Chapter 1 of the Draft Environmental Impact Statement discloses the purpose and need for the proposed action. The analyses results disclose existing and future capacity deficiencies throughout the regional system including as noted in the comment at the Broadway Curve. The transportation problem identified specific to the purpose and need relates to east-west regional mobility in the southwest valley unique from the Broadway Curve. While the Draft Environmental Impact Statement further discloses the proposed freeway would help reduce congestion at the Broadway Curve, improvements to Interstate 10 through the curve are a part of another planned project adopted in the region's Long Range Transportation Plan.
80	**Traffic**	While a portion of the traffic through the Broadway Curve is airport-related, an equal portion extends west to Interstate 17 and even to Interstate 10 west of downtown Phoenix.
81	**Traffic**	Chapter 1 of the Draft Environmental Impact Statement discloses the purpose and need for the proposed action. The analyses results disclose existing and future capacity deficiencies throughout the regional system including as noted in the comment at the Broadway Curve. The transportation problem identified specific to the purpose and need relates to east-west regional mobility in the southwest valley unique from the Broadway Curve. While the Draft Environmental Impact Statement further discloses the proposed freeway would help reduce congestion at the Broadway Curve, improvements to Interstate 10 through the curve are a part of another planned project adopted in the region's Long Range Transportation Plan.
82	**Traffic**	An analysis of the origins and destinations of projected freeway users is presented in Figure 3-18, on page 3-36 of the Final Environmental Impact Statement. Freeway users are defined as those motorists who pass through the bend of the freeway (around the South Mountains). Therefore, this would not count motorists in Laveen Village who go to Interstate 10 (Papago Freeway) and motorists in Ahwatukee Foothills Village who go to Interstate 10 (Maricopa Freeway). The results of the origin-destination analysis show that 73 percent of the traffic going around the South Mountains has origins or destinations in the area within or around the Study Area and supports the conclusion that the proposed action would serve east–west mobility consistent with commuting movements. In reference to the comment regarding trucks using the proposed freeway to avoid Interstate 10 through downtown Phoenix, the vehicle mix and specifically the percentages of trucks using the facility is similar in vehicle mix ratios found throughout the region's existing freeway system.
83	**Traffic**	The citation "MAG 2010c" is provided at the end of the first sentence of the third paragraph of the first column on page 3-64 of the Draft Environmental Impact Statement.
84	**Traffic**	As detailed in Chapter 1, *Purpose and Need*, in the Draft Environmental Impact Statement, the proposed action is not needed in response to national freight movement, nor is it intended to provide service primarily for freight movement. The proposed action is needed to address local capacity deficiencies and has been developed in response to local growth in population, housing, employment, and travel levels.

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Education Organization). To accommodate this volume the " port of Tucson" has received a 10 X expansion since 2012. (KVOA Tucson). This information is omitted in the DEIS because it is outside the scope of the Study, which only encompasses Maricopa county, not the tri county (Maricopa, Pinal and Pima) alignment of the I-10 from Phoenix to Tucson, AKA the first leg of the CANAMEX.

85

ADOT will not address traffic flows originating outside Maricopa County.

Also excluded from the DEIS because it is outside the scope of the report is that Union Pacific is currently negotiating with Arizona and the state land department to purchase state trust land to open a 950 acre rail yard at Picachio Peak. It is Planned to be the largest yard between Texas and California, multiple sources (AZ republic., AZ Starnet) the yard will handle tens of thousands of containers originating in California and Tucson ports

The additional planned container traffic terminating at hubs in Pima (Tucson) county and the planned Pinal (Picachio peak) hubs create a significant increase in freight flows to Phoenix specifically to the hubs along 51st Ave.

Arizona has identified the Intermodal Transportation industry as a critical potential "Pillar Industry" in Arizona.

Chapter three describes freight and trucks as pass through, but that is a mis-statement. The assessment is technically correct, but not accurate. As a hub, Freight Enters Phoenix from Points south west and East. Those freight "Loads" are deposited and "exchanged" for loads heading in the opposite direction, So even though 70 % of the freight passes through Phoenix it terminates in Phoenix as a transfer point.

Those volumes will increase by virtue of the intermodal transportation plans In Pima and Pinal counties, but were conveniently left out of the "study area".

86

ADOT admitted the 202 is a truck bypass while attempting to minimize the utilization of the loop as a potion of the CANAMEX. In the 6-11 SMCAT meeting it was freely discussed how Congress has not dictated the exact route, and how the CANAMEX' own web site self identifies the I-10 corridor, not any other. Additionally there is the current lack of suitability along the I-8/ 85 future I-11 route, which is obviated by the completion of the 202 highway anyway. In addition all Phoenix based shipping hubs are located "within" the new 202 loop and would be more efficiently accessed by ALL traffic types by using the 202.

87

ADOT surveyed truck drivers about routes in the early days of traffic review. Their surveys indicated that most traffic never passed through Phoenix. However the system of intermodal transport is hub and spoke, so freight comes in to a terminal and the driver drops the load and picks a new one, never passing through. So the Driver survey was

Code	Issue	Response
85	**Traffic**	The road network for the Maricopa Association of Governments regional travel demand model includes all of Maricopa County and a substantial portion of Pinal County. While a road may not be within the Study Area for the proposed action, because it is included in the Maricopa Association of Governments travel demand model road network, its influence is considered in the traffic analysis for the proposed action.
86	**Purpose and Need**	The statements made on June 11, 2013, as paraphrased in the comment as trucks would use the proposed freeway to avoid Interstate 10 through downtown Phoenix is misleading. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Recognition of the trucking contribution to traffic in the region is disclosed on page 3-64 of the Final Environmental Impact Statement. As supported by the traffic analysis presented in the Final Environmental Impact Statement, the primary user vehicles of the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed action, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, trucking destinations in the Phoenix metropolitan area would still prompt truck drivers to enter congested areas. Choosing to travel on the proposed freeway versus Interstate 10 would not produce substantial travel-time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
87	**Purpose and Need**	The statements made on June 11, 2013, as paraphrased in the comment as trucks would use the proposed freeway to avoid Interstate 10 through downtown Phoenix is misleading. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Recognition of the trucking contribution to traffic in the region is disclosed on page 3-64 of the Final Environmental Impact Statement.

(Response 87 continues on next page)

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87	correct. What is not accurate is the notion that the freight stays behind. As indicated in Chapter three of the Study Nearly 35 % of US freight passed through Phoenix. Phoenix is not a train hub so all of these containers are by truck. The DEIS is inadequate in its description of this container traffic and its effect Understand that the two ports in Mexico mentioned below are developed in partnership with Union Pacific to obviate the need to expand Long Beach and Los Angeles Harbors. This is stated frequently by supporters of the CANAMEX. See also the description by PAG, Pima Association of Governments http://www.pagnet.org/programs/transportationplanning/intermodaltransportation/freight/tabid/245/default.aspx http://azttca.org/20130601-feature.aspx I-11http://interstate11.org/exhibits.aspx
88	**The following are comments related to impacts related to the Deficiencies in Description of Proposed Action:** A. The description of the proposed action is deficient. The action is described generally as building a freeway in compliance with the RTP. Lacking from the description are the following:
89	1. The typical cross-section of the freeway should be included, listing major deviations, if any, from the typical cross-section for each of the three West Alternatives and the single East Alternative. While at the outset the cross-section was not known, the 10-lane alternative was eliminated in the fourth-tier screening. A freeway with three general purpose (GP) and one High Occupancy Vehicle (HOV) lane in each direction, plus auxiliary lanes where necessary, was established for all alternatives.
90	2. The profile for the freeway should be described in general terms for each Alternative.
91	3. The location of proposed interchanges for each alternative should be shown.
92	4. The fact that park-and-ride lots would be provided at interchanges should be stated. The term park-and-ride appears only once in the Summary (Page S-19) in the context of a mitigation measure for Displacements and Relocations. The term park-and-ride does not appear at all in Chapter 1 (Purpose and Need); it appears three times in Chapter 3 (Alternatives) first on Page 3-6 as part of the discussion of Modal Screening Results, the second time on Page 3-15, Figure 3-8 (indicating that the park-and-ride lot at the 40th Street Interchange potentially would be expanded, and for the third time on Page 3-40 in the context of the No-Action Alternative. Thus unless a reader studied Figure 3-8 very carefully, he or she would not be aware of the potential expansion of the park-and-ride lot at the 40th Street Interchange.
	33

(Comment code 93 is on the next page)

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87 (cont.)		As supported by the traffic analysis presented in the Draft and Final Environmental Impact Statements, the primary user vehicles of the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed action, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, trucking destinations in the Phoenix metropolitan area would still prompt truck drivers to enter congested areas. Choosing to travel on the proposed freeway versus Interstate 10 would not produce substantial travel-time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
88	**Proposed Action**	While the proposed action is summarily defined on page 1-1 of the Draft Environmental Impact Statement as the "construction and operation of a major transportation facility," design specifics for each action alternative are found in text beginning on page 3-40 of the Final Environmental Impact Statement. Sufficient detail is provided to: ensure meaningful comparison and analyses of the alternatives in reference to operational characteristics, cost, and impacts; and to convey sufficient information to reviewers of the characteristics of each alternative in accordance with 23 Code of Federal Regulations 771 Environmental Impact and Related Procedures or in the Federal Highway Administration Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents.
89	**Alternatives**	Key elements of the alternatives studied in detail are presented in the Draft Environmental Impact Statement, beginning on page 3-40. A typical section of the proposed freeway is depicted in Figure 3-34, on page 3-58 of the Draft Environmental Impact Statement.
90	**Alternatives**	The vertical alignment of each action alternative is described beginning on page 3-40 of the Draft Environmental Impact Statement. The profiles are shown graphically in Figures 3-20 to 3-25.
91	**Alternatives**	The proposed interchange locations for each action alternative are shown in Figure 3-28, on page 3-51 of the Draft Environmental Impact Statement.
92	**Alternatives**	Inclusion of park-and-ride lots is not part of the scope of the proposed action. No new park-and-ride lots are proposed as part of the proposed action. Locations of future park-and-ride lots would be determined by the City of Phoenix and Valley Metro (see discussion of potential enhancements on page 3-60 of the Draft Environmental Impact Statement).
93	**Transit**	Inclusion of park-and-ride lots is not part of the scope of the proposed action. No new park-and-ride lots are proposed as part of the proposed action. Locations of future park-and-ride lots would be determined by the City of Phoenix and Valley Metro (see discussion of potential enhancements on page 3-60 of the Draft Environmental Impact Statement).

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93 There is no mention of park-and-ride in the Traffic Overview Report.

94 For the public in general, the Regional Transportation Plan (RTP) and complying with the RTP are abstract and perhaps foreign concepts. The Description of the Proposed Action should have sufficient information to help the public visualize what is being proposed on the ground.

95 **Deficiencies in Evaluation of Alternatives**

B. **The evaluation of alternatives is deficient because there is no analysis of traffic impacts on local streets and local access.** A specific example would be how Pecos Road would be impacted by the Proposed Action. With the Proposed Action, the South Mountain Freeway (SMF) would obliterate and replace existing Pecos Road (as described as Alternative E1); access to the street system in the area would be provided via interchanges at 40th Street, 24th Street, Desert Foothills Parkway, and 17th Avenue.

96 1. The DEIS does not indicate what type of interchange would be constructed at these locations. Because there would be no access to the Gila River Indian Community (GRIC) on the south side, neither of the two typical interchanges depicted on Page 3-14, "Diamond Interchange" and "Single Point Urban Interchange," would be applicable. The DEIS should indicate the type of interchange to be provided, at least conceptually and with a simple graphic.

97 2. The DEIS should present recent traffic volume counts for Pecos Road and turning movement counts at the existing signalized intersections at 40th Street, 32nd Street, 24th Street, Desert Foothills Parkway, and 17th Avenue. Then it should discuss the impacts on existing traffic due to the loss of access at 32nd Street and how existing traffic patterns will change. Then, 2035 peak hourly traffic volumes at the interchanges should be presented so that the public can be informed of how present routings will be affected and what the impacts will be in 2035. The impacts on the cross streets are not dependent on the specific design details and can be evaluated based on the traffic volume projections.

98 3. The DEIS should discuss how the Proposed Action would affect emergency vehicle access times for the communities now served by the signalized intersection at Pecos Road/32nd Street.

99 4. With the Proposed Action, the eastbound left-turn and westbound right turn direct access to the park-and-ride facility at 40th Street will be lost, shifting the ride-share traffic to the two park-and ride access points via 40th Street. The southern access driveway is less than 300 ft (center-to-center) north of Pecos Road. The construction of the freeway ramps will shorten the spacing between the junction of the westbound ramp terminal and the southern access driveway for the park-and-ride lot. The impacts to traffic operations along 40th Street, impacts to park-

Code	Issue	Response
94	**Alternatives**	As described in the responses above, the elements of the proposed freeway and the potential action alternatives were described in the Draft Environmental Impact Statement.
95	**Alternatives**	See responses to specific comments below. The alternatives analysis process of developing and screening documents was a disclosed, robust, comprehensive, objective and consistent with the National Environmental Policy Act's intent to use a logical, sequential interdisciplinary approach to establish a range of reasonable alternatives (as concluded in text beginning on page 3-26 of the Draft Environmental Impact Statement).
96	**Alternatives**	The third bullet in the third column on page 3-51 of the Draft Environmental Impact Statement states that "The diamond interchange configuration (see sidebar on page 3-14) was used to evaluate service traffic interchange needs." The comment is incorrect in assuming that there would be no access to the Gila River Indian Community to the south. At 40th Street, there is an existing road to the south, and the planned interchange at that location would provide access onto Gila River Indian Community land. Similarly, the interchanges at 24th Street, Desert Foothills Parkway, and 17th Avenue would be constructed to allow for future connections from Gila River Indian Community land. The initial layout would be similar to the interchanges at State Route 202L (Red Mountain Freeway) and Dobson Road. Figure 3-28 indicated whether the interchanges would include full access or half access. In some locations, a single-point urban interchange or other interchange type may be used to address higher traffic volumes. The determination of the interchange type would be made during final design in coordination with the local jurisdiction.
97	**Traffic**	Text beginning on page 3-60 of the Final Environmental Impact Statement presents the traffic analyses for the action and no action alternatives for existing and future conditions. The analyses used state-of-the-practice methods and analytical tools to demonstrate the traffic operational performance of each alternative. Ancillary to the effort, in 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the proposed freeway.
98	**Traffic**	Emergency responders would address the construction of the proposed freeway by amending the local emergency response plan to include the facility. As concluded in the section, *Social Conditions*, in Chapter 4 of the Draft and Final Environmental Impact Statements, response times for police, fire, and medical emergency services would be faster when compared with response times under the No-Action Alternative. Circulation on major arterial streets would be improved through better distribution of traffic onto the overall transportation network, the provision of alternative routes, and through localized operational improvements such as grade separations and planned interchanges.
99	**Traffic**	In addition to access from 40th Street, access to the park-and-ride lot would be provided from the westbound on-ramp. This is similar to the park-and-ride operations at Happy Valley Road and Interstate 17. Bus operations and circulation would continue to function as they do today. Traffic operational characteristics along 40th Street and at the Cottonwood Lane intersection would not be adversely affected by the freeway. The park-and-ride lot has been expanded to its ultimate configuration.

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and-ride access, impacts on bus operations, impacts at the intersection of 40th Street/E Cottonwood Lane/bus access to park-and-ride should be evaluated, both for existing and 2035 traffic volumes. The long-term expansion of the park-and-ride facility should also be discussed.

100 5. The DEIS should discuss how access will be provided to the existing U-Haul Dealer on the south side of Pecos Road, now accessed directly via the signalized intersection at 32nd Street. Since there will be no interchange at 32nd Street with the Proposed Action, this property will become land-locked. It is unclear based on the information in Tables 4-12 and 4-13 (Pages 4-39 and 4-42, respectively) if this facility is being displaced.

101 C. **The evaluation of alternatives is deficient because** the presentation of the results of the "select link" analysis is misleading. On Page 3-36, Figure 3-18 presents the contribution of traffic to the select link by geographical areas, some of which are very large. The select link is at a point between the 51st Avenue and 17th Avenue interchanges on the South Mountain Freeway. The text accompanying Figure 3-18 states that *"A projected 73 percent of the travelers who might use the proposed action would have origins and/or destinations near the proposed action."* This statement is misleading, since it implies that 73% of the traffic using the South Mountain Freeway would have origins in close proximity to the proposed freeway.

A review if a larger scale map in the Traffic Overview Report, which is the source of the information presented in Figure 3-18, indicates that about 15% of the selected link traffic would have origins or destinations within the Study Area as defined in Figure S-2 of the DEIS. If the definition of "proximity" were to be extended to the area within a 20-mile radius of the select link, the contribution of this entire 20-mile radius area would be about 40 to 50%.

102 **The following are comments related to impacts related to the Religious and Racial Discrimination and Civil Rights Violations in the South Mountain Freeway DEIS:**

The DEIS clearly discriminates on the basis of religion and race, and the ongoing ADOT plans for blasting *Muhadagi Doog* (South Mountain) are ongoing civil rights violations.

Throughout the DEIS, it is acknowledged that the GRIC and other native American tribes hold *Muhadagi Doog* as a sacred site. From the actual language of the DEIS: "The South Mountains are highly valued and considered sacred by some Native American communities. The Community, which includes the Akimel O'odham (River Pima) and Pee Posh (Maricopa) tribes, and other Native American entities—including the Colorado River Indian Tribes and three O'odham groups: the Salt River Pima-Maricopa Indian Community, the Ak-Chin Community, and the Tohono O'odham Nation—consider the South Mountains to play a role in their cultures, identities, histories, and oral traditions."

Code	Issue	Response
100	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange would have displaced more than 100 homes and would have been located near an existing high school. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The storage facility is located on Gila River Indian Community land and would not be displaced. Reasonable access to the facility would remain available from 32nd Street, Chandler Boulevard, and other east–west local streets. A grade-separated bridge would be constructed for the freeway to go over 32nd Street.
101	**Traffic**	The quotation noted in the comment has been changed to be consistent with a similar statement made in the caption to Figure 3-18: "Seventy-three percent of travelers anticipated to use the proposed action would be involved in trips beginning or ending in the Study Area itself or in the areas immediately surrounding it." The figure does portray the locations of the cities included in the different areas. The proposed action would serve regional travel from the southwestern to southeastern portions of the region (not just internal Study Area travel). The analysis does consider traffic that passes through the Phoenix metropolitan area It should also be noted that, by definition, these freeway users would not include traffic from Laveen Village to Interstate 10 (Papago Freeway) or from Ahwatukee Foothills Village to Interstate 10 (Maricopa Freeway). Therefore, the 15 percent of trips identified in the comment as Study Area-originated are by motorists traveling to the other side of the South Mountains.
102	**Cultural Resources**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The proposed project, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resource studies and engaging in an ongoing, open dialogue with the Gila River Indian Community Tribal Historic Preservation Office regarding

(Response 102 continues on next page)

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Code	Issue	Response
102 (cont.)		the identification and evaluation of places of religious and cultural importance to the Gila River Indian Community that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community.

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Code	Comment Document
102	There is plenty of correspondence in the DEIS and its Appendices in which the GRIC repeatedly asserts and reminds ADOT of this, to no avail. ADOT plans to blast Muhadagi Doog. If we were to take a look at the same issue and frame it as a danger to a sacred site that plays a role in cultures, identities, histories, and oral traditions of a white, European-based religion, such as the Vatican, a sacred site for the Roman Catholic Church, we can illuminate how this is clearly religious discrimination, and likely racial discrimination. If Rome, Italy decided there needed to be a freeway that needed to take out part of the Vatican, well, that would just be unthinkable to the people there of the Roman Catholic faith. Think of the outrage and outcry such a proposal would muster, even worldwide! So what is the difference between the Vatican and Roman Catholics' beliefs, and Muhadagi Doog and the "Native American entities?"
103	This attitude and planned action deliberately and intentionally violates the civil rights of the "Native American entities." In a 1979 consultation on the issue, the United States commission on civil rights defined religious discrimination in relation to the civil rights guaranteed by the Fourteenth Amendment to the United States Constitution. [**Section 1.** All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.] As for racial discrimination, the equal protection clause was originally added to deal with the lack of equal protection provided by law to all in the course of administering justice in the states that had Black codes. The United States commission on civil rights noted, "Whereas religious civil liberties, such as the right to hold or not to hold a religious belief, are essential for Freedom of Religion (in the United States secured by the First Amendment), religious discrimination occurs when someone is denied "**the equal protection of the laws, equality of status under the law, equal treatment in the administration of justice**, and equality of opportunity and access to employment, education, housing, public services and facilities, and public accommodation **because of their exercise of their right to religious freedom**." (Emphasis added.) Also, the **American Indian Religious Freedom Act** (commonly abbreviated to AIRFA) is a US federal law and a joint resolution of Congress that was passed in **1978**. It was created to protect and preserve the traditional religious rights and cultural practices of American Indians, Eskimos, Aleuts and Native Hawaiians. These rights include, but are not limited to, **access of sacred sites, repatriation of sacred objects held in museums, freedom to worship through ceremonial and traditional rites, including within prisons,** and **use and possession of objects considered sacred**. (Emphasis added.) The

Code	Issue	Response
102 (cont.)		Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Gila River Indian Community (Figure 3-6 on page 3-10 of the Final Environmental Impact Statement illustrates a representation of such alternatives). Ultimately the other alternatives were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to study alternatives on its land (see Final Environmental Impact Statement page 3-25). Therefore, the Arizona Department of Transportation, with concurrence from Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.
103	**Title VI, 14th Amendment**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.

(Response 103 continues on next page)

Code	Comment Document
103	Act required policies of all governmental agencies to **eliminate interference with the free exercise of Native religion** (Emphasis added.), based on the First Amendment, and to accommodate access to and use of religious sites to the extent that the use is practicable and is not inconsistent with an agency's essential functions. It also acknowledged the prior violation of that right. Clearly, the No Build Alternative is the only viable option that does not constitute a violation of the 14th Amendment to the Constitution and a violation of the American Indian Religious Freedom Act as any freeway alternative proposed in the DEIS of the South Mountain Freeway requires blasting away part of Muhadagi Doog.

Code	Issue	Response
103 (cont.)		The American Indian Religious Freedom Act, 42 United States Code Section 1996, provides a policy statement of the United States "to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian . . . including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites." The Arizona Department of Transportation and Federal Highway Administration complied with the policy stated in the American Indian Religious Freedom Act throughout the environmental impact statement process, as evidenced by consultation efforts, mitigation measures, and a discussion of cultural resource issues in the Draft Environmental Impact Statement. The study would not violate the American Indian Religious Freedom Act because, as stated above, the Gila River Indian Community would not be prohibited from continuing to practice their beliefs even if the project goes forward, since access to the mountain will be maintained, impacts will be mitigated based on input by the Gila River Indian Community and others, and only a small fraction of the mountain would be affected.

Code	Comment Document
104	**Failure to Provide Timely Access to NEPA Documents and Public Records; Obstruction** ADOT made it extremely difficult for the public to actually review the DEIS, Appendices, and Technical Reports. ADOT was evasive and not at all forthcoming with these, even when proper processes to gain access to these were employed. This is in violation of NEPA regulations.
105	Despite the statements on page 6-23 of the South Mountain Freeway (Loop 202) DEIS and Section 4(f) Evaluation Chapter 6, Comments and Coordination that printed copies of the documents were "available for review only and at no charge at the following repositories throughout the Study Area," the Appendices and Technical Reports were not ever at these for review, even when this was pointed out to ADOT. (These repositories were: Phoenix Public Library – Ironwood Branch, 4333 East Chandler Boulevard, Phoenix, AZ 85048; Phoenix Public Library – Burton Barr Central Library, 1221 North Central Avenue, Phoenix, AZ; Sam Garcia Western Avenue Library, 495 East Western Avenue, Avondale, AZ 85323, and the Tolleson Public Library, 9555 West Van Buren Street, Tolleson, AZ 85353.)
106	This page, which was available on the Internet, also claimed that these documents were available, by appointment, "at the ADOT Environmental Planning Group, 1611 West Jackson Street, Phoenix, AZ 85007, (602) 712-7767" but no one ever answered this number or returned my repeated phone calls and messages.
107	The posting also claimed, "Compact disks are available at no charge and can be obtained by request by calling (602) 712-7767." Again, no one ever answered this number or returned phone calls, after I started calling and leaving messages on Thursday, June 6, 2013. I also requested them through the Public Information Officer for ADOT, to no avail. This led me to contact the ADOT director's office several times to ask for these materials on June 10, 2013, and I was finally handed a CD of the Technical Reports at 5PM of that day after driving to ADOT's offices to retrieve them.
108	However, when I loaded the CD on my computer, I found that three of the Technical Reports were not on the CD. I had to repeatedly call ADOT and request and re-request these, asking about the interminable delays in producing them. After 16 calendar days from that, I was finally allowed to see the final Technical Report on Cultural Resources. Brock J Barnhart, ADOT Assistant Communication Director, even tried to assert that some of these were confidential and restricted, claiming on June 18, 2013, when he finally did email me the Scoping Report,: "The reports are indeed confidential and are protected by the National Historical Preservation Act. Section 304

Code	Issue	Response
104	**Public Involvement**	The Draft Environmental Impact Statement was made available at five public locations throughout the area and was available for purchase at one location. The Draft Environmental Impact Statement was available also by compact disc by request, at the public hearing, and on the Web site at <azdot.gov/southmountainfreeway>. These locations were well advertised and documented on page 6-23 of the Draft Environmental Impact Statement. Technical reports and other information were available by request.
105	**Public Involvement**	Hard copies of the Draft Environmental Impact Statement and Section 4(f) Evaluation were made available at the repositories. All copies placed for public viewing contained the appendices as a compact disc in pockets in the back of the document. The comment is correct that the technical reports supporting the Draft Environmental Impact Statement were only available by request.
106	**Public Involvement**	The first record of a call placed to the Arizona Department of Transportation Environmental Planning Group by the commenter, was Saturday, June 8, 2013. The call was returned to the commenter on Monday, June 10, 2013 and a disc containing the technical reports was provided on the same day.
107	**Public Involvement**	The technical reports were provided to the commenter, as requested, on June 10, 2013, the same day they were requested.
108	**Public Involvement**	On June 17, 2013, the commenter contacted the Arizona Department of Transportation by e-mail to request a scoping technical report, if one existed. The scoping technical report was provided on June 18, 2013. Two of the technical reports requested (Cultural Resources and Section 4[f]) contained confidential information. After discussion with the Federal Highway Administration, release of the reports, in redacted form, was approved. Additional time was required for the Arizona Department of Transportation's cultural staff to review the documents and to redact the information deemed confidential. However, the redacted technical reports were provided on June 28, 2013.

Code	Comment Document

[16 U.S.C. 470w-3(a) — Confidentiality of the location of sensitive historic resources]
(a) The head of a Federal agency or other public official receiving grant assistance pursuant to this Act, after consultation with the Secretary, shall withhold from disclosure to the public, information about the location, character, or ownership of a historic resource if the Secretary and the agency determine that disclosure may —
(1) cause a significant invasion of privacy;
(2) risk harm to the historic resources; or
(3) impede the use of a traditional religious site by practitioners."

108

Of course, this statute refers to information, not whole reports. When I pointed that out in an email, he agreed to produce the report, but that took another eight days.

I gained access to the last of these Technical Reports on June 26, 2013, with portions redacted. That was less than 30 days before the close of comment.

Code	Issue	Response

Code	Comment Document

REPORTS

Four

Review and Critique of DEIS for Loop 202 (South Mountain Freeway) by Herman Basmaciyan, P.E. dated July 17, 2013.

Code	Issue	Response

Code	Comment Document

109

HERMAN BASMACIYAN, P.E.
Traffic, Transportation, Parking
Expert Witness and Consulting Services
701 Marguerite Avenue
Corona del Mar, CA 92625
Tel: 949-903-5738
herman.b@roadrunner.com

July 17, 2013

Ms. Pat Lawlis
President, Protecting Arizona's Resources and Children (PARC)
P.O.Box 50455
Phoenix, Arizona 85076-0455

Proj. No. 130601

Subject: DEIS for Loop 202, South Mountain Freeway

Dear Ms. Lawlis:

Per your request, I have reviewed the Draft Environmental Impact Statement (DEIS) for Loop 202, South Mountain Freeway (SMF) and related documents pertaining to travel modeling, traffic, circulation, and transportation and traffic engineering/planning.

I am a Registered Civil and Traffic Engineer in the State of California (Registration Numbers 20137 and 525, respectively) and a Registered Engineer (in retired status) in the States of Washington, Arizona, and Florida. I have over 50 years of experience in traffic and transportation engineering, traffic modeling and forecasting, parking studies, and the preparation of traffic impact studies. I have personally prepared or had a key role in the preparation of over 400 reports, including environmental documents, in various jurisdictions in California, Arizona, Washington, Oregon, Nevada, Colorado, Montana, Louisiana, and Ohio, as well as several multi-State projects sponsored by the U.S. Department of Transportation. My curriculum vitae (cv.) is attached.

Code	Issue	Response
109		See responses to direct comments below.

Code	Comment Document

Based on my review of the documents cited above and my education, professional knowledge and many years of experience, I have identified deficiencies and/or omissions in the environmental documentation for the Loop 202 South Mountain Freeway project. These deficiencies and/or omissions are discussed in my report, attached. In view of these deficiencies and/or omissions, I have concluded that the DEIS leads to the selection of a Preliminarily Preferred Action Alternative, improperly.

In my opinion, based on the information presented, the No Action Alternative should have been selected as the preferred course of action.

Please contact me if I can provide further details or clarification about any matters covered in this letter and the attached report.

Sincerely,

Herman Basmaciyan. P.E.

Attached:
Curriculum Vitae
Review and Critique of DEIS for Loop 202 (South Mountain Freeway)

HERMAN BASMACIYAN, P.E.

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Herman Basmaciyan, P.E.

Profile

- Over 50 years of transportation planning and traffic engineering experience, including services to legal professionals
- Expert witness services in San Diego, Orange, Los Angeles, Riverside, and San Mateo Counties in eminent domain, traffic engineering, transportation engineering/planning, and parking matters
- Experience in numerous traffic impact studies, transportation planning projects, parking studies, analysis of land use/transportation system interrelationships and traffic/transportation engineering
- Management of, or key role in, a wide variety of transportation/traffic engineering projects in California, Oregon, Washington, Arizona, Nevada, Colorado, Montana, New Mexico, Ohio, and Louisiana

Education

- Master of Science in Civil Engineering, University of Virginia, 1962
- Bachelor of Science in Civil Engineering, Robert College,1960
- Numerous Short Courses in Transportation and Traffic Engineering

Registration

Professional Engineer:

- California, Civil
- California, Traffic
- Arizona (retired status)
- Florida (retired status)
- Washington (retired status)

Professional Organizations

- Institute of Transportation Engineers
- American Society of Civil Engineers

Employment History

- **Individual** Providing Expert Witness and Consultant Services, Corona del Mar, CA, since January 2005
- **Transportation Consultant,** County of Riverside, Riverside, CA, 2005-2011
- **Vice President**, Kimley-Horn and Associates, Inc, Orange, CA 1992-2004
- **Principal**, Basmaciyan-Darnell, Inc., Irvine, CA 1978-1992
- **Principal**, Herman Basmaciyan and Associates, Newport Beach, CA 1976-1978

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110		Résumé

Code	Comment Document

- **Senior Associate**, VTN Corporation, Irvine, CA, and Bellevue, WA 1971-1976
- **Senior Transportation Planning Engineer**, DeLeuw, Cather and Company, San Francisco, CA 1970-1971
- **Advisory Analyst**, Service Bureau Corporation (then a subsidiary of IBM), Palo Alto, CA 1967-1970
- **Director**, Puget Sound Regional Transportation Study, Seattle, WA 1962-1967
- **Research Assistant**, Virginia Council of Highway Research, Charlottesville, VA 1960-1962

Representative Projects in Arizona

- Business 8 Corridor Study, Yuma, AZ
- Development of Traffic Circulation Models, Flagstaff, AZ
- Downtown Transportation Study, Tempe, AZ
- FMPO Travel Demand Model Update and Data Collection, Flagstaff, AZ
- Arizona Passenger Rail Feasibility Study, Arizona Department of Transportation, AZ
- Business 8 Corridor Study, Yuma, AZ
- Phoenix Urban Area Public Transportation Study, Phoenix, AZ
- Statewide Rail Passenger Feasibility Study, Statewide, AZ
- Traffic Circulation Study, San Luis, AZ
- Yuma Area Service Highway Major Investment Study, Design Concept Report, and Environmental Assessment, Yuma, AZ
- Yuma Regional Transportation Study, Yuma, AZ
- Yuma Regional Transportation Study, Yuma, AZ

Other Major Representative Projects

- Analysis of Transit Services and Transit System Improvement Options, Boulder, CO
- MAGLEV in Southern California, Los Angeles, CA
- Major Investment Study for rail and bus transit improvements in Cincinnati, Ohio and vicinity
- Southeast Los Angeles/Western Orange County Transportation Study, Southern California Association of Governments, CA
- Public Transportation Alternatives Feasibility Study, including High-Speed Trains, Western WA
- Alternatives Analysis for Transitway Program, Orange County, CA
- Cross-Sound Transportation Study, Puget Sound Region, WA
- Downtown Transit Terminal Location Study, Mountain Line, Missoula, MT

HERMAN BASMACI AN, P.E.

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- Alternatives Analysis and Environmental Assessment for the Improvement of Facilities for High Occupancy Vehicles at and near the Interchange of I-405 and SR-55, Orange County Transportation Authority, CA
- Bridge and Major Thoroughfare Fee Study, County of San Diego, CA
- Central County Corridor Study, Orange County Transportation Authority, Orange, CA
- Circulation Element of El Segundo General Plan, El Segundo, CA
- Circulation Element of Westminster General Plan, Westminster, CA
- Circulation system planning analyses for the Rancho Santa Fe Association, Rancho Santa Fe, CA
- Circulation System Planning, East Otay Mesa Specific Plan, San Diego County, CA
- Environmental Documentation for California State Route 57 Improvements, Orange County, CA
- Front Avenue Corridor Study, Portland, OR
- Harbor Boulevard Smart Street Feasibility Study and Environmental Documentation, Garden Grove, Anaheim, Santa Ana, Fountain Valley, Orange County, CA
- Moulton Parkway Feasibility Study, Orange County, CA
- North-South/Central Orange County Corridor Study, Orange County, CA
- On-Call Transportation Planning and Traffic Engineering Services for Caltrans District 11, CA
- People-Mover/PRT Feasibility Study, Seattle, WA
- Regional Transit Plan, San Diego County, CA
- Santa Ana River Crossings Cooperative Study, Orange County, CA
- Santa Ana Transportation Corridor Alternatives Analysis and Environmental Documentation, Orange County, CA
- Station Area Traffic Analysis, Commuter Rail Service between Oceanside and San Diego, North San Diego County Transit Development Board, Oceanside, CA
- Station-Area Traffic Analysis, Commuter Rail Service between Oceanside and Escondido, North San Diego County Transit Development Board, Oceanside, CA
- Tri-Met Transit Development Program, Portland, OR

HERMAN BASMACI AN, P.E.

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Code	Comment Document

REVIEW AND CRITIQUE
of
DEIS FOR LOOP 202 (SOUTH MOUNTAIN FREEWAY)

Prepared for

Protect Arizona's Resources and Children (PARC), et al.
Phoenix, Arizona

by
Herman Basmaciyan, P.E.
July 17, 2013

Code	Issue	Response

Code	Comment Document

SECTION I - SUMMARY OF FINDINGS AND CONCLUSIONS

Following is a summary of the findings and conclusions of the review of the DEIS for Loop 202 (South Mountain Freeway) focused on traffic, travel forecasting, circulation, and related matters:

111 1. The socio-economic data projections presented in the Purpose and Need and elsewhere in the DEIS are faulty.

111 2. Since socio-economic data are the starting point for the MAG Travel Model, the travel-related forecasts presented in the Purpose and Need and elsewhere in the DEIS are faulty.

112 3. The forecast of vehicle miles of travel (VMT) lacks credibility. The DEIS states that VMT will grow at a higher rate compared to population and employment growth. This premise is contrary to actual national trends which uniformly show decreases in VMT. Moreover, in the DEIS the methodology used for computation of VMT is not adequately explained.

113 4. As presented in the DEIS, the Purpose and Need defines the need as "completing the Regional Freeway System," "adding capacity to the regional freeway and arterial system," and "serving travel needs in the Southwest area." No compelling need specifically for the South Mountain Freeway (SMF) is presented in the Purpose and Need.

5. The Description of the Proposed Action in the Summary Chapter of the DEIS fails to provide details essential for informed decision-making.

6. Some reasonable and feasible alternatives were not considered in the DEIS or were improperly eliminated early in the screening process.

7. Since the evaluation and selection of alternatives is based largely on the travel forecasts (among other considerations), the evaluations and selection are fatally flawed. As stated in Item 2 above, the travel forecasts were prepared based on faulty socio-economic forecasts.

8. Some impacts, including impacts on the arterial street system adjoining proposed interchanges, construction impacts, and the impacts of truck traffic are not addressed at all or are not adequately addressed in the DEIS.

Code	Issue	Response
111	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
112	**Traffic**	The local conditions and setting of the Phoenix metropolitan area are not consistent with areas of high-density cities in other parts of the country. In Maricopa County, daily vehicle miles traveled levels increased by almost 2 percent between 2011 and 2012, and the 2012 daily vehicle miles traveled are approaching the prerecession peak in 2007. (*Source*: the Arizona Department of Transportation's Multimodal Planning Division's Highway Performance Monitoring System Data for calendar years 2012 and 2011).
113	**Purpose and Need**	The actual need defined in Chapter 1 of the Draft Environmental Impact Statement is based on socioeconomic factors (see page 1-11) and on regional transportation demand and existing and projected transportation system deficiencies (see page 1-13). The proposed action is the construction and operation of a major transportation facility. Chapter 1, *Purpose and Need*, defines the need or the problem the proposed action would solve. Chapter 3 evaluates alternatives for addressing this need. The responsiveness of the proposed freeway to the purpose and need criteria is presented in the Draft Environmental Impact Statement, beginning on page 3-27.

Code	Comment Document

SECTION I - SUMMARY OF FINDINGS AND CONCLUSIONS

Following is a summary of the findings and conclusions of the review of the DEIS for Loop 202 (South Mountain Freeway) focused on traffic, travel forecasting, circulation, and related matters:

1. The socio-economic data projections presented in the Purpose and Need and elsewhere in the DEIS are faulty.

2. Since socio-economic data are the starting point for the MAG Travel Model, the travel-related forecasts presented in the Purpose and Need and elsewhere in the DEIS are faulty.

3. The forecast of vehicle miles of travel (VMT) lacks credibility. The DEIS states that VMT will grow at a higher rate compared to population and employment growth. This premise is contrary to actual national trends which uniformly show decreases in VMT. Moreover, in the DEIS the methodology used for computation of VMT is not adequately explained.

4. As presented in the DEIS, the Purpose and Need defines the need as "completing the Regional Freeway System," "adding capacity to the regional freeway and arterial system," and "serving travel needs in the Southwest area." No compelling need specifically for the South Mountain Freeway (SMF) is presented in the Purpose and Need.

114 5. The Description of the Proposed Action in the Summary Chapter of the DEIS fails to provide details essential for informed decision-making.

115 6. Some reasonable and feasible alternatives were not considered in the DEIS or were improperly eliminated early in the screening process.

116 7. Since the evaluation and selection of alternatives is based largely on the travel forecasts (among other considerations), the evaluations and selection are fatally flawed. As stated in Item 2 above, the travel forecasts were prepared based on faulty socio-economic forecasts.

117 8. Some impacts, including impacts on the arterial street system adjoining proposed interchanges, construction impacts, and the impacts of truck traffic are not addressed at all or are not adequately addressed in the DEIS.

Code	Issue	Response
114	**Purpose and Need**	As pointed out on page S-1, in the sidebar, "*What you will find in the Summary chapter,*" the text in the Summary is not the "final word," and readers are urged to turn to the main text when questions about Summary content arise.
115	**Alternatives**	In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process presented in Chapter 3 of the Draft Environmental Impact Statement. The preferred alternative was the outcome to this process. Text beginning on page 3-26 of the Draft Environmental Impact Statement establishes conclusions associated with the process.
116	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see page 3-27 of the Draft Environmental Impact Statement). Traffic projections are regularly updated by the Maricopa Association of Governments. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11.
117		See responses to specific comments following.

Code	Comment Document

(118)

9. Even assuming arguendo that the demographics used to demonstrate the need for the project are accurate (they are not), none of the Action Alternatives considered will alleviate the anticipated capacity deficiencies identified in the Purpose and Need. Despite the expenditure of about $2 billion to $3 billion to build the South Mountain Freeway and despite the displacement of many residences and business establishments, there will be capacity deficiencies at levels comparable to the No Action Alternative on freeways and arterials throughout the Metropolitan Area and on the South Mountain Freeway itself.

(119)

10. Appropriate mitigation measures are not proposed to mitigate the impacts of the Action Alternatives.

(120)

11. Based on these traffic and circulation considerations, none of the Action Alternatives should have been selected as the Preferred Alternative. Indeed, when correct socio-economic data is used, the No Action Alternative largely achieves the desired outcomes without exorbitant costs and/or negative impacts.

Supporting information for the summary of findings and conclusions is presented in Section II of this report. Exhibits are presented following the last page of Section II.

Code	Issue	Response
118	**Purpose and Need**	Chapter 1 shows that there is a need for a major transportation facility (an action alternative) within the Study Area today and that without a major transportation facility in the Study Area in the future (the No-Action Alternative), the region would continue to suffer even greater congestion, traffic delays, and impacts on the movement of people and goods and the delivery of services. Capacity deficiencies would be substantially greater in the foreseeable future under No-Action when compared against the action alternatives.
119	**Impacts**	The comment provides no specifics. The Arizona Department of Transportation and Federal Highway Administration have included mitigation measures based on the level of impact associated with the proposed action. These mitigation measures have been coordinated and reviewed by local, regional, State, and federal agencies. Specific responses are made to specific comments later in this document.
120	**Alternatives**	The Arizona Department of Transportation, with concurrence from the Federal Highway Administration, has determined that the proposed freeway (as made up by the W59 and E1 Alternatives) is the appropriate solution to the transportation problem identified in the Draft Environmental Impact Statement. All of the alternatives were subject to a thorough evaluation using a multidisciplinary set of criteria in accordance with National Environmental Policy Act and Federal Highway Administration guidance.

Code	Comment Document

SECTION – II SUPPORTING INFORMATION FOR THE SUMMARY OF FINDINGS AND CONCLUSIONS

In this Section of the report, information is presented to support each of the numbered items 1 through 11 in Section I.

121

1. **The socio-economic data projections presented in the Purpose and Need and elsewhere in the DEIS are faulty.** The socio-economic data used in the DEIS was developed by MAG, relying primarily on information from the 2005 special census and not considering the 2010 U.S. Census. As a result, MAG's 2035 forecasts of population, households, and employment are overstated. The procedure MAG used to prepare the forecasts is explained below in a direct quote from the Traffic Overview Report.

A special census was conducted for Maricopa County in 2005 to capture the boom in population, housing, and employment that much of the region experienced during the first half of the decade. In 2007, MAG released socioeconomic projections for Maricopa County based on the results of the 2005 census through 2030. In 2009, MAG subsequently extended these projections through 2035. Table 3 presents the projections for Maricopa County.

Table 3. Projected Growth in Population, Housing, and Employment in Maricopa County, 2005–2035

Year	Population	Housing	Employment
2005	3, 681, 000	1, 480, 000	1, 748, 000
2010	4, 216, 000	1, 685, 000	2, 157, 000
2020	5, 230, 000	2, 104, 000	2, 788, 000
2030	6, 136, 000	2, 502, 000	3, 379, 000
2035	6, 545, 000	2, 676, 000	3, 600, 000

Source: Maricopa Association of Governments, 2007 and 2009

Based on the 2010 U.S. Census data, which should have been reflected in the DEIS, it is obvious that MAG's forecast of socio-economic data based on the 2005 special Census were too high by a large margin. The following table, presents a comparison of MAG's 2010 forecast to actual data from the 2010 U.S. Census.

Code	Issue	Response
121	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. Chapter 1 shows that there is a need for a major transportation facility (an action alternative) within the Study Area today and that without a major transportation facility in the Study Area in the future (the No-Action Alternative), the region would continue to suffer even greater congestion, traffic delays, and impacts on the movement of people and goods and the delivery of services. The Arizona Department of Transportation, with concurrence from the Federal Highway Administration, has determined that the proposed freeway (as made up by the W59 and E1 Alternatives) is the appropriate solution to the transportation problem identified in the Draft Environmental Impact Statement.

Code	Comment Document

Comparison of 2010 Census Data to MAG/DEIS Growth Projections, 2005-2010

TOTAL	2005 Actual	2010 Projected	2005-2010 Projected Annual Growth Rate	2010 Actual	2005-2010 Actual Annual Growth Rate
Population - County	3,681,025	4,216,499	2.75%	3,817,117	0.73%
Population - Study Area	1,951,251	2,274,221	3.11%	2,117,619	1.65%
Total Housing Units - County	1,479,767	1,685,134	2.63%	1,639,279	2.07%
Total Housing Units - Study Area	471,484	589,087	4.55%	478,340	0.29%

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MAG's forecast of Maricopa County population for 2010 is 4,216,499 compared to the actual U.S. Census population of 3,817,117. The MAG forecast is too high by approximately 400,000, or about a 10% overstatement compared to the actual 2010 U.S. Census population. Housing units for Maricopa County are overestimated by about 3%. Population for the Study Area is overestimated by about 7%, and housing units for the Study area are overestimated by MAG by about 23%. Likewise there are large discrepancies in the forecast and actual annual growth rates between 2005 and 2010 in all categories.

Because of these inaccuracies in the MAG socio-economic forecasts even for a short term of five years (2005 to 2010), the long term forecasts for a 30-year period (2005 to 2035) are substantially overstated and are not reliable. If the DEIS had taken into account the information from the 2010 U.S. Census, the 2035 socio-economic forecasts would have started at a lower reference point for 2010. The resulting 2035 forecasts would have been lower even if all other procedures and modeling parameters were unchanged from those used in the 2007/2009 MAG forecasts.

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2. **Since socio-economic data are the starting point for the MAG Travel Model, the travel-related forecasts presented in the Purpose and Need and elsewhere in the DEIS are faulty.** The DEIS should have presented travel forecasts based on correct socio-economic data in all affected text, tables and figures in the DEIS. Faulty travel forecasts affect the Air Quality and Noise impact analyses in addition to the analysis of traffic and circulation impacts.

3. **The forecast of vehicle miles of travel (VMT) lacks credibility. The DEIS states that VMT will grow at a higher rate compared to population and employment growth. This premise is contrary to actual national trends which uniformly show decreases in VMT. Moreover, in the DEIS the methodology used for computation of VMT is not adequately explained.** Figure 1-4 in the Purpose and Need chapter of the DEIS indicates that the number of daily vehicle miles of travel (VMT) will be approximately 185,000,000 and that VMT growth will outpace the growth in population, employment and housing units. This premise is contradictory to the following quote from the Traffic Overview Report (Page 2-5).

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122	**Purpose and Need**	The historical growth in the Maricopa Association of Governments region is discussed in the Draft Environmental Impact Statement, beginning on page 1-5. Critical factors such as available land, mild climate, affordable cost of living, and employment opportunities that led to the historical growth rates in the region remain unchanged. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
123	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.

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"Historical and Projected Travel in the MAG Region

Historical population growth in the region (see Table 2) greatly pressured the region's transportation system. As shown in Table 7, the growth in travel, as measured in vehicle miles traveled (VMT), has mirrored the growth in population in Maricopa County (an annual compound growth rate of approximately 5.4 percent). In 2010, travel demand reached 101 million VMT per day (MAG 2010a) and is projected to reach 185 million VMT per day in 2035 (MAG 2010a)."

The growth in VMT from 101 million in 2010 to 185 million in 2035 would represent an annual compound growth rate of about 2.5%. On the other hand, Table 20-4 on Page 20-8 (Exhibit 1) of the RTP states that in 2030 VMT will be approximately 139,740,000 if the RTP improvements are implemented. Accordingly, the 2035 VMT (per the DEIS) of 185,000,000 would represent a compound growth rate of about 7% per year for the 5 years between MAG's 2030 VMT forecast and the 2035 VMT forecast in the DEIS. These apparent discrepancies amongst the various sources cited cast serious doubt on the credibility of the VMT estimate presented in the DEIS. Notwithstanding the foregoing, if correct socio-economic data forecasts were used in the DEIS, the 2035 VMT would have been even lower.

ADOT's over-statement of VMT in the DEIS is further compounded when viewed in the context of recent travel trends and forecasts. Travel surveys nationally and in the MAG region indicate that travel statistics such as trip length, VMT per person, and VMT per household have actually decreased in recent years or have been steady. According to the National Household Travel Survey (NHTS), which is a periodic travel survey sponsored by the US DOT, the average vehicle trip length was 9.9 miles in 2001 and 9.7 miles in 2009 (Table 3, Page 10) (see Exhibit 2). Since the 95% confidence interval stated by the survey is 0.2, statistically there was no change in the average trip length. Also the number of daily vehicle trips per household dropped from 5.95 in 2001 to 5.66 in 2009. Since the confidence interval in this case is .06, the decrease is statistically significant. Figure 6, Page 32 (Exhibit 3) indicates that average time spent in vehicles and miles traveled were lower in metropolitan areas in all population ranges and in rural areas.

MAG was a participant in the 2009 NHTS Survey (surveys were conducted between April 2008 and April 2009) and augmented the national data base by added household surveys within the MAG Region. MAG documented the results of the survey in its publication "MAG 2008 NHTS Dataset for the MAG Region." Table 7 on Page 107 (Exhibit 4) of this publication daily trip rates in the MAG Region are presented. The daily trip rates range from a low of 3.72 on Sunday to

Code	Issue	Response
123 (cont.)		Under the National Environmental Policy Act, it is common for new data to avail itself and to, therefore, update the environmental impact statement as new data become available. It is not a requirement, however, to stop the environmental impact statement process in its entirety to wait for new information to become available. Completing an environmental impact statement under those terms would be quite difficult and, arguably, the public would not receive benefits associated with a proposed public infrastructure action. In this case, the project team experts were aware that socioeconomic projections were to be made available but it was likely (based on the Draft Environmental Impact Statement content and processes and a qualitative understanding of what the updated information would show and reveal) that conclusions affected by such data would not substantially change. The team undertook a quite acceptable, common, and understood practice of publishing the Draft Environmental Impact Statement while new data was developing and then present the new information in the Final Environmental Impact Statement. The new information would not automatically assume the need for a supplemental document.

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a high of 7.26 on a Tuesday. The 7-day weekly numerical average is 4.99 vehicle trips per household, and the numerical average of the five weekdays is 5.45 vehicle trips per household. The trip rates in the MAG data set are comparable to the NHTS national rates. The DEIS does not reference the 2009 NHTS results which do not support the projections of VMT levels relied on to support the South Mountain Freeway (SMF).

In 2001 MAG conducted the Maricopa Regional Household Travel Survey. A Final Report was prepared making it possible to compare several trip-making characteristics and trends/changes between the 2001 and the 2008/2009 data sets. Trip rates per household for all modes increased between 2001 and 2008/2009 from 7.38 to 10.50, as reported on Page 120 of "MAG 2008 NHTS Dataset for the MAG Region" (Exhibit 5) The duration of trips in 2001 and 2008 (trip length in minutes) appears to be comparable, since the tabulated data for the 2001 survey (Pages 76 through 78 of the Final Report) (Exhibit 6) follows the same curve pattern illustrated in Figure 7-10 in the report "MAG 2008 NHTS Dataset for the MAG Region" (Exhibit 7). Again, comparing MAG data for 2001 and 2009, the drastic increases in VMT presented in the DEIS cannot be supported.

Several sources, including the U.S. PIRG Education Fund, the Economist, and the New York Times, have published reports and articles about declining trends in VMT. Some of the downturn or flattening in VMT trends may be attributable to major events such as the recession in the early 1990s, bursting of the high tech bubble, the bursting of the housing bubble, and rises in fuel costs. On the other hand, changes in travel habits and the "travel time budget," or the concept that the time a driver will devote to driving on any given day is limited, could also have contributed to the flattening or reductions in vehicle miles of travel. In addition, factors to be considered include increased use of on-line shopping, a larger proportion of elderly persons who tend to make fewer, and/or shorter, driving trips, and other factors.

The VMT numbers presented in the DEIS are at odds with this generally recognized downward trend in VMT. The reason for this apparent divergence from documented trends is not clear. Was the estimate of VMT for 2035 a direct unadjusted output generated by the MAG Regional Travel model or was it computed by another methodology? If not generated by the model, why not? What was the methodology used? A reliable forecast of VMT is important for the Air Quality impact analysis in addition to the analysis of traffic and circulation impacts.

4. **As presented in the DEIS, the Purpose and Need defines the need as "completing the Regional Freeway System," "adding capacity to the regional freeway and arterial system," and "serving travel needs in the Southwest area." No compelling need specifically for the South Mountain Freeway (SMF) is presented in the Purpose and Need.** The Purpose and Need statement in the DEIS is very general and is focused on the need to add freeway capacity but

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not focused on building the SMF. The problems identified that lead to the proposed action (not direct quotes) are:

- Accommodating population and employment growth in the Phoenix Metropolitan Area.
- Completing the Regional Freeway and Highway System, that was delineated about 30 years ago.
- Providing additional freeway capacity to reduce congestion in the Urban Core.
- Serve travel needs in the Southwest portion of the Metropolitan Area.

The stated needs point to Regional level problems and not to a specific facility such as the proposed South Mountain Freeway, Loop 202 (SMT). Following is a discussion of each of the stated problems and why they do not define the need for a specific facility:

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- There is no question that historically, the Phoenix Metropolitan Area has grown very rapidly. Going forward, however, growth will likely not occur at a steady pace. Undoubtedly, there will be cyclical ups and downs. In the long-range future, the trend will likely be upwards, although it appears that the actual amount and rate of growth reached by the planning horizon year 2035 will be significantly less than forecasted in the DEIS. Nevertheless, in view of the anticipated growth, the case is made in the Purpose and Need (P&N) chapter of the DEIS that the transportation infrastructure needs to be improved. The P&N, however, does not support construction of the SMF (Loop 202), as would be appropriate for a DEIS that may lead to an action, in this case the construction of the freeway.

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- The justification in the P&N that Loop 202 is in the RTP and has been on the books for 30 years is a self-fulfilling objective. The presentation of historical data in the P&N is beneficial because it gives the public a sense of what has transpired in the last 25 to 30 years. The Purpose and Need for the South Mountain Freeway however, should have been supported, in addition, by specific problems that Loop 202 would reasonably be expected to alleviate or address, since this DEIS is for a proposed implementation action and not for a programmatic action such as the adoption of the RTP.

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- The P&N emphasizes that additional freeway capacity would be needed in the Phoenix Metropolitan Area. But, the capacity deficiencies are concentrated in the Urban Core and along I-10, I-17, S1, US 60 and other freeways to the east and north. The P&N does not identify the travel components (origin and destination combinations) that Loop 202 would divert away from the freeways that are congested now or are expected to be congested in 2035. The question arises whether all reasonable

Code	Issue	Response
124	**Purpose and Need**	Chapter 1, *Purpose and Need*, follows Federal Highway Administration guidance with respect to complying with the National Environmental Policy Act, which is to define the transportation problem. This Draft Environmental Impact Statement chapter analyzing the purpose and need for the proposed action does not identify a specific facility as the solution. That is addressed in Chapter 3. The comment notes that it is unlikely that growth will occur at a steady pace. First, there is no basis upon which this statement is made. Regardless, as illustrated in Chapter 1 of the Draft and Final Environmental Impact Statement, historical growth rates and trends are described that support the idea that growth has not occurred at a steady pace but is subject to external factors such as new technology, changes in market conditions, cost of living. However, the growth model for future planning purposes does take historical growth trends and "level" them out; a common practice in growth models used by metropolitan planning organizations such as the Maricopa Association of Governments.
125	**Purpose and Need**	Nowhere in the Draft Environmental Impact Statement is reference made that the proposed action is needed to comply with the *Regional Transportation Plan*. The analysis of purpose and need would have ended the environmental impact statement process at that point if a need in the form of a transportation problem had not been identified, and this is disclosed in the Draft Environmental Impact Statement. As observed in the comment, this information is provided for historical perspective. That is why it is presented in the section, *Historical Context of the Proposed Action*. By objectively examining travel in the region and establishing need as presented in Chapter 1 of the Draft Environmental Impact Statement, the alternatives process focused on a systematic, sequential, interdisciplinary approach to establishing a range of reasonable alternatives. An incidental benefit of the results as presented in text beginning on page 3-35 is consistency with local planning. In fact, as disclosed in Chapter 1, it is further explained that the analysis of purpose and need would have ended the environmental impact statement process at that point if a need in the form of a transportation problem had not been identified.
126	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. Information related to the origin and destination, including pass-thru, of vehicles that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Draft Environmental Impact Statement.

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alternatives have been considered in the DEIS, or if they may have been eliminated too early in the tiered screening process. Also please see the next item.

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- The information in the P&N indicates that congestion on I-10 (Papago) extends to the West almost as far as Loop 101 (Agua Fria) and on I-10 (Maricopa as far South as Loop 202 (Santan) and beyond. Traffic volumes in the P&N (2010 and 2035) indicate that traffic volumes on the north south arterials in the Study Area go up approaching I-10 (Papago) and that traffic on the east-west arterials go up approaching I-10 (Maricopa). Clearly travel from the southwest area is oriented to the north and east, rather than to the west. Since traffic to/from the Southwest area will continue to use the congested portions of I-10, it is unclear how the SMF will alleviate congestion in the urban core.

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- The north-south portion of Loop 202 (South Mountain), may be beneficial for north-south traffic destined for I-10 because some traffic that would be on the arterials would be able to use Loop 202 instead. However, on I-10, motorists would encounter congestion whether traveling east or west. The east-west portion of Loop 202 would not be an alternative to the congested east-west arterials because there is no north-south access across South Mountain. Therefore, congested arterials such as Baseline Road and other east-west arterials further north are not likely to receive much, if any, benefit from the east-west portion of Loop 202.

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The P&N should have identified and itemized the problem (s) that create the need for the proposed action in specific terms such as:

- Alleviating a specific current or expected future capacity deficiency (for example, I-10 between Point A and Point B) on the freeway system or on the arterials.
- Providing an adequate roadway network to serve the circulation needs within the Study Area and identifying deficiencies in terms such as Baseline Road between Point A and Point B.
- Accommodating commuters to/from the Study Area. Number of work trips between the Study Area and other parts of the Metropolitan Area should have been presented to support the need.
- Serving pass-through truck traffic between major truck origins and destinations. An example might have been: About 1,000 trucks use I-10 through Phoenix now en route between the East Coast and Los Angeles, without stopping in Phoenix. This number is forecast to increase to 4,500 in 2035, contributing to worsening congestion on I-10.

In summary, even if the supporting demographic forecasts are presumed accurate, the P&N in the DEIS does not support the construction of SMF (Loop 202). The DEIS should have but failed to identify, let alone analyze, the compelling

Code	Issue	Response
126 (cont.)		In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process presented in Chapter 3 of the Draft Environmental Impact Statement. The preferred alternative was the outcome to this process. Text beginning on page 3-26 of the Draft Environmental Impact Statement establishes conclusions associated with the process.
127	**Purpose and Need**	The comment states that "Clearly travel from the southwest is oriented to the north and east, rather than to the west." First, there is no basis upon which this statement is made. The purpose of a major transportation facility in the Study Area is to help address increased travel from the southwest to the east. The major transportation facility would provide an alternate route to congested portions of Interstate 10. The purpose and need analysis as described in Chapter 1 of the Draft and Final Environmental Impact Statements confirmed the Study Area as the appropriate area in which to define the transportation problem. While other transportation problems may existing in the region's transportation network, this environmental impact statement process focused appropriately on the identified problem in the southwest region of the Phoenix metropolitan area.
128	**Alternatives**	The purpose and need analysis as described in Chapter 1 of the Draft and Final Environmental Impact Statements confirmed the Study Area as the appropriate area in which to define the transportation problem. While other transportation problems may existing in the region's transportation network, this environmental impact statement process focused appropriately on the identified problem in the southwest region of the Phoenix metropolitan area. As stated in text in the Draft Environmental Impact Statement, beginning on page 3-27, the proposed freeway would appropriately shift traffic from some other freeway segments and the arterial network. Figure 3-12, in this section, illustrates positive effects on arterial roads such as the referenced Baseline Road.
129	**Purpose and Need**	In response to the comment, the reader is referred to both Chapters 1 and 3 of the Draft and Final Environmental Impact Statements. Text in each of these chapters speaks specifically to the context of purpose and need in terms of the four bulleted points in the comment. The proposed freeway would alleviate identified capacity deficiency, would enhance the circulation needs with the Study Area, would serve commuter travel, and would accommodate truck traffic at vehicle mix percentages similar to those percentages found throughout the region's freeway network.

problems and needs in the Study Area that the SMF would be intended to alleviate. Specific evaluation criteria could then have been developed to assess the effectiveness of each alternative to alleviate, wholly or partially, each of the problems in the Study Area. This lack of specificity in the Purpose and Need affects the identification of alternatives and the evaluation of alternatives.

130 5. **Some reasonable and feasible alternatives were eliminated early in the screening process, possibly due to the faulty Purpose and Need. With a revised and appropriately framed Purpose and Need, additional alternatives may emerge.** On Page 3-3 of the DEIS, the alternatives screening criteria are presented as quoted below.

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131 *The following general categories reflect the criteria established for the screening process (Alternatives Screening Report [2003]):*

- *ability to satisfy purpose and need*
- *ability to minimize impacts on the human and natural environments*
- *ability to improve operational characteristics of the region's transportation system*
- *degree of public and political acceptability*
- *consideration of overall conceptual cost estimates*

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132 Since one of the criteria is satisfying the Purpose and Need, a faulty Purpose and Need would result in a faulty screening process. In addition, the third bullet item in the criteria is one of the needs identified in the Purpose and Need; it is duplicative and is not a separate and distinct criterion.

133 Alternatives that should have been but were not included in the evaluations or those that should have been evaluated in greater detail include:

134 a) As discussed previously, the No Action Alternative should have been identified as the preferred alternative in the DEIS. The No Action Alternative is dismissed in the DEIS simply because it does not meet the Purpose and Need. Since the Purpose and Need is faulty, this reason for dismissing the No Action Alternative is not defensible. The No Action Alternative would have no physical impacts, including no impact on South Mountain. It may also have beneficial air quality and noise impacts because the No Action Alternative would result in less VMT, compared to the Preferred Action Alternative as indicated by the comparison of VMT for the "RTP 2030" and "No Build" Alternatives presented in the MAG RTP, Table 20-4 on Page 20-8 (Exhibit 1). Notwithstanding, there were other Action alternatives that would have met the Purpose and Need but were not considered in the DEIS or were not adequately addressed.

Code	Issue	Response
130		See response to specific comments below.
131		See response to specific comments below.
132	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. Past determinations surrounding the alternatives development and screening process, including the reasons for the elimination of alternatives, as outlined in Chapter 3 of the Final Environmental Impact Statement, were reviewed for appropriateness based on the new data and were determined to remain appropriate screening determinations. The noted duplicate criterion has been deleted from the Final Environmental Impact Statement.
133		See response to specific comments below.
134	**Alternatives**	As stated on page 3-40 of the Final Environmental Impact Statement, the No-Action Alternative would not satisfy the purpose and need of the proposed action because it would result in further difficulty in gaining access to adjacent land uses, increased difficulty in gaining access to Interstate and regional freeway systems from the local arterial street network, increased levels of congestion-related impacts, continued degradation in performance of regional freeway-dependent transit services, increased trip times, and higher user costs. Further, the No-Action Alternative would be inconsistent with Maricopa Association of Governments' and local jurisdictions' long-range planning and policies. The No-Action Alternative was included in the Draft and Final Environmental Impact Statements for detailed study to compare impacts of the action alternatives with the consequences of doing nothing (impacts can result from choosing to do nothing).

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135	b) The initial list of modal alternatives does not include a hybrid consisting of freeway spot improvements where needed, new freeway segment (s), more lanes on selected arterials beyond the improvements included in the RTP, additional arterials not included in the RTP. A well-defined hybrid alternative should have been considered and evaluated. An example of a hybrid alternative, that would include some of the features of the Preferred Action Alternative and that would avoid any impacts on South Mountain, is presented in attached Exhibit 8. The salient features of the hybrid alternative would be: • Construction of a freeway along the alignment of the Preliminarily Selected Action Alternative (59th Avenue/63rd Avenue) between I-10 and W. Carver Road, • Construction of a new four-lane arterial along W. Carver Road between 59th Avenue and 51st Avenue, • Arterial improvements along 51st Avenue between W. Carver Road and W. Pecos Road (extended westerly from the western terminus of Pecos Road), • Construction of a new four-lane arterial between 51st Avenue and the present western terminus of Pecos Road (generally east west along an alignment approximating an extension of W. Pecos Road) • Extensive arterial improvements in the Southwest area.
136	c) Dismissal of all alternatives impacting GRIC land without thorough evaluation is not appropriate. When the complete set of benefits, costs and impacts are assessed one or more alternatives through GRIC may emerge to be a better choice than the Preferred Action Alternative. Alternatives not considered or not evaluated fully include: • The "Community Alternative" that is depicted in Figure 3-11 on Page 3-25 of the DEIS. This alternative would not have any impacts on South Mountain. An alignment similar to the Community Alternative is shown in an article on the Arizona Republic website. The link to the article is: http://www.azcentral.com/community/ahwatukee/articles/20130308south-mountain-freeway-plan-ignored.html • The various alternatives through GRIC land that parallel W. Pecos Road, depicted in Figure 3-5 on Page 3-7 of the DEIS.

Code	Issue	Response
135	**Alternatives**	According to 23 Code of Federal Regulations §771.111(f)," the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope...". The proposed action should satisfy the project need and should be considered in the context of the local area socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need. Construction of Carver Road between 59th and 51st avenues is included in the City of Phoenix General Plan transportation element. Improving 51st Avenue between Carver Road and Pecos Road would require permission of the Gila River Indian Community. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process. Based on previous comments from the Gila River Indian Community related to pass-through traffic using 51st Avenue, the Gila River Indian Community would not support any activities that would increase unwanted traffic through its communities. Extending Pecos Road to 51st Avenue would not be feasible because a portion would be located on Gila River Indian Community land, and the Gila River Indian Community has not provided permission to construct a facility on its land. Based on previous comments from the Gila River Indian Community related to pass-through traffic using 51st Avenue, the Gila River Indian Community would not support any activities that would increase unwanted traffic through its communities. Improvements to the arterial street system in the southwestern area (Laveen and Estrella Villages) are planned in the City of Phoenix General Plan. For these reasons, alternatives similar to the hybrid alternative proposed in the comment were eliminated from detailed study.
136	**Alternatives**	Dismissal of all alternatives affecting Gila River Indian Community land is appropriate. The act by the Gila River Indian Community of not allowing alternatives on its land is sufficient evaluation. The Gila River Indian Community has consistently stated (beginning in 2000, with a Community Council resolution) that it is not interested in an alternative on its land. See Draft Environmental Impact Statement Chapter 2, *Gila River Indian Community Coordination*.

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- The Riggs Road/Beltline Road/51st Avenue Alternative that would avoid any impacts on South Mountain

- The Queen Creek Road Alternative that would have no impact on south Mountain

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c) A depressed freeway alternative along W. Pecos Road in the Eastern Section of the SMF is discussed in the DEIS starting on Page 3-15 and several pages following. In the third tier screening of alternatives, the depressed freeway alternative was dropped from further evaluation because of drainage design complications, greater right-of-way need compared to the rolling profile, more residential displacements, and increased construction and right-of-way costs. In the third tier screening, the decision to construct the SMF as an eight-lane facility (three general purpose lanes plus one high occupancy lane in each direction) had not been made. The reduction of the SMF from a 10-lane facility to an 8-lane facility was made in the fourth tier screening. Therefore, it is unclear if the additional right-of-way need for about 150 acres is in reference to a 10-lane or an 8-lane design. The DEIS should have considered this matter and verify if, in fact, a depressed profile would require 150 acres of additional right-of-way beyond what ADOT has already acquired plus what ADOT would need to acquire to accommodate the 8-lane SMF rolling profile. Since 90% of the cost difference between the rolling and depressed alternatives is attributed to right-of-way, any reductions in right-of-way would make a large difference in cost and in residential displacements. The matter of a depressed profile should have been re-visited after the decision to use an 8-lane cross section to confirm or revise the previous findings based on the 10-lane alignment. This re-visit should have identified the additional parcels that would need to be acquired and the residential displacements.

On Page 3-18 of the DEIS, Impacts on Ahwatukee Foothills Village are discussed in the following quote:

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Impacts on Ahwatukee Foothills Village – *The public generally perceives that a depressed freeway would reduce and/or eliminate impacts on visual resources and freeway-related noise. Visual and noise-level impacts from operation of the proposed E1 Alternative would, however, still occur and would require mitigation, as would be the case for the at-grade rolling profile.*

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It is unclear from the statement in the DEIS if the impacts of the rolling profile and depressed alternatives would be identical or if the depressed alternative would have less impact. The DEIS should have this clear and recognize any advantages the depressed alternative might have, if any. If

Code	Issue	Response
136 (cont.)		Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Draft Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
137	**Alternatives**	All of the design options and refinements (such as tunnel and bridge options and depressed freeway options) considered in the Third-Tier screening were revisited after the determination to change the proposed freeway from ten to eight lanes. The comparisons presented in the Draft Environmental Impact Statement section, *Depressed Freeway Options*, reflect an eight-lane freeway concept for the at-grade/ elevated profile and the depressed profile.
138		Quote from Draft Environmental Impact Statement.
139	**Drainage**	As noted on page 3-18 of the Draft Environmental Impact Statement, drainage served as the primary design constraint for the Pecos Road segment of the E1 Alternative. Assessments were performed to determine constructibility and effectiveness in avoiding or reducing impacts and to evaluate whether a depressed profile would generate other desired or undesired outcomes. Based on the results of these assessments, further design options were developed and refined in attempts to reduce impacts on the adjacent community. The modifications incorporated alternative drainage designs, use of retaining walls, and other features to reduce right-of-way requirements.

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the depressed alternative would have less impact than the rolling profile alternative, less mitigation would be needed.

140 d) The Ray Road and Chandler Boulevard Alternatives were improperly dismissed from further consideration in the second tier screening on the basis of "substantial" impacts that were not quantified in the DEIS. In the western portion of the SMF, several location alternatives and variations were studied in detail. By comparison, in the eastern portion W. Pecos Road became the sole survivor of the screening process very early in the evaluation process.

141 e) In the screening process, the "freeway" alternatives of the westerly extension of the Superstition Freeway, the southerly extension of SR 51, and the southerly extension of I-10 to the Superstition Freeway (extended) were dismissed in the second tier of screening. The rationale for elimination from further consideration was not supported by substantive analysis in the DEIS. If there was any substantive analysis, it should have been presented in the DEIS. Because of the location of these alternatives, there would be no impacts on South Mountain.

142 f) Freeway improvements on the congested freeways in the urban core should have been considered and discussed in the DEIS. Possible improvements to alleviate congestion where the congestion now exists (rather than build the SMF) could include addition of high occupancy/toll lanes (HOT lanes), auxiliary lanes, interchange improvements, and others. If such improvements were deemed to be not feasible after substantive analysis, the conclusions should have been documented more thoroughly in the DEIS along with the rationale for rejecting such alternatives. Because of the location of such improvements, there would be no impacts on South Mountain.

143 g) The I-8/SR 85 Alternative, mentioned on Page 3-9, is dismissed because it does not meet the Purpose and Need for the proposed action. Since the Purpose and Need is faulty, the dismissal of this alternative on the basis of the Purpose and Need is also faulty. The benefits of this alternative, that would avoid any impacts on South Mountain, should have been quantified and presented in the DEIS.

144 h) The development of a complete arterial system in the Southwest area was not considered in the DEIS. As discussed in Item 5.b), the MAG RTP does not indicate any arterial improvements except one new arterial facility in the Southwest area. A complete arterial system would alleviate much of the forecasted congestion in the area and would meet the Purpose and Need objectives of adding capacity and improving circulation in the

Code	Issue	Response
140	**Alternatives**	In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. As noted in Table 3-5 on page 3-12 of the Draft Environmental Impact Statement, the Ray Road and Chandler Boulevard alternatives would result in hundreds of residential and business displacements and would split the Ahwatukee Foothills Village. For these reasons, the two alternatives were eliminated from detailed study.
141	**Alternatives**	In the Eastern Section, the initial screening identified clear, undesirable aspects of the alternatives, with only the E1 Alternative being prudent and feasible. In the Western Section, the three action alternatives studied in detail each had positive and negative aspects, however none were substantial enough to eliminate the alternative (or other alternatives). The Draft Environmental Impact Statement is a summary of technical analyses providing the necessary details associated with the decision-making process. Additional details and quantities are documented in technical reports and memos. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process.
142	**Alternatives**	The Draft Environmental Impact Statement is a summary of technical analyses providing the necessary details associated with the decision-making process. Additional details and quantities are documented in technical reports and memos. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process. Improvements to other freeway corridors such as Interstate 10, other new freeways such as State Route 303 Loop, arterial street improvements, and expansion of the existing bus and light rail systems are included in the *Regional Transportation Plan*. See discussion beginning on page 1-9 of the Draft Environmental Impact Statement. The analysis of future conditions includes the assumption that all of the planned improvements identified in the *Regional Transportation Plan* would be in place by 2035. Draft Environmental Impact Statement Chapter 1, *Purpose and Need*, concludes that, even with these improvement in place, there is a clear need for a major transportation facility in the Study Area.

(Responses continue on next page)

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143	**Alternatives**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the need for the freeway has not changed. The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. Past determinations surrounding the alternatives development and screening process, including the reasons for the elimination of alternatives, as outlined in Chapter 3 of the Final Environmental Impact Statement, were reviewed for appropriateness based on the new data and were determined to remain appropriate screening determinations. The Interstate 8/State Route 85 Alternative is in place today and will be in place in the future as an alternative route for motorists to use to bypass the entire Phoenix metropolitan area. The alternative serves that purpose, but provides no benefits to support regional travel within the Phoenix metropolitan area. For this reason, it was eliminated from further study.
144	**Alternatives**	The *Regional Transportation Plan* is not the primary source of funding for expansion of the arterial street system. Funding for the arterial street system generally comes from the local jurisdiction or through impact fees for development. It is anticipated that the arterial street network in the Study Area will be expanded in this same manner. The Maricopa Association of Governments regional travel demand model includes assumptions related to arterial street expansion based on local jurisdiction general planning. In the case of the Study Area, it is assumed that most of the arterial street network would be built out by 2035. Draft Environmental Impact Statement Chapter 1, *Purpose and Need*, concludes that, even with these improvement in place, there is a clear need for a major transportation facility in the Study Area. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.

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Southwest area. This alternative would avoid any impacts on South Mountain.

145 In summary, several reasonable and viable alternatives were not considered in the DEIS or were dismissed from further consideration without an appropriate level of analysis, even though many of them would not have any impacts on South Mountain. This is a major deficiency, since a major requirement of the DEIS is that all reasonable alternatives be evaluated with appropriate level of detail.

146 6. **The Description of the Proposed Action in the Summary Chapter fails to provide details essential for informed decision-making.** The action is described generally as building a freeway in compliance with the RTP. Lacking from the description are the following:

147 • The typical cross-section of the freeway, preferably with dimensions that ADOT commonly uses, should have been included. Major deviations, if any, from the typical cross-section for each of the three West Alternatives and the single East Alternative should have been identified.

148 • While at the outset the cross-section was not known, the 10-lane alternative was eliminated in the fourth-tier screening. A freeway with three general purpose (GP) and one High Occupancy Vehicle (HOV) lane in each direction, plus auxiliary lanes where necessary, was established for all alternatives.

149 • The profile for the freeway should have been described in general terms for each Alternative.

150 • The location of proposed interchanges for each alternative should have been shown.

151 • The fact that park-and-ride lots would be provided at/near some or all interchanges, if true, should have been stated. The term park-and-ride appears only once in the Summary (Page S-19) in the context of a mitigation measure for Displacements and Relocations. The term park-and-ride does not appear at all in Chapter 1 (Purpose and Need); it appears three times in Chapter 3 (Alternatives) first on Page 3-6 as part of the discussion of Modal Screening Results, the second time on Page 3-15, Figure 3-8 indicating that the park-and-ride lot at the 40th Street Interchange potentially would be expanded, and for the third time on Page 3-40 in the context of the No-Action Alternative. Thus unless a reader studied Figure 3-8 very carefully, he or she would not be aware of the potential expansion of the park-and-ride lot at the 40th Street Interchange. There is no mention of park-and-ride in the Traffic Overview Report.

Code	Issue	Response
145	**Alternatives**	Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process. A thorough feasible and prudent avoidance analysis of the South Mountains was conducted as presented in Chapter 5 of the Draft and Final Environmental Impact Statements and concluded avoidance to the direct use of the resource was not feasible and prudent. In support of this response and given the concerns about the South Mountains, consider the following review from the U.S. Department of the Interior on the Draft Environmental Impact Statement: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources." The complete letter can be found in Appendix 7, Volume III, on page B4.
146	**Purpose and Need**	As pointed out in the Draft Environmental Impact Statement on page S-1, in the sidebar, "*What you will find in the Summary chapter,*" the text in the Summary is not the "final word," and readers are urged to turn to the main text when questions about Summary content arise. It is clear, as pointed out in Chapter 3, *Alternatives*, that a beneficial outcome of the alternatives screening process—a "... logical, sequential, step-by-step process using data and expertise from multiple disciplines ..." (page 3-27)—was that the mode determined to be appropriate for addressing the identified transportation problem was a highway that, in turn, was consistent with local and regional plans (as supported by stakeholder jurisdictions). Nowhere in the Draft Environmental Impact Statement is reference made that the proposed action is needed to comply with the *Regional Transportation Plan*. The analysis of the proposed action's purpose and need would have ended the environmental impact statement process at that point if a need in the form of a transportation problem had not been identified, and this is disclosed in the Draft Environmental Impact Statement.
147	**Design**	A typical section is provided in Figure S-9 on page S-10 of the Draft Environmental Impact Statement. As noted on page S-8 at the end of the section, *Action Alternatives*, "Chapter 3, *Alternatives*, has detailed descriptions of features of the alternatives." This information begins on page 3-40 of the Draft Environmental Impact Statement.
148	**Design**	Agree.
149	**Design**	This information is presented in Chapter 3 of the Draft Environmental Impact Statement. Descriptions of the horizontal and vertical alignments of the action alternatives are provided, beginning on page 3-40. Graphical depictions are shown in Figures 3-20 to 3-25.
150	**Design**	This information is presented in the Summary Chapter of the Draft Environmental Impact Statement; see Figure S-8. It is also presented in Chapter 3; see Figure 3-28.
151	**Design**	The inclusion of park-and-ride lots is not part of the scope of the proposed action. No new park-and-ride lots are proposed as part of the proposed action. Locations of future park-and-ride lots would be determined by the City of Phoenix and Valley Metro. As described in the responses above, the elements of the proposed freeway and the potential action alternatives were described in the Draft Environmental Impact Statement.

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For the public in general, the Regional Transportation Plan (RTP) and complying with the RTP are abstract and perhaps foreign concepts. The Description of the Preliminarily Proposed Action should have had sufficient information to help the public visualize what is being proposed on the ground.

(152) 7. **Since the evaluation of alternatives is based on the travel forecasts (among other considerations), the evaluations are faulty. As stated in Item 2 above, the travel forecasts, in turn, are faulty because they are based on faulty socio-economic forecasts.** The MAG travel forecasting model was run with faulty data inputs. As a result, all figures and tables in the DEIS that present data from the model are incorrect, resulting in conclusions in the DEIS that cannot be supported by reliable analysis. The faulty travel forecasts affect the Air Quality and Noise impact analyses, as well, because they rely on traffic forecasts, as one of the inputs. On the basis of this fatal flaw alone, the DEIS should be thrown out, and the analysis should be done properly from the beginning.

(153) 8. **Some potential impacts, including impacts on the arterial street system adjoining proposed interchanges, construction impacts, and the impacts of truck traffic are not addressed at all or are not addressed in detail sufficient for a DEIS for an Action Alternative (as opposed to a programmatic action such as the adoption of the RTP).**

(154) a) The DEIS does not present an analysis of traffic impacts on arterials in the vicinity of the proposed interchanges and impacts on local access. A specific example of this type of deficiency, that may be applicable elsewhere in the Study Area, is the lack of analysis as to how W. Pecos Road would be impacted by the Proposed Action. With the Proposed Action, the South Mountain Freeway (SMF) would obliterate and replace existing Pecos Road (described in the DEIS as Alternative E1); access to the street system in the area would be provided via interchanges at 40th Street, 24th Street, Desert Foothills Parkway, and 17th Avenue. There will be no interchange at 32nd Street. Under existing conditions, a signalized intersection at the intersection of W. Pecos Road and 32nd Street provides access to the community on the north side of W. Pecos Road. This access for the community will not be available when the SMF is built, and traffic that now uses 32nd Street will have to use other routes. Please see Item c) on Page 16 for more details about how this matter should have been addressed in the DEIS.

A similar problem will be created at the western terminus of W. Pecos Road at 27th Avenue which is the sole access for the existing Foothill Reserve and Calabrea communities. When the SMF is constructed as proposed, this access will no longer be available and existing traffic will be forced to use another route. ADOT has proposed to construct an extension of Chandler Boulevard, between its existing terminus at 19th Avenue and 27th Avenue, to provide access to Foothill Reserve and

Code	Issue	Response
152	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. All impact analyses affected by the updated socioeconomic data, including air quality and noise, were updated accordingly and those updates are reflected in the Final Environmental Impact Statement. Determinations relating to the identification of the Preferred Alternative were also confirmed in accounting for the new population, employment, housing, and traffic projections.
153		See responses to specific comments below.
154	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange would have displaced over 100 homes and would have been located near an existing high school. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

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Calabrea. The DEIS should have analyzed the traffic implications of this rerouted traffic on 17th Avenue, Chandler Boulevard, and major intersections along the route, using methodology and data as described in Item c) on Page 16. The need for traffic controls (traffic signals, stop signs, and others) should have been identified in the DEIS.

155

This extension of Chandler Boulevard is identified as a "Newly constructed local street" in Figure 3-33 on Page 3-57 of the DEIS. East of 19th Avenue, Chandler Boulevard is constructed with a five-lane cross-section (two lanes in each direction, plus a two-way left-turn lane in the center. The DEIS should have stated that if the extension of Chandler Boulevard were to be constructed, it should continue the existing five-lane cross-section. This cross section would be necessary in order to accommodate the traffic increases due to the re-routing of Foothill Reserve and Calabrea traffic, as well as other traffic that would use Chandler Boulevard if it were to be constructed. Such other additional traffic would include:

- Traffic to and from the 247 acres of vacant land the City of Phoenix has purchased that lies north of Chandler Boulevard, between 19th and 27th Avenues. In addition to about 100 acres of open space, under consideration for this land would be 40 to 60 acre community park, a library, and other uses that may be identified in the City's future planning and community outreach processes.

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- Traffic to and from the vacant land (bounded by Chandler Boulevard on the north, W. Pecos Road on the south, 19th Avenue on the east, and 27th Avenue on the west) that was rezoned by the City of Phoenix to permit 11 acres of commercial uses, 11 acres of multi- family housing, and 650 to 1,050 single-family residences.

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- Any other traffic increases that would affect Chandler Boulevard.

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Even with the construction of Chandler Boulevard between 19th Avenue and 27th Avenue, residents in Foothill Reserve and Calabrea will incur substantial out-of-direction travel and additional travel time to access the SMF, compared to the present route. To get home, these residents will have to exit the SMF at 17th Avenue, travel north on 17th Avenue to Chandler Boulevard, then southwest on Chandler Boulevard to connect with the street system within the two communities. The DEIS should have quantified the added time and distance of travel and should have considered the construction of a two lane access road between 17th Avenue and 27th Avenue on the north side of the SMF. In addition to facilitating access for the residents of Foothill Reserve and Calabrea, such an access road would help reduce future traffic on 17th Avenue and would help maintain emergency vehicle response times at levels comparable to existing.

Code	Issue	Response
155	**Design**	The Chandler Boulevard extension was developed in close coordination with the City of Phoenix and supports the ultimate lane configuration and planned development in the area.
156	**Design**	Additional local roads would be constructed along with the development of this land (as identified in the City's General Plan).
157	**Design**	Reasonable access would remain to the noted developments. The travel time savings as a product of using the South Mountain Freeway in comparison to use of Pecos Road would likely offset any additional travel time attributable to the change in access. Emergency responders would address the construction of the proposed freeway by amending the local emergency response plan to include the facility.

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158	The SMF will cause similar alterations in local traffic patterns elsewhere along the route, primarily in the Western portion of the SMF. The DEIS should have discussed traffic impacts in the vicinity of all interchanges along the proposed action, with appropriate analysis, similar to that described in Item c), below.
159	b) The DEIS does not indicate what type of interchange would be constructed at the interchanges along W. Pecos Road. Because there would be no access to the Gila River Indian Community (GRIC) on the south side, neither of the two typical interchanges depicted on Page 3-14 of the DEIS, "Diamond Interchange" and "Single Point Urban Interchange," would be applicable. The DEIS should have indicated the type of interchange to be provided, at least conceptually and with a simple graphic.
160	c) The DEIS should have presented recent traffic volume counts for W. Pecos Road (between I-10 and 27th Avenue) and turning movement counts at the existing signalized intersections at 40th Street, 32nd Street, 24th Street, Desert Foothills Parkway, and 17th Avenue. Traffic counts should also have been made at major intersections along the path motorists would use to access Foothill Reserve and Calabrea when the construction of the SMF would cut off the present access via W. Pecos Road/ 27th Avenue. Then it should have discussed the impacts on existing traffic due to the loss of access at 32nd Street and 27th Avenue and how existing traffic patterns would change. Then, 2035 peak hourly traffic volumes at the interchanges should have been presented so that the public could be informed of how present routings would be affected and what the impacts would be in 2035. The impacts on the cross streets are not dependent on the specific design details and can be evaluated based on the traffic volume forecasts from the MAG travel model. Analyses with similar methodology should have been performed at interchanges along the entire route of the SMF.
161	d) The DEIS should have discussed how the Proposed Action would affect emergency vehicle access times for the communities now served by the signalized intersection at Pecos Road/32nd Street and via W. Pecos Road/27th Avenue (Chandler Boulevard). Extending this example, the DEIS should have discussed how emergency vehicle access would be affected at all locations along the proposed action where the arterial street pattern would be altered.
162	e) With the Proposed Action, the eastbound left-turn and westbound right turn direct access to the park-and-ride facility north of W. Pecos Road at 40th Street will be lost, shifting the park-and-ride traffic to the two access points via 40th Street. The southern access driveway is less than 300 ft (center-to-center) north of Pecos Road. The construction of the freeway

Code	Issue	Response
158	**Traffic**	The proposed freeway would include improvements along arterial streets at interchange locations to facilitate the movement of traffic on, off, and across the freeway. The arterial street improvements are included within the right-of-way footprint used for the analysis of impacts.
159	**Traffic**	The third bullet in the third column on page 3-51 of the Draft Environmental Impact Statement states that "The diamond interchange configuration (see sidebar on page 3-14) was used to evaluate service traffic interchange needs." The assumption that there would be no access to the Gila River Indian Community to the south is incorrect. At 40th Street, there is an existing road to the south, and the planned interchange at that location would provide access onto Gila River Indian Community land. Similarly, the interchanges at 24th Street, Desert Foothills Parkway, and 17th Avenue would be constructed to allow for future connections from Gila River Indian Community land. The initial layout would be similar to the interchanges at State Route 202L (Red Mountain Freeway) and Dobson Road. Figure 3-28 indicated whether the interchanges would include full access or half access. In some locations, a single-point urban interchange or other interchange type may be used to address higher traffic volumes. The determination of the interchange type would be made during final design in coordination with the local jurisdiction.
160	**Traffic**	Existing traffic volumes on the City of Phoenix's streets is available at the City's Web site, <phoenix.gov/streets/traffic/volumemap>. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
161	**Traffic**	Emergency responders would address the construction of the proposed freeway by amending the local emergency response plan to include the facility. This would include emergency response on the freeway and alternative routes for diversion of traffic in the event that an incident occurred along the freeway. As concluded in the section, *Social Conditions*, in Chapter 4 of the Draft Environmental Impact Statement, response times for police, fire, and medical emergency services would be faster when compared with response times under the No-Action Alternative. Circulation on major arterial streets would be improved through better distribution of traffic onto the overall transportation network, the provision of alternative routes, and through localized operational improvements such as grade separations and planned interchanges.
162	**Traffic**	In addition to access from 40th Street, access to the park-and-ride lot would be provided off of the westbound on-ramp. This is similar to the park-and-ride operations at Happy Valley Road and Interstate 17. Bus operations and circulation would continue to operate as-is today. Traffic operational characteristics along 40th Street and at the Cottonwood Lane intersection would not be adversely affected by the freeway. The park-and-ride lot has been expanded to its ultimate configuration.

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ramps will shorten the spacing between the junction of the westbound ramp terminal and the southern access driveway for the park-and-ride lot. The impacts to traffic operations along 40th Street, impacts to park-and-ride access, impacts on bus operations, impacts at the intersection of 40th Street/E Cottonwood Lane/bus access to park-and-ride should have been evaluated, both for existing and 2035 traffic volumes. The long-term expansion of the park-and-ride facility should also have been discussed.

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f) The DEIS should have discussed how access would be provided to the existing U-Haul Dealer and storage facility on the south side of Pecos Road, now accessed directly via the signalized intersection at 32nd Street. Since there will be no interchange at 32nd Street with the Proposed Action, this property will become land-locked. It is unclear based on the information in Tables 4-12 and 4-13, (Pages 4-39 and 4-42, respectively in the DEIS, if this facility is being displaced.

g) Construction period impacts are not adequately addressed in the DEIS. Solely from the standpoint of transportation, traffic, and circulation matters, the discussion provided in Section 4 under "Temporary Construction Impacts" and "Materials Sources and Waste Material" on Pages 4-161 through 4-164 in the DEIS is very general. While the estimate of "borrow" material is site-specific, the amount is expressed in millions of cubic yards, and not by some other measurement more easily understood by the public. The discussion of construction impacts should have been expanded to include more site specific information and should have included such items as:

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- the number of truckloads of export or import materials
- haul routes (the route trucks will use to haul away excess dirt or bring in dirt) during the grading of the route
- number of trucks to bring in aggregate, asphalt/concrete, reinforcing steel, and any other construction materials
- duration of construction
- how traffic will be handled on the existing street system when useable segments of the freeway are opened to traffic prior to the completion of the entire freeway
- impacts on traffic on I-10 (both Papago and Maricopa) during the construction period
- detour routes and the traffic impacts of the detours
- other considerations

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h) The Construction Sequencing described in the DEIS (Page 3-59) is not consistent with Figure 8-4, the Plan Phasing - Freeways/Highways in the 2010 Update of the Regional Transportation Plan (RTP) (Exhibit 9). The RTP presents the following phasing schedule:

Code	Issue	Response
163	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange would displace more than 100 homes and would have been located near an existing high school. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The storage facility is located on Gila River Indian Community land and would not be displaced. Reasonable access to the facility would remain available from 32nd Street, Chandler Boulevard, and other east–west local streets. A grade-separated bridge would be constructed for the freeway to go over 32nd Street.
164	**Construction**	Information related to haul routes, number of trucks, traffic routing, and detouring is discussed in general terms because more detailed information is not available. These details depend highly on the construction sequencing and construction methods, which have not been determined at this stage in the process. As noted on page 6-23 of the Draft Environmental Impact Statement, during construction, the Arizona Department of Transportation typically holds information meetings at the beginning of construction activities regarding the upcoming improvements and work schedules. The public can be informed through construction updates/newsletters or many other means. The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would accelerate the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method, breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years, and the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period.
165	**Implementation**	The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would accelerate the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method, breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years, and the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period. As noted in the Draft Environmental Impact Statement on page 3-59, "Construction sequencing and duration could change based on several factors, including funding availability, traffic volumes, coordination with other major freeway projects, earthwork balancing, utility relocation schedules, and regional priorities."

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- In Fiscal Year (FY) 2011-2015 : Segment between I-10 (Papago) and Baseline Road also Segment between 51st Avenue and 19th Avenue
- In FY 2016-2020 : Segment between I-10 (Maricopa) and 19th Avenue
- In FY 2021-2025 : Segment between Baseline Road and 51st Avenue

The phasing sequence in the DEIS, presented without an explanation of the rationale for the change from the RTP, is:

- I-10 (Papago) to Baseline Road and concurrently, I-10 (Maricopa) to approximately 51st Avenue (along Pecos Road and through the South Mountains)
- Baseline Road to 51st Avenue

Despite repeated assertions throughout the DEIS that the Proposed Action is consistent with the RTP, this divergence in phasing between the RTP and the proposed action is not mentioned in the DEIS.

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i) The evaluation of alternatives is deficient because the presentation of the results of the "select link" analysis is misleading. On Page 3-36 of the DEIS , Figure 3-18 presents the contribution of traffic to the select link by geographical areas, some of which are very large. The select link is at a point between the 51st Avenue and 17th Avenue interchanges on the South Mountain Freeway. The text accompanying Figure 3-18 states that:

"A projected 73 percent of the travelers who might use the proposed action would have origins and/or destinations near the proposed action."

This statement is misleading, since it implies that 73% of the traffic using the South Mountain Freeway would have origins in close proximity to the proposed freeway.

A review of a larger scale map in the Traffic Overview Report, which is the source of the information presented in Figure 3-18, indicates that only about 15% of the selected link traffic would have origins or destinations within the Study Area as defined in Figure S-2 of the DEIS. If the definition of "proximity" were to be extended to the area within a 20-mile radius of the select link, the contribution of this entire 20-mile radius area would be about 40 to 50%. To reach the 73% level of contribution, a radius of about 30 miles would be needed.

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j) The evaluation of alternatives is deficient because the cut line analysis presented in the Purpose and Need and in the Evaluation Chapters of the DEIS as well as in the Traffic Overview Report is faulty. The following points support this assertion.

Code	Issue	Response
166	**Implementation**	The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would accelerate the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method, breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years, and the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period. As noted in the Draft Environmental Impact Statement on page 3-59, "Construction sequencing and duration could change based on several factors, including funding availability, traffic volumes, coordination with other major freeway projects, earthwork balancing, utility relocation schedules, and regional priorities."
167	**Traffic**	The quote noted in the comment was changed in the Final Environmental Impact Statement to be consistent with a similar statement made in the caption to Figure 3-18: "Seventy-three percent of travelers anticipated to use the proposed action would be involved in trips beginning or ending in the Study Area itself or in the areas immediately surrounding it." The figure does accurately portray the locations of the cities included in the different areas. The observations in the comment further support that the proposed action would serve regional travel from the southwestern to southeastern portions of the region (not just internal Study Area travel). It should also be noted that by definition, these freeway users would not include traffic from Laveen Village to Interstate 10 (Papago Freeway) or from Ahwatukee Foothills Village to Interstate 10 (Maricopa Freeway). So, the 15 percent of trips identified in the comment as Study Area-originated are by motorists making trips to the other side of the South Mountains.
168		See responses to specific comments below.

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169	Only two of the six cut lines analyzed, (north-south cut lines 1 and 4, in Figure 3-13 in the DEIS) are in the Study Area. The limits of cut lines 2, 3, 5, 6 extend well beyond the boundaries of the Study Area, in each case with a small portion of the cut line in the Study Area. Therefore, the cut lines as designated do not convey a sense of deficiencies and traffic volume increases within the Study Area.
170	It is customary in presenting the results of a cut line analysis to itemize each of the facilities included in each cut line along with the capacity for each facility (existing or as proposed in the RTP as appropriate) and the traffic volume for each facility (existing, No Action, and Proposed Action as appropriate). Such information is not presented in the DEIS or in the Traffic Overview Report. Only aggregate quantities for Freeways and Arterials are presented in the various tables that address cut lines.
171	To make the cut lines relevant to the analysis of the South Mountain Freeway, cut lines other than 1 and 4 should have been revised as described below:
172	• Cut line 2 addresses north south traffic volumes and capacity. Near its western terminus, it should not include a crossing of SR 30, since this facility, when built would carry east-west traffic. Cut line 2 should have been subdivided into two segments, the first segment extending from the western limit (not including SR 30) of the cut line to 43rd Avenue, and the second from 43rd Avenue to a point just West (or South) of I-10 (Maricopa). I-10 should not be included in this cut line, since a segment of I-10 one interchange removed is included in cut line 6. Including the same facility in more than one cut line, especially at points so closely spaced, is an exaggeration of the effect of I-10 and represents double counting.
173	• Cutline 3 should also have been subdivided into two segments, the first segment extending from the western limit of the cut line to 43rd Avenue, and the second from 43rd Avenue to I-10 (Maricopa). • Cut lines 5 and 6 should have been subdivided into two segments, a southern segment south of South Mountain Park Preserve (SMPP) and a northern segment north of SMPP.
170	Facility-by-facility information, as described in the previous paragraph (paragraph "j"), should have been presented for the re-delineated cut lines.
174	k) The evaluation of alternatives is deficient because a potential freeway weaving problem is not identified and addressed. The distance between

Code	Issue	Response
169	**Purpose and Need**	The purpose and need criteria for the proposed action address regional problems, not just problems localized in the Study Area. For this reason, it is appropriate to include cut lines within and in proximity to the Study Area to better understand the distribution of trips in the region.
170	**Traffic**	The itemized list of traffic volumes by facility has been added to the Traffic Overview Report as an appendix.
171	**Traffic**	As indicated in the responses below, the identified cut lines were selected to present specific travel patterns and are appropriate for the analysis of the proposed action.
172	**Traffic**	Cut line 2 is included to evaluate demand across the Salt River. The proposed changes, eliminating the proposed State Route 30 crossing and the Interstate 10 crossing, would discount two major crossings of the Salt River.
173	**Traffic**	The cut lines as presented represent industry standard practice and were developed in conjunction with leaders of traffic analysis practice in Arizona. The proposed changes would not provide any benefits to the analysis or results. Subdividing the cut lines would eliminate their usefulness in evaluating regional traffic, which is their purpose.
174	**Traffic**	The project development process includes detailed analyses of the freeway operational characteristics, including weaving areas along the entire freeway. Basic level of service information is presented in Figure 3-39 on page 3-63 of the Draft Environmental Impact Statement. In the figure, the noted section is shown to experience less than 2 hours of level of service E or F conditions during the morning and evening commuting periods.

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the System Interchange at I-10 (Maricopa) and the signalized intersection at Pecos Road and 40th Street is approximately 3,500 ft. (measured between the signal and the merge point where the Loop 202 mainline and the ramps to and from I-10 come together). When the 40th Street Interchange is constructed, the distance between the ramp merge points will be approximately 2,500 ft. and possibly less. A distance of 2,500 ft between ramp merge and diverge points has the potential of creating a weaving problem on the freeway.

175 This potential problem should have been analyzed and appropriate mitigation proposed, if necessary, and should not have been deferred to the design phase, since the peak hourly traffic volumes are available from MAG, although not reported in the DEIS. Please note that Figure 3-39 in the DEIS indicates congestion at this location, even without a weaving analysis and without specifically considering the effect of bus traffic to/from the 40th Street park-and-ride facility and the effect of potentially high truck traffic volumes on freeway operations.

176 Similar weaving problems may be encountered elsewhere along the freeway.

177 l) The evaluation of alternatives is deficient because no substantive analysis of truck traffic is presented. As a sidebar on Page 3-64, the DEIS presents a good description of the nature of the trucking industry, goods movement in general, and the location of employment areas with heavy truck traffic, along with an illustration of the designated CanaMex route. Also in the sidebar, some general statistics about typical percentages (of trucks as a percent of total traffic) are provided. It is stated that the truck percentage on I-10 "near" the Proposed Action is 8%. Other than the information in the sidebar not much other truck-related statistics are provided. The sidebar also states that providing a truck by-pass is not a Purpose and Need for the SMF. This statement is contradicted by the statement on Page 3-24 of the DEIS, that presents as one of the criteria in the 5th tier screening for selecting a route for the freeway:

> ➢ reduction of truck and commuter traffic on 51st Avenue and Beltline Highway

178 Thus the SMF, if constructed would act, at least, as a by-pass for trucks that now use 51st Avenue.

Figure 4.10 in the "MAG Internal Truck Travel Survey and Truck Model Development Study" is attached as Exhibit 10. The figure indicates that more than 1,000 heavy trucks a day use the route via Riggs Road and Beltline Road to access 51st Avenue.

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175	**Traffic**	To mitigate this issue, the on-ramp from Interstate 10 would be extended beyond the 40th Street exit ramp to allow traffic to merge onto the State Route 202L main line.
176	**Traffic**	The preliminary design of the action alternatives is at a sufficient detail to ensure constructibility and operational feasibility. The analyses to support the environmental impact statement process included weaving considerations in the operational performance of the action alternatives.
177	**Traffic**	The comment incorrectly attributes the quoted text to the purpose and need for the proposed action when it is identified as being criteria that the Gila River Indian Community Governor requested to be addressed by an alignment on Gila River Indian Community land. The "reduction of truck and commuter traffic on 51st Avenue and the Beltline Highway" is consistent with a project goal as disclosed in the Draft Environmental Impact Statement of promoting better distribution of traffic onto the overall transportation network; better distribution does not equate to a "bypass".
178	**Traffic**	It is reasonable to conclude trucks using 51st Avenue are doing so currently to bypass downtown Phoenix. In other words, the bypass of Interstate 10 through downtown Phoenix is already occurring on streets not intended for such use. The proposed freeway would not introduce another bypass route but would better distribute regional and local traffic on the regional network.

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179	The ADOT traffic counts indicate that about 2,000 to 2,500 heavy trucks use SR 85 daily between I-8 and I-10. If the SMF is constructed, some through truck traffic would likely prefer to use the SMF for personal reasons and/or because the SMF route would be slightly shorter in miles than the route via I-8 and SR 85. Also the SMF route would avoid the congestion along I-10 through the urban core of the Phoenix Metropolitan Area.
180	The ADOT traffic counts indicate that about 2,400 heavy trucks are on I-10 (Maricopa) just south of SR 202 (Loop 202 Santan) and also north of SR 202. These trucks presumably have origins and destinations within the Phoenix Metropolitan Area. Depending on the location of the origins and destinations within the Metro Area, some of these heavy trucks would use the SMF to avoid traveling on the congested portions of I-10 in the urban core. The Final Report of the "MAG External Truck Travel Model Development" presents in Table 4-8 estimates of external-to-external (E-E) truck trips. These would be truck trips that travel through the area with no need to stop. No categorization of the size of trucks is provided. All trucks, except for small delivery vehicles, pickups, and vans, are included in the numbers. The table indicates that daily truck traffic on I-10 (between a point south of the junction of I-8 and a point west of SR 85) is approximately 6,200 in both directions combined. Since these are long trips, the majority of these trucks would be heavy trucks. Since there are about 2,000 to 2,500 heavy trucks on SR 85, it appears that 3,500 to 4,000 heavy trucks use I-10 to go through the Metropolitan Area or have an origin or destination within the Metro Area. Table 6-4 in the same report indicates that E-E trips between a point south of the junction of I-8 and a point west of SR 85 would grow at an annual rate of 3.7%. Undoubtedly some of this E-E heavy truck traffic would also use the SMF.
181	In addition the "MAG and PAG External Travel Study" and other MAG reports present information about truck movements, truck origins and destinations, both internally and outside the Metropolitan Area. Despite the availability of a substantial amount of data and a state-of-the-art modeling tool (TransCad) the DEIS does not address the impacts of heavy trucks using the SMF.
182	Also not addressed in the DEIS is the potential of the SMF to become an unintended by pass route, for all vehicles including heavy trucks, via Loop 202 (Santan) and Loop 202 (SMF) between US 60 and I-10 (Papago).
183	In summary, the SMF would become an attractive route for heavy trucks for travel to/from the Phoenix Metropolitan Area as well as for heavy

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179	**Trucks**	It is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85. That the proposed freeway would avoid congestion along Interstate 10 would not seem material to trucks currently using the Interstate 8/State Route 85 bypass.
180	**Purpose and Need**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicles using the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed freeway, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85 (see page 3-64 of the Final Environmental Impact Statement).
181	**Trucks**	Among the factors considered in this study were 1) the amount of truck traffic that would be generated if an action alternative were to become the Selected Alternative and 2) that traffic's potential impact on the surrounding community. The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Air quality and noise modeling for the Draft and Final Environmental Impact Statements used this forecast truck traffic (see Final Environmental Impact Statement pages 4-68 and 4-100, respectively).
182	**Traffic**	Location #2 in Figure 3-12, on page 3-29 of the Draft Environmental Impact Statement, indicates that traffic along State Route 202L (Santan Freeway) just east of Interstate 10 would experience substantially higher traffic volumes with the proposed freeway when compared with conditions without the proposed freeway. This is an intended outcome for the region's freeway system. The project team does not anticipate that "all vehicles" would use State Route 202L; a large volume of traffic would continue to use U.S. Route 60 and Interstate 10 (see Figure 3-12).
183	**Trucks**	Among the factors considered in this study were 1) the amount of truck traffic that would be generated if an action alternative were to become the Selected Alternative and 2) that traffic's potential impact on the surrounding community.

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trucks traveling through the Metro Area. The DEIS is deficient in not addressing truck traffic impacts and formulating and evaluating appropriate alternatives to deal with truck traffic, even though ADOT states in the DEIS that heavy trucks will use the SMF and even though a wealth of information is available about freight movements. The DEIS fails to take advantage of this wealth of information to provide an estimate of the number of trucks that can be expected on the SMF. Indications are that heavy trucks will use the SMF to a much greater extent than other freeways in the Metropolitan Area, with the possible exception of I-10. Also, as pointed out earlier, the Purpose and Need is faulty and has led to the elimination of several alternatives that might have been carried forward for further study if the truck traffic issue had been recognized at the outset.

184

m) **Sufficient information is not presented in the DEIS.** Numerous tables and figures carry the notation "Source: MAG, Year, Extrapolated Analysis." The actual source of the data should have been provided and the data provided by MAG should have been included in the Appendix. The Traffic Overview Report, which is the basis of much of Chapter 3 (Alternatives) in the DEIS, does not offer anything further in this matter. Without more backup information, it is not possible to ascertain what constitutes "extrapolation," and whether the extrapolation reflects the full extent and significance of the information available.

185

In Chapter 3 (Alternatives) of the DEIS, traffic volume, capacity, and other information is provided in spotty manner and does not offer the opportunity to ascertain if the information provided for selected locations is reasonable and if it fits in with the overall picture. For example, in Figure 3-38, daily traffic volumes are presented for the length of South Mountain Freeway between I-10 (Maricopa) and I-10 (Papago). However, traffic volumes are not presented for Loop 202 (Santan) and I-10 north, south, east, or west, of the junction (s) of I-10. Therefore routing changes attributable to the Proposed Action cannot be identified.

186

n) **The selection of the preliminarily selected alternative for the Western Section should have been based on a side-by-side comparative evaluation of the three action alternatives plus the No Action Alternative.** In the DEIS, the No Action Alternative is not included in the evaluation that leads to the selection of the preliminarily preferred alternative. In Figure 3-41, Page 3-67 of the DEIS, a comparison of the three action alternatives is presented. On the basis of this evaluation, the W71 Alternative is eliminated, even though it is unclear why it is substantially, if at all, inferior to the W59 Alternative and the W101 Alternative Options. The comparative information presented is:

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183 (cont.)		The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Air quality and noise modeling for the Draft and Final Environmental Impact Statements used this forecast truck traffic (see Final Environmental Impact Statement pages 4-68 and 4-100, respectively). Commercial trucks would use the proposed action. As with all other freeways in the Maricopa Association of Governments region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. And as with travel on all other freeways in the Maricopa Association of Governments region, the primary users of the proposed action would be automobiles. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicles using the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed freeway, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85 (see page 3-64 of the Final Environmental Impact Statement).
184	**Traffic**	The sidebar, "*How are MAG data used in the DEIS?*," on page 1-4 of the Draft Environmental Impact Statement explains the citation notations. In general, the source of the traffic data is the Maricopa Association of Governments regional travel demand model, and analyses were performed using Maricopa Association of Governments data as inputs.
185	**Traffic**	The desired information is available in Figure 3-12, on page 3-29 of the Draft Environmental Impact Statement. This figure presents traffic volumes with and without the proposed freeway at locations similar to those noted in the comment.
186	**Alternatives**	The section, *Identification of a Preferred Alternative*, beginning on page 3-65 of the Draft Environmental Impact Statement, provides the logical process that was used by decision makers to identify the Preferred Alternatives. A summary of key elements of each action alternative is provided in Figure 3-41.

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- The W71 Alternative would require no Bureau of Land Management (BLM) land reclassification, whereas the W59 Alternative would.
- The W71 Alternative would displace 22 businesses, compared to 41 for the W59 Alternative and 14 to 30 for the W101 Alternative Options.
- The W71 Alternative would result in an annual tax revenue loss of $6.3 million in the City of Phoenix, but no revenue loss in Tolleson and Avondale. By comparison, the W59 Alternative would have a tax revenue loss of $5.1 million in Phoenix and none in Tolleson and Avondale. The W101 Alternative Options would have a tax revenue loss of $7.0 million to $8.0 million for all three cities combined.
- The W71 Alternative would have a total project cost (right-of-way plus construction cost) of $1.54 billion, compared to $1.23 billion for the W59 Alternative and $1.72 to $1.87 billion for the W101 Alternative Options.
- The W71 Alternative would displace 825 residential properties, compared to 733 for the W59 Alternative and 926 to 1304 (single family) for the W101 Alternative Options.
- The W71 Alternative would affect 4 high priority hazardous sites, compared to 5 for the W59 Alternative and 1 for the W101 Alternative Options.
- During the period December 2003 to April 2006, six Cities and Towns passed resolutions in support of the W59 Alternative and opposing the W101 Alternative, with the City of Tolleson passing two separate resolutions. Since the DEIS gives no indication to the contrary, it is assumed that none of these seven to nine year old resolutions opposed the W71 Alternative.

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In summary, based on the information presented in Figure 3-41, the W71 Alternative would rank, at worst, in the middle of the three alternatives evaluated, and it should not have been eliminated from further consideration. This improper elimination of the W71 Alternative led to a final stage evaluation of the W101 and W59 Alternatives, once again without the inclusion of the No Action Alternative in this final stage of evaluation and with an entirely different set of evaluation criteria.

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The comparative evaluation of the W101 and W59 Alternatives is described on Pages 3-68 and 3-69 of the DEIS. Notwithstanding the fact that the No Action Alternative was not included in this final evaluation stage and not withstanding the fact that an entirely new set of evaluation criteria was introduced, there are some flaws in the comparison of the two Alternatives as discussed below. While the discussion is focused on travel modeling, traffic, circulation, and transportation and traffic engineering/planning, readily apparent flaws in other subjects are also pointed out. This should not be construed as a complete review of matters pertaining to other subjects.

Code	Issue	Response
186 (cont.)		As stated on page 3-40 of the Final Environmental Impact Statement, the No-Action Alternative would not satisfy the purpose and need of the proposed action because it would result in further difficulty in gaining access to adjacent land uses, increased difficulty in gaining access to Interstate and regional freeway systems from the local arterial street network, increased levels of congestion-related impacts, continued degradation in performance of regional freeway-dependent transit services, increased trip times, and higher user costs. Further, the No-Action Alternative would be inconsistent with Maricopa Association of Governments' and local jurisdictions' long-range planning and policies. The No-Action Alternative was included in the Draft and Final Environmental Impact Statements for detailed study to compare impacts of the action alternatives with the consequences of doing nothing (impacts can result from choosing to do nothing).
187	**Alternatives**	The information on page 3-41 of the Draft Environmental Impact Statement provides the elements that were used by decision makers to determine that the W71 Alternative would not be the Preferred Alternative. The Arizona Department of Transportation, in coordination with the Federal Highway Administration, determined that the W59 and W101 Alternatives would provide more benefits than would the W71 Alternative. The W71 Alternative was not "eliminated" because it is still a viable action alternative; it was just not the Preferred Alternative.
188	**Alternatives**	The information on page 3-41 of the Draft Environmental Impact Statement provides the elements that were used by decision makers to determine that the W71 Alternative would not be the Preferred Alternative. The Arizona Department of Transportation, in coordination with the Federal Highway Administration, determined that the W59 and W101 Alternatives would provide more benefits than would the W71 Alternative. The W71 Alternative was not "eliminated" because it is still a viable action alternative; it was just not the Preferred Alternative. The No-Action Alternative is included for detailed study in accordance with National Environmental Policy Act requirements to compare beneficial and adverse impacts of the action alternatives with those benefits and consequences (adverse impacts) of not proceeding with one of the action alternatives.

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Under the heading "Overall Transportation Needs" on Page 3-68:

189 • In reference to the first bullet item – Linking the southern areas of the region with the central metropolitan area was not identified as a goal in the Purpose and Need, so this should not be a basis for evaluation. Both Alternatives would provide an alternative route to I-10 for regional connectivity, as asserted elsewhere in the DEIS, so this cannot be used as a distinguishing factor. Also, based on this bullet item, the proposed action will merely change how traffic accesses I-10, not keep traffic out of the central metropolitan area. Ultimately, traffic will use the congested facilities in the central metropolitan area.

190 • In reference to the third bullet item – The statement is true and would be a point favoring the W101 Alternative.

191 • In reference to the fourth and fifth bullet items – These bullet items state that for the W101 Alternative widening improvements would be needed on Loop 101 and that for the W59 Alternative widening improvements would be needed on I-10. What the comparison fails to mention is that in addition to the widening of I-10, the W59 Alternative will necessitate the construction of a new freeway-to-freeway interchange, modifications of the existing interchanges at 51st Avenue, 59th Avenue, and 67th Avenue, as well as the construction of service roads between 51st and 67th Avenues. Likewise, in addition to widening improvements on Loop 101, a partial or full reconstruction of the interchange at I-10/Loop 101, relocation of ramps at McDowell Road and Thomas Road as well as modification of existing interchanges at 99th Avenue and 91st Avenue would be necessary. There is no indication as to the relative ease or difficulty of constructing the widening improvements and associated interchange modifications on I-10 and Loop 101. It is unclear how these two bullet items are used to select one alternative over the other.

Under the Heading "Consistency with Regional and Long-range Planning Goals" on Page 3-69:

192 In reference to the first bullet item – If less land is converted to freeway use, obviously more land would potentially be available for development. The rationale for the statement: ".....thereby optimizing opportunities for planned development" is unclear and should have been explained.

Under the Heading "Environmental and Societal Impacts" on Page 3-69:

193 In reference to the first bullet item – Per Figure 3-41, Page 3-67 of the DEIS, the W101 Alternative Options would displace 926 to 1,304 single-

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189	**Alternatives**	The comparative analysis was not confined to evaluating purpose and need criteria for the proposed action. It had already been determined that the W59 and W101 Alternatives met those purpose and need criteria. Otherwise, they would not have advanced to this stage of the alternatives development and screening process. The primary observation is that the W59 Alternative would provide a more direct route to the central metropolitan area as compared with the W101 Alternative. This is an accurate observation and a point favoring the W59 Alternative.
190		Comment noted.
191	**Alternatives**	The bullets are provided to offset the impacts of each. Neither provides a substantial improvement over the other with respect to improvements associated with the connections at Interstate 10 (Papago Freeway).
192	**Alternatives**	Further explanation has been provided on page 3-69 of the Final Environmental Impact Statement.
193		Comment noted.
194	**Alternatives**	The breakdown by type of displacement is presented in the section, *Displacements and Relocations*, on page 4-39 in the Draft Environmental Impact Statement. See Table 4-12. The 733 residential displacements for the W59 Alternative include 680 multifamily units.

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family residential properties, and the W59 Alternative would displace 733 residential properties. For the W59 Alternative, the mix of multi-family and single-family residential properties is not stated, making it impossible to compare the number of housing units that would be displaced. Following is a direct quote from the "Title VI and Environmental Justice Report", Page 4-3.

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194 *In addition to the single-family displacements, the W59 Alternative would result in the potential displacement of two apartment complexes having a total of 680 units. These apartments fall within a census block where greater than 50 percent of the population is minority. The majority of the apartment units are "market-rate" rents; however, one of the apartment complexes currently accepts Section 8housing vouchers. (Of the 264 units in the complex, 16 currently use Section 8 vouchers.*

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195 Taking into consideration the 680 multi-family units, the W59 Alternative would result in the displacement 1411 housing units, which would be more than any of the W101 Alternative options.

Under the heading "Operational Differences" on Page 3-69:

196 In reference to the first bullet item – Based on the information in Figure 3-40 on Page 3-66 of the DEIS, the statement in this bullet item is true. The DEIS fails to point out that Figure 3-40 also indicates, however, that operating conditions would be virtually identical for the two alternatives east of 59th Avenue, closer to the central metropolitan area.

197 In reference to the second bullet item - The statement is true and would be a point favoring the W101 Alternative.

198 In reference to the third bullet item – It is unclear what travel movements and how many motorists would benefit from this "direct access to downtown Phoenix." Regardless of which and how many motorists would benefit from this "direct access," travel would continue to be under congested conditions on I-10 east of 59th Avenue.

199 In reference to the fourth bullet item - The statement is true and would be a point favoring the W101 Alternative, although the number of motorists that would benefit from this "better access" is not presented.

200 In reference to the fifth bullet item – Since the location of SR 30 (called SR 801 in the RTP) and the timetable for its construction are unknown, this bullet item is speculative.

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195	**Acquisitions and Relocations**	The 680 multifamily units have already been counted in the total for the W59 Alternative. See Table 4-12, on page 4-39.
196	**Traffic**	Agree.
197	**Alternative**	Comment noted. The identification by the Arizona Department of Transportation, with concurrence from the Federal Highway Administration, of the W59/E1 Alternative as the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area) sought to balance agency responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities and environmental conditions.
198		Comment noted.
199		Comment noted.
200	**Alternatives**	Projects in the *Regional Transportation Plan* historically have been funded and constructed. Therefore, the project is reasonably foreseeable.

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200	In reference to the sixth bullet item – Since the location of SR 30 (called SR 801 in the RTP) and the timetable for its construction are unknown, this bullet item is, in part, speculative.
	Under the heading "Estimated Costs" on Page 3-69:
201	Planning level cost estimates presented in Figure 3-36 and accompanying text on Page 3-59 of the DEIS do not indicate that an allowance for contingencies was included in the cost estimates. A contingency allowance of about 30 to 40 percent of the construction cost (excluding right-of-way) is typically included in the cost estimate at this level of project development. It is also noted in the DEIS that right-of-way costs will depend on growth in the region, and the actual right-of-way costs may differ from the estimates. Because of these unknowns, the actual difference in cost between the two alternatives may be lower or higher than the $490 million to $640 million range cited in this bullet item.
202	In summary, the comparative evaluation in the DEIS does not support the selection of the W59 Alternative as the Preliminary Preferred Alternative because: • The No Action Alternative was not included in the final comparative evaluation. • The W71 Alternative was unjustifiable eliminated. • Uniform comparative evaluation criteria were not used. • There were data and rationale flaws in the comparative evaluation process. • Viable alternatives to the proposed eastern portion of the project, discussed previously, would affect the selection of alternatives for the western alignment. The DEIS should have had a discussion of this matter in the comparative evaluation of the western alignments.
203	9. **None of the Action Alternatives will alleviate the anticipated capacity deficiencies identified in the Purpose and Need. Despite the expenditure of about $2 billion to $3 billion to build the South Mountain Freeway and despite the displacement of many residences and business establishments, there will be capacity deficiencies at levels comparable to the No Action Alternative on freeways and arterials throughout the Metropolitan Area and on the South Mountain Freeway itself.** While the levels of congestion may be slightly less, Level of Service E and F conditions will prevail at approximately the same levels and durations in 2035 with or without an Action Alternative. In all graphics that present congestion levels throughout the DEIS, no distinction is made between Level of Service (LOS) E and LOS F. Therefore it is impossible to ascertain if an improvement from LOS F to LOS E is achieved or a degradation from LOS E to LOS F.
204	Most, if not all, jurisdictions differentiate between LOS E and LOS F in their analyses. The reason is that, as stated on Page 1-14 of the DEIS, LOS E
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Code	Issue	Response
201	**Alternatives**	The cost estimates for all of the action alternatives include contingencies for construction and right-of-way. The same assumptions were made for each alternative. The estimates are identified as planning-level cost estimates and consideration of such estimates is appropriated in the environmental impact statement process.
202	**Alternatives**	The Draft Environmental Impact Statement presents the information that was used by the Arizona Department of Transportation, with concurrence from the Federal Highway Administration, to identify the W59 and E1 Alternatives as the Preferred Alternatives. The No-Action Alternative is included for detailed study in accordance with National Environmental Policy Act requirements to compare beneficial and adverse impacts of the action alternatives with those benefits and consequences (adverse impacts) of not proceeding with one of the action alternatives. (Impacts can occur through choosing to do nothing.) The No-Action Alternative would not satisfy the purpose and need of the proposed action (see Draft Environmental Impact Statement page 3-40) and was, therefore, not identified as the Preferred Alternative. The W71 Alternative was not eliminated; it was determined to be the least desirable of the three action alternatives in the Western Section (reasons are noted previously). There is no restriction on what ultimately become the determining factors among alternatives. The Draft Environmental Impact Statement presents those factors that were actually used by the Arizona Department of Transportation and Federal Highway Administration to identify the Preferred Alternative. The alternatives development and screening process was sound, and the information used was disclosed in the Draft Environmental Impact Statement. None of the other Eastern Section alternatives identified in the Draft Environmental Impact Statement or new alternatives proposed in the comment would change the alternatives development and screening process; they were all eliminated from detailed study.
203	**Traffic**	The comparison of traffic operational characteristics between the action alternatives and the No-Action Alternative is presented in the Draft Environmental Impact Statement, beginning on page 3-27 of the Draft Environmental Impact Statement. The analysis shows that the action alternatives would: · reduce overall traffic on the arterial street system (see Figures 3-12 and 3-13) · optimize travel on the region's freeway system (see Figure 3-12) · reduce the capacity deficiency to levels better than experienced today (see Figures 1-12 and 3-14) · reduce the duration of level of service E or F conditions in key areas of the region's freeway system (see Figure 3-15) · improve travel times on trips within the Study Area and across the region (see Figure 3-17 and Table 3-8) · provide improved regional mobility for areas projected to experience growth in the next 25 years (see Figures 1-7 and 3-18) When all of this is considered in the realm of travel time savings for motorists in the region, the user benefits approximate $200 million per year (see Table 4-26).

(Response 204 begins on the next page)

Code	Comment Document
204	represents unstable traffic flow with traffic volume approaching capacity or at capacity. LOS F, on the other hand, represents congested and stop-and-go conditions, with traffic volumes over capacity. Yet in the Traffic Overview LOS E is defined as a condition where the volume to capacity ratio (V/C ratio) is greater than 0.86 (Table 10, Page 2-8) (Exhibit 11). In other words, the DEIS asserts that congestion prevails when the traffic volume reaches 86% of capacity, contrary to the statement on Page 1-14 of the DEIS. Most jurisdictions (including the California Department of Transportation, Caltrans) define the upper limit of LOS D to be a V/C ratio of 0.89. V/C ratios in the range of 0.91 to 1.00 represent LOS E, and 1.01 and above represent LOS F.
205	Furthermore, as indicated in Exhibit 11, the DEIS uses a freeway capacity value of 2,030 vehicles per hour per lane (v/ph/pl), whereas the Highway Capacity Manual (a publication by the Transportation Research Board that is widely used by many jurisdictions for capacity calculations, including ADOT) cites a service volume of 2,250 passenger cars per hour per lane (pc/ph/pl) at LOS E. The reason for this difference is not explained.
206	Also no explanation is provided as to how the duration of congestion is determined. The DEIS should have provided a good explanation of how duration of congestion is determined for planning purposes on the basis of the V/C ratio, especially in the analysis in this DEIS, where no distinction is made between LOS E and LOS F.
207	Figure 3-14 on Page 3-31 of the DEIS states that the Proposed Freeway will accommodate 6% of the regional travel demand, but that 5% of the travel demand will remain unmet. The same illustration indicates that arterial system enhancements would accommodate 5% of the regional travel demand. Figure 9-3 in the MAG RTP (Exhibit 12) presents the planned arterial improvements. Only one arterial improvement, an easterly extension of SR 801, is shown within the Study Area even though the Summary and Purpose and Need Chapters stress that there will be large amounts of growth in the southwestern portion of the Metropolitan Area. Additional arterial improvements in the study area along with arterial system enhancements throughout the modeling area may be able to accommodate the remaining unmet travel demand. The addition of the freeway segment included in the hybrid alternative illustrated in Exhibit 8 would also help reduce the unmet travel demand. As a side note, it is not explained in Figure 3-14 why it was necessary to use "data extrapolated from the 41st Street cut line." MAG's TransCad model is capable of summarizing travel time, vehicle hours of travel, vehicle miles of travel by any geographic area, by facility type, by Level of service, and other selected filters. The use of "extrapolated data" appears to be unwarranted.
208	Figures 3-15 and 3-16 (Pages 3-32 and 3-33 in the DEIS) present changes in congestion with the No Action compared to the Proposed Action conditions. The differences are very subtle. Without the distinction between segments operating

Code	Issue	Response
204	**Traffic**	Because much of the region's freeway system is congested, merely noting the level of service of a segment of freeway would not provide adequate information. Therefore, the project team provided the duration of congested conditions and defined congested conditions as being level of service E or F. The Arizona Department of Transportation typically uses level of service D as a threshold for acceptable conditions, so anything in excess of that was determined to be labeled as congested. The thresholds used in the analysis were determined in coordination with the Maricopa Association of Governments and based on observed traffic conditions in the Phoenix metropolitan area.
205	**Traffic**	Capacity levels used in the Draft Environmental Impact Statement were based on the thresholds used in the Maricopa Association of Governments regional travel demand model. The Maricopa Association of Governments model is calibrated to reflect conditions on Phoenix metropolitan freeways.
206	**Traffic**	The thresholds used to calculate duration of level of service E or F are provided in the Traffic Overview Report in Table 10. This level of detail is appropriate for the technical report.
207	**Traffic**	The *Regional Transportation Plan* is not the primary source of funding for expansion of the arterial street system. Funding for arterial streets generally comes from the local jurisdiction or through impact fees for development. It is anticipated that the arterial street network within the Study Area will be expanded in this same manner. The Maricopa Association of Governments regional travel demand model includes assumptions related to arterial street expansion based on local jurisdiction general planning. In the case of the Study Area, it is assumed that most of the arterial street network would be built out by 2035. Chapter 1, *Purpose and Need*, concludes that even with these improvements in place, there is a clear need for a major transportation facility in the Study Area. The analysis of capacity deficiency (unmet demand) in the region is presented in Figures 1-12 and 3-24. The analysis shows that the unmet demand in 2010 is 19 percent; in 2035, without the proposed freeway, the unmet demand increases to 24 percent; in 2035, with the proposed freeway, the unmet demand would be only 18 percent. The cut-line analysis (see Figure 3-13) shows that with the proposed freeway there would be a substantial shift in regional travel from arterial streets to freeways. The 41st Street cut line was used as a way to focus the analysis on the east–west movement that would be influenced by the proposed freeway. The noted information from the Maricopa Association of Governments travel demand model was used in other analyses.
208	**Traffic**	Because much of the region's freeway system is congested, merely noting the level of service of a segment of freeway would not provide adequate information. Therefore, the project team provided the duration of congested conditions and defined congested conditions as being level of service E or F. The Arizona Department of Transportation typically uses level of service D as a threshold for acceptable conditions, so anything in excess of that was determined to be labeled as congested. The thresholds used in the analysis were determined in coordination with Maricopa Association of Governments and based on observed traffic conditions in the Phoenix metropolitan area. The thresholds used to calculate the duration of level of service E or F are provided in the Traffic Overview Report in Table 10.

Code	Comment Document

at LOS E and LOS F and without an explanation of how the duration of congestion is determined, the information presented is not very useful for a thorough evaluation by the public and for decision-making.

209 **10. Appropriate mitigation measures are not proposed to mitigate the impacts of the Action Alternatives.** Assuming for discussion purposes only, that the Preliminarily Preferred Action Alternative is implemented, appropriate mitigation measures should have been addressed in the DEIS. Some appropriate mitigation measures would include:

210
- Placement of truck weight limits on the SMF
- Upgrading the Route via I-10/I-8/SR 85/I-10 to full freeway standards and obtaining Congressional approval for the designation of this route as the CanaMex Route
- Development of an east-west truck route to by-pass the Phoenix Metropolitan Area
- Formulation and inclusion in the RTP of a plan for arterials in the Southwest area to help guide development patterns so that desirable options are not precluded
- Restricting the transporting of hazardous materials on the SMF
- Others

211 **11. Based on these traffic and circulation considerations, none of the Action Alternatives should have been selected as the Preferred Alternative for the following reasons.**

212 a. It is understood that the Preliminarily Preferred Alternative would add capacity to the Regional Freeway System. On the other hand, the added capacity would have nominal effect on alleviating congestion in the central metropolitan area, where the need is greatest. This raises the question if the proposed SMF is the correct tool to deal with congestion in the central metropolitan area.

213 b. The Preferred Alternative is not consistent with the RTP because the phasing of construction presented in the DEIS differs from the phasing plan in the RTP.

214 c. There are many deficiencies in the DEIS, including:

215
- use of faulty socio-economic data;
- faulty forecasts of vehicular travel resulting from the use of faulty socio-economic data as input to the travel model;

Code	Issue	Response
209		See response to specific comments below.
210	**Trucks**	As it relates to truck weight limits and transport of hazardous materials, Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; truck traffic would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement). Improvements to State Route 85 are included in the *Regional Transportation Plan*, and the plan is to continue to improve this corridor until it is completely access-controlled with a freeway section north of the Gila River. The *Regional Transportation Plan* is not the primary source of funding for expansion of the arterial street system. Funding for arterial streets generally comes from the local jurisdiction or through impact fees for development. It is anticipated that the arterial street network within the Study Area will be expanded in this same manner. The Maricopa Association of Governments regional travel demand model includes assumptions related to arterial street expansion based on local jurisdiction general planning. In the case of the Study Area, it is assumed that most of the arterial street network would be built out by 2035. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel.
211		See responses to specific comments below.
212	**Alternatives**	The comment infers the transportation problem is congestion in the central metropolitan area. As presented in Chapter 1 of the Draft and Final Environmental Impact Statements, the purpose and need analysis demonstrated a transportation problem associated with east-west regional mobility in the southwestern region of the Phoenix metropolitan area. The Arizona Department of Transportation, with concurrence from the Federal Highway Administration, has determined that the South Mountain Freeway (as made up by the W59 and E1 Alternatives) is the appropriate solution to the described transportation problem. A contribution of the Preferred Alternative to alleviate congestion in the central metropolitan area would be an incidental benefit of the project and would support a goal of better distribution of regional traffic across the network.
213	**Implementation**	Construction phasing of a project is not an indicator of "consistency." The location and facility type are indicators of consistency. Nowhere in the Draft Environmental Impact Statement is it referenced that the proposed action is needed to comply with the *Regional Transportation Plan*.
214		Comment noted.

(Responses continue on next page)

Code	Comment Document

- unreliable Air Quality and Noise impact analyses, since they are based on faulty travel forecasts;
- failure to analyze viable alternatives with appropriate detail;
- deficiencies in the evaluation process and methodology;
- failure to analyze crucial potential impacts, such as truck traffic, impacts on arterials connecting to and near proposed interchanges, and others identified in this report.

216 These deficiencies in the DEIS render the DEIS useless as a decision-making tool. The selection of a Preliminarily Preferred Alternative on the basis of a faulty DEIS is inappropriate.

217 Because of these considerations and because it avoids any physical impacts on the environment, the No Action Alternative should have been selected as the Preferred Alternative.

Code	Issue	Response
215	**Traffic**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. The new projections were also used to update the air and noise analyses for the Final Environmental Impact Statement (see sections beginning on pages 4-68 and 4-88, respectively). All of the alternatives were subject to a thorough evaluation using a multidisciplinary set of criteria in accordance with National Environmental Policy Act and Federal Highway Administration guidance. Among the factors considered in this study were 1) the amount of truck traffic that would be generated if an action alternative were to become the Selected Alternative and 2) that traffic's potential impact on the surrounding community. The right-of-way footprints for the action alternatives include the necessary widening of arterial streets connecting to the proposed freeway. Additional traffic-related impacts have been coordinated with the appropriate local jurisdictions.

(Responses continue on next page)

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	EXHIBITS

Code	Issue	Response
216	**Alternatives**	All analyses presented in the Draft Environmental Impact Statement used state-of-the-practice, scientific community accepted methods, data and assumptions and were updated as appropriate as new data and/or regulatory requirements were disclosed. Updating analyses throughout an environmental impact statement process is common and expected. The Final Environmental Impact Statement reflects those updates. The Arizona Department of Transportation and Federal Highway Administration, in cooperation with the U.S. Army Corps of Engineers, the U.S. Bureau of Indian Affairs, and the Western Area Power Administration, prepared the Draft and Final Environmental Impact Statements and Section 4(f) Evaluation in accordance with the National Environmental Policy Act of 1969 [42 United States Code § 4332(2)(c)], Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 United States Code § 303, as amended), and Section 404 of the Clean Water Act of 1977 (33 United States Code § 1251). All of these agencies are experienced in the review of National Environmental Policy Act documents and have found the logical sequence of decision making to be sound and in line with National Environmental Policy Act requirements. The Draft Environmental Impact Statement and Section 4(f) Evaluation 1) satisfies Federal Highway Administration and Arizona Department of Transportation's environmental analysis requirements; 2) provides a comparison of the social, economic, and environmental impacts that may result from implementation of the proposed action—construction and operation of a major transportation facility; and 3) identifies measures to avoid, reduce, or otherwise mitigate adverse impacts.
217	**Alternatives**	The No-Action Alternative would not avoid all physical impacts on the environment. In contrast, the No-Action Alternative would result in: · further difficulty in gaining access to adjacent land uses · increased difficulty in gaining access to Interstate and regional freeway systems from the local arterial street network · increased levels of congestion-related impacts such as deterioration of air quality · continued degradation in performance of regional freeway-dependent transit services · increased trip times and higher user costs For these reasons, the Arizona Department of Transportation, with concurrence from the Federal Highway Administration, did not select the No-Action Alternative, instead identifying the W59 and E1 Alternatives as the Preferred Alternatives.

Code	Comment Document

218

TABLE 20-4
ROADWAY PERFORMANCE MEASURES FROM MAG MODEL
(Maricopa County Portion of MAG Modeling Area)*

	Scenario		
Measures	2008 Base	2030 RTP	2030 No Build
Population**	4,236,286	6,381,4254	6,381,426
Supply Measures			
Lane-Miles			
Freeways	1,920	2,565	1,914
Arterials	10,270	19,596	18,166
Capacity Miles			
Freeways	53,210,043	79,389,209	53,048,469
Arterials	79,486,623	157,610,234	146,796,437
Demand Measures			
Daily Vehicle-Miles (VMT)			
Freeways	33,721,948	58,423,300	43,355,601
Arterials	46,296,429	81,316,235	92,823,216
Level of Service Measures			
Congested Lane-Miles			
Freeways	433	825	966
Arterials	1,236	2,277	3,994
% Congested Lane-Miles			
Freeways	22.6	28.8	50.5
Arterials	12.0	11.6	22.0
Daily Congested VMT			
Freeways	11,777,622	22,588,646	27,677,484
Arterials	10,095,551	19,153,038	33,478,230
% Daily Congested VMT			
Freeways	34.9	38.7	63.8
Arterials	21.8	23.6	36.1
Total Vehicle Hours of Delay			
Hours of Delay	686,069	1,436,565	2,115,615
Hrs of Delay per 1000 VMT	8.50	10.2	15.5

* Results are derived from Base Year 2008, 2030 RTP and 2030 No Build MAG model runs - August 2009
* The No-build is based on the 2008 Base Year Freeway and the Planned Arterial networks
** Resident population in households + resident population in group quarters (excluding institutional facilities, military and correctional facilities) + Transient population + Seasonal Population

doubles. The total vehicle hours of delay experiences an increase of 109 percent between the 2008 Base Year and the 2030 RTP, but dramatically increases by more than two hundred percent under the No Build scenario. Clearly, the freeway capacity added in the RTP helps significantly to mitigate the effects of a growing population. For arterials, the percentage of congested lane miles for the RTP increases by approximately three percent compared to the

EXHIBIT 1

Code	Issue	Response
218		Exhibits reviewed.

Code	Comment Document

Summary of Travel Trends

The trends data indicate that the *per capita* growth in travel that the U.S. experienced over the last four decades may be slowing. Statistically, of the ten major travel indicators shown in Table 3, in 2009 seven estimates were lower than the same estimate in 2001 estimates and the remainder are statistically the same (within the confidence interval).

Importantly, all of the travel estimates related to households are slightly lower in 2009 than 2001--including person and vehicle trips and the average daily person and vehicle miles generated by U.S. households. The longstanding decline in household size continued between 2001 and 2009. In addition, the average number of vehicle trips and vehicle miles of travel per driver are significantly lower than the 2001 estimate. The data shows both average person trip length and average vehicle trip length to be about the same as in 2001 (that is, within the confidence interval).

Table 3. Summary of Travel Statistics
1969, 1977, 1983, 1990, and 1995 NPTS, and 2001 and 2009 NHTS.

	1969	1977	1983	1990	1995	2001	2009	95% CI
Per Person								
Daily Person Trips	2.02	2.92	2.89	3.76	4.30	3.74	3.79	0.03
Daily PMT	19.51	25.95	25.05	34.91	38.67	36.89	36.13	1.35
Per Driver								
Daily Vehicle Trips	2.32	2.34	2.36	3.26	3.57	3.35	3.02	0.03
Daily VMT	20.64	19.49	18.68	28.49	32.14	32.73	28.97	0.71
Per Household								
Daily Person Trips	6.36	7.69	7.20	8.94	10.49	9.66	9.50	0.09
Daily PMT	61.55	68.27	62.47	83.06	94.41	95.24	90.42	3.38
Daily Vehicle Trips	3.83	3.95	4.07	5.69	6.36	5.95	5.66	0.06
Daily VMT	34.01	32.97	32.16	49.76	57.25	58.05	54.38	1.34
Per Trip								
Average person trip length (miles)	9.67	8.87	8.68	9.47	9.13	10.04	9.75	0.36
Average vehicle trip length (miles)	8.89	8.34	7.90	8.85	9.06	9.87	9.72	0.22

Notes:

- Average trip length is calculated using only those records with trip mileage information present.
- 1990 person and vehicle trips were adjusted to account for survey collection method changes (see 2001 Summary of Travel Trends Appendix 2).
- PMT is Person Miles of Travel. VMT is Vehicle Miles of Travel. CI is Confidence Interval. NPTS is Nationwide Personal Transportation Survey.

EXHIBIT 2

Code	Issue	Response

Code	Comment Document

Summary of Travel Trends

Figure 5. Average Time Spent In Vehicles and Miles Traveled 2001 and 2009 NHTS.

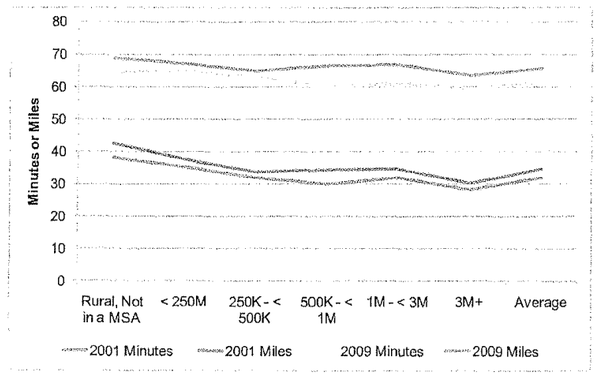

EXHIBIT 3

Code	Issue	Response

Code	Comment Document

7.1 Variation in Trip Rate-Weekday Versus Weekend

Table 7-9 indicates the variation in vehicle trip rate by day of week. The average household trip rate was highest on Saturdays. The average auto occupancy was also highest on Saturdays. However, the average vehicle trip rate was highest on a weekday (Tuesday). Weekday vehicle trip rate on any given day was higher than vehicle trip rate for Saturday or Sunday. Freeway traffic counts for the Valley indicate more volumes during weekdays than during weekends.

Vehicle Trip Rate by Day of Week			
Travel Day	Average Household Trip Rate by Day of Week	Average Occupancy by Day of Week	Average Vehicle Trip Rate by Day of Week
Sunday	9.26	2.49	3.72
Monday	9.05	1.98	4.57
Tuesday	11.04	1.52	7.26
Wednesday	11.09	1.83	6.06
Thursday	8.52	2.11	4.04
Friday	10.89	2.04	5.34
Saturday	13.67	3.44	3.97

Table 7-9 Variation in Vehicle Trip Rate by Day of Week

EXHIBIT 4

Code	Issue	Response

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Locations Table

1. All home locations were geo-coded.
2. About ninety-five percent of work and school locations were geo-coded.

Trips Table

1. Based upon weighted data, Auto continues to be a dominant mode of transportation. Walk trips constitute 9 percent of overall trips (but not all of these trips are modeled), while bike trips constituted about 1 percent of overall trips. The transit share of trips is slightly above 1 percent.
2. Overall auto occupancy is higher in 2008-2009 NHTS than when compared to 2001 MAG household travel survey. NHTS captured a much higher rate of HOV travel than the MAG 2001 household travel survey.
3. Work trips constitute a lower percentage of overall trips in 2008-2009 than when compared to 2001 MAG household travel survey.
4. Average trip length between home and work has increased between 2001 MAG household travel survey and 2008-2009 National Household Travel Survey dataset for MAG. The average (reported) trip length increased to 12.92 miles (weighted data for weekday) in 2008 NHTS from 10.6 miles (estimated) in 2001 survey.
5. The average daily household trip rate (weighted) in 2008 travel survey (10.50) is higher than the corresponding value in 2001 household travel survey (7.38).
6. The average vehicle occupancy (weighted) was higher during the weekends (3.44 on Saturday and 2.49 on Sunday) than during weekdays (1.88).
7. The average person trip rate was highest during a weekend and the average auto occupancy was highest during a weekend. However, the average vehicle trip rate was the highest during the weekday.

10.2 Conclusions

Data from the NHTS Add-on surveys have been successfully used for travel demand models estimation and calibration. Data quality was either comparable to or exceeded that of similar surveys and was suitable for its intended applications. The data set contains necessary details and is easy to work with. Data imputation was required (example, for school locations) and warrants consideration of innovative GPS-based approaches.

The performed analysis demonstrated general applicability of the survey data for analytical purposes as well as for the purposes of models estimation, calibration and validation. A few issues with the survey data were identified and analyzed. The survey had a relatively small sample of transit users, thus its applicability for some of transit modeling tasks is questionable.

Segments like low-income households and Hispanic households were under-sampled. Targeted effort to reach these population groups will be required in future regional travel surveys. Pilot studies could be recommended prior to the original survey, concentrating on these household segments. For the 2008 NHTS, there is no record of any pilot study in the literature provided to MAG.

The NHTS survey tour/trip production rates were found to be comparable to other surveys. Overall 2008 Add-on NHTS survey data proved to be a valuable dataset suitable for advanced transportation modeling, planning and analytical work. Emerging GPS-based methodologies should be carefully considered for future survey efforts in order to support advanced transportation models and analyses.

EXHIBIT 5

Code	Issue	Response

Code	Comment Document

The average reported trip duration was 20 minutes. As shown in Table T-17, 70% of all trips were 20 minutes or shorter. Trips by Transit tended to be the longest, while those by walk and bike were the shortest. Tables T-18 through T-22 show the reported trip durations by mode for the standard trip purposes.

Table T-17
Reported Trip Durations

Trip Duration	N	All Trips	Auto-Driver	Auto-Pass	Transit	Walk	Bike	Other
5 min or less	12588	21.5%	19.9%	23.2%	4.5%	39.4%	21.0%	5.5%
6 to 10 minutes	12101	20.9%	20.5%	23.0%	6.7%	21.6%	21.3%	10.2%
11 to 15 min	11465	19.7%	19.2%	20.9%	10.1%	19.0%	21.0%	20.4%
16 to 20 min	5703	9.8%	9.9%	9.4%	8.1%	7.3%	6.3%	15.0%
21 to 25 min	2856	4.8%	5.3%	4.1%	4.7%	2.4%	2.9%	8.2%
26 to 30 min	7320	12.4%	13.4%	10.5%	12.6%	7.2%	14.4%	20.7%
31 to 35 min	1136	1.9%	2.2%	1.4%	4.9%	.5%	1.9%	3.6%
36 to 40 min	907	1.5%	1.7%	1.0%	5.5%	.5%	1.4%	2.8%
41 to 45 min	1466	2.5%	2.9%	1.7%	8.7%	.7%	.8%	4.5%
46 to 50 min	406	.7%	.7%	.4%	5.3%	.2%	1.4%	1.9%
51 to 55 min	196	.3%	.3%	.2%	2.8%	.0%	.6%	.7%
56 to 60 min	1096	1.9%	2.0%	1.7%	9.3%	.4%	4.3%	1.7%
61 to 65 min	92	.2%	.1%	.1%	2.0%	.1%	.5%	.5%
66 to 70 min	115	.2%	.2%	.2%	1.4%	.0%	.3%	.4%
71 to 75 min	163	.3%	.3%	.2%	3.0%	.1%	.5%	.5%
76 to 80 min	56	.1%	.1%	.1%	.6%	-	.2%	.2%
81 to 85 min	35	.1%	.1%	.0%	.2%	.0%	-	.1%
86 min +	772	1.3%	1.0%	1.7%	9.5%	.6%	1.2%	3.3%
Total	58473	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Average		20.48	21.02	19.15	42.92	13.32	19.56	29.51

Base: All trips, weighted.

Table T-18
Reported Trip Durations by Trip Purpose

Trip Duration	N	All Trips	Home-based Work	Home-based Shop	Home-based Other	Non-Home Based
5 min or less	12588	21.5%	6.3%	28.4%	23.9%	25.6%
6 to 10 minutes	12101	20.9%	9.7%	29.5%	22.5%	21.9%
11 to 15 min	11465	19.7%	17.2%	20.0%	20.9%	18.9%
16 to 20 min	5703	9.8%	11.4%	9.4%	9.2%	9.7%
21 to 25 min	2856	4.8%	6.1%	2.8%	4.6%	5.4%
26 to 30 min	7320	12.4%	27.6%	5.4%	10.6%	7.9%
31 to 35 min	1136	1.9%	3.2%	.6%	1.6%	2.3%
36 to 40 min	907	1.5%	2.8%	.8%	1.2%	1.6%
41 to 45 min	1466	2.5%	5.8%	.9%	1.8%	2.1%
46 to 50 min	406	.7%	1.4%	.4%	.5%	.7%
51 to 55 min	196	.3%	.6%	.2%	.3%	.4%
56 to 60 min	1096	1.9%	5.0%	.7%	1.2%	1.3%
61 to 65 min	92	.2%	.3%	.1%	.1%	.1%
66 to 70 min	115	.2%	.3%	.2%	.2%	.2%
71 to 75 min	163	.3%	.6%	.3%	.2%	.2%
76 to 80 min	56	.1%	.1%	-	.1%	.1%
81 to 85 min	35	.1%	.1%	-	.1%	.1%
86 min +	772	1.3%	1.6%	.5%	1.2%	1.6%
Total	58473	100.0%	6.3%	28.4%	23.9%	25.6%
Average		20.48	32.73	13.74	18.41	18.02

Base: All trips, weighted.

EXHIBIT 6 p.1

Code	Issue	Response

Code	Comment Document

Table T-19
Reported Trip Durations by Trip Purpose for Home-based Work Trips

Trip Duration	N	All Trips	Auto-Driver	Auto-Pass	Transit	Walk	Bike	Other
5 min or less	674	6.3%	5.9%	4.3%	-	36.5%	10.4%	6.3%
6 to 10 minutes	1040	9.7%	9.7%	7.9%	4.9%	20.3%	12.5%	12.5%
11 to 15 min	1835	17.2%	17.3%	17.0%	4.9%	17.8%	22.2%	18.8%
16 to 20 min	1218	11.4%	11.9%	9.3%	4.9%	8.1%	4.2%	9.4%
21 to 25 min	648	6.1%	6.5%	3.9%	1.4%	2.0%	5.6%	-
26 to 30 min	2951	27.6%	27.5%	33.5%	17.6%	10.2%	18.8%	31.3%
31 to 35 min	347	3.2%	3.5%	2.0%	3.5%	1.0%	1.4%	-
36 to 40 min	299	2.8%	2.8%	2.3%	6.3%	1.0%	2.8%	-
41 to 45 min	616	5.8%	5.8%	6.2%	9.9%	.5%	1.4%	3.1%
46 to 50 min	151	1.4%	1.4%	1.4%	3.5%	.5%	1.4%	-
51 to 55 min	61	.6%	.5%	.7%	3.5%	-	2.8%	-
56 to 60 min	531	5.0%	4.6%	7.7%	11.3%	-	7.6%	-
61 to 65 min	32	.3%	.2%	.3%	4.9%	-	2.1%	-
66 to 70 min	33	.3%	.3%	.1%	2.8%	-	.7%	-
71 to 75 min	59	.6%	.5%	.5%	4.2%	-	2.1%	3.1%
76 to 80 min	16	.1%	.1%	.1%	1.4%	-	.7%	-
81 to 85 min	9	.1%	.1%	.1%	.7%	-	-	-
86 min +	173	1.6%	1.2%	2.6%	14.1%	2.0%	3.5%	15.6%
Total	10692	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Average		32.73	32.05	36.85	52.04	22.01	28.72	76.95

Base: All home-based work trips, weighted.

Table T-20
Reported Trip Durations by Trip Purpose for Home-based Shop Trips

Trip Duration	N	All Trips	Auto-Driver	Auto-Pass	Transit	Walk	Bike	Other
5 min or less	1586	28.4%	30.4%	24.7%	3.9%	25.9%	29.1%	15.4%
6 to 10 minutes	1648	29.5%	30.6%	28.9%	9.8%	21.5%	21.8%	17.9%
11 to 15 min	1121	20.1%	19.9%	20.6%	7.8%	18.5%	27.3%	28.2%
16 to 20 min	525	9.4%	8.5%	10.9%	9.8%	13.2%	7.3%	20.5%
21 to 25 min	155	2.8%	2.7%	3.0%	5.9%	1.5%	1.8%	5.1%
26 to 30 min	303	5.4%	4.3%	6.5%	15.7%	16.1%	1.8%	7.7%
31 to 35 min	32	.6%	.6%	.1%	5.9%	.5%	1.8%	2.6%
36 to 40 min	42	.8%	.5%	1.2%	5.9%	1.0%	-	-
41 to 45 min	53	.9%	.9%	1.1%	3.9%	-	1.8%	-
46 to 50 min	25	.4%	.2%	.7%	2.0%	.5%	5.5%	-
51 to 55 min	8	.1%	.1%	.1%	3.9%	-	-	-
56 to 60 min	38	.7%	.5%	.8%	11.8%	.5%	1.8%	2.6%
61 to 65 min	3	.1%	.1%	-	-	-	-	-
66 to 70 min	11	.2%	.1%	.3%	2.0%	-	-	-
71 to 75 min	14	.3%	.1%	.3%	5.9%	.5%	-	-
76 to 80 min	-	-	-	-	-	-	-	-
81 to 85 min	-	-	-	-	-	-	-	-
86 min +	26	.5%	.3%	.6%	5.9%	.5%	-	-
Total	5590	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Average		13.74	12.75	14.94	40.40	16.08	14.53	16.82

Base: All home-based shop trips, weighted.

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Code	Issue	Response

Code	Comment Document

Table T-21
Reported Trip Durations by Trip Purpose for Home-based Other Trips

Trip Duration	N	All Trips	Auto-Driver	Auto-Pass	Transit	Walk	Bike	Other
5 min or less	6535	23.9%	24.0%	25.0%	3.2%	32.5%	22.8%	4.6%
6 to 10 minutes	6170	22.5%	23.4%	23.9%	3.2%	22.8%	25.5%	9.7%
11 to 15 min	5717	20.9%	20.3%	21.8%	9.6%	22.3%	20.2%	19.9%
16 to 20 min	2519	9.2%	8.8%	8.8%	7.0%	8.2%	6.6%	16.3%
21 to 25 min	1261	4.6%	4.9%	4.2%	4.5%	2.9%	1.9%	7.6%
26 to 30 min	2901	10.6%	10.2%	9.2%	14.0%	8.4%	14.9%	23.0%
31 to 35 min	425	1.6%	1.6%	1.3%	7.6%	.4%	1.9%	4.0%
36 to 40 min	332	1.2%	1.3%	.9%	7.6%	.4%	.8%	3.2%
41 to 45 min	483	1.8%	2.0%	1.1%	6.4%	.8%	.5%	4.4%
46 to 50 min	128	.5%	.4%	.2%	5.7%	.1%	1.1%	2.1%
51 to 55 min	75	.3%	.3%	.2%	3.2%	.1%	-	.6%
56 to 60 min	330	1.2%	1.2%	1.1%	7.6%	.4%	3.7%	1.9%
61 to 65 min	35	.1%	.1%	.1%	1.3%	.0%	-	.6%
66 to 70 min	44	.2%	.1%	.2%	.6%	-	-	.4%
71 to 75 min	66	.2%	.3%	.1%	3.8%	.1%	-	.4%
76 to 80 min	20	.1%	.1%	.0%	.6%	-	-	.2%
81 to 85 min	16	.1%	.1%	.1%		.0%	-	.1%
86 min +	333	1.2%	1.0%	1.5%	14.0%	.5%	.3%	1.3%
Total	27390	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Average		18.41	18.42	17.88	48.81	13.36	17.00	26.88

Base: All home-based other trips, weighted.

Table T-22
Reported Trip Durations by Trip Purpose for Non-Home Based Trips

Trip Duration	N	All Trips	Auto-Driver	Auto-Pass	Transit	Walk	Bike	Other
5 min or less	3793	25.6%	23.1%	24.6%	10.3%	63.0%	28.2%	8.7%
6 to 10 minutes	3241	21.9%	22.4%	23.1%	10.3%	18.5%	18.3%	11.9%
11 to 15 min	2791	18.9%	19.3%	20.2%	16.0%	9.9%	16.9%	22.7%
16 to 20 min	1439	9.7%	10.2%	10.3%	11.5%	3.5%	7.0%	8.1%
21 to 25 min	792	5.4%	5.8%	4.3%	7.7%	1.2%	5.6%	12.5%
26 to 30 min	1164	7.9%	8.6%	7.5%	6.4%	1.0%	11.3%	9.3%
31 to 35 min	332	2.2%	2.5%	2.0%	3.2%	.6%	2.8%	2.4%
36 to 40 min	233	1.6%	1.9%	1.0%	2.6%	.4%	2.8%	1.2%
41 to 45 min	314	2.1%	2.2%	1.7%	11.5%	.6%	1.4%	5.4%
46 to 50 min	100	.7%	.7%	.5%	7.7%	.2%	-	.9%
51 to 55 min	52	.4%	.4%	.2%	1.3%	-	-	1.2%
56 to 60 min	195	1.3%	1.2%	1.6%	8.3%	.3%	1.4%	.9%
61 to 65 min	21	.1%	.1%	.1%	.6%	.2%	-	-
66 to 70 min	28	.2%	.2%	.1%	.6%	-	1.4%	.9%
71 to 75 min	24	.2%	.1%	.2%	-	-	-	.9%
76 to 80 min	21	.1%	.1%	.3%	.6%	-	-	.3%
81 to 85 min	10	.1%	.1%	.0%	-	-	-	.3%
86 min +	239	1.6%	1.2%	2.2%	1.3%	.6%	2.8%	12.5%
Total	14789	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Average		18.02	17.75	18.20	29.34	10.92	18.70	40.13

Base: All non-home-based trips, weighted.

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Code	Issue	Response

Code	Comment Document

Figure 7-10 shows the frequency distribution of all trips by trip duration. About 65 percent of all reported trips have duration of at the most 15 minutes. Similarly, *Figure 7-11* shows the frequency distribution of all trips by trip length. About 42 percent of all reported trips have a trip length of at the most 3 miles. From the NHTS data, the average reported trip length for HBW trip (all days) was about 12.61 miles.

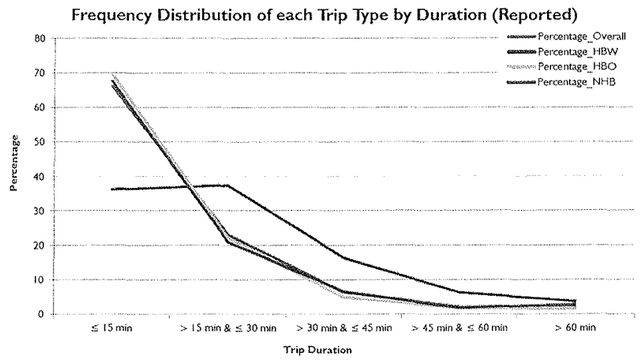


Figure 7-10 Frequency Distribution of Trip Duration by Purpose

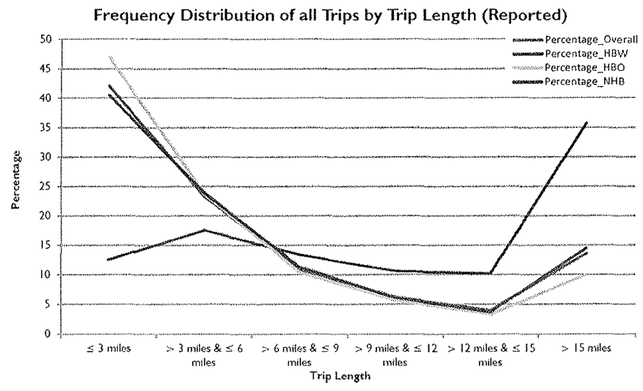


Figure 7-11 Frequency Distribution of Trip Length by Purpose

EXHIBIT 7

Code	Issue	Response

Code	Comment Document

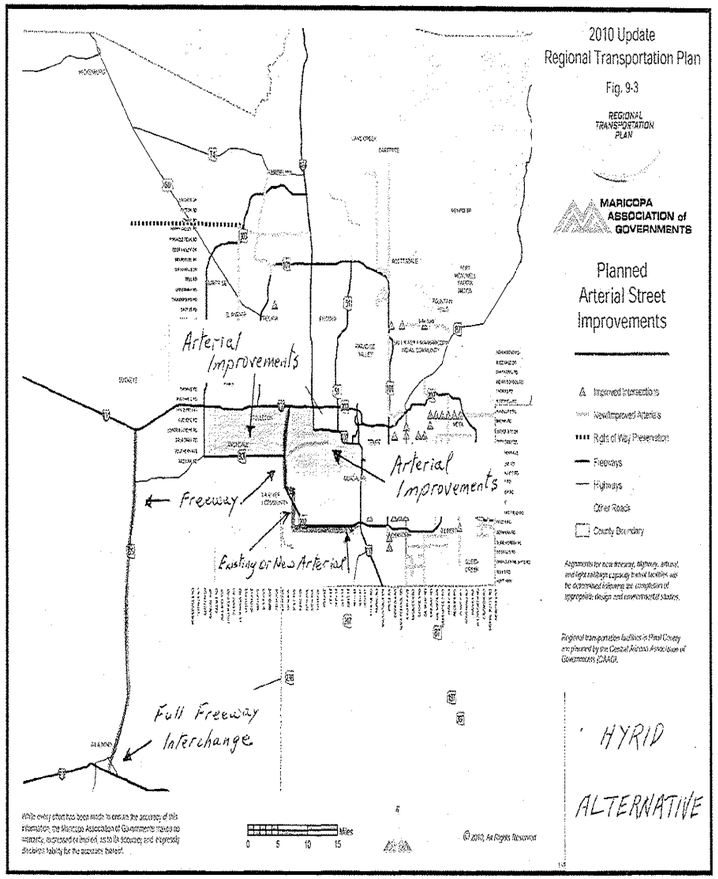


EXHIBIT 8

Code	Issue	Response

Code	Comment Document

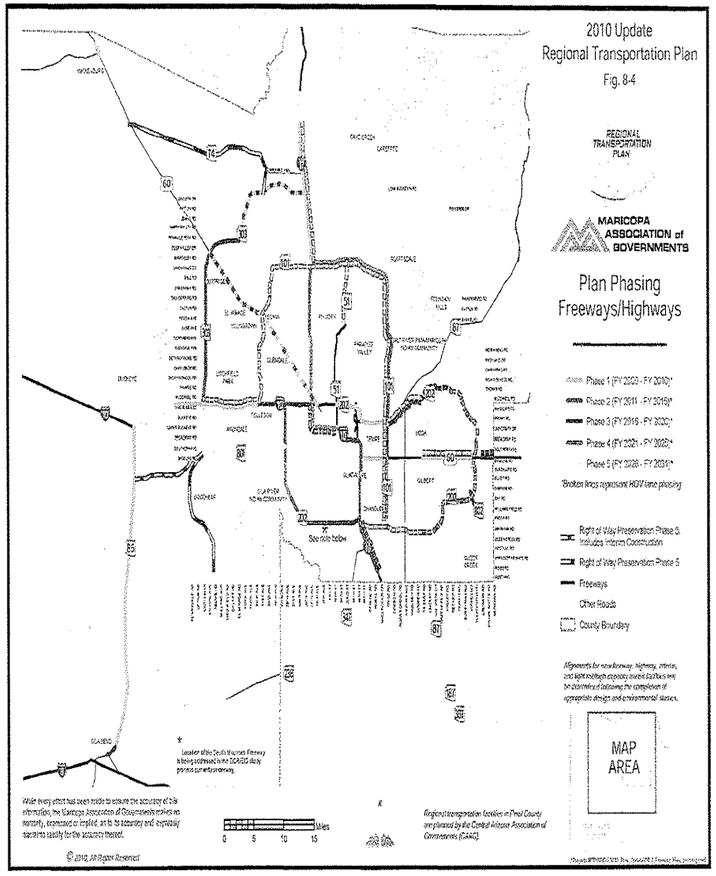


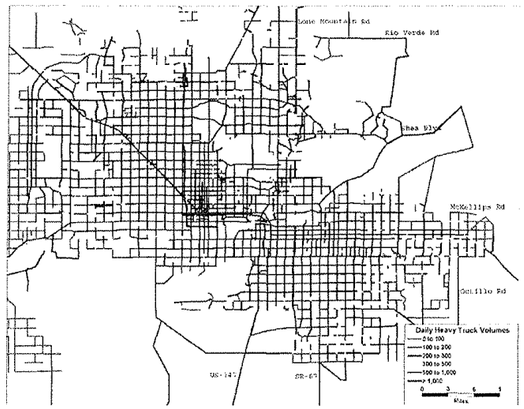
EXHIBIT 9

Code	Issue	Response

Code	Comment Document

MAG Internal Truck Travel Survey and Truck Model Development Study

Figure 4.10 Daily Heavy-Truck Volumes – Phoenix Area



4-26 *Cambridge Systematics, Inc.*

EXHIBIT 10

Code	Issue	Response

Code	Comment Document

Table 9. Average Daily Traffic Volumes on Arterial Streets (without the Proposed Action), 2010 and 2035

Segment		Vehicles Per Day		
		2010	2035	Change (%)
Buckeye Road	35th Avenue to 27th Avenue	34,475	34,928	1.3
	51st Avenue to 43rd Avenue	34,654	34,141	–1.5
	83rd Avenue to 75th Avenue	28,002	33,625	20.1
Baseline Road	19th Avenue to 7th Avenue	26,168	46,575	78.0
	24th Street to 32nd Street	43,815	58,482	33.5
	40th Street to 48th Street	59,984	66,748	11.3
Chandler Boulevard	24th Street to 32nd Street	21,589	29,289	35.7
	40th Street to 48th Street	25,303	32,086	26.8
	48th Street to I-10	42,300	58,464	38.2
Pecos Road	32nd Street to 40th Street	21,211	18,955	–10.6
	Desert Foothills Parkway to 24th Street	10,759	9,634	–10.5
	17th Avenue to Desert Foothills Parkway	3,708	7,440	100.6

Source: Maricopa Association of Governments, 2010a, extrapolated analysis
Note: The 2035 road network includes all of the improvements from the RTP except the proposed action.

Operational Performance of Freeways in the MAG Region

The previous section concluded that traffic volumes would increase between 2010 and 2035 because of increases in capacity (additional lanes) and demand (additional VMT). This section presents the analytical results addressing how these changes in traffic volumes would affect system efficiency in terms of level of service (LOS). The analysis focuses on the region's freeway system and presents the duration of LOS E or F (congested conditions) as modeled by the MAG regional travel demand model. The duration of LOS E or F conditions is determined by comparing the ratio of the projected traffic volume to the capacity (2,030 vehicles per hour per lane) of the freeway segment as presented in Table 10. Figures 3 and 4 present the morning (AM) peak travel period results for 2010 and 2035, respectively. Figures 5 and 6 present the evening (PM) peak travel period results for 2010 and 2035, respectively.

Table 10. Duration LOS E or F as Volume-to-Capacity Ratio

Volume-to-Capacity Ratio	Duration LOS E or F
≤ 0.86	no congestion
> 0.86 to 1.01	less than 2 hours
> 1.01 to 1.06	from 2 to 3 hours
> 1.06	greater than 3 hours

Source: Maricopa Association of Governments, 2010a, extrapolated analysis

EXHIBIT 11

Code	Issue	Response

Code	Comment Document

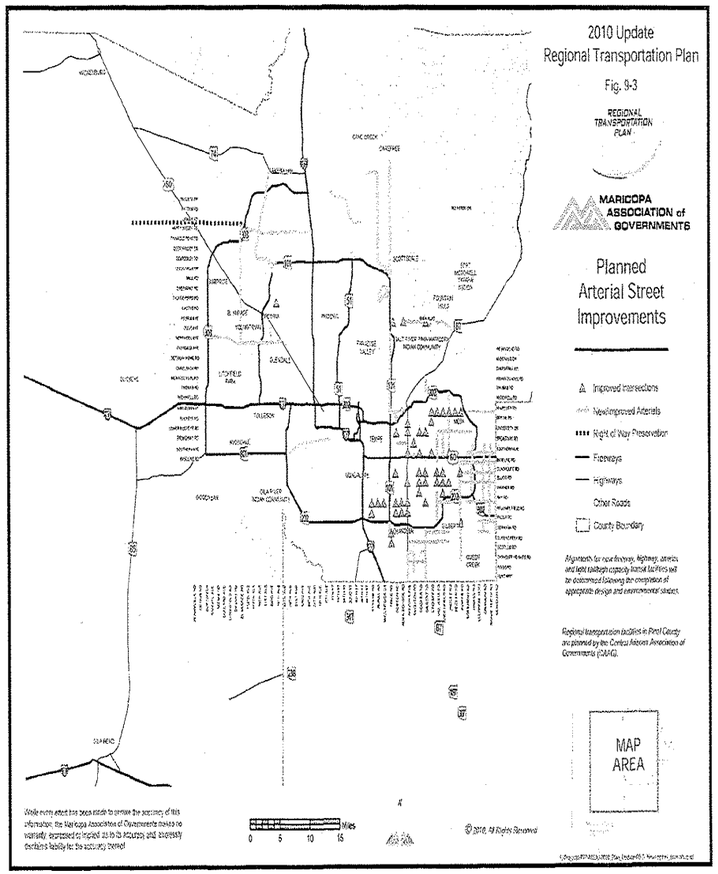


EXHIBIT 12

Code	Issue	Response

Code	Comment Document

REPORTS

Five

SWCA Comments on ADOT
South Mountain DEIS (April 2013)

Code	Issue	Response

Code	Comment Document

SWCA Comments on ADOT South Mountain Freeway Draft EIS (April 2013) Prepared for PARC et al.

ADEQUACY OF THE NEPA ANALYSIS

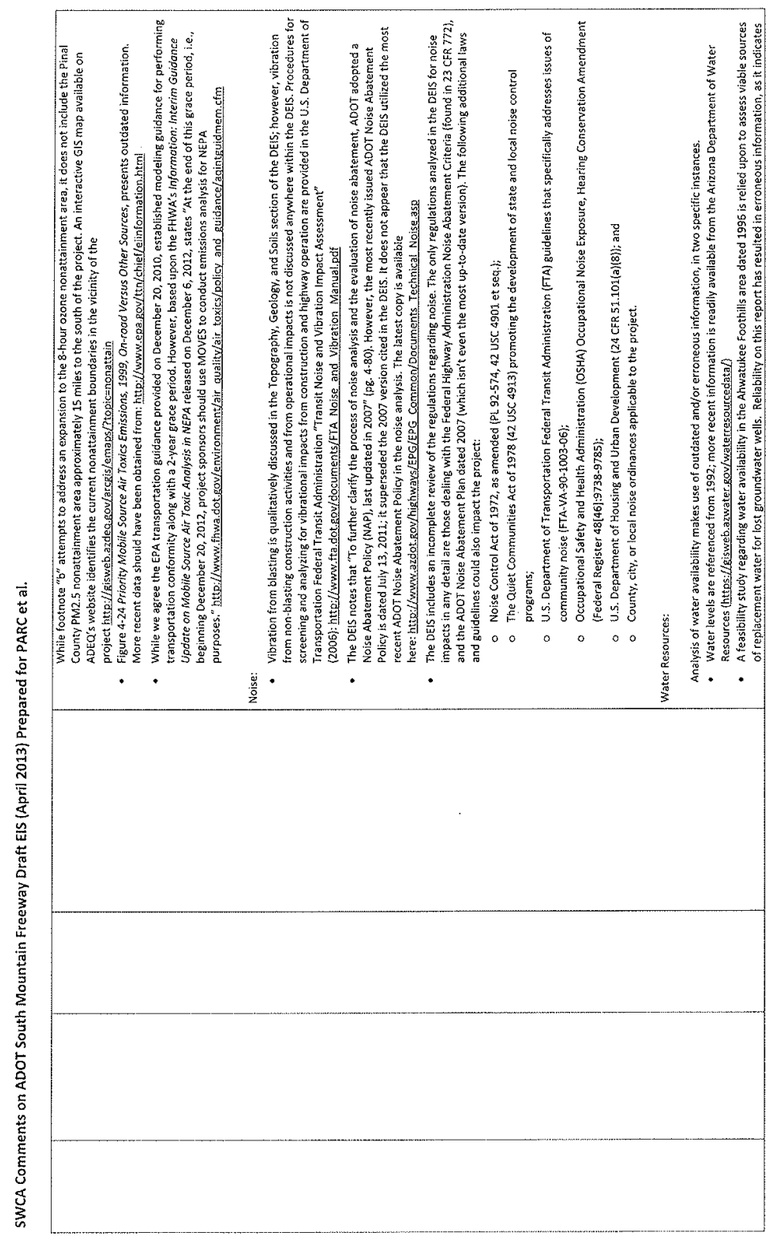
	Chapter	Section/Subsection	Page(s)	Resource Area	Comment
219	1	All	1-22	General NEPA – Purpose and Need	Chapter 1 of the DEIS, *Purpose and Need*, presents a lengthy and elaborate explanation of the need for the proposed freeway ("as recognized in over 25 years of transportation planning") based on Phoenix area growth rates from 1950 to the present day coupled with MAG growth projections to 2035. However, even if one accepts these future growth projections as reasonably accurate and that the "need" is real, there is nothing in the stated "purpose" to demonstrate why the proposed freeway remedy must be built within the selected Study Area and nowhere else. In short, other reasonable alternatives exist that could also fulfill the stated Purpose and Need, but these have been arbitrarily excluded from detailed analysis in violation of 40 CFR 1502.14. (Also see question/answer 2a of "Forty Most Asked Questions Concerning CEQ's NEPA Regulations": "In determining the scope of alternatives to be considered, the emphasis is on what is 'reasonable' rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.")
220	1	All	1-22	General NEPA – Study Area	NEPA requires that the EIS "Rigorously explore and objectively evaluate all reasonable alternatives [emphasis added]," including those "not within the jurisdiction of the lead agency" (40 CFR 1502.14(a) and (c)). In reviewing the April 2013 South Mountain Freeway (Loop 202) Draft Environmental Impact Statement and Section 4(f) Evaluation, we find no technical or scientific rationale or justification presented as to why the project Study Area comprises the precise area it does. Why is it declared to fall along these particular boundaries and not others? The impression is that these boundaries were drawn for political and procedural reasons to comport with MAG's and ADOT's previous planning efforts, rather than to allow a comprehensive, objective NEPA assessment. Specifically, this Study Area appears configured so as to exclude freeway alternatives further south or west (including potential alternatives in Pinal or Pima Counties), thus deliberately avoiding evaluation of other "reasonable alternatives" to the Pecos Road alignment.
221				General NEPA – Omitted, Outdated, and Inaccurate Information Used as Basis for Impact Analysis and Public Comment	Standard practice in preparing NEPA documents, per CEQ regulations at 40 CFR 1502.24 ("Methodology and Scientific Accuracy"), is to use, and to present to the public, the "best available" scientific and technical information. Moreover, in accordance with Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554; H.R. 5658), the federal Office of Management and Budget (OMB) issued Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, which state they are "designed to help agencies ensure and maximize the quality, utility, objectivity and integrity of the information that they disseminate (meaning to share with, or give access to, the public)" and, furthermore, that "It is crucial that information Federal agencies disseminate meets these guidelines." (OMB 2002) It is our assessment that ADOT has failed in the *South Mountain Freeway (Loop 202) Draft Environmental Impact Statement and Section 4(f) Evaluation* to present to the public the "best available" scientific and technical information. This is particularly true of the following resources and associated impact analyses. Air Quality: • The data presented in Figure 4-18 *Comparison of National Economic and Demographic Growth Indicators and Air Emissions, 1970-2005*, is outdated. The U.S. EPA website http://www.epa.gov/airtrends/aqtrends.html#comparison provides data through 2011. • The subsection fails to include a discussion of more recent ambient monitoring data for calendar years 2011 and 2012. The *MCAQD 2011 Air Monitoring Network Review* is readily available (http://www.maricopa.gov/aq/divisions/monitoring/docs/pdf/2011_Network_Assessment.pdf) and should have been employed in the analysis. Furthermore, the most recent available ambient monitoring data from 2012 should have been incorporated into the DEIS. These data are available at: http://www.epa.gov/airdata/. • Figure 4-20 *Nonattainment Areas for Particulate Matter, Carbon Monoxide, and Ozone, Maricopa County*, is not up-to-date.
222	All	All	All		

1

Code	Issue	Response
219	**Purpose and Need**	As discussed beginning on page 1-11 of the Draft Environmental Impact Statement, the proposed action is needed to serve projected growth in population and accompanying transportation demand and to correct existing and projected transportation system deficiencies. The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. As presented in text beginning on page 3-1 of the Draft Environmental Impact Statement, a comprehensive alternatives development and screening process was undertaken that represented an objective, defensible, and fully disclosed logical, sequential, step-by-step process using data and expertise from multiple disciplines applied to a comprehensive set of alternatives to establish the appropriate range of reasonable alternatives for detailed study in the Draft Environmental Impact Statement. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Final Environmental Impact Statement page 3-27). The model projects demand for multiple modes of travel, including automobile, bus, and light rail. Driving patterns and alternative modes of transportation are among the key model inputs used to forecast travel demand in the Study Area.
220	**Purpose and Need**	The parameters for delineation of the Study Area are described in Chapter 1, *Purpose and Need*, of the Draft and Final Environmental Impact Statements as the area defining the transportation problem. As presented in the chapter, transportation models were used to determine where the characteristics of the transportation problem would diminish, and, generally, it is at these locations where the definition of the Study Area took shape. This effort was coordinated with stakeholder agencies, including the U.S. Environmental Protection Agency. The statement that the project team excluded alternatives outside of the Study Area is not supported by the facts presented in the Draft Environmental Impact Statement. Alternatives considered in the Draft Environmental Impact Statement included many that were located outside of the Study Area. Examples include the Riggs Road Alternative (see page 3-9), the State Route 85/Interstate 8 Alternative (see page 3-9), the U.S. Route 60 Extension (see page 3-12), the Interstate 10 Spur (see page 3-12), and the Central Avenue Tunnel (see page 3-12).
221		Comment noted. Specific comments are addressed below.

(Response 222 begins on next page)

Code	Comment Document



SWCA Comments on ADOT South Mountain Freeway Draft EIS (April 2013) Prepared for PARC et al.

While footnote "b" attempts to address an expansion to the 8-hour ozone nonattainment area, it does not include the Pinal County PM2.5 nonattainment area approximately 15 miles to the south of the project. An interactive GIS map available on ADEQ's website identifies the current nonattainment boundaries in the vicinity of the project http://gisweb.azdeq.gov/arcgis/emaps/?topic=nonattain

- Figure 4-24 *Priority Mobile Source Air Toxics Emissions, 1999, On-road Versus Other Sources*, presents outdated information. More recent data should have been obtained from: http://www.epa.gov/ttn/chief/eiinformation.html

While we agree the EPA transportation guidance provided on December 20, 2010, established modeling guidance for performing transportation conformity along with a 2-year grace period. However, based upon the FHWA's *Information: Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA* released on December 6, 2012, states "At the end of this grace period, i.e., beginning December 20, 2012, project sponsors should use MOVES to conduct emissions analysis for NEPA purposes," http://www.fhwa.dot.gov/environment/air_quality/air_toxics/policy_and_guidance/agintguidmem.cfm

Noise:

- Vibration from blasting is qualitatively discussed in the Topography, Geology, and Soils section of the DEIS; however, vibration from non-blasting construction activities and from operational impacts is not discussed anywhere within the DEIS. Procedures for screening and analyzing for vibrational impacts from construction and highway operation are provided in the U.S. Department of Transportation Federal Transit Administration "Transit Noise and Vibration Impact Assessment" (2006): http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf

The DEIS notes that "To further clarify the process of noise analysis and the evaluation of noise abatement, ADOT adopted a Noise Abatement Policy (NAP), last updated in 2007" (pg. 4-80). However, the most recently issued ADOT Noise Abatement Policy is dated July 13, 2011; it superseded the 2007 version cited in the DEIS. It does not appear that the DEIS utilized the most recent ADOT Noise Abatement Policy in the noise analysis. The latest copy is available here: http://www.azdot.gov/highways/Env/Env_Common/Documents_Technical_Noise.asp

- The DEIS includes an incomplete review of the regulations regarding noise. The only regulations analyzed in the DEIS for noise impacts in any detail are those dealing with the Federal Highway Administration Noise Abatement Criteria (found in 23 CFR 772), and the ADOT Noise Abatement Plan dated 2007 (which isn't even the most up-to-date version). The following additional laws and guidelines could also impact the project:
  - Noise Control Act of 1972, as amended (PL 92-574, 42 USC 4901 et seq.);
  - The Quiet Communities Act of 1978 (42 USC 4913) promoting the development of state and local noise control programs;
  - U.S. Department of Transportation Federal Transit Administration (FTA) guidelines that specifically addresses issues of community noise (FTA-VA-90-1003-06);
  - Occupational Safety and Health Administration (OSHA) Occupational Noise Exposure, Hearing Conservation Amendment (Federal Register 48[46]:9738-9785);
  - U.S. Department of Housing and Urban Development (24 CFR 51.101(a)(8)); and
  - County, city, or local noise ordinances applicable to the project.

Water Resources:

Analysis of water availability makes use of outdated and/or erroneous information, in two specific instances.

- Water levels are referenced from 1992; more recent information is readily available from the Arizona Department of Water Resources (https://gisweb.azwater.gov/waterresourcedata/)
- A feasibility study regarding water availability in the Ahwatukee Foothills area dated 1996 is relied upon to assess viable sources of replacement water for lost groundwater wells. Reliability on this report has resulted in erroneous information, as it indicates

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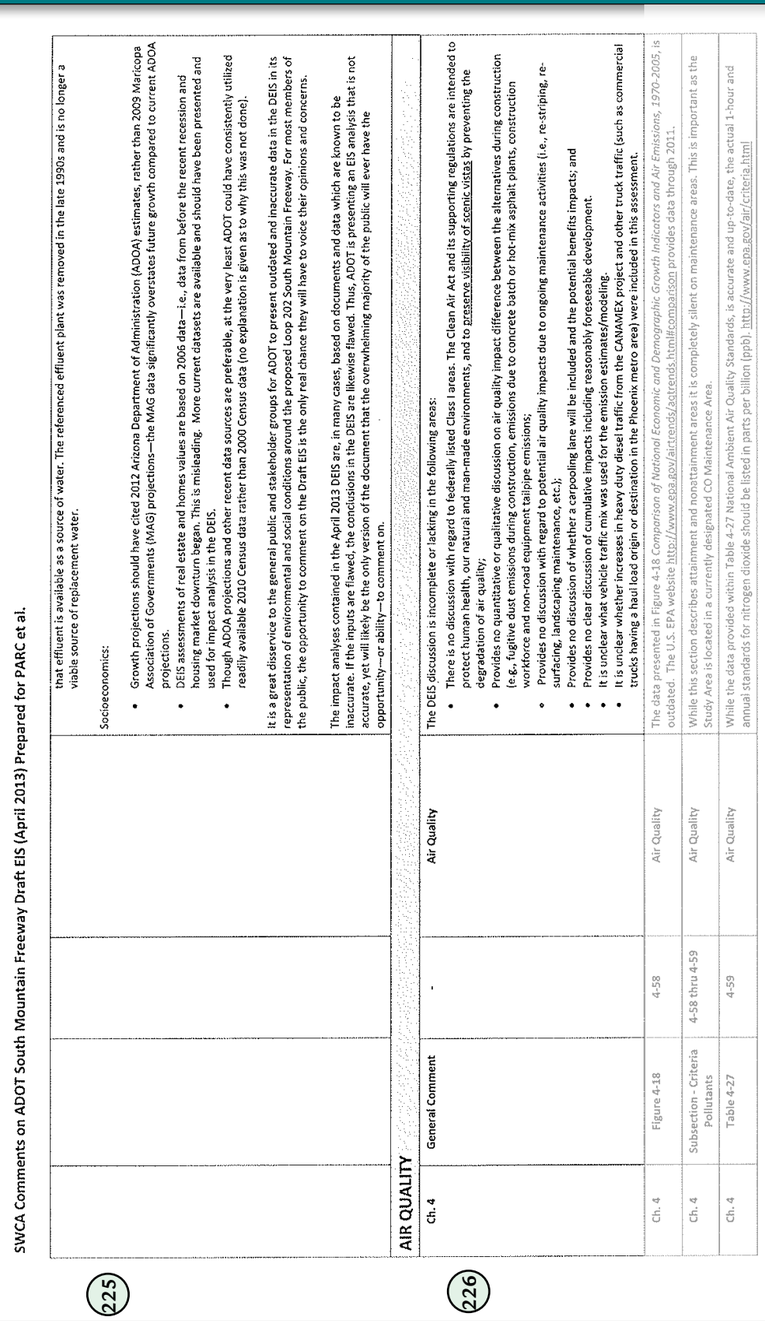
Code	Issue	Response
222	**Air Quality**	The data presented in Figure 4-18 of the Draft Environmental Impact Statement are included to demonstrate that emissions of criteria pollutants have decreased and continue to decrease. More recent data merely make a stronger case that these emissions have declined and do not change the conclusion. The monitoring data presented beginning on page 4-60 of the Draft Environmental Impact Statement demonstrate pollutant trends in the Study Area. More recent data merely make a stronger case that these emissions have declined and do not change the conclusion. Where information was deemed important to decision-making—for example, more recent trends in attainment status for various criteria pollutants—that information has been included. See for example the discussion on particulate matter that begins on page 4-61. Pinal County is not included in the Study Area and is, therefore, not discussed. All nonattainment areas presented in Figure 4-20 on page 4-61 of the Draft Environmental Impact Statement are current. As clarification, the title of Figure 4-20 was changed in the Final Environmental Impact Statement from "Nonattainment Areas for Particulate Matter, Carbon Monoxide, and Ozone, Maricopa County" to "Nonattainment and Maintenance Areas for Particulate Matter, Carbon Monoxide, and Ozone, Maricopa County." 40 Code of Federal Regulations § 93.111(c) was followed to conduct a qualitative analysis for particulate matter (PM_{10}) for the proposed action. This analysis complied with National Environmental Policy Act requirements for the development of the Draft Environmental Impact Statement. In December 2010, the U.S. Environmental Protection Agency established transportation conformity guidance for performing quantitative particulate matter ($PM_{2.5}$ and PM_{10}) hot-spot analyses for transportation projects and established a 2-year grace period. U.S. Environmental Protection Agency conformity guidance continues to allow qualitative particulate matter (PM_{10}) hot-spot conformity analyses for analyses that were started before or during the grace period and if the final environmental document for the project is issued no more than 3 years after issuance of the draft environmental document. A particulate matter (PM_{10}) qualitative analysis was performed for this project because the initial air quality technical analysis report for the proposed action was produced in October 2005. The Arizona Department of Transportation and Federal Highway Administration have updated the qualitative analysis to a quantitative analysis for the Final Environmental Impact Statement to ensure that a state-of-the-art analysis is completed for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The mobile source air toxics discussion was also updated to reflect the Federal Highway Administration's 2012 guidance. This discussion begins on page 4-77 of the Final Environmental Impact Statement.
223	**Traffic**	There are no federal requirements directed specifically to highway traffic induced vibration. All studies the highway agencies have done to assess the impact of operational traffic induced vibrations have shown that both measured and predicted vibration levels are less than any known criteria for structural damage to buildings. The noise analysis was updated for the Final Environmental Impact Statement using most recent Federal Highway Administration and Arizona Department of

(Response 223 continues on next page)

Code	Comment Document



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					that effluent is available as a source of water. The referenced effluent plant was removed in the late 1990s and is no longer a viable source of replacement water.
					Socioeconomics:
					• Growth projections should have cited 2012 Arizona Department of Administration (ADOA) estimates, rather than 2009 Maricopa Association of Governments (MAG) projections—the MAG data significantly overstates future growth compared to current ADOA projections.
					• DEIS assessments of real estate and homes values are based on 2006 data—i.e., data from before the recent recession and housing market downturn began. This is misleading. More current datasets are available and should have been presented and used for impact analysis in the DEIS.
					• Though ADOA projections and other recent data sources are preferable, at the very least ADOT could have consistently utilized readily available 2010 Census data rather than 2000 Census data (no explanation is given as to why this was not done).
					It is a great disservice to the general public and stakeholder groups for ADOT to present outdated and inaccurate data in the DEIS in its representation of environmental and social conditions around the proposed Loop 202 South Mountain Freeway. For most members of the public, the opportunity to comment on the Draft EIS is the only real chance they will have to voice their opinions and concerns.
					The impact analyses contained in the April 2013 DEIS are, in many cases, based on documents and data which are known to be inaccurate. If the inputs are flawed, the conclusions in the DEIS are likewise flawed. Thus, ADOT is presenting an EIS analysis that is not accurate, yet will likely be the only version of the document that the overwhelming majority of the public will ever have the opportunity—or ability—to comment on.
225					
	AIR QUALITY				
	Ch. 4	General Comment	-	Air Quality	The DEIS discussion is incomplete or lacking in the following areas:
					• There is no discussion with regard to federally listed Class I areas. The Clean Air Act and its supporting regulations are intended to protect human health, our natural and man-made environments, and to preserve visibility of scenic vistas by preventing the degradation of air quality;
					• Provides no quantitative or qualitative discussion on air quality impact difference between the alternatives during construction (e.g., fugitive dust emissions during construction, emissions due to concrete batch or hot-mix asphalt plants, construction workforce and non-road equipment tailpipe emissions;
					◦ Provides no discussion with regard to potential air quality impacts due to ongoing maintenance activities (i.e., re-striping, re-surfacing, landscaping maintenance, etc.);
					• Provides no discussion of whether a carpooling lane will be included and the potential benefits impacts; and
					• Provides no clear discussion of cumulative impacts including reasonably foreseeable development.
					• It is unclear what vehicle traffic mix was used for the emission estimates/modeling.
					• It is unclear whether increases in heavy duty diesel traffic from the CANAMEX project and other truck traffic (such as commercial trucks having a haul load origin or destination in the Phoenix metro area) were included in this assessment.
	Ch. 4	Figure 4-18	4-58	Air Quality	The data presented in Figure 4-18 *Comparison of National Economic and Demographic Growth Indicators and Air Emissions, 1970-2005*, is outdated. The U.S. EPA website http://www.epa.gov/airtrends/2at trends.html#comparison provides data through 2011.
	Ch. 4	Subsection - Criteria Pollutants	4-58 thru 4-59	Air Quality	While this section describes attainment and nonattainment areas it is completely silent on maintenance areas. This is important as the Study Area is located in a currently designated CO Maintenance Area.
	Ch. 4	Table 4-27	4-59	Air Quality	While the data provided within Table 4-27 National Ambient Air Quality Standards, is accurate and up-to-date, the actual 1-hour and annual standards for nitrogen dioxide should be listed in parts per billion (ppb). http://www.epa.gov/air/criteria.html
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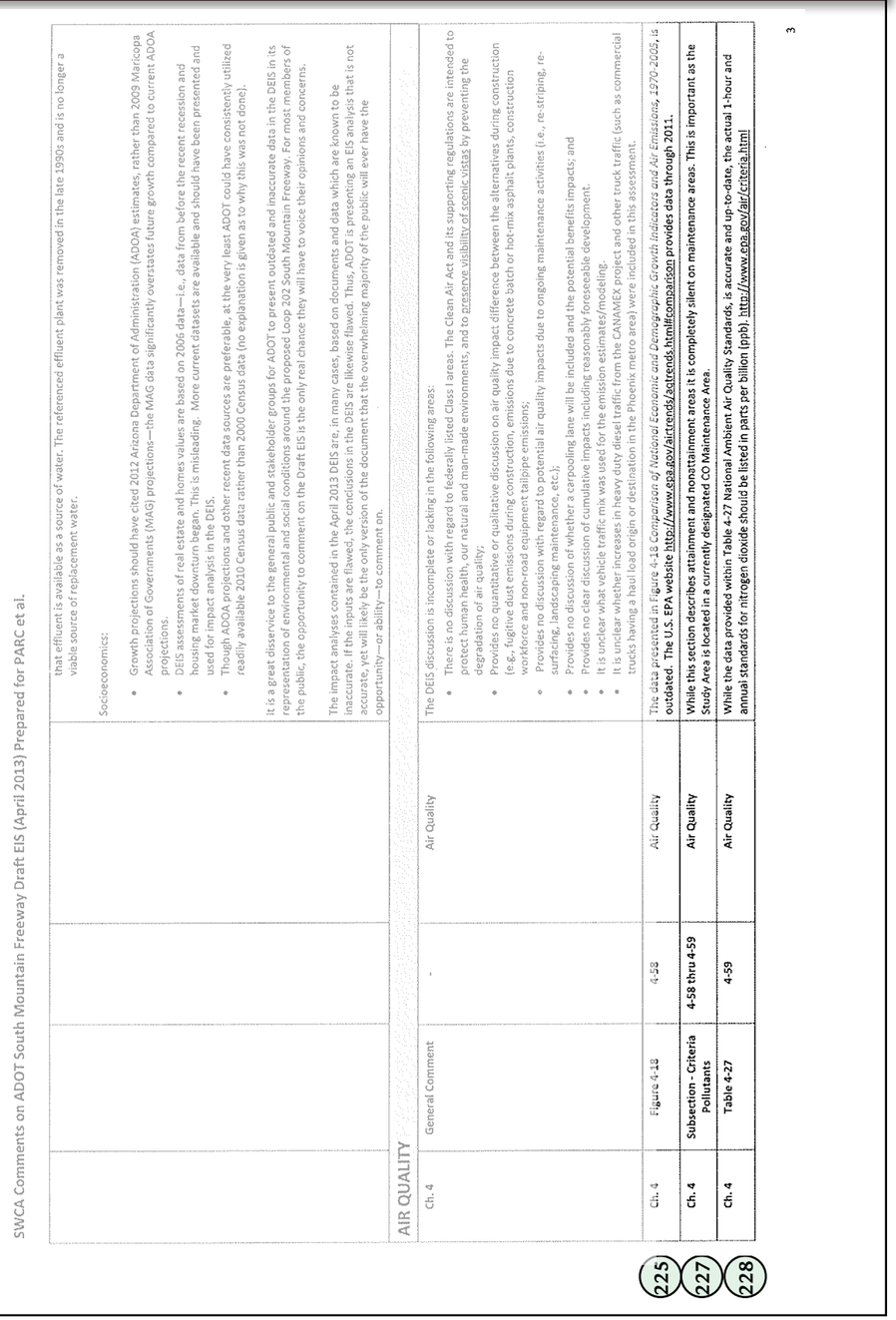
Code	Issue	Response
223 (cont.)		Transportation policy and traffic projections provided by the Maricopa Association of Governments in August 2013. This updated analysis begins on page 4-88 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted. As stated in the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, environmental impact statements should be analytic rather than encyclopedic (40 Code of Federal Regulations Part 1502.2(a). Those noise regulations of direct consequence to the proposed action were discussed.
224	**Groundwater**	As noted on page 4-97 of the Draft Environmental Impact Statement, although groundwater level data in Ahwatukee Foothills Village were shown from 1972 to 1992, this information was gathered from the U.S. Geological Survey in 2009. Groundwater data in other areas may indeed be more current. This information would not alter the conclusions of this section of the Draft Environmental Impact Statement. The comment is correct that wastewater effluent is not available as a replacement source and is not being used. The City of Phoenix did operate a wastewater reclamation facility in this area, but it was removed from service and demolished. The City of Phoenix still owns the property, but all facilities have been removed from the site. Thus, only two water sources are available for irrigation and lake supply for the Foothills Community Association: the well that would be acquired and potable water from the City of Phoenix. The discussion on page 4-100 of the Draft Environmental Impact Statement has been modified in the Final Environmental Impact Statement to reflect that reclaimed wastewater would not be available; however, the conclusion on page 4-100 is still appropriate. As stated on page 4-100 of the Draft Environmental Impact Statement, "In the event that well replacement were to be impossible, Arizona Department of Transportation would still replace the water that would be lost through the acquisition."
225	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. The new projections were also used to update the air and noise analyses for the Final Environmental Impact Statement (see sections beginning on pages 4-68 and 4-88, respectively).

(Response 226 begins on next page)

Code	Comment Document



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				that effluent is available as a source of water. The referenced effluent plant was removed in the late 1990s and is no longer a viable source of replacement water.	
				Socioeconomics:	
				• Growth projections should have cited 2012 Arizona Department of Administration (ADOA) estimates, rather than 2009 Maricopa Association of Governments (MAG) projections—the MAG data significantly overstates future growth compared to current ADOA projections.	
				• DEIS assessments of real estate and homes values are based on 2006 data—i.e., data from before the recent recession and housing market downturn began. This is misleading. More current datasets are available and should have been presented and used for impact analysis in the DEIS.	
				• Though ADOA projections and other recent data sources are preferable, at the very least ADOT could have consistently utilized readily available 2010 Census data rather than 2000 Census data (no explanation is given as to why this was not done).	
				It is a great disservice to the general public and stakeholder groups for ADOT to present outdated and inaccurate data in the DEIS in its representation of environmental and social conditions around the proposed Loop 202 South Mountain Freeway. For most members of the public, the opportunity to comment on the Draft EIS is the only real chance they will have to voice their opinions and concerns.	
				The impact analyses contained in the April 2013 DEIS are, in many cases, based on documents and data which are known to be inaccurate. If the inputs are flawed, the conclusions in the DEIS are likewise flawed. Thus, ADOT is presenting an EIS analysis that is not accurate, yet will likely be the only version of the document that the overwhelming majority of the public will ever have the opportunity—or ability—to comment on.	
AIR QUALITY					
Ch. 4	General Comment	-	Air Quality	The DEIS discussion is incomplete or lacking in the following areas:	
				• There is no discussion with regard to federally listed Class I areas. The Clean Air Act and its supporting regulations are intended to protect human health, our natural and man-made environments, and to preserve visibility of scenic vistas by preventing the degradation of air quality;	
				• Provides no quantitative or qualitative discussion on air quality impact difference between the alternatives during construction (e.g., fugitive dust emissions during construction, emissions due to concrete batch or hot-mix asphalt plants, construction workforce and non-road equipment tailpipe emissions;	
				◦ Provides no discussion with regard to potential air quality impacts due to ongoing maintenance activities (i.e., re-striping, re-surfacing, landscaping maintenance, etc.);	
				• Provides no discussion of whether a carpooling lane will be included and the potential benefits impacts; and	
				• Provides no clear discussion of cumulative impacts including reasonably foreseeable development.	
				• It is unclear what vehicle traffic mix was used for the emission estimates/modeling.	
				• It is unclear whether increases in heavy duty diesel traffic from the CANAMEX project and other truck traffic (such as commercial trucks having a haul load origin or destination in the Phoenix metro area) were included in this assessment.	
Ch. 4	Figure 4-18	4-58	Air Quality	The data presented in Figure 4-18 *Comparison of National Economic and Demographic Growth Indicators and Air Emissions, 1970-2005*, is outdated. The U.S. EPA website http://www.epa.gov/airtrends/actrends.html#comparison provides data through 2011.	
Ch. 4	Subsection - Criteria Pollutants	4-58 thru 4-59	Air Quality	While this section describes attainment and nonattainment areas it is completely silent on maintenance areas. This is important as the Study Area is located in a currently designated CO Maintenance Area.	
Ch. 4	Table 4-27	4-59	Air Quality	While the data provided within Table 4-27 National Ambient Air Quality Standards, is accurate and up-to-date, the actual 1-hour and annual standards for nitrogen dioxide should be listed in parts per billion (ppb). http://www.epa.gov/air/criteria.html	

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Code	Issue	Response
226	**Air Quality**	Mobile sources are not regulated for impacts on visibility in Class 1 areas (40 Code of Federal Regulations § 51.307). Quantification of short-term impacts associated with construction or maintenance activities is not required; qualitative discussion may be found under *Mitigation* on page 4-85 of the Final Environmental Impact Statement. The proposed high-occupancy vehicle lane is discussed on page 3-19 of the Draft Environmental Impact Statement. Cumulative impacts are discussed on page 4-167 of the Draft Environmental Impact Statement. Vehicle traffic mix projections were provided by Maricopa Association of Governments and are consistent with the regional conformity analyses; they are discussed in greater detail in the air quality technical report prepared for the project. The results of the analyses are summarized in the Draft Environmental Impact Statement and have been updated in the Final Environmental Impact Statement. The air quality analysis has been updated for the Final Environmental Impact Statement using most recent Federal Highway Administration and U.S. Environmental Protection Agency guidance and traffic projections provided by the Maricopa Association of Governments in August 2013. This updated analysis begins on page 4-68 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted.
	Trucks	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Air quality and noise modeling for the Draft and Final Environmental Impact Statements used this forecast truck traffic (see Final Environmental Impact Statement pages 4-68 and 4-100, respectively).
227	**Air Quality**	The maintenance area is discussed in the subsection, *Carbon Monoxide*, on page 4-59 Draft Environmental Impact Statement. As clarification, the title of Figure 4-20 was changed in the Final Environmental Impact Statement from "Nonattainment Areas for Particulate Matter, Carbon Monoxide, and Ozone, Maricopa County" to "Nonattainment and Maintenance Areas for Particulate Matter, Carbon Monoxide, and Ozone, Maricopa County."
228	**Air Quality**	According to the U.S. Environmental Protection Agency, the official level of the annual nitrogen dioxide standard is 0.053 parts per million. See footnote #2 (epa.gov/air/criteria.html).

Code	Comment Document
229	SWCA Comments on ADOT South Mountain Freeway Draft EIS (April 2013) Prepared for PARC et al. Ch. 4 | Subsection – Characteristics of Criteria Pollutants | 4-60 thru 4-62 | Air Quality | The subsection fails to include a discussion of more recent ambient monitoring data for calendar years 2011 and 2012. For example: • According to Maricopa County Air Quality Department's *2011 Air Monitoring Network Review*, there were a total of 18 unique days when at least one monitor exceeded the ozone standard. There were 70 individual exceedances of the 8-hour standards at 14 different sites. For the year there was one violation of the 8-hour ozone standard. • In terms of PM10, there were 19 unique days when at least on e monitor exceeded the 24-hour standard and 11 sites that violated the 24-hour standard. It should be noted that some of these exceedances were petitioned to be classified as exceptional events; however, EPA approval of these requests can take over a year. • In addition, there were 9 unique days when at least one monitor exceeded the standard; however, there were no violations of the 24-hour or annual PM2.5 standards. The MCAQD *2011 Air Monitoring Network Review* should have been obtained from: http://www.maricopa.gov/aq/divisions/monitoring/docs/pdf/2011_Network_Assessment.pdf Furthermore, the most recent available ambient monitoring data from 2012 should have been incorporated into the DEIS and is available at: http://www.epa.gov/airdata/.
230	Ch. 4 | Figure 4-20 | 4-61 | Air Quality | *Figure 4-20 Nonattainment Areas for Particulate Matter, Carbon Monoxide, and Ozone, Maricopa County*, is not up-to-date. While footnote "b" attempts to address an expansion to the 8-hour ozone nonattainment area further to the south, Figure 4-20 does not include the Pinal County PM2.5 nonattainment area approximately 15 miles to the south of the project. An interactive GIS map is available on ADEQ's website identifies the current nonattainment boundaries in the vicinity of the project http://iswweb.azdeq.gov/arcgis/emaps/?topic=nonattain
231	Ch. 4 | Figure 4-23 | 4-62 | Air Quality | It is unclear what time period (i.e., year) is being presented in Figure 4-23 *Sources of the 188 Hazardous Air Pollutants Regulated by the Environmental Protection Agency*. Data from 2008 should have been obtained from: http://www.epa.gov/ttn/chief/eiinformation.html
232	Ch. 4 | Figure 4-24 | 4-62 | Air Quality | Figure 4-24 *Priority Mobile Source Air Toxics Emissions, 1999, On-road Versus Other Sources*, presents outdated information. More recent data from 2008 should have been obtained from: http://www.epa.gov/ttn/chief/eiinformation.html
233	Ch. 4 | Local Emissions of Priority MSATs | 4-64 | Air Quality | The DEIS fails to discuss the findings of Joint Air Toxics Assessment Project (JATAP) which occurred within the DEIS Air Quality Study Area. According to data collected during the Pilot Study (March 2003 – March 2004), annual average concentrations of formaldehyde, acetaldehyde, benzene and 1,3 butadiene were on the high end of the range when compared to EPA funded assessment of other U.S. cities.
234	Ch. 4 | Table 4-30 | 4-65 | Air Quality | It is unclear as what year is being represented in Table 4-30 *Priority Mobile Source Air Toxic Emissions, South Phoenix*. Data from 2008 should have been obtained from: http://www.epa.gov/ttn/chief/eiinformation.html
	Ch. 4 | Environmental Consequences – CO | 4-65 | Air Quality | The EPA transportation guidance provided on December 20, 2010, established modeling guidance for performing transportation conformity and under certain circumstances allows for a 2-year grace period. However, based upon the FHWA's *Information: Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA* released on December 6, 2012, states "At the end of this grace period, i.e., beginning December 20, 2012, project sponsors should use MOVES to conduct emissions analysis for NEPA purposes." Therefore, in accordance with FWHA guidance the CO analysis presented in the DEIS should have been updated using MOVES2010, which is the current EPA/FHWA approved model.
	Ch. 4 | Environmental Consequences – CO | 4-65 | Air Quality | It is unclear whether the maximum projected 1-hour and 8-hour CO concentrations at intersections/interchanges reported on Table 4-31 and 4-32 include background concentrations or existing permitted stationary sources in the study area.
	Ch. 4 | Environmental Consequences – Ozone | 4-65 | Air Quality | The DEIS lacks discussion of potential impacts with regard to ozone on a quantitative or even a qualitative level. While we agree that O3 is a regional pollutant, just because another agency is responsible for the developing plans to reduce emissions of O3 precursors does not mean that potential impacts due to ozone should have been discounted.
	Ch. 4 | Environmental | 4-65 | Air Quality | The EPA transportation guidance provided on December 20, 2010, established modeling guidance for performing transportation

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Code	Issue	Response
229	**Air Quality**	The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement was updated on page 4-75 of the Final Environmental Impact Statement to represent current conditions. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the *Regional Transportation Plan* that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014.
230	**Air Quality**	Pinal County is not included in the Study Area and is, therefore, not discussed. All nonattainment areas presented in Figure 4-20 on page 4-61 of the Draft Environmental Impact Statement are current. As clarification, the title of Figure 4-20 was changed in the Final Environmental Impact Statement from "Nonattainment Areas for Particulate Matter, Carbon Monoxide, and Ozone, Maricopa County" to "Nonattainment and Maintenance Areas for Particulate Matter, Carbon Monoxide, and Ozone, Maricopa County."
231	**Air Quality**	As noted in the footnote reference to Figure 4-23, the information was based on the Federal Highway Administration publication, Transportation Air Quality Facts and Figures, January 2006. The data referenced were from 1999. This figure was removed from the Final Environmental Impact Statement.
232	**Air Quality**	As noted in the footnote reference to Figure 4-23, the information was based on the Federal Highway Administration publication, Transportation Air Quality Facts and Figures, January 2006. This figure was removed from the Final Environmental Impact Statement.
233	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics.

(Response 234 begins on next page)

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Code	Comment Document				
	Ch. 4	Subsection – Characteristics of Criteria Pollutants	4-60 thru 4-62	Air Quality	The subsection fails to include a discussion of more recent ambient monitoring data for calendar years 2011 and 2012. For example: • According to Maricopa County Air Quality Department's *2011 Air Monitoring Network Review*, there were a total of 18 unique days when at least one monitor exceeded the ozone standard. There were 70 individual exceedances of the 8-hour standards at 14 different sites. For the year there was one violation of the 8-hour ozone standard. • In terms of PM10, there were 19 unique days when at least one monitor exceeded the 24-hour standard and 11 sites that violated the 24-hour standard. It should be noted that some of these exceedances were petitioned to be classified as exceptional events; however, EPA approval of these requests can take over a year. • In addition, there were 9 unique days when at least one monitor exceeded the standard; however, there were no violations of the 24-hour or annual PM2.5 standards. The MCAQD *2011 Air Monitoring Network Review* should have been obtained from: http://www.maricopa.gov/aq/divisions/monitoring/docs/pdf/2011_Network_Assessment.pdf Furthermore, the most recent available ambient monitoring data from 2012 should have been incorporated into the DEIS and is available at: http://www.epa.gov/airdata/
	Ch. 4	Figure 4-20	4-61	Air Quality	Figure 4-20 *Nonattainment Areas for Particulate Matter, Carbon Monoxide, and Ozone, Maricopa County*, is not up-to-date. While footnote "b" attempts to address an expansion to the 8-hour ozone nonattainment area further to the south, Figure 4-20 does not include the Pinal County PM2.5 nonattainment area approximately 15 miles to the south of the project. An interactive GIS map is available on ADEQ's website identifies the current nonattainment boundaries in the vicinity of the project http://lasweb.azdeq.gov/arcgis/rest/services/emapaz/Pages/emapaz.aspx
	Ch. 4	Figure 4-23	4-62	Air Quality	It is unclear what time period (i.e., year) is being presented in Figure 4-23 *Sources of the 188 Hazardous Air Pollutants Regulated by the Environmental Protection Agency*. Data from 2008 should have been obtained from: http://www.epa.gov/ttn/chief/eiinformation.html
	Ch. 4	Figure 4-24	4-62	Air Quality	Figure 4-24 *Priority Mobile Source Air Toxics Emissions, 1999, On-road Versus Other Sources*, presents outdated information. More recent data from 2008 should have been obtained from: http://www.epa.gov/ttn/chief/eiinformation.html
	Ch. 4	Local Emissions of Priority MSATs	4-64	Air Quality	The DEIS fails to discuss the findings of Joint Air Toxics Assessment Project (JATAP) which occurred within the DEIS Air Quality Study Area. According to data collected during the Pilot Study (March 2003 – March 2004), annual average concentrations of formaldehyde, acetaldehyde, benzene and 1,3 butadiene were on the high end of the range when compared to EPA funded assessment of other U.S. cities.
	Ch. 4	Table 4-30	4-65	Air Quality	It is unclear as what year is being represented in Table 4-30 *Priority Mobile Source Air Toxic Emissions, South Phoenix*. Data from 2008 should have been obtained from: http://www.epa.gov/ttn/chief/eiinformation.html
235	Ch. 4	Environmental Consequences – CO	4-65	Air Quality	The EPA transportation guidance provided on December 20, 2010, established modeling guidance for performing transportation conformity and under certain circumstances allows for a 2-year grace period. However, based upon the FHWA's *Information: Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA* released on December 6, 2012, states "At the end of this grace period, i.e., beginning December 20, 2012, project sponsors should use MOVES to conduct emissions analysis for NEPA purposes." Therefore, in accordance with FWHA guidance the CO analysis presented in the DEIS should have been updated using MOVES2010, which is the current EPA/FHWA approved model.
236	Ch. 4	Environmental Consequences – CO	4-65	Air Quality	It is unclear whether the maximum projected 1-hour and 8-hour CO concentrations at intersections/interchanges reported on Table 4-31 and 4-32 include background concentrations or existing permitted stationary sources in the study area.
237	Ch. 4	Environmental Consequences – Ozone	4-65	Air Quality	The DEIS lacks discussion of potential impacts with regard to ozone on a quantitative or even a qualitative level. While we agree that O3 is a regional pollutant, just because another agency is responsible for the developing plans to reduce emissions of O3 precursors does not mean that potential impacts due to ozone should have been discounted.
235	Ch. 4	Environmental	4-65	Air Quality	The EPA transportation guidance provided on December 20, 2010, established modeling guidance for performing transportation

Code	Issue	Response
234	**Air Quality**	The footnote to Figure 4-30 on page 4-65 of the Draft Environmental Impact Statement references data from the 2004 Joint Air Toxics Assessment Project. These data are from 2003–2004.
235	**Air Quality**	40 Code of Federal Regulations § 93.111(c) was followed to conduct a qualitative analysis for particulate matter (PM_{10}) for the proposed action. This analysis complied with National Environmental Policy Act requirements for the development of the Draft Environmental Impact Statement. In December 2010, the U.S. Environmental Protection Agency established transportation conformity guidance for performing quantitative particulate matter ($PM_{2.5}$ and PM_{10}) hot-spot analyses for transportation projects and established a 2-year grace period. U.S. Environmental Protection Agency conformity guidance continues to allow qualitative particulate matter (PM_{10}) hot-spot conformity analyses for analyses that were started before or during the grace period and if the final environmental document for the project is issued no more than 3 years after issuance of the draft environmental document. A particulate matter (PM_{10}) qualitative analysis was performed for this project because the initial air quality technical analysis report for the proposed action was produced in October 2005. The Arizona Department of Transportation and Federal Highway Administration have updated the qualitative analysis to a quantitative analysis for the Final Environmental Impact Statement to ensure that a state-of-the-art analysis is completed for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
236	**Air Quality**	The modeling protocols area is discussed in greater detail in the air quality technical report prepared for the project. The results of the analyses are summarized in the Draft Environmental Impact Statement. The carbon monoxide analyses used a background value of 2 parts per million. This has been updated in the Final Environmental Impact Statement (see page 4-75).
237	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the *Regional Transportation Plan* that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014.

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		Consequences – Particulate Matter			
238	Ch. 4	Environmental Consequences – Particulate Matter	4-65	Air Quality	conformity along with a 2-year grace period. However, based upon the FHWA's *Information: Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA* released on December 6, 2012, states "At the end of this grace period, i.e., beginning December 20, 2012, project sponsors should use MOVES to conduct emissions analysis for NEPA purposes." http://www.fhwa.dot.gov/environment/air_quality/policy_and_guidance/agintguid3mem.cfm The December 20, 2010 FR notice (Vol. 75, No. 243) specifies "that any quantitative PM hot-spot analyses conducted during the grace period must use MOVES1010a, since MOBILE6.2 does not have the capabilities to produce viable results for project-level PM emissions analysis and is therefore not appropriate for this purpose." Therefore, in accordance with FWHA guidance the PM analysis presented in the DEIS should have used MOVES2010, which is the current EPA/FHWA approved model.
239	Ch. 4	Environmental Consequences – Particulate Matter	4-65	Air Quality	The FHWA guidance specifies "the implications of MOVES on MSAT emissions estimates compared to MOBILE are" lower estimates of total MSAT emissions; significantly lower benzene emissions; significantly higher diesel PM emissions, especially for lower speeds. Consequently, diesel PM is projected to be the dominate component of the emissions totals." Therefore, in accordance with FWHA guidance the MSAT analysis presented in the DEIS should have used MOVES2010, which is the current EPA/FHWA approved model.
240	Ch. 4	Environmental Consequences – Particulate Matter	4-65	Air Quality	Was a formal interagency consultation process conducted to determine whether the current qualitative analysis is adequate for the purpose of full disclosure of potential PM10 and PM2.5 impacts associated with the action alternatives?
238	Ch. 4	Mobile Source Air Toxics – Emissions Model	4-70	Air Quality	The analysis fails to address impacts of PM2.5. This is a significant flaw as the project is within approximately 15 miles of the Pinal County PM2.5 nonattainment area.
241	Ch. 4	Mobile Source Air Toxics – Emissions Model	4-70	Air Quality	The DEIS states "The implications of MOVES related to MSAT emissions estimates compared with MOBILE as used in this analysis are lower estimated of total MSAT emissions; and significantly lower benzene emissions; significantly higher DPM emissions, especially for lower speeds." Therefore, in accordance with FWHA guidance the MSAT analysis presented in the DEIS should have used MOVES2010, which is the current EPA/FHWA approved model.
242	Ch. 4	Figure 4-28	4-71	Air Quality	MSAT emissions and impacts during construction of proposed action and the alternatives are lacking. Furthermore, it is unclear whether morning and afternoon rush hour short-term emissions were included in the modeling?
243	Ch. 4	Table 4-34	4-72	Air Quality	It is unclear what type of vehicle is being represented by this graph (i.e., gasoline passenger vehicle, diesel passenger vehicle, heavy-duty diesel truck, etc.). The DEIS should be updated to clarify what type vehicle this represents and provide a comparison to the other vehicle classes.
238					It is unclear in both ADOT's *Environmental Planning Group Draft Report Air Quality Assessment South Mountain Freeway SR 202L* dated March 1, 2013 and the DEIS what is the breakdown of VMT for light duty/ heavy duty gasoline and diesel vehicles under the various alternatives? The assessment and DEIS should have clearly specified the vehicle mix. As stated in the DIES "The implications of MOVES related to MSAT emissions estimates compared with MOBILE as used in this analysis are lower estimated of total MSAT emissions; and significantly lower benzene emissions; significantly higher DPM emissions, especially for lower speeds." Therefore, in accordance with FWHA guidance the MSAT analysis presented in the DEIS should have used MOVES2010, which is the current EPA/FHWA approved model.

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238	**Air Quality**	As noted on page 4-70 of the Draft Environmental Impact Statement, MOBILE6.2 was used to project emissions at a regional level consistent with 40 Code of Federal Regulations Part 93.111(c), since the mobile source air toxics analysis for the proposed action started before or during the grace period for using the MOVES2010 emissions model. However, the mobile source air toxics analysis presented on page 4-70 of the Draft Environmental Impact Statement was updated on page 4-77 of the Final Environmental Impact Statement using the MOVES2010 model.
239	**Air Quality**	The air quality analysis parameters were determined through the process established by the Arizona Department of Transportation interagency consultation procedures [40 Code of Federal Regulations § 93.105(c)(1) (i)].
240	**Air Quality**	Maricopa County is in attainment for the particulate matter ($PM_{2.5}$) National Ambient Air Quality Standard; the Pinal County particulate matter ($PM_{2.5}$) nonattainment area is not included in the Study Area.
241	**Air Quality**	The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would accelerate the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method, breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years, and the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period. The mobile source air toxics analyses as presented in the Draft Environmental Impact Statement were based on average daily traffic volumes over a 1-year period. However, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis has been prepared for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. For this analysis, emission factors were generated for the morning peak, midday hours, afternoon peak, and overnight. Particulate matter (PM_{10}) emissions were modeled incorporating operating conditions included in the U.S. Environmental Protection Agency's *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas*, publication number EPA-420-B-13-053, dated November 2013. The development of the particulate matter (PM_{10}) hot-spot modeling protocol for this analysis used a formal interagency consultation process.
242	**Air Quality**	The data presented were based on the U.S. Environmental Protection Agency's MOBILE6.2 national defaults, including the national default vehicle fleet mix.
243	**Air Quality**	Vehicle traffic mix projections were provided by the Maricopa Association of Governments.

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244	Ch. 4	Table 4-34	4-72	Air Quality	ADOT's Environmental Planning Group Draft Report Air Quality Assessment South Mountain Freeway SR 202L dated March 1, 2013, which is the basis for the modeled impact results presented in the DEIS, does not account for increases in heavy duty diesel vehicles from the CANAMEX project and/or Phoenix-area origination and destination traffic, as "Average daily traffic volumes are projected to range from approximately 60,000 to over 200,000; heavy-truck traffic is expected to account for approximately 5-7% of the volume (MAG, 2010b)." The potential increases to heavy-truck traffic could result in significant increases to criteria pollutant and MSAT emissions, and vehicles originating from outside of the United States may not have the same level of emission controls or diesel fuel standards. In addition, it is unclear whether the potential increases to heavy-truck traffic were considered based on the natural bypass potential of the project. The DEIS should have accounted for all increases in heavy-duty diesel vehicle traffic from the CANAMEX project, Phoenix-area origination and destination traffic, as well as considered additional increases due to the natural bypass potential of the project.
245	Ch. 4	MSAT Information Status	4-74	Air Quality	The DEIS fails to discuss studies conducted in support of Joint Air Toxics Assessment Project (JATAP), which included air toxic measurements, numerical modeling, exposure modeling and risk assessment for the metropolitan Phoenix area. The DEIS should have included a discussion on these studies and should have be obtained from the *Phoenix, Arizona Air Toxics Assessment – Final Comprehensive Report* dated September 2011 and available at: http://www.epa.gov/ttnamti1/files/20022/2004csatam/CSATAMJATAPFR305ep11.pdf
246	Ch. 4	MSAT Information Status	4-74	Air Quality	The DEIS fails to discuss the "Mobile Source Air Toxics (MSATs) at Three Schools Next to US 95 in Las Vegas, Nevada" (May 2010). This report was prepared for the Nevada Department of Transportation and provides a discussion on the: 1) indoor and outdoor concentrations of MSATs to which students are exposed at the three schools near US 95; 2) the influence of US 95 vehicle traffic on MSAT concentrations at the three schools, both before and after the November 2007 freeway expansion; and 3) the effectiveness and MSAT removal efficiencies of HVAC/filtration systems before and after modified air filtration systems were installed at each school. The DEIS should have included a discussion of this study as it provides a potential mitigation strategy for reducing MSAT exposure at schools.
	Ch. 4	No-Action Alternative	4-76	Air Quality	The DEIS states "MSATs emissions for the entire regional Study Area would decline regardless of whether the proposed action were constructed." Does this statement consider increases to heavy-truck traffic associated with trucks bypassing the Phoenix downtown area as well as those from the CANAMEX project, and from Phoenix-area origination and destination traffic? Therefore, in accordance with FWHA guidance the MSAT analysis presented in the DEIS should have used MOVES2010, which is the current EPA/FHWA approved model, and should have included the projected increases in heavy truck traffic.
	Ch. 4	No-Action Alternative	4-76	Conformity	Neither the DEIS or the supporting technical report provides the conformity determination (i.e., the conformity analysis demonstrating the project conforms).
	NOISE				
	Ch. 4	General Comment	-	Noise	The DEIS discussion is incomplete or lacking in the following areas: • Provides no discussion with regard to potential noise impacts due to ongoing maintenance activities (i.e., re-striping, re-surfacing, landscaping maintenance, etc.); • Provides no clear discussion of cumulative impacts including reasonably foreseeable development; and • It is unclear what vehicle traffic mix was used for the noise modeling

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244	**Air Quality**	The Mexico to Canada route (commonly referred to as the CANAMEX route) is described in detail on page 3-64 of the Draft Environmental Impact Statement. The locally preferred route includes Interstate 8 and State Route 85 to bypass the Phoenix metropolitan area. State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of metropolitan Phoenix. This route would continue to be available for interstate and interregional travel. Trucks crossing from Mexico to Arizona are restricted to the commercial zones within 25 miles of the border. The Federal Motor Carrier Safety Administration is administering a United States-Mexico cross-border, long-haul trucking pilot program. The program tests and demonstrates the ability of Mexico-based motor carriers to operate safely in the United States beyond the municipalities and commercial zones along the United States-Mexico border (see <fmcsa.dot.gov/intl-programs/trucking/trucking-program.aspx>). Petróleos Mexicanos (better known as Pemex), the Mexican state-owned petroleum company, has guaranteed 15 parts per million in its sulfur diesel fuel in the border region (see <http://transportpolicy.net/index.php?title=Mexico:_Fuels:_Diesel_and_Gasoline>). All air quality analyses included projected truck traffic Provided by the Maricopa Association of Governments.
245	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics.
246	**Air Quality**	The National Near Roadway Mobile Source Air Toxic Study is discussed on page 4-74 of the Draft Environmental Impact Statement, but not in great detail. As stated in the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, environmental impact statements should be analytic rather than encyclopedic [40 Code of Federal Regulations Part 1502.2(a)]. The mobile source air toxics emissions information presented in the Draft and Final Environmental Impact Statements demonstrates mobile source air toxics emissions at the study area level would be much lower in the future. The U.S. Environmental Protection Agency's MOVES model also predicts lower mobile source air toxics emissions in the future. Therefore, there is no basis for the assumption that mitigation would be needed.

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Ch. 4	Table 4-34	4-72	Air Quality	ADOT's Environmental Planning Group Draft Report Air Quality Assessment South Mountain Freeway SR 202L dated March 1, 2013, which is the basis for the modeled impact results presented in the DEIS, does not account for increases in heavy duty diesel vehicles from the CANAMEX project and/or Phoenix-area origination and destination traffic, as "Average daily traffic volumes are projected to range from approximately 60,000 to over 200,000; heavy-truck traffic is expected to account for approximately 5-7% of the volume (MAG, 2010b)." The potential increases to heavy-truck traffic could result in significant increases to criteria pollutant and MSAT emissions, and vehicles originating from outside of the United States may not have the same level of emission controls or diesel fuel standards. In addition, it is unclear whether the potential increases to heavy-truck traffic were considered based on the natural bypass potential of the project. The DEIS should have accounted for all increases in heavy-duty diesel vehicle traffic from the CANAMEX project, Phoenix-area origination and destination traffic, as well as considered additional increases due to the natural bypass potential of the project.
Ch. 4	MSAT Information Status	4-74	Air Quality	The DEIS fails to discuss studies conducted in support of Joint Air Toxics Assessment Project (JATAP), which included air toxic measurements, numerical modeling, exposure modeling and risk assessment for the metropolitan Phoenix area. The DEIS should have included a discussion on these studies and should have be obtained from the *Phoenix, Arizona Air Toxics Assessment – Final Comprehensive Report* dated September 2011 and available at: http://www.epa.gov/ttnamti1/files/20032004csatam/CSATAMJATAPFR30Sep11.pdf
Ch. 4	MSAT Information Status	4-74	Air Quality	The DEIS fails to discuss the "Mobile Source Air Toxics (MSATs) at Three Schools Next to US 95 in Las Vegas, Nevada" (May 2010). This report was prepared for the Nevada Department of Transportation and provides a discussion on the: 1) indoor and outdoor concentrations of MSATs to which students are exposed at the three schools near US 95; 2) the influence of US 95 vehicle traffic on MSAT concentrations at the three schools, both before and after the November 2007 freeway expansion; and 3) the effectiveness and MSAT removal efficiencies of HVAC/filtration systems before and after modified air filtration systems were installed at each school. The DEIS should have included a discussion of this study as it provides a potential mitigation strategy for reducing MSAT exposure at schools.
Ch. 4	No-Action Alternative	4-76	Air Quality	**The DEIS states "MSATs emissions for the entire regional Study Area would decline regardless of whether the proposed action were constructed." Does this statement consider increases to heavy-truck traffic associated with trucks bypassing the Phoenix downtown area as well as those from the CANAMEX project, and from Phoenix-area origination and destination traffic?**
Ch. 4	No-Action Alternative	4-76	Conformity	**Therefore, in accordance with FHWA guidance the MSAT analysis presented in the DEIS should have used MOVES2010, which is the current EPA/FHWA approved model, and should have included the projected increases in heavy truck traffic.** **Neither the DEIS or the supporting technical report provides the conformity determination (i.e., the conformity analysis demonstrating the project conforms).**
NOISE				
Ch. 4	General Comment	-	Noise	**The DEIS discussion is incomplete or lacking in the following areas:** • **Provides no discussion with regard to potential noise impacts due to ongoing maintenance activities (i.e., re-striping, re-surfacing, landscaping maintenance, etc.);** • **Provides no clear discussion of cumulative impacts including reasonably foreseeable development; and** • **It is unclear what vehicle traffic mix was used for the noise modeling**

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247	**Trucks**	Vehicle traffic mix projections were provided by the Maricopa Association of Governments and are consistent with the regional conformity analyses; they are discussed in greater detail in the air quality technical report prepared for the project. As noted on page 4-70 of the Draft Environmental Impact Statement, MOBILE6.2 was used to project emissions at a regional level consistent with 40 Code of Federal Regulations Part 93.111(c), since the mobile source air toxics analysis for the proposed action started before or during the grace period for using the MOVES2010 emissions model. However, the mobile source air toxics analysis presented on page 4-70 of the Draft Environmental Impact Statement was updated on page 4-77 of the Final Environmental Impact Statement using the MOVES2010 model.
248	**Air Quality**	As stated on page 4-76 of the Draft Environmental Impact Statement, the proposed action is contained within the currently approved *Regional Transportation Plan* and the Maricopa Association of Government's Fiscal Year 2011–2015 TIP contains several references to the South Mountain Freeway project. Therefore, the proposed action would conform to the approved transportation plan and transportation improvement program. The carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
249	**Noise**	Analysis of noise impacts associated with maintenance activities are not required by Arizona Department of Transportation and Federal Highway Administration policy. Cumulative noise impacts are addressed on page 4-176 of the Draft Environmental Impact Statement. Vehicle traffic mix projections were provided by the Maricopa Association of Governments and are consistent with the regional conformity analyses; they are discussed in greater detail in the noise technical report prepared for the project.

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250	Ch. 4	Noise Criteria	4-80	Noise	The DEIS notes that "To further clarify the process of noise analysis and the evaluation of noise abatement, ADOT adopted a Noise Abatement Policy (NAP), last updated in 2007" (4-80). However, the most recently issued ADOT Noise Abatement Policy is dated July 13, 2011, which superseded the 2007 version cited in the DEIS. It does not appear that the DEIS utilized the most recent ADOT Noise Abatement Policy in the noise analysis.
251	Ch. 4	Noise Criteria	4-80	Noise	The DEIS includes an incomplete review of the regulations regarding noise. The only regulations analyzed in the DEIS for noise impacts in any detail are those dealing with the Federal Highway Administration Noise Abatement Criteria (found in 23 CFR 772), and the ADOT Noise Abatement Plan dated 2007 (which isn't even the most up-to-date version). The following additional laws and guidelines could impact the project: • Noise Control Act of 1972, as amended (PL 92-574, 42 USC 4901 et seq.); • The Quiet Communities Act of 1978 (42 USC 4913) promoting the development of state and local noise control programs; • U.S. Department of Transportation Federal Transit Administration (FTA) has published a guideline that specifically addresses issues of community noise (FTA-VA-90-1003-06); • Occupational Safety and Health Administration (OSHA) Occupational Noise Exposure, Hearing Conservation Amendment (Federal Register 48[46]:9738-9785); • U.S. Department of Housing and Urban Development (24 CFR 51.101(a)(8)); and • County, city, or local noise ordinances applicable to the project.
252	Ch. 4	Table 4-40 – Noise Analysis Results, Western and Eastern Sections	4-84	Noise	It appears that not all sensitive receptors that could be impacted by noise from the project were identified and impacts predicted for, only the ones closest to the project were analyzed. For example, multiple schools located within approximately 0.5 mi of the project or alternatives that could be impacted were not evaluated, such as the following: • Kyrene de la Estrella; • Kyrene del Milenio; • Kyrene de la Sierra; • Desert Vista High School; • Keystone Montessori; • Horizon Community Learning Center; • St. John Bosco Interparish Catholic School; • Betty Fairfax High School; • Cheatham Elementary School; • Country Gardens Charter School; • Summit School of Ahwatukee; and • Sunridge Elementary School.
253	Ch. 4	Construction Noise Inset	4-89	Noise	Both the DEIS and the accompanying Noise Report use as a proxy for noise-related construction impacts from the project "measurements" from "4 freeway construction project in Arizona that assessed the collective impact of construction noise" (p. 4-89 in the DEIS and p. 3-17 of the Noise Report) However, the specific freeway construction project was not mentioned; therefore, the comparability of these measurements to the proposed project is questionable and cannot be ascertained from the data provided.
254	Ch. 4	Mitigation for Vibration-related Impacts Inset	4-115	Topography, Geology, and Soils	Vibration from blasting is qualitatively discussed in the Topography, Geology, and Soils section of the DEIS; however, vibration from non-blasting construction activities and from operational impacts is not discussed anywhere within the DEIS. Procedures for screening and analyzing for vibrational impacts from construction and highway operation are provided in the U.S. Department of Transportation Federal Transit Administration "Transit Noise and Vibration Impact Assessment" (2006).
	WATER RESOURCES				
255	4	Water Resources	4-93	Surface Water	The DEIS correctly identifies that there are impaired waters within the project area (page 4-93). However, the importance of this designation is not fully carried through the analysis. ADOT's Statewide Stormwater Permit (Permit No. AZS000018-2008) has specific monitoring criteria associated with impaired waters and specific mitigation criteria that shall be implemented for impaired waters. These

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250	**Noise**	The noise analysis has been updated for the Final Environmental Impact Statement using most recent Federal Highway Administration and Arizona Department of Transportation policy and traffic projections provided by the Maricopa Association of Governments in August 2013. This updated analysis begins on page 4-88 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted.
251	**Noise**	As stated in the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, environmental impact statements should be analytic rather than encyclopedic [40 Code of Federal Regulations Part 1502.2(a)]. Those noise regulations of direct consequence to the proposed action were discussed.
252	**Noise**	As stated on page 4-82 of the Draft Environmental Impact Statement, over 220 sensitive receivers were evaluated from a traffic noise perspective. All of the receivers represent noise sensitive land uses in proximity to the proposed project. These receivers were closer to the proposed action than the schools listed; therefore, these receivers would have higher noise levels than the schools more distant from the proposed action. Analysis of noise impacts is conducted in accordance with Arizona Department of Transportation and Federal Highway Administration policy.
253	**Noise**	The measurements were collected during the construction of State Route 202L (Red Mountain Freeway) near Mesa Drive. This information has been added to the text box on page 4-98 of the Final Environmental Impact Statement.
254	**Noise**	There are no federal requirements directed specifically to highway traffic induced vibration. All studies the highway agencies have done to assess the impact of operational traffic induced vibrations have shown that both measured and predicted vibration levels are less than any known criteria for structural damage to buildings.
255	**Water Resources**	The specific water quality constituents that cause the impairment change from year to year as the Arizona Department of Environmental Quality and U.S. Environmental Protection Agency assess and evaluate the water quality standards; therefore, the specific contaminants from the Section 303(d) list are not noted in the Draft Environmental Impact Statement. The primary constituent that causes impairment (total dissolved solids) is discussed on page 4-93 of the Draft Environmental Impact Statement. Specific best management practices would not be known until final design when the stormwater pollution prevention plan would be developed. The Flood Control District of Maricopa County has shared drainage systems with the municipalities and stormwater discharges that have the potential to reach the Salt and Gila rivers; therefore, the Flood Control District of Maricopa County has established and implemented monitoring requirements to comply with Arizona Pollutant Discharge Elimination System regulations, as discussed beginning on page 4-93 of the Draft Environmental Impact Statement. Discussion of Arizona Pollutant Discharge Elimination System requirements and the Arizona Department of Transportation's permit requirements through individual permits begins on page 4-94 of the Draft Environmental Impact Statement.

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					specific criteria are not discussed.
					The specific water quality constituents are not identified that cause the impairment of these waters. This lack of disclosure prevents full analysis of the expected impact to these impaired waters due to both construction and operation of the proposed freeway.
					The analysis concludes that "Implementation of BMPs associated with any of the action alternatives would reduce water quality impacts on the receiving waters of the Salt and Gila rivers. Both construction and operational impacts may be mitigated through the use of BMPs." (page 4-101) This conclusion is not supported by the existing disclosure. Without disclosure of 1) the types of impairment on the Salt and Gila Rivers, 2) the specific monitoring/mitigation required under the ADOT Statewide permit, and 3) analysis of the types of contaminants to be discharged from the project, the conclusion as stated is arbitrary and unsupported.
256	4	Water Resources	4-93	Surface Water	Specific to the impaired waters, the analysis also concludes that "increased pollutant loading from freeway operation might further impair listed reaches of the Salt River and might need measures in addition to existing permit controls to achieve or maintain water quality standards in accordance with CWA Section 303(d)." (page 4-97) This analysis is incomplete. It would be reasonable to extend the analysis to disclose a) what measures might be needed, and b) whether those measures would be effective. Without disclosure of 1) the type of impairment, 2) the types of contaminants, and 3) the prescribed mitigation measures and their effectiveness, disclosure of impacts to the impaired waters is partial and limited.
257	4	Secondary and Cumulative Impacts	4-173	Surface Water	The impaired waters should be identified on at least one of the maps included in the Water Resources section. Instead they appear in the Waters of the U.S. section later in the DEIS. The analysis indicates in several places that along the Eastern route, surface water discharge would be routed onto lands owned by the Gila River Community, and that this currently occurs. "The drainage design features of the E1 Alternative would be such that drainage patterns from the South Mountains toward the Gila River would not be altered. Currently, drainage flows generally from the north to the south, passing under Pecos Road through a series of culverts following natural drainages/washes. The E1 Alternative would include small drainage basins and channels on the northern side of the freeway to treat the water quality and meter and direct drainage flows under the freeway and onto Community land in the same manner as they are currently." (4-98) This passage highlights a general lack in the Cumulative Impacts section of the EIS. The fundamental first step in assessing cumulative impacts is to define what other Reasonably Foreseeable Actions overlap the project in both time and space. No list of Reasonably Foreseeable Actions is provided in the DEIS. Lacking this fundamental background information results in an inadequate framework for assessing cumulative impacts. From the analysis of cumulative impacts of water resources, the reasonably foreseeable actions considered appear to be fairly generic. Specifically, the potential for development along the south side of the Eastern alignment, on the Gila River Indian Community, ought to have been explicitly assessed for its likelihood of occurring. Potential development in this area has a high likelihood of changing the location of stormwater discharges and the impact of those stormwater discharges.
258	4	Water Resources	4-100	Groundwater	The future discharge of stormwater is stated as being identical to that occurring at present. This is a valid method of identifying any direct impacts from the project. It is not, however, a valid method of identifying any cumulative impacts from the project, as there may be reasonably foreseeable development south of Pecos Road that would alter conditions from the current situation. Analysis of impacts as required under NEPA and other laws has several fundamental components: 1) The "best available scientific and technical information" shall be used (CEQ) 2) The analysis is not arbitrary (Administrative Procedures Act) 3) Resources are interrelated and the direct impacts on one resource may engender indirect impacts on other resources; these indirect impacts must be assessed (CEQ)

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256	**Waters of the US**	A reference to the figure on which the impaired waters are shown has been added to the discussion on page 4-101 of the Final Environmental Impact Statement. The sentence, "Several reaches of the Salt and Gila rivers are on the Section 303(d) list, including that portion of the Salt River in the Study Area" has been modified to read: "Several reaches of the Salt and Gila rivers are on the Section 303(d) list, including that portion of the Salt River in the Study Area (see Figure 4-36 on page 4-116)."
257	**Secondary and Cumulative Impacts**	As noted on page 4-171 of the Draft Environmental Impact Statement, the type of activities that could contribute to cumulative impacts included general development patterns. Development on the Gila River Indian Community is a tribal function and requires no approval from other jurisdictions or notice to other jurisdictions regarding pending development. As a result, development along the Gila River Indian Community boundary is speculative. It is, however, difficult to conceive of a development project on the Gila River Indian Community that would cause upstream impacts to the level described in the comment. As noted in the comment, according to 46 *Federal Register* 18026 (March 23, 1981), an environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible. The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department, Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway (see *Mitigation*, beginning on page 4-126 of the Draft Environmental Impact Statement and on page 4-138 of the Final Environmental Impact Statement).
258		Specific comments are addressed below.

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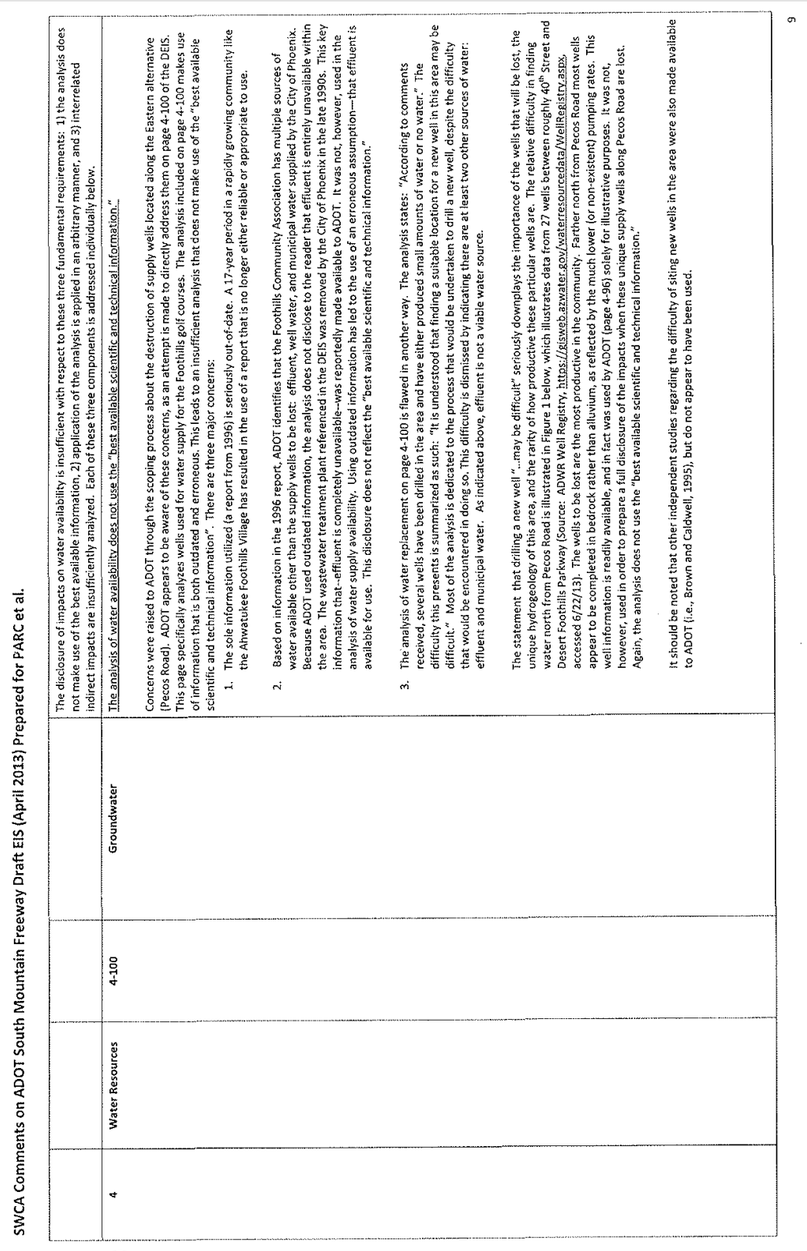

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4	Water Resources	4-100	Groundwater	

The disclosure of impacts on water availability is insufficient with respect to these three fundamental requirements: 1) the analysis does not make use of the best available information, 2) application of the analysis is applied in an arbitrary manner, and 3) interrelated indirect impacts are insufficiently analyzed. Each of these three components is addressed individually below.

The analysis of water availability does not use the "best available scientific and technical information."

Concerns were raised to ADOT through the scoping process about the destruction of supply wells located along the Eastern alternative (Pecos Road). ADOT appears to be aware of these concerns, as an attempt is made to directly address them on page 4-100 of the DEIS. This page specifically analyzes wells used for water supply for the Foothills golf courses. The analysis included on page 4-100 makes use of information that is both outdated and erroneous. This leads to an insufficient analysis that does not make use of the "best available scientific and technical information". There are three major concerns:

1. The sole information utilized (a report from 1996) is seriously out-of-date. A 17-year period in a rapidly growing community like the Ahwatukee Foothills Village has resulted in the use of a report that is no longer either reliable or appropriate to use.

2. Based on information in the 1996 report, ADOT identifies that the Foothills Community Association has multiple sources of water available other than the supply wells to be lost: effluent, well water, and municipal water supplied by the City of Phoenix. Because ADOT used outdated information, the analysis does not disclose to the reader that effluent is entirely unavailable within the area. The wastewater treatment plant referenced in the DEIS was removed by the City of Phoenix in the late 1990s. This key information that--effluent is completely unavailable--was reportedly made available to ADOT. It was not, however, used in the analysis of water supply availability. Using outdated information has led to the use of an erroneous assumption—that effluent is available for use. This disclosure does not reflect the "best available scientific and technical information."

3. The analysis of water replacement on page 4-100 is flawed in another way. The analysis states: "According to comments received, several wells have been drilled in the area and have either produced small amounts of water or no water." The difficulty this presents is summarized as such: "It is understood that finding a suitable location for a new well in this area may be difficult." Most of the analysis is dedicated to the process that would be undertaken to drill a new well, despite the difficulty that would be encountered in doing so. This difficulty is dismissed by indicating there are at least two other sources of water: effluent and municipal water. As indicated above, effluent is not a viable water source.

The statement that drilling a new well "...may be difficult" seriously downplays the importance of the wells that will be lost, the unique hydrogeology of this area, and the rarity of how productive these particular wells are. The relative difficulty in finding water north from Pecos Road is illustrated in Figure 1 below, which illustrates data from 27 wells between roughly 40th Street and Desert Foothills Parkway (Source: ADWR Well Registry, https://gisweb.azwater.gov/waterresourcedata/WellRegistry.aspx, accessed 6/22/13). The wells to be lost are the most productive in the community. Farther north from Pecos Road most wells appear to be completed in bedrock rather than alluvium, as reflected by the much lower (or non-existent) pumping rates. This well information is readily available, and in fact was used by ADOT (page 4-96) solely for illustrative purposes. It was not, however, used in order to prepare a full disclosure of the impacts when these unique supply wells along Pecos Road are lost. Again, the analysis does not use the "best available scientific and technical information."

It should be noted that other independent studies regarding the difficulty of siting new wells in the area were also made available to ADOT (i.e., Brown and Caldwell, 1995), but do not appear to have been used.

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Code	Issue	Response
259	**Water Resources**	Page 4-100 of the Draft Environmental Impact Statement states that finding a suitable location for a new well in this area may be difficult. Productivity of the well in bedrock formations is primarily based on intercepting fractures, and that can be very difficult to do. The Arizona Department of Transportation is aware of the difficult conditions that exist in replacing wells in this area. The Arizona Department of Transportation is also aware of the productivity of the well in question. The comment is correct that wastewater effluent is not available as a replacement source and is not being used. The City of Phoenix did operate a wastewater reclamation facility in this area, but it was removed from service and demolished. The City of Phoenix still owns the property, but all facilities have been removed from the site. Thus, only two water sources are available for irrigation and lake supply for the Foothills Community Association: the well that would be acquired and potable water from the City of Phoenix. In this Final Environmental Impact Statement, the discussion on page 4-100 of the Draft Environmental Impact Statement has been modified in the Final Environmental Impact Statement to reflect that reclaimed wastewater would not be available; however, the conclusion on page 4-100 is still appropriate. As stated on pages 4-100 of the Draft Environmental Impact Statement, "In the event that well replacement were to be impossible, the Arizona Department of Transportation would still replace the water that would be lost through the acquisition." Depending on whether an action alternative were to become the Selected Alternative, it may be possible to keep certain wells in their current location, but move the well controls and associated piping to outside of the right-of-way. Such an analysis would be performed later in the design process. If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards (see text box on page 4-100 of the Draft Environmental Impact Statement). The number of wells potentially affected would be consistent with that of a project the magnitude of the proposed action, and the well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Transportation to effectively mitigate well impacts associated with its projects throughout the region.

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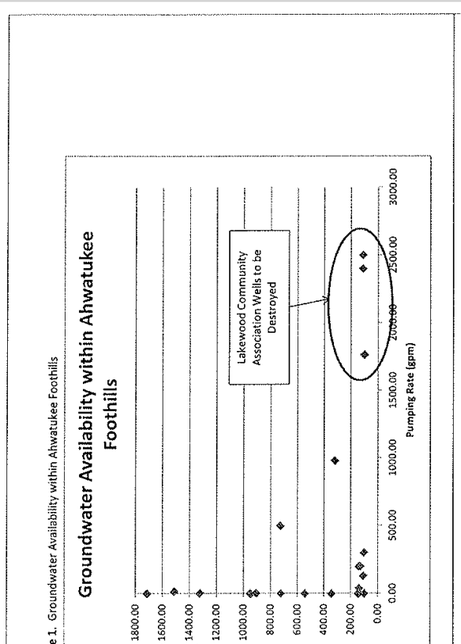
Figure 1. Groundwater Availability within Ahwatukee Foothills



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4	Water Resources	4-100	Groundwater

The analysis of water availability is applied in an arbitrary manner, and is not complete.

In addition to being technically flawed by the use of outdated information and by not fully assessing available information, the analysis presented by ADOT has been applied in an arbitrary manner. The detailed analysis regarding water availability (page 4-100) focused solely on the Foothills Community Association and the potential loss of their wells. The DEIS does not analyze nearby entities that would experience the same impacts, or entities anywhere else along the potential freeway route. One specific example is the Lakewood Community Association. As shown in Figure 1, the supply wells currently used by the Lakewood community would be even more difficult to replace given their large pumping capacity. The DEIS arbitrarily discloses impacts to one entity (Foothills Community Association) and not the other (Lakewood Community Association), no more than a few miles away. Further, no other impacts to domestic wells or supply wells are disclosed anywhere along any of the alternative routes, despite the potential for significant impacts to be present as demonstrated by the Foothills Community Association wells.

With respect to the total number of wells to be impacted (Table 4-41), this type of tabulation is not a useful or sufficient analysis. A thorough analysis would, at the least, identify the number of domestic or exempt wells, the number of supply or non-exempt wells, the presence of monitoring wells, and the ownership of major supply wells.

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Code	Issue	Response
260		Comment noted.
261	**Water Resources**	Because of the public concern expressed during the environmental impact statement process, page 4-100 of the Draft Environmental Impact Statement focuses on the Foothills Community Association to provide more details on the well acquisition, condition assessment, and replacement process used by the Arizona Department of Transportation. The Arizona Department of Transportation understands, and states on page 4-100 of the Draft Environmental Impact Statement, that finding a suitable location for a new well in this area may be difficult. Depending on whether an action alternative were to become the Selected Alternative, it may be possible to keep certain wells in their current location, but move the well controls and associated piping to outside of the right-of-way. Such an analysis would be performed later in the design process. Table 4-41, on page 4-98 of the Draft Environmental Impact Statement, discloses the number of wells that may be acquired by each action alternative and, as noted on page 4-98 of the Draft Environmental Impact Statement, some of these wells are abandoned wells. This information was updated in the Final Environmental Impact Statement on page 4-106. The comment suggests that the wells that would be adversely affected should be further classified as domestic, supply, or monitoring, and well ownership should be noted. This additional level of detail would not assist the environmental impact statement decision-making process.

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262	SWCA Comments on ADOT South Mountain Freeway Draft EIS (April 2013) Prepared for PARC et al. 4 | Water Resources | 4-100 | Groundwater The analysis of water availability fails to take into account significant indirect effects. Analysis of impacts under NEPA does not require that speculative impacts be assessed, but it does require that reasonably foreseeable impacts be addressed, and in particular indirect impacts that may affect another resource. The DEIS fails to disclose significant adverse indirect impacts resulting from the loss of these supply wells. ADOT states that there are three sources of water: effluent, groundwater, and municipal water. The best available scientific and technical information indicates that two of these sources—effluent and groundwater—are either completely unavailable or their availability is going to be challenging. That leaves only one source of water: municipal water from the City of Phoenix. The DEIS correctly states that City of Phoenix water is significantly more expensive than groundwater. It does not, however, fully investigate the impact of this cost. There are two reasonably foreseeable outcomes if only City of Phoenix water is available: 1) The golf courses within the Foothills community become economically infeasible. There are several analogs that suggest this is a reasonable effect. One course in the Ahwatukee area has recently closed because of financial difficulties. One other course already has seasonal shutdowns due to water expenses. State law restricts increases of association fees, making associations relatively unresponsive to large increases in costs. That increased costs of water would have a negative effect is not speculative. The economic fallout from the loss of a golf course—not only to the course owner and operator but to the many homeowners with home values that would be impacted—is reasonably foreseeable and should have been disclosed as an indirect environmental impact of losing supply wells. 2) The lakes within the Lakewood community would likely also become economically infeasible, for the same reasons. These are large lakes that require significant amounts of water. The costs of supplying municipal water to these lakes would be prohibitive, and the association would not be able to raise fees to respond (in Arizona HOA fee increases are statutorily capped at a maximum of 5% per annum). These lakes are the centerpiece of the Lakewood community. The loss of these lakes would have a significant negative impact on homeowners in the area, including to neighborhood property values, recreational opportunities, and aesthetic values. The loss of these lakes is reasonably foreseeable and should have been disclosed as an indirect environmental impact of losing supply wells. 11
262	4 | Secondary and Cumulative Impacts | 4-173 | Water Availability Based on the above concerns, the assessment of cumulative impacts of water availability is lacking. The DEIS states: "Ongoing planned and permitted residential, commercial, and industrial development in the region would likely continue to place a demand on water availability. The proposed action would have little cumulative effect on water availability." (emphasis added)
263	4 | Water Resources | 4-97 | Groundwater Given the outcomes of attempting to replace water lost to both Foothills Community Association and Lakewood Community Association, there would be stresses placed on other aspects of the water delivery system within the City of Phoenix. This has not been analyzed properly as either a direct, indirect, or cumulative impact. A comment typical throughout the document, but specific to groundwater resources is the use of outdated information. Specifically, groundwater levels are shown from 1992, almost 20 years in the past. If new information is not available, it is the responsibility of the agency to either obtain that information, or state clearly why that cannot be done. (CEQ Regs 1502.22)
264	4 | Water Resources | 4-97 | Groundwater Curiously, elsewhere in the document "Topography, Geology, and Soils" more up-to-date groundwater levels are presented. The analysis of water quality is insufficient. While existing background water quality (page 4-97) is of interest, the more important concern is the potential for the proposed freeway route to impact known areas of contamination. This is not disclosed in the assessment of water resources. There are several basic and readily available data sources that should have been consulted for this analysis. At a

Code	Issue	Response
262	**Water Resources**	The comment is correct that wastewater effluent is not available as a replacement source and is not being used. The City of Phoenix did operate a wastewater reclamation facility in this area, but it was removed from service and demolished. The City of Phoenix still owns the property, but all facilities have been removed from the site. Thus, only two water sources are available for irrigation and lake supply for the Foothills Community Association: the well that would be acquired and potable water from the City of Phoenix. In the Final Environmental Impact Statement, the discussion on page 4-100 of the Draft Environmental Impact Statement has been modified to reflect that reclaimed wastewater would not be available (see page 4-108 of the Final Environmental Impact Statement); however, the conclusion on page 4-100 is still appropriate. As stated on page 4-100 of the Draft Environmental Impact Statement, "In the event that well replacement were to be impossible, Arizona Department of Transportation would still replace the water that would be lost through the acquisition." Page 4-100 of the Draft Environmental Impact Statement states that finding a suitable location for a new well in this area may be difficult. Productivity of the well in bedrock formations is primarily based on intercepting fractures, and that can be very difficult to do. The Arizona Department of Transportation is aware of the difficult conditions that exist in replacing wells in this area. The procedure identified on page 4-100 of the Draft Environmental Impact Statement defines the procedure that the Arizona Department of Transportation would use to replace adversely affected wells, and also identifies the general costs the Arizona Department of Transportation would incur to replace the lost water sources. As noted in this discussion, if it were necessary to provide replacement water instead of a new well, the Arizona Department of Transportation would, in negotiations with the well owner, include the difference between the costs of pumping the well and the costs of the new replacement water source. Depending on whether an action alternative were the Selected Alternative, it may be possible to keep certain wells in their current location, but move the well controls and associated piping to outside of the right-of-way. Such an analysis would be performed later in the design process.
263	**Water Resources**	As noted on page 4-97 of the Draft Environmental Impact Statement, although groundwater level data in Ahwatukee Foothills Village were shown from 1972 to 1992, this information was gathered from the U.S. Geological Survey in 2009. Groundwater data in other areas may indeed be more current; however, this additional level of detail would not assist the environmental impact statement decision-making process.
264	**Hazardous Materials**	Both the Van Buren Tank Farm and the West Van Buren Water Quality Assurance Revolving Fund site were identified and considered during development of the Draft Environmental Impact Statement (see pages 4-97 and 4-153 of the Draft Environmental Impact Statement and the Draft Initial Site Assessment prepared for the proposed project). These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected medium (groundwater) and the construction zone (near-surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165.

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					minimum: 1) known Leaking Underground Storage Tank (LUST) sites, 2) known State (WQARF) or Federal (CERCLA) superfund sites, and 3) known or suspected landfills, either historic or active (the location along the Salt River makes this a particularly important item to assess in the DEIS).
265	4	Waters of the U.S.	4-112	Waters of the U.S.	The DEIS states: "The general and special conditions of the Section 404 Individual Permit would minimize impacts on jurisdictional waters to the extent practicable. ADEQ would issue Section 401 Individual certification for compliance with water quality prior to Section 404 permit issuance." The issuance of the Section 401 Individual certification in light of the impaired nature of the Salt and Gila River should have been discussed.
	SOCIOECONOMICS				
266	1	Context of the purpose and need	1-1, 1-5	Socioeconomics	Purpose and Need (Chapter 1) states that demand for travel is based on capacity, transportation demand, and social and economic needs. Chapter 1 further states that MAG's regional travel demand model is used to forecast travel demand and that one of the inputs used includes socioeconomic data based on population and economic forecasts. Data used throughout the DEIS for projected population estimates are not consistent with Arizona Department of Administration estimates (see below). Population project estimates used throughout the DEIS are higher than the state range of estimates. Therefore, inputs into the travel demand model are likely skewing the model output, which is the foundation of two of the three elements of the project purpose and need.
266	1	Purpose and Need	1-11	Socioeconomics	in the DEIS, projected growth estimates Maricopa County population to be 6.5 million by 2035 (citing MAG 2009b), however 2012 population projections estimated for Maricopa County by the Arizona Department of Administration (ADOA) estimate population in the county to be 5.2 million (low), 5.7 million (medium), or up to 6.2 million (high). http://www.workforce.az.gov/population-projections.aspx Therefore the DEIS is using a population estimate for the County that is not consistent with the state's estimates. The DEIS estimates are 1.3 million to 500,000 more than state recognized projections. The ADOA estimates are intended "provide reliable unbiased projections of future population growth and a single state repository for current population references enabling sound planning and decision making by government and private entities." No indication is provided as to why a new system for projections is used and why it is so inconsistent with the ADOA estimates.
267	1	Purpose and Need	1-11	Socioeconomics	DEIS states that 50% of the 6.5 million in population growth is expected to occur in areas that would be immediately served by the proposed action. This freeway is intended to be part of a regional transportation system intended to improve regional connectivity, regional capacity, etc. (see DEIS page 1-10). Therefore statement about service area is irrelevant to the purpose and need.
	1, 3, 4	Study Area		Socioeconomics	Study Area is not well defined. Chapter 1 states that it is limited to southern Phoenix metropolitan area (page 1-1), while Chapter 3 further defines the study area in a figure caption (Figure 3-1). Chapter 3 defines the study area as the southwestern portion of Maricopa County, defined by a gap in the freeway network, limited by South Mountain and GRIC. No discussion is included on why there is a gap in the transportation network here, and why this is the only gap area. Why couldn't the study area and therefore alternatives include a connection south of the Gila River Indian Community (i.e., in Pinal County), or along Riggs Road or Queen Creek Road within the GRIC? This study area is further used in Chapter 4 when discussing social and economic conditions and impacts. As above, the South Mountain freeway is a regional freeway serving broader regional needs; therefore, for the purpose of the socioeconomic analysis, the study area is too restrictive. There is no reason the study area can't be different for socioeconomics than for other resources.
	4	Regional Demographic context	4-20	Socioeconomics	Regarding population growth, see comment above. Projections are higher and potentially inflated with no explanation as to why a different source is used and why the estimates are different.
	4	Population and Employment	4-20	Socioeconomics	It would be more appropriate to use a range of projection estimates as provided by ADOA. Using ADOA estimates for Maricopa County for 2035, population will increase 50–75% (not 85%) between 2005 and 2035. Projections on the ADOA website are from 2012 while projections in the DEIS are from 2009 or earlier (MAG 2009b).
	4	Population and	4-20	Socioeconomics	Per CEQ regulations, agencies are required to use the best available data in the analysis and in the decision making process. Data

Code	Issue	Response
265	**Water Resources**	According to 33 Code of Federal Regulations 323.3, a permit is required for discharges of dredged or fill material into waters of the United States. As noted on page 4-110 of the Draft Environmental Impact Statement, as design proceeds, the Arizona Department of Transportation would prepare and submit an application to the U.S. Army Corps of Engineers for a permit under Section 404 of the Clean Water Act. Steps are outlined beginning on page 4-110 of the Draft Environmental Impact Statement. Minimization of impacts would be achieved and unavoidable impacts would be mitigated to the extent reasonable and practicable. These steps are outlined beginning on page 4-110 of the Draft Environmental Impact Statement.
266	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
267	**Purpose and Need**	The Draft Environmental Impact Statement does not state that there would be 6.5 million in population growth. In 2005, there were already 3.7 million people in Maricopa County, so the increase between 2005 and 2035 would be 2.8 million people, and 44 percent of that growth would occur in the area served by the proposed freeway. This information supports the definition of the Study Area and the need for a major transportation system in the southwestern portion of the Phoenix metropolitan area.

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					minimum: 1) known Leaking Underground Storage Tank (LUST) sites, 2) known State (WQARF) or Federal (CERCLA) superfund sites, and 3) known or suspected landfills, either historic or active (the location along the Salt River makes this a particularly important item to assess in the DEIS).
4	Waters of the U.S.	4-112	Waters of the U.S.		The DEIS states: "The general and special conditions of the Section 404 (Individual Permit would minimize impacts on jurisdictional waters to the extent practicable. ADEQ would issue Section 401 Individual certification for compliance with water quality prior to Section 404 permit issuance."
					The issuance of the Section 401 individual certification in light of the impaired nature of the Salt and Gila River should have been discussed.
SOCIOECONOMICS					
1	Context of the purpose and need	1-1, 1-5	Socioeconomics		Purpose and Need (Chapter 1) states that demand for travel is based on capacity, transportation demand, and social and economic needs. Chapter 1 further states that MAG's regional travel demand model is used to forecast travel demand and that one of the inputs used includes socioeconomic data based on population and economic forecasts. Data used throughout the DEIS for projected population estimates are not consistent with Arizona Department of Administration estimates (see below). Population project estimates used throughout the DEIS are higher than the state range of estimates. Therefore, inputs into the travel demand model are likely skewing the model output, which is the foundation of two of the three elements of the project purpose and need.
1	Purpose and Need	1-11	Socioeconomics		In the DEIS, projected growth estimates Maricopa County population to be 6.5 million by 2035 (citing MAG 2009b), however 2012 population projections estimated for Maricopa County by the Arizona Department of Administration (ADOA) estimate population in the county to be 5.2 million (low), 5.7 million (medium), or up to 6.2 million (high). http://www.workforce.az.gov/population-projections.aspx Therefore the DEIS is using a population estimate for the County that is not consistent with the state's estimates. The DEIS estimates are 1.3 million to 300,000 more than state recognized projections. The ADOA estimates are intended "provide reliable unbiased projections of future population growth and a single state repository for current population references enabling sound planning and decision making by government and private entities." No indication is provided as to why a new system for projections is used and why it is so inconsistent with the ADOA estimates.
1	Purpose and Need	1-11	Socioeconomics		DEIS states that 50% of the 6.5 million in population growth is expected to occur in areas that would be immediately served by the proposed action. This freeway is intended to be part of a regional transportation system intended to improve regional connectivity, regional capacity, etc. (see DEIS page 1-10). Therefore statement about service area is irrelevant to the purpose and need.
1, 3, 4	Study Area		Socioeconomics		Study Area is not well defined. Chapter 1 states that it is limited to southern Phoenix metropolitan area (page 1-11), while Chapter 3 further defines the study area as the southwestern portion of Maricopa County, defined by a gap in the freeway network, limited by South Mountain and GRIC. No discussion is included of why there is a gap in the transportation network here, and why this is the only gap area. Why couldn't the study area and therefore alternatives include a connection south of the Gila River Indian Community (i.e., in Pinal County), or along Riggs Road or Queen Creek Road within the GRIC? This study area is further used in Chapter 4 when discussing social and economic conditions and impacts. As above, the South Mountain freeway is a regional freeway serving broader regional needs; therefore, for the purpose of the socioeconomic analysis, the study area is too restrictive. There is no reason the study area can't be different for socioeconomics than for other resources.
4	Regional Demographic context	4-20	Socioeconomics		Regarding population growth, see comment above. Projections are higher and potentially inflated with no explanation as to why a different source is used and why the estimates are different.
4	Population and Employment	4-20	Socioeconomics		It would be more appropriate to use a range of projection estimates as provided by ADOA. Using ADOA estimates for Maricopa County for 2035, population will increase 50–75% (not 85%) between 2005 and 2035. Projections on the ADOA website are from 2012 while projections in the DEIS are from 2009 or earlier (MAG 2009b).
4	Population and	4-20	Socioeconomics		Per CEQ regulations, agencies are required to use the best available data in the analysis and in the decision making process. Data

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Code	Issue	Response
268	**Study Area**	The parameters for reference to the Study Area are defined in Chapter 1, *Purpose and Need*, of the Draft and Final Environmental Impact Statements as the area defining the transportation problem. As presented in the chapter, transportation models were used to determine where the characteristics of the transportation problem would diminish and generally, it is at these locations where the definition of the Study Area took shape. This effort was coordinated with stakeholder agencies, including the U.S. Environmental Protection Agency. The comment references the term, *Study Area*, in terms of the analytical requirements associated with impact analyses. Each element of the environment has independent, unique (while sometimes overlapping) geographic limits for impact analyses. These limits are established by technical expertise, knowledge, the application of recognized and accepted analytical methods and assumptions, and characteristics unique to the proposed action. Methodology reports were prepared for all elements and shared with agency peers and internal team members to validate methods and limits of study prior to conducting analyses, and results were validated by peers. During impact analyses, limits were adjusted, as appropriate, based on changes in project design as well as in-field observations. Impact analyses results were the subject of the application of scientific-community–recognized techniques with the appropriate amount of presentation in accordance with the efficiency and decision-making provisions of the National Environmental Policy Act. Chapter 2, *Gila River Indian Community Coordination*, of the Draft and Final Environmental Impact Statements text goes to great lengths to discuss limitations of study on Gila River Indian Community land. Chapter 3, *Alternatives*, of the Draft and Final Environmental Impact Statements provides substantial discussion on why alternatives on Riggs or Queen Creek roads were eliminated from further study. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
269	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a

(Response 269 continues on next page)

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					is out of date (see comments above).
	4	Employment	4-21	Socioeconomics	growth in the region has essentially halted since the 2007 recession; however ADOA indicates some small growth etween now and 2035. Statement in the DEIS about growth is not accurate.
	4	Community Character	4-21	Socioeconomics	nt recreational bicycle route; no discussion is included about what construction of the highway would do to road.
270	4	Community Character/General	4-21	Socioeconomics	include a discussion of recreation opportunities and changes to those in terms of community character, or sense is included in the DEIS that addresses changes in recreation opportunities or changes to recreationist experiences; discussed in Chapter 5 (trail, parkland, etc.) and impacts to these resources from a Section 4(f) perspective, but pacts from a social perspective is discussed. This should have been included in the social conditions or as a DEIS.
271	4	Community Character/General	4-21	Socioeconomics	
272	4	Environmental Consequences (all alternatives)		Socioeconomics	hapter 4 is limited to long-term impacts to arterials (reduction in traffic). Only a brief mention of the short-term is made at the end of Chapter 4, however this discussion should have been carried into the resource analysis to e. Construction will result in traffic delays, traffic re-routes (intentional and casual) noise, air emissions, etc. The S page 4-21) that there would be no adverse impacts to access to schools, however if construction impacts are have to be), this statement is not true for short-term impacts. rly not true for the long term. Under any of the action alternatives, the removal of the traffic interchange at 32nd Street would, for example, significantly curtail access to at least four nearby schools: Kyrene de los Lagos Elementary School, Desert Vista High School, Kyrene Akimel A-al Middle School, and Kyrene de la Estrella Elementary School.
	4	Environmental Justice	4-30, 4-36	Socioeconomics	the affected environment (census block-level, census block group) for Environmental Justice is appropriate. Affected Populations identified the presence of minority and low-income populations throughout the study area. with the area of potential adverse environmental impacts being limited to the right-of-way footprint only. The cts is appropriate for displacements (direct impacts) only. Environmental justice populations can experience ts such as adverse changes in air quality, noise levels, visual impacts, hazardous materials, property value, etc. tal Justice populations are understated/underestimated in this DEIS as impact discussion is limited to direct ip is not defined when the analysis states "impacts would be temporary and would not cause undue hardship." ts being disproportionate, especially as it relates to low-income populations, is that they are often unable to verse environmental impact—this is particularly true on tribal lands such as the GRIC, where individual residences ed to a family's personal allotment of land. Therefore, although everyone in the ROW (including non-opulations) would be affected, if there are environmental justice populations—which the DEIS says there are—proportionate on those populations.
	4	Environmental Justice	4-36	Socioeconomics	der to fully assess environmental justice impacts because air and noise are not analyzed in terms of general imilarly, for property value impacts, no discussion is included to understand if there would be property value be negative, generally how far out those impacts would be experienced, and if EJ populations would be impacted. discussion of how far away from the freeway impacts would be experienced, and therefore no discussion of al-justice impacts from air and noise, property value, etc.
	4	Displacements and Relocations	4-40	Socioeconomics	ate values uses home values from 2006, 7 years ago. This data represents values prior to the 2007+ recession and best available data. The housing market is quite different than it was in 2006; more recent data should have been ais.
	4	Economic Impacts	4-46+	Socioeconomics	of current housing inventory in the Study Area (not just the footprint/ROW), or of property values impacts at all, f concern over the long course of the project; property value as a public concern is expressed multiple times in
273					nt of the impacts of freeways on property values from the expansion of the Superstition Freeway/US60 did find mic benefits to property values from increased access and to multifamily residential, but that there were also

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269 (cont.)		lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. The Maricopa Association of Governments' control total for Maricopa County is consistent with the "ADOA—Medium Series."
270	**Purpose and Need**	The reference in the Draft Environmental Impact Statement was to the Study Area, not to Maricopa County or to the state of Arizona. Therefore, the Arizona Department of Administration numbers do not apply. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
271	**Design**	The main line of the E1 Alternative would not have a bicycle route as part of the design. Continuous east–west riding would be possible in the neighborhoods adjoining the alternative and along Chandler Boulevard.
272	**Section 4(f) and Section 6(f)**	The proposed action would not have impacts on recreational opportunities or cause any changes to recreational experiences. With the exception of the Maricopa Trail, the affected trails are planned (future) facilities. Impacts on proposed trails are discussed in the Draft Environmental Impact Statement Section 4(f) section. Because the proposed action would be constructed as an elevated span that would clear the existing Maricopa Trail segment, no impact from a social perspective was determined to be likely. The social conditions section of the Draft Environmental Impact Statement addresses issues regarding community character and access; specific parkland impacts are addressed in the Draft Environmental Impact Statement Chapter 5, *Section 4(f) Evaluation*.
273	**Traffic**	The impacts noted in the comment are primarily temporary construction impacts. These are covered in the section, *Temporary Construction Impacts*, beginning on page 4-161 of the Draft Environmental Impact Statement. The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange was eliminated based on undesirable residential displacements, proximity to nearby schools, and cost. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

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	4	Employment	4-21	Socioeconomics	throughout the section is out of date (see comments above).
	4	Community Character	4-21	Socioeconomics	Last paragraph states growth in the region has essentially halted since the 2007 recession; however ADOA indicates some small growth every year (1.1–1.8%) between now and 2035. Statement in the DEIS about growth is not accurate.
	4	Community Character/General	4-21	Socioeconomics	Pecos Road is a significant recreational bicycle route; no discussion is included about what construction of the highway would do to recreational use of this road.
	4	Community Character/General	4-21	Socioeconomics	Social Conditions often include a discussion of recreation opportunities and changes to those in terms of community character; or sense of place. No discussion is included in the DEIS that addresses changes in recreation opportunities or changes to recreationist experiences; Section 4(f) impacts are discussed in Chapter 5 (trail, parkland, etc.) and impacts to these resources from a Section 4(f) perspective, but no discussion of the impacts from a social perspective is discussed. This should have been included in the social conditions or as a separate section of the DEIS.
	4	Environmental Consequences (all alternatives)		Socioeconomics	Impacts discussion in Chapter 4 is limited to long-term impacts to arterials (reduction in traffic). Only a brief mention of the short-term impacts of construction is made at the end of Chapter 4, however this discussion should have been carried into the resource analysis to paint a complete picture. Construction will result in traffic delays, traffic re-routes (intentional and casual) noise, air emissions, etc. The statement is made (DEIS page 4-21) that there would be no adverse impacts to access to schools, however if construction impacts are considered (which they have to be), this statement is not true for short-term impacts. The statement is similarly not true for the long term. Under any of the action alternatives, the removal of the traffic interchange at 32nd Street would, for example, significantly curtail access to at least four nearby schools: Kyrene de los Lagos Elementary School, Desert Vista High School, Kyrene Akimel A-al Middle School, and Kyrene de la Estrella Elementary School.
274	4	Environmental Justice	4-30, 4-36	Socioeconomics	**The unit of analysis for the affected environment (census block-level, census block group) for Environmental Justice is appropriate.** **Affected Environment, Affected Populations identified the presence of minority and low-income populations throughout the study area.** **However, we disagree with the area of potential adverse environmental impacts being limited to the right-of-way footprint only. The ROW footprint for impacts is appropriate for displacements (direct impacts) only. Environmental justice populations can experience indirect adverse impacts such as adverse changes in air quality, noise levels, visual impacts, hazardous materials, property value, etc.** **Impacts to Environmental Justice populations are understated/underestimated in this DEIS as impact discussion is limited to direct impacts. Undue hardship is not defined when the analysis states "impacts would be temporary and would not cause undue hardship."** **The idea behind impacts being disproportionate, especially as it relates to low-income populations, is that they are often unable to relocate to avoid an adverse environmental impact—this is particularly true on tribal lands such as the GRIC, where individual residences may frequently be linked to a family's personal allotment of land. Therefore, although everyone in the ROW (including non-environmental justice population) would be affected, if there are environmental justice populations—which the DEIS says there are—then the effects are disproportionate on those populations.**
275	4	Environmental Justice	4-36	Socioeconomics	It is difficult for the reader to fully assess environmental justice impacts because air and noise are not analyzed in terms of general attenuation distance. Similarly, for property value impacts, no discussion is included to understand if there would be property value changes, if they would be negative, generally how far out those impacts would be experienced, and if EJ populations would be impacted. Generally, there is no discussion of how far away from the freeway impacts would be experienced, and therefore no discussion of potential environmental-justice impacts from air and noise, property value, etc.
276	4	Displacements and Relocations	4-40	Socioeconomics	Assessment of real estate values uses home values from 2006, 7 years ago. This data represents values prior to the 2007+ recession and is not the most recent, best available data. The housing market is quite different than it was in 2006; more recent data should have been employed in the analysis.
276	4	Economic Impacts	4-46+	Socioeconomics	There is no discussion of current housing inventory in the Study Area (not just the footprint/ROW), or of property values impacts at all, despite being a topic of concern over the long course of the project; property value as a public concern is expressed multiple times in Chapter 6 of the DEIS. ADOT's 2001 assessment of the impacts of freeways on property values from the expansion of the Superstition Freeway/US60 did find that there were economic benefits to property values from increased access and to multifamily residential, but that there were also

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274	**Environmental Justice and Title VI**	Impacts related to air quality, noise, visual resources, and hazardous materials are considered in the Draft Environmental Impact Statement for all populations, including environmental justice populations (see Draft Environmental Impact Statement page 4-58 [air quality], page 4-79 [noise], page 4-155 [visual resources], and page 4-152 [hazardous materials], respectively). The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. Land acquisition and relocation assistance services for the project shall be available to all individuals without discrimination in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act). The Uniform Act provides uniform, fair, and equitable treatment of people whose property is impacted or who are displaced as a result of the project, including those with special needs. Advisory assistance services and compensation practices are described in detail in the Arizona Department of Transportation's *Right-of-way Procedures Manual*, located at <azdot.gov/business/RightofWay_Properties/booklets-and-manuals>. For further discussion, see page 4-51 of the Final Environmental Impact Statement and Appendix 4-1. There would be no direct impacts on Gila River Indian Community land, nor would there be any adverse impacts that would require relocations from the Gila River Indian Community or allotment land.
275	**Neighborhoods/ Communities**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pages 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
276	**Neighborhoods/ Communities**	The availability and valuation assessment of residential properties has been updated in the Final Environmental Impact Statement (see page 4-47).

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4	Economic impacts	4-46+	Socioeconomics	negative impacts to property values on single-family residential housing (ADOT 2003). Impacts were based on distance to the freeway as well as a variety of other factors. The DEIS should have included a discussion of property values, both current in the study area (not just the right-of-way) as well as differentiating between impacts during construction and during operation.
				Property tax discussion is limited to direct loss of revenue through direct loss of properties (displaced, only in the ROW). No assessment is included of potential reductions in property tax revenue from changes in home prices in the study area if the project is constructed.

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277	**Neighborhoods/ Communities**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pages 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

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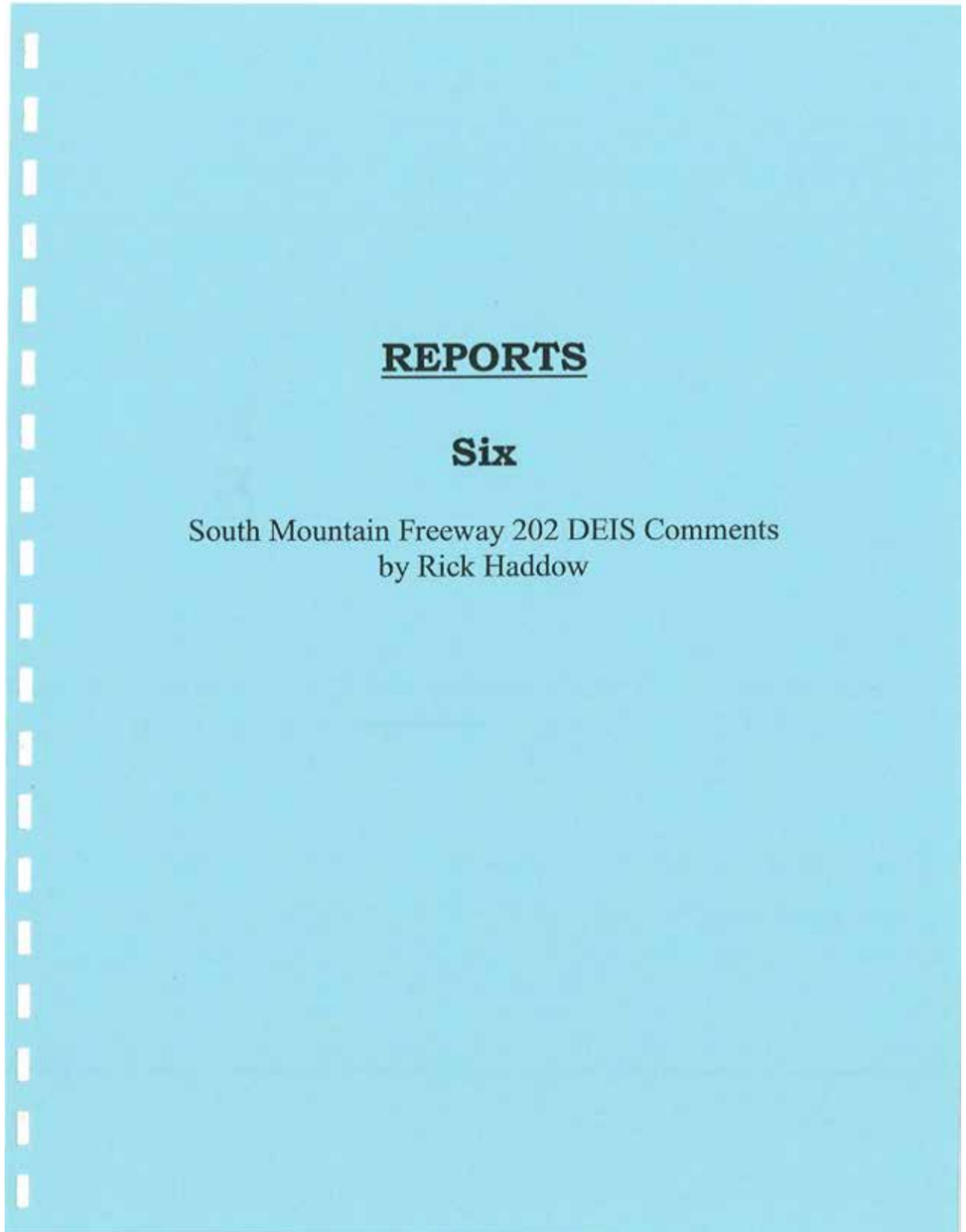

REPORTS

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South Mountain Freeway 202 DEIS Comments
by Rick Haddow

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South Mountain Freeway 202 DEIS
Comments Prepared for PARC et al.
By: Rick Haddow

From approximately 2006 through 2012, I worked for the Arizona Department of Transportation ("ADOT") as a District Environmental Coordinator. As a District Environmental Coordinator for ADOT, I was responsible for, in part, overseeing environmental planning and compliance with regard to ADOT construction projects and related public outreach. Prior to working with ADOT, I was with the Maricopa County Health Department, Division of Environmental Services for approximately 18 years. While with the County I, in part, designed and implemented the ambient air monitoring system network to determine attainment status for criteria pollutants throughout the County – including the area impacted by the proposed South Mountain/Loop 202 Freeway. I have also worked, and continue to work, as an environmental consultant. As set forth in my CV, which is attached hereto, I have significant experience in assessing environmental impacts and the mitigation thereof, as well as in air and water monitoring, modeling, and permitting.

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I recently reviewed the ADOT Draft Environmental Impact Statement for the South Mountain/ Loop 202 Freeway ("DEIS") and was shocked at what was presented. The DEIS is mostly standard boiler plate information as copied from regulatory documents. The use of data, the methodology employed, and the conclusions presented in the DEIS are absolutely without technical merit and do not comply with the fundamental concepts and purpose of an environmental impact statement. The DEIS does not protect or properly inform the citizens of the level of risk to public health by building the freeway. Following are some of my comments based on my thirty years of experience in the environmental field.

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The DEIS utilizes faulty wind speed data and methodology in doing its modeling. Wind speed is an essential part of the air shed modeling that ADOT used to determine, in part, regional stability – which relates to inversion layers and local weather patterns vis-à-vis projected freeway pollution. For example, the DEIS inputs are based on times that are not concurrent with pollution building hours. The DEIS also fails to correlate the morning traffic hours 0500 to 1100 during the build up of tail pipe emissions during an air shed inversion. The ability to determine CO and Particulate concentrations needs accurate wind data measurements during periods expected to have high pollutant concentrations.

280

The South Mountain Transportation Corridor Study ("SMTC") – a scoping document/component of the DEIS – confirms that South Mountain greatly influences the local air shed movement. According to the SMTC, down slopes bring cooler air in the evenings. The SMTC and the DEIS, however, fail to indicate that this process intensifies the morning desert inversion, exacerbating pollutant concentrations. Air quality will worsen by the influence of the mountain and any build option. The mountain creates its own small air shed, which is not evaluated by the DEIS. All reporting data uses valley wide components for stated results.

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278	**Environmental Impact Statement Process**	The study used state-of-the-practice, scientific community methods and similarly accepted methods. Methods, assumptions, and data were developed early in the environmental impact statement process and peer reviewed by the Federal Highway Administration, the Arizona Department of Transportation, and other federal, State, and local agencies. Peer reviewers concluded that the methods, assumptions, and data are appropriate. The Draft Environmental Impact Statement has sufficient technical merit, does comply with "fundamental concepts and purpose of an environmental impact statement," and does appropriately and properly inform the public. The Arizona Department of Transportation and Federal Highway Administration, in cooperation with the U.S. Army Corps of Engineers, the U.S. Bureau of Indian Affairs, and the Western Area Power Administration, prepared the Draft and Final Environmental Impact Statements and Section 4(f) Evaluation in accordance with the National Environmental Policy Act of 1969 [42 United States Code § 4332(2)(c)], Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 United States Code § 303, as amended), and Section 404 of the Clean Water Act of 1977 (33 United States Code § 1251). All of these agencies are experienced in the review of National Environmental Policy Act documents and have found the logical sequence of decision making to be sound and in line with National Environmental Policy Act requirements. The Draft Environmental Impact Statement and Section 4(f) Evaluation 1) satisfies Federal Highway Administration and Arizona Department of Transportation's environmental analysis requirements; 2) provides a comparison of the social, economic, and environmental impacts that may result from implementation of the proposed action—construction and operation of a major transportation facility; and 3) identifies measures to avoid, reduce, or otherwise mitigate adverse impacts.
279	**Air Quality**	The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Modeling methodology and results were reviewed by the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments.

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The sampling and stability data relied on by the SMTC and the DEIS is inaccurate. ADOT relies on air data taken at the Phoenix airport in the middle of the Valley without terrain conditions that proximate the region impacted by the South Mountain Freeway. Even based on the airport data, however, ADOT finds E and F stability 57% of the time. That is, according to ADOT "air shed mixing poorest diffusion condition." The actual 202 stability would be much worse, compounding Phoenix airport conditions by stronger temperature inversions because of the mountain's location and size. More pollutants from the freeway next to the ground will be trapped more quickly with significantly higher expected pollutant concentrations in the Ahwatukee community.

ADOT DEIS did not use MCAQD DELTA Temperature instruments for calculating inversion conditions to determine accurate pollutant concentration projections. ADOT DEIS technical documents clearly show that Maricopa County Air Quality delta T systems data was not used for actual ground level measurements of temperature inversions. Without this data of actual inversion strength, which shows how quickly pollutant concentrations will increase, any modeling cannot accurately reflect the population exposure to those pollutants. Stability and Air Quality modeling conducted by ADOT as set forth in the DEIS provides no useful data and must not be used to determine potential air pollution concentrations of the South Mountain 202 freeway.

282

ADOT used Aircraft Communications Addressing and Reporting System (ACARS) for vertical temperatures and wind profiles. This method does not correlate to ground level inversion strength for population exposure and is not a scientific method or remotely reasonable to conclude accurate results. Data used does not have any quality assurance or quality control measurements. This means the equipment used does not have proven repeatability to produce the same temperature or wind speed for any given measurement. Moreover, no standard heights were used for correlating air shed temperatures. For example, one data point is measured at 2000 feet the next is at 3000 feet separated by miles and not at the same time of day. These random numbers were used by ADOT in a model without identifying the program.

Any results derived from the ACARS data are incomplete, not relevant, and mislead the community with technical jargon trying to show justification of expected air quality concentrations for each build and no build situation. Not only is the data not taken from the freeway project area, the data is randomly gathered at different heights, locations, and times. If a temperature sensor or wind speed and direction system cannot produce the same temperature/direction/speed each time for the same given test, the data is not valid and must not be used for modeling. As indicated previously, the data used in the DEIS is not valid without any quality assurance and quality control data to support measurements.

281

ADOT incorrectly uses ambient delta temperatures for determining air quality inversions. Page 18 of the DEIS Technical Report of the air quality section shows ambient delta temperature differences between air quality monitoring stations separated by many miles and different elevations. This spatial distance is not how to determine inversion strength. The DEIS report author produces figures, graphs and explanation of their findings of inversions found and expected in the future. This clearly shows that ADOT does not

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279 (cont.)		The U.S. Environmental Protection Agency-recommended wind speed of 1 meter per second was used in the modeling. Traffic volumes during the evening peak hour were used in the modeling to represent worst-case conditions. During the time that Maricopa County was in nonattainment for carbon monoxide, it was as a result of exceedances of the 8-hour standard associated with evening traffic.
280	**Air Quality**	The South Mountains may redirect airflow, but they do not stop airflow.
281	**Air Quality**	At the request of (then) Arizona State Senator John Huppenthal, short-term monitoring of meteorological conditions at Pecos Road and 24th and 40th streets was conducted during 2006 and 2007. Results of this sampling and data from various Maricopa County Air Quality Department monitoring sites were included in the technical report for informational purposes only.

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understand air quality modeling and misrepresents the danger to the citizens from Loop 202 Freeway pollution.

281 Delta temperature is used vertically with two temperature sensors comparing the difference of temperature between them. Standard Delta temperature systems used for air quality modeling and forecasting daily air quality by County and State officials has one temperature sensor at three meters and the other at ten meters, directly above each other. An inversion is when the air at the lower sensor is cooler than the upper sensor regardless of the ambient temperature. Inversion strength is only a few degrees, with five degrees being a very strong inversion. The facts, figures, and explanation of the DEIS technical documents using delta temperature clearly show the report has no merit. Those in the atmospheric measurement business understand that the DEIS author does not understand the meaning of delta temperature, how it is obtained, used or its ability for meaningful input into air quality models. An example of this lack of understanding can be found on page 29 of the ADOT Technical Report, Air Quality section, which states that, "[t]he difference in the hourly temperatures at the two locations were again plotted to provide an indication of the atmosphere's stability; the results are represented in figure 15. Positive numbers indicate that the temperatures at SMPP were warmer than at Pecos road location and represent inversion conditions during that hour." Inversion measurements to determine pollution concentrations are never conducted as ADOT purports. What is worse is that those measurements made it into their air quality prediction models, falsely reporting results to the public as good science.

281 Notwithstanding that this NEPA process has taken over 12 years, ADOT has not conducted any studies on atmospheric and/or ambient quality/conditions in the Ahwatukee area. As a result, there is no valid baseline data to input into air quality models that predict how bad the pollution in the area will be. Sites listed for reference to determine air quality for the citizens are nowhere near the impacted area and should not be used to determine air quality north of the Pecos Road alignment. Similarly, there are no temperature soundings for accurate air shed profiling. There are no air toxics measurements taken to understand the current components of the ambient air quality, and there are no wind speed and direction instruments installed as necessary to apply good science for modeling. These wind speed and direction monitors should have been installed north of the Pecos Road alignment east and west throughout the Ahwatukee community and near South Mountain to show how the Ahwatukee air shed does not remove tail pipe emissions from the freeway, but actually washes pollutants to the west in the mornings, shifting north near noon, with winds lastly northeasterly. This normal wintertime pattern known to all Arizona air quality technical persons is not shown or reflected in the ADOT DEIS.

283 In my opinion, wintertime inversions with multiple days of air stagnation will cause exceedances of the ambient air quality standards for the criteria pollutants for any build option inside the Ahwatukee area.

284 My independent research and data review of other local air quality databases with more accurate and relevant measurements (i.e. hourly wind speed and direction, actual

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282	**Air Quality**	The Aircraft Communications Addressing and Reporting System data were not used for modeling; they were included for informational purposes only.
283	**Air Quality**	Phoenix is in nonattainment for particulate matter (PM_{10}) and ozone. Exceedances of ozone attributable to the proposed freeway are unlikely, and the analysis of particulate matter (PM_{10}) impacts also suggests the same for particulate matter (PM_{10}). See page 4-76 of the Final Environmental Impact Statement for the results of the particulate matter (PM_{10}) analysis.
284	**Air Quality**	Identification of data sources used in the comment would have been helpful. The comment would need to provide citations and references for the information provided for further comment response. The air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in *Guideline for Modeling Carbon Monoxide from Roadway Intersections* (A-OAQPS, 1992). Inputs to the model were based on U.S. Environmental Protection Agency-recommended values or were selected to provide a conservative estimate of impacts. Modeling methodology and results were reviewed by the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments. Although the qualitative particulate matter (PM_{10}) hot-spot analysis performed in the Draft Environmental Impact Statement met 40 Code of Federal Regulations § 93.111(c), the Arizona Department of Transportation and Federal Highway Administration have updated the qualitative analysis to a particulate matter (PM_{10}) quantitative analysis for the Final Environmental Impact Statement to ensure that a state-of-the-art analysis is completed for the proposed action. The quantitative project-level particulate matter (PM_{10}) hot-spot analysis prepared for the proposed project is summarized in the prologue to the Final Environmental Impact Statement (page xiii) and is more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. A particulate matter ($PM_{2.5}$) analysis is not required since the area is in attainment for the particulate matter ($PM_{2.5}$) National Ambient Air Quality Standard.

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inversion strength and air stagnation durations, and many other components of air modeling) shows that the Ahwatukee/Foothills area north of the proposed freeway alignment will exceed both particulate matter (PM) and Carbon Monoxide (CO) standards within 100 meters (micro scale siting) from the edge of roadway of the South Mountain Freeway during adverse weather and meteorological conditions. Valley-wide pollutant concentrations will be high, and any build option will compound and intensify trapped pollution between the freeway and the mountain.

284 Ahwatukee residents 100 to 500 meters (middle scale siting) away from the freeway alignment will most likely experience unhealthy exposures near or at the air quality standards for particulate matter (PM). Diesel Particulate Matter, the fine PM 2.5 µm will be carried further into the community and based on the DEIS list of the components of diesel particulate matter, will present serious health concerns.

285 The data used to support the DEIS does not have quality assurance or quality control and is not valid. All air quality data used must meet quality assurance measurements of precision and accuracy to be valid. Quality control measurements using different testing systems than quality assurance must meet standards (test concentrations). Incorrectly applying slope and intercept calculations to data can potentially reduce air quality measurements into database. Improper testing of air quality instruments will invalidate data. Not meeting the testing frequency requirements for either QA or QC will invalidate data.

Particulate and gaseous samplers and meteorological systems require routine maintenance, failure to maintain equipment as required will invalidate collected air quality data. The DEIS does not ensure data measurements used are valid, traceability of measurement protocols are missing and should make all reports suspect of erroneous results.

286 Page 67 of the technical report on the air quality section states that "the selection of each of the metrological conditions was based on EPA-454-/R 92-005, guidelines for modeling carbon monoxide from roadway intersections." This is not how you would determine the air quality impact of an eight lane freeway. It appears that the DEIS was completed by contractors without experience in the industry and randomly attached meaningless data, facts and figures that do not support the stated ADOT conclusions. ADOT review of submitted air quality technical data and conclusions are without merit, proper review of methodology and applied science. This report provides no real analysis of the stated purpose of the DEIS.

287 The DEIS component addressing the US Army Corps of Engineers section 404 of the clean water act, and the 401 certification by ADEQ is in jeopardy. EPA has found that ADOT has routinely failed to comply with contracts with FHWA, USACOE, ADEQ and USFS to maintain, limit or control sediment discharges into jurisdictional waters of the US. The Gila and Salt rivers are waters of the US inside this planned project. EPA actions have created an environmental program inside of ADOT. This environmental program has failed to implement the most basic construction mitigations. Statewide highway

Code	Issue	Response
285	**Air Quality**	Ambient levels of the criteria pollutants reported were obtained from the Maricopa County Air Quality Department, which follows U.S. Environmental Protection Agency quality assurance/quality control procedures.
286	**Air Quality**	The air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in Guideline for Modeling Carbon Monoxide from Roadway Intersections (A-OAQPS, 1992). This is accepted methodology. See <epa.gov/ttn/scram/dispersion_prefrec.htm#cal3qhc>.
287	**Water Resources, Waters of the United States**	Controlling and treating runoff is a normal function of the Arizona Department of Transportation projects. No evidence is offered to substantiate such statements. The U.S. Army Corps of Engineers, as a cooperating agency, has participated and contributed in each step of the environmental process. The agency has found the logical sequence of decision making to be sound and in line with National Environmental Policy Act requirements. The Arizona Department of Environmental Quality has also contributed to the process. Both agencies as referenced in the comment have oversight roles in project permitting as established in the Clean Water Act (Sections 401, 402, and 404). Extensive mitigation in accordance with the permitting requirements can be found in the *Water Resources* and *Waters of the United States* sections of Chapter 4 of the Final Environmental Impact Statement. The Arizona Department of Transportation is fully obligated and committed to implementation and adherence to those mitigation strategies.

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construction along hillsides have created large and numerous rills (deep cuts down hillsides). These rills, wash sediment into our waterways, polluting the ecosystem. ADOT management down plays environmental stewardship, by stating "we have always done it this way". ADEQ, Army Corps and FHWA do not conduct any inspections. Internal ADOT environmental staff does not influence ADOT management; ADOT management is self environmental regulating without fear of ADEQ, FHWA or other construction partners. FHWA does not provide funding for continued maintenance of hillside erosion after construction. Statewide ADOT does not provide its maintenance highway workers funding to mitigate sediment discharges from hillside rills and failed sediment control features of the original construction best management practices. ADOT has failed to protect the environment in nearly all completed construction sites with the same terrain of the South Mountain 202. It is expected that ADOT will not honor their own Statewide Individual Stormwater permit, allowing sediment discharges during and after construction of the freeway.

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Tail pipe emissions and other transportation discharges including: material lost from untarpped or improperly tarpped trucks, fluids/chemicals leaking from container vehicles can dry and become reintrained into the atmosphere potentially harming residents closest to freeway.

Tribal lands do contribute to the local air shed loading of particulate matter. The entire area south of the planned freeway is unstable land used and never maintained for dust control. No enforcement ability by Federal, State or County for the impact to the Ahwatukee residents, this additional particulate will be in addition to particulate generated by vehicle emissions.

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PM10 blown onto the freeway from the Tribal lands to the south will be reintrained into the atmosphere, allowing PM10 normally not reaching the Ahwatukee areas to be re broadcasted into the air and carried into the neighborhood.

A hazardous materials accident would trap the community or create panic to shelter in place with gaseous plume and fire exposure. Most winds will carry hazardous materials and smoke into the area north of the freeway. Potentially trapping people between the plume and their ability to exit safety without traveling through the plume of toxic gases.

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Visibility will be significantly reduced for all residents looking south, southeast and southwest. Observations of local freeways from local area hill tops inside metro Phoenix clearly shows the dark particulate/tail pipe emissions above valley freeways. This planned freeway will be no different. Heavy particulate and tailpipe emissions will obscure current scenic views.

Code	Issue	Response
288	**Air Quality**	Paved road dust was considered in the quantitative, project-level, particulate matter (PM_{10}) hot-spot analysis prepared for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
289	**Air Quality**	According to the 2013 Arizona Department of Transportation A*ir Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns experience flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
290	**Air Quality**	Impacts on visibility are primarily related to extremely small aerosols from multiple sources. As noted in the text box on page 4-69 of the Final Environmental Impact Statement, in the Phoenix metropolitan area, about 34 percent of particulate ($PM_{2.5}$) emissions are attributed to on-road mobile sources, which contributes to the brown cloud and visibility issues; however, reductions in on-road mobile source emissions through emission controls have produced visibility improvements. The Arizona Department of Environmental Quality monitors visibility in the Phoenix metropolitan area.

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Curriculum Vitae

Richard B. Haddow
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Apache Junction, AZ 85119
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2006 to January 2012 Arizona Department of Transportation: Globe District Environmental Coordinator

2003 to Present Haddow Environmental Research Organization: Air Quality Expert Witness, EPA Qualified Researcher, AZ State Licensed Investigator, qualifying party.

1985 to 2003 Maricopa County Health Department / Environmental Services: Quality Assurance Manager, Public Health Engineer, Environmental Health Supervisor, Open Burning/Asbestos Manager, Environmental Investigator Supervisor

Knowledge Skills and Abilities (KSA) Technical

Represent the ADOT Globe District Engineer for all environmental programs while providing technical assistance and expertise to local governments. Represented Maricopa County Environmental Services to the MAG Committee, Air Quality Technical Advisory Committee.

Conducted statistical analysis with air quality modeling, meteorological modeling and travel demand modeling to determine air quality equipment siting criteria to meet Maricopa County EPA grant objectives.

Managed and maintained multiple complex databases for air quality modeling. Conducted research studies using demographic and land use data to address the impacts of alternative highway designs.

Conducted stakeholder groups and community workshops on environmental rule making. Forecasted carbon monoxide, particulate and ozone advisories to the public and media. Worked with and for attorneys to collect information and provide testimony as an expert witness. Provided testimony in support of industrial clients against claims that they were in violation of environmental laws. Testified as an expert witness for the Attorney General's Office for Superfund Investigations.

Areas of expert subject matter include: air quality modeling, law enforcement, air pollution chemistry, air monitoring instrumentation and siting, analytical chemistry, air toxics, meteorological monitoring and forecasting, environmental compliance, regulatory analyses, audits, permitting, emissions inventories, environmental data analysis, quality assurance, quality control, soil and water sampling, technical report writing, data acquisition instrumentation calibrations (as well as repair and maintenance), standards testing and traceability.

Conducted environmental investigations.

Earned more than ten semi-annual certifications as an ADEQ visible emissions evaluator EPA Method 9.

Performed technical review of air, soil, water and meteorological data, performance and system auditing, database management, air monitoring and site assessment and selection. Adhered to the Code of Federal Regulations for NAAQS (National Ambient Air Quality Standards).

Experienced in the arenas of water programs, data validation, air pollution training, air pollution prevention, hazardous air pollutants, water supply field inspection, hazardous materials and waste management.

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Evaluated permit applications to determine the potential impact to communities surrounding industrial facilities in the event of a release (Off Site Consequence Analysis). Prepared complex reports, findings and conclusions and presented to executive management.
Conducted stakeholder group meetings and community workshops to explain complex environmental programs. Worked with neighbors to resolve complex issues that had potential to directly impact their quality of life.

Knowledge Skills and Abilities (KSA) Professional Experience
Represent the ADOT Globe District Engineer for COGs, MPOs and tribal transportation groups. Maricopa County Environmental Services: Worked with groups by means of committee/task force to resolve complex rule making and air quality planning by applying political consensus. Wrote, operated and managed Federal grants with signature authority, as well as multiple ongoing complex programs. Designed, built and maintained an ambient air monitoring program with use of ISTEA funds ($1.2M) to ensure future state transportation monies. Preparation and dissemination of complex models, findings, and conclusions to executive management. Conducted environmental seminars and training programs that simplified the understanding of a highly technical analysis.

Evaluated permit applications for process engineering such as Title V permits and Non Title V permits, including mobile sources. Held regulatory authority over permit holders to ensure compliance within the sand and gravel industry as well as mining and earthmoving operations. Managed multiple ongoing environmental programs. Applied AP-42 emission factors as related to hot asphalt mixing facilities, Portland cement plants, and sand and gravel processing. Reviewed and commented on air quality permit applications to Arizona Department of Environmental Quality (ADEQ) and non-attainment counties. Wrote, implemented and maintained dust control programs. Managed and trained air quality permit investigators. Conducted environmental seminars and training programs for regulated industry groups and regulators. Conducted and managed storm water pollution prevention planning programs (SWPPP).

Operated and managed an ambient air monitoring program in accordance with the USEPA objectives for criteria pollutants: Particulates (PM-10μm & 2.5μm), carbon monoxide, ozone, sulfur dioxide, nitrogen dioxide and lead. Monitored air toxics, hazardous air pollutants, and visibility including enhanced ozone monitoring (PSD). Conducted technical research for the assessment of air quality (modeling). Performed analysis of statistical data to evaluate attainment status of pollutants. Operated and managed the quality assurance program to ensure data met or exceeded ambient air monitoring protocols, methods and traceability of standards. Managed federal and state performance audits. Performed field environmental monitoring and investigations for special studies. Managed a team of air quality assurance technicians, chemists, and electronic technicians. Managed the chemistry laboratory operations. Designed, installed, managed and maintained the network for ambient air monitoring stations in Maricopa County, Arizona. Conducted joint special studies for ozone, particulates, carbon monoxide and visibility with USEPA, ADEQ, and the USDA Forest Service. Managed the database for ambient air quality and quality assurance in the USEPA AIRS database. Designed and managed the gaseous and particulate standards program for QA/QC. Author of the first approved by USEPA for Quality Assurance and Operating Procedures Manual for Field and Office Activities of Maricopa County, Arizona.

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Worked closely with Federal Highway Administration (NEPA), US Army Corps of Engineers 404 Permits, US Fish and Wildlife, Arizona Department of Game and Fish, Arizona Historical Preservation Office, Bureau of Land Management (Arizona) and ADEQ 401water quality cert., ADOT Individual (MS4) permit to ensure compliance of mitigation measures statewide.

Education
Quality assurance ambient air monitoring, CARB Sacramento, Ca 1985
Bachelor of Science, AZ State Univ., MBA course completed 1993.
Environmental Investigations, Western States Projects 1994.
Regulatory Framework for Toxic and Hazardous Substances, Department of Manufacturing and Industrial Technology, Arizona State University, College of Engineering and Applied Sciences 1995.

Military Service
US Navy, Advanced Electronics, Qualified in Nuclear Submarines 1978-1984,
Honorable Discharge

Licenses and Certifications
State of Arizona Private Investigation Business License # 1003813
Qualified US Environmental Protection Agency Researcher
Erosion Control Coordinator, Arizona General Contractors Association
Chemical-terrorism Vulnerability Information User - Certificate

Community Services
Pinal County Sheriff's Office Criminal Investigation Bureau Volunteer/Crime Victim Advocate
Chair, Pinal County Local Emergency Planning Committee (PC LEPC)

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REPORTS

Seven

Comments on the SMF DEIS
Re: Cultural Resources Impacts
by Samantha Skenedore, Of Counsel: The Shanker Law Firm, PLC.

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COMMENTS ON THE SOUTH MOUNTAIN FREEWAY
DRAFT ENVIRONMENTAL IMPACT STATEMENT
ISSUED APRIL 2013
REGARDING IMPACTS TO CULTURAL RESOURCES
July 22, 2013

Prepared by Samantha C. Skenandore
Of-Counsel, The Shanker Law Firm, PLC

292 The Federal Highways Administration (the "FHWA") and the Arizona Department of Transportation ("ADOT") prepared and issued a Draft Environmental Impact Statement and Section 4(f) Evaluation (the "DEIS") of the Freeway project pursuant to 42 U.S.C. §4332(2)(c), 49 U.S.C. §303 and 33 U.S.C. §1251 in April 2013. The DEIS particularly addresses the preferred alternative (the "E1 Alternative") for building a major highway known as the South Mountain Loop which will destroy and desecrate a mountain range held sacred by Native Americans from various tribes.[1] The FHWA and ADOT issued the DEIS and selected the E1 Alternative despite the fact that the E1 Alternative will (1) cause irreversible damage to the sacred and historically significant South Mountain,[2] and (2) have a profound negative impact on the religious, cultural and spiritual well-being of Native Americans. Portions of South Mountain lie within the exterior boundaries of a federally-recognized tribe – the Gila River Indian Community (the "GRIC").[3] The GRIC and other tribes have attached a significant traditional, cultural and religious value upon South Mountain and adjacent areas.

293 The FHWA and the ADOT failed to adequately consult with the tribes. This failure is carried over into the DEIS which, as a result, draws flawed conclusions. The FHWA and ADOT should re-initiate the Section 106 process with reasonable and good faith efforts to consult all tribes and amend any and all technical studies identifying, assessing, evaluating and mitigating adverse impacts to cultural resources with tribal input.

294 In addition, the FHWA and ADOT should seek a review by the National Advisory Council on Historic Preservation to conduct a case analysis of the Section 106 deficiencies and strictly adhere to the Council's recommendations for corrective actions. *See* 36 C.F.R. §800.9. The aforementioned recommendations are based on the following:

I. The FHWA and ADOT is non-compliant with Section 106 ("Section 106") of the National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470).

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[1] *See* ADOT, with concurrence from the FHWA, identified the E1 Alternative as its Preferred Alternative in the Eastern Section (the "E1 Alternative"). *See* ADOT, South Mountain Study Team, *Summary*, P. 38, website available at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/south-mountain-loop-202-docs/EIS/summary/Summary.pdf (viewed July 18, 2013).
[2] The FHWA and ADOT determined that the South Mountain qualified as a Traditional Cultural Property. *See* ADOT, South Mountain Study Team, Summary, Table S-3, p. S-17 available at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/south-mountain-loop-202-docs/EIS/summary/Summary.pdf (viewed July 18, 2013).
[3] For more information on the Gila River Indian Community, please see the official page available at: http://www.gilariver.org/ (viewed July 18, 2013).

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292	**Cultural Resources**	The religious and cultural importance of the South is acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26 as well as in the Summary of the Draft Environmental Impact Statement. The description in the Draft Environmental Impact Statement is based on input received from the Gila River Indian Community and its members and other Indian Nations and their members. The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community. Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resource studies and engaging in an ongoing, open dialogue with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance, including the South Mountains, to the Gila River Indian Community that may be adversely affected by the proposed freeway. Information describing the outreach and collaboration can be found in Chapter 2 and in text beginning on pages 4-140 and 5-26 of the Final Environmental Impact Statement. Mitigation measures were suggested in a letter from the Lieutenant Governor of the Gila River Indian Community to the Administrator, Arizona Division, Federal Highway Administration, dated June 23, 2010 (see page A372 of Appendix 2-1 of the Final Environmental Impact Statement). In this letter, the Gila River Indian Community submitted a proposal to address partial measures for the mitigation of adverse effect from the Pecos Road Alignment of the South Mountain Freeway. The Gila River Indian Community's proposal found the engineering solutions acceptable, but stated that implementation and construction of the proposed freeway would require further consultation. In committing to the evaluation of the South Mountains Traditional Cultural Property, the Arizona Department of Transportation and Federal Highway Administration also committed to the Gila River Indian Community's participation in ongoing engineering design refinements and acknowledged the importance of all plants and animals in the traditional culture of the Akimel O'odham and Pee Posh of the Gila River Indian Community. To clarify, use of the mountains for the purposes of the proposed freeway represents two-tenths of one percent of the total mountain range. Since 1988, and as part of this environmental impact statement process, several measures have been undertaken and will be undertaken to further reduce effects on the mountains. These measures, including narrowing the design footprint, acquiring replacement land immediately adjacent to the mountains, and the provision of highway crossings, are outlined in text beginning on page 5-23 of the Draft Environmental Impact Statement.

(Responses continue on next page)

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295	Section 106 of the National Historic Preservation Act of 1966, 16 U.S. C. § 470, requires federal agencies, here the FHWA, to take into account the effects of their actions on historic properties listed on or eligible for inclusion in the National Register of Historic Places (the "NRHP")[4] and allow the Advisory Council on Historic Preservation (the "ACHP") a reasonable opportunity to comment. The ACHP promulgated regulations of the historic preservation review process entitled "Protection of Historic Properties" in 36 C.F.R. Part 800. The Section 106 process is designed to properly identify, assess and mitigate adverse actions on cultural resources. The process requires the lead federal agency to identify historic properties and determine if such properties are eligible for listing in the NRHP. To be determined eligible for listing in the NRHP, properties must be a place of significance in American history, architecture, archaeology, engineering or culture and meet at least one or more of the following criteria: **Criterion A**. [A]ssociated with events that have made a significant contribution to the broad patterns of our history; or **Criterion B**. [A]ssociated with the lives of persons significant in our past; or **Criterion C**. [E]mbody the distinctive characteristics of a type, period or method of construction or that represent the work of a master, or that possess high artistic values or that represent a significant distinguishable entity whose components may lack individual distinction; or **Criterion D**. [Y]ielded, or may be likely to yield, information important in prehistory or history. They also must possess integrity of location, design, settings, materials, workmanship, feeling and/or association. Properties may be of local, state or national importance.[5]
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297	During the development of the Freeway project, the GRIC underwent the process to obtain a Tribal Historic Preservation Officer (THPO) to assist in identifying and nominating historic properties on GRIC's tribal lands[6] for the purposes of Section

[4] Authorized by the National Historic Preservation Act of 1966, the National Park Service's National Register of Historic Places is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources. *See*: http://www.nps.gov/nr/ (viewed on July 19, 2013).
[5] See *Id.* and National Park Service, National Register Bulletin 38, Guidelines for Evaluating and Documenting Traditional Cultural Properties 1990, *available at* www.cr.nps.gov/nr/publications/bulletins/nrb38/htm. Criteria for eligibility for being on the National Register are: "associated with events that have made a significant contribution to the broad patterns of our history; are associated with the lives of persons significant in our past; embody the distinctiveness of a type, period, or method of construction, or…represent the work of a master, or…possess high artistic values, or…represent a significant and distinguishable entity whose components may lack individual distinction; or have yielded, or may be likely to yield, information important in prehistory or history." 36 C.F.R. § 60.4.
[6] Tribal lands means "all lands within the exterior boundaries of any Indian reservation; and …all dependent Indian communities" (16 U.S.C. § 470w(14)).

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293	**Cultural Resources**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
294	**Cultural Resources**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. As noted in Table 4-48, which begins on page 4-133 of the Draft Environmental Impact Statement, the Advisory Council on Historic Preservation has been consulted during the Section 106 process.
295	**Cultural Resources**	The Section 106 process of the National Historic Preservation Act is discussed on page 4-128 of the Draft Environmental Impact Statement.
296	**Cultural Resources**	Eligibility criteria for inclusion in the National Register of Historic Places are discussed on page 4-128 of the Draft Environmental Impact Statement.
297	**Cultural Resources**	The Gila River Indian Community's Tribal Historic Preservation Officer is discussed on page 4-128 of the Draft Environmental Impact Statement.

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298	106.[7] The South Mountain has been approved as a traditional cultural property under criteria A and B. The South Mountain, known in the Pima language as the "Muhadag Do'ag"[8] and in the Maricopa language as "Avikwaxos" consists of the Ma Ha Tauk, Gila, and Guadalupe Mountain Ranges. The mountain range abuts the northern territory of the GRIC and is the immediate landscape of the northern boundary of the GRIC reservation. A portion of main ridge north and main ridge south of the South Mountain is on GRIC land and serves as the 'Community's main, direct physical link to the South Mountains.' The South Mountain is a prominent figure in oral traditions of both the Akimel O'Odham (Pima) and the Pee Posh (Maricopa).
299	GRIC tribal members and the tribal government hold the South Mountain sacred and see it as central to its creation story. *See* Gila River Indian Community Resolution No. GR-41-07, A Resolution Designating the South Mountain Range (Muhadag, Avikwaxos) as a Sacred Place and Traditional Cultural Property of the Gila River Indian Community. The E1 Alternative would desecrate the South Mountain by cutting through it, resulting in a devastating negative disparate impact culturally, spiritually, and religiously upon GRIC tribal members.
298	On January 6, 1982, the Gila River Indian Community Tribal Council adopted an ordinance declaring "…as a matter of Community policy and legislative determination, that the public interests of the Pima-Maricopa people and the interests of all other persons living within the jurisdiction of the Gila River Indian Community require that the Community adopt a means whereby all sites, location, structures, and objects of sacred, historical or scientific interest or nature will be protected from desecration, destruction, theft, or other interference." *See* Gila River Indian Community Resolution No. GR-01-82. In 1989, the Gila River Indian Community Tribal Council adopted a resolution to preserve the lands of their Hohokam ancestors, by approving the "Policy Statement of the Four Southern Tribes (Salt River Pima-Maricopa Indian Community, Ak-Chin Indian Community, Tohono O'odham Nation, and the Gila River Indian Community) which outlines the Four Tribes' intent to protect, promote, and preserve cultural affinity to the HuHuKam." See Gila River Indian Community Resolution No. GR-15-89. Most importantly to the present review, the Gila River Indian Community Tribal Council adopted a tribal resolution affirming that the South Mountain is "a sacred

[7] In the absence of a Tribal Historic Preservation Officer ("THPO"), the State Historic Preservation Officer assumes the duties of Section 106 review. Since the onset of the project in July 2001 (see DEIS, Table 2-1, Chapter 2), the GRIC successfully created its own Tribal Historic Preservation Office and employed a THPO.
[8] The DEIS neglects to address the accurate meaning of Muhadag Do'ag, the site which is also known as the South Mountain, South Mountain Range and/or Salt River Mountains (Range) based on the prominent and valid oral history of the GRIC. Do'ag means mountain and Muhadag means greasy.

Code	Issue	Response
298	**Cultural Resources**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26 of the Draft Environmental Impact Statement.
299	**Cultural Resources**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The description in the Draft Environmental Impact Statement is based on input received from the Gila River Indian Community and its members and other Indian Nations and their members. The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Although the Draft Environmental Impact Statement describes the impacts on the South Mountains as adverse, this would not prohibit Native Americans from continuing to practice their beliefs because only a small fraction of the mountain would be affected, replacement lands would be provided, and access to the mountain would be maintained, and mitigation would be implemented based on input by Native Americans. Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Community (Figure 3-6 on page 3-10 of the Draft Environmental Impact Statement illustrates a representation of such alternatives). Ultimately the other alternatives were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to study alternatives on its land (see Draft and Final Environmental Impact Statement page 3-25). In June 2013, the Maricopa Association of Governments approved new socioeconomic projections for Maricopa County. The purpose and need and analysis of alternatives were updated and reevaluated using these new population, employment, and housing projections and corresponding projections related to regional traffic. The conclusions reached in the Draft Environmental Impact Statement were reconfirmed in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). Therefore, the Arizona Department of Transportation, with concurrence from the Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the western section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.

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298	place/traditional cultural property …that…must be kept inviolate thereby recording the sacredness and significance of South Mountain to the people of the GRIC and its tribal government." *See* Gila River Indian Community Resolution No. GR-41-07 (April 2007). The resolution further states that the GRIC "strongly opposes any alteration of the South Mountain Range for any purpose"…and that any alteration "…would be a violation of the cultural and religious beliefs of the Gila River Indian Community and would have a negative cumulative effect on the continuing lifeways of the people of the Gila River Indian Community." *Id.* The O'odham concept of creation is not something in the past but is an ongoing process - one that GRIC members are intrinsically a part of and are obligated to participate in. Members from the Four Southern Tribes fulfill this duty through perennial ceremonies and rituals designed to preserve and stabilize the earth. Failure to fulfill those obligations is believed to result in great harm to the earth and the people who depend on it. Ceremonies are efforts undertaken for specific purposes in accordance with instructions handed down from generation to generation, and when generations of O'odham people are gathered together in the same time and place to carry out ceremony, this is the embodiment of culture. Rituals are performed in prescribed locations that are unique and specific sites possess different spiritual properties and significance. The O'odham are aware that the plants and animals that exist on the South Mountain range possess a kind of healing that cannot be found anywhere else in their current boundaries. O'odham traditionalists and elders of the Four Southern Tribes use portions of the South Mountain for periodic ceremonies and rituals. These are people who are keepers of the tribal peoples' heritage and culture who possess an essential role believed to sustain the tribal people as a whole. These people are responsible for passing on ceremonies and songs that have been performed for ages. Many O'odham songs are place-specific and refer to a certain mountain or bend in a river, as a way of respecting that place's centrality to O'odham culture and well-being. O'odham traditionalists also are people who follow the way of living from the earth: picking and harvesting traditional foods like many kinds of cactus fruits, foraging for wild plants to use as traditional medicines, and teaching and guiding the young in the cultural and spiritual ways.
300	Due to the fact that the South Mountain range is used and venerated by O'odham tribes and the Freeway project is a large-scale transportation project impacting a large sacred site footprint, strict adherence to Section 106 should have preceded the preparation and issuance of a DEIS. The Freeway project is noncompliant with Section 106 for the reasons set forth below:
300	**a. The DEIS clearly shows that the FHWA and ADOT failed to make reasonable and good faith efforts to consult all federally recognized**

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299 (cont.)		After determining that no prudent and feasible alternatives existed to avoid the South Mountains Traditional Cultural Property, efforts were undertaken to minimize harm. These measures are documented, beginning on page 5-27 of the Draft and Final Environmental Impact Statements. Some of these measures included avoidance of specific sites and providing multiuse crossings and fencing that would limit access by freeway users, but allow Gila River Indian Community members to continue to gain access to the site. In addition, the Federal Highway Administration and Arizona Department of Transportation committed to provide funds for the Gila River Indian Community to conduct a full evaluation of the South Mountains Traditional Cultural Property (see page 4-160 of the Final Environmental Impact Statement). Documentation of these efforts are in a letter from the Lieutenant Governor of the Gila River Indian Community to the Administrator, Arizona Division, Federal Highway Administration, dated June 23, 2010 (see page A372 of Appendix 2-1 of the Final Environmental Impact Statement). In this letter, the Gila River Indian Community submitted a proposal for the "Evaluation of Traditional Cultural Property and Adverse Effects of Transportation Corridor Development posed by the proposed construction of the current Pecos Alignment of the South Mountain Freeway." In committing to the evaluation of the South Mountains Traditional Cultural Property, the Federal Highway Administration and Arizona Department of Transportation also committed to the Gila River Indian Community's participation in ongoing engineering design refinements and acknowledged the significance of all plants and animals in the traditional culture of the Akimel O'odham and Pee Posh of the Gila River Indian Community.
300	**Cultural Resources**	Strict adherence to Section 106 of the National Historic Preservation Act not only preceded the preparation and issuance of a Draft Environmental Impact Statement, but is ongoing and will continue. The Draft and Final Environmental Impact Statements comply with Section 106 of the National Historic Preservation Act. The Section 106 process is documented in Table 4-47 beginning on page 4-145 of the Final Environmental Impact Statement.

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Indian tribes that may attach religious and cultural significance to the Area of Potential Effects *See Id.* at §800.3(f)(2).[9]

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The DEIS appears to suggest that FHWA and ADOT properly noticed, hosted, held and/or facilitated numerous meetings with the GRIC and perhaps, other tribes.[10] Table 2-1 in the DEIS illustrates that the project initiated in July of 2001, however, no subsequent record of meetings with any other tribe (other than the GRIC) is demonstrated in the table until March 18, 2011.[11] In other words, no other tribes appear to have been consulting parties nor were they present at the onset of the project. The only reference to solicitation of tribal input other than the GRIC did not occur until March 18, 2011. The GRIC was the only tribe at the table throughout the majority of the project for *over ten (10) years*. The DEIS fails to demonstrate any reasonable and good faith effort to bring all interested and impacted tribes to the table. Further Table 4-48 demonstrates that only one tribe, the Hopi Tribe, concurred on the Section 106 consultations. According to the DEIS, one other tribe, the Yavapai-Prescott Indian Tribe, deferred its participation to the Southern Tribes and all other tribes, including the GRIC, neither responded nor concurred with the Section 106 findings. The data speaks for itself. The tribes have been left almost entirely out of a project that has been under development since 2001. The tribes, however, are on record for openly and voluntarily asserting the significant cultural, traditional and religious attachment to the sacred site.

Table 4-48 in the DEIS demonstrates that nearly each federally-recognized tribe associated with the Freeway project has opted to either refrain from responding to the FHWA and ADOT or has, in some rare instances, deferred its position to the Southern Tribes. The record, again, reflects an abundant failure on behalf of the FHWA and ADOT to gain meaningful consultation with the affected tribes, having performed outreach to only to the GRIC, one of the Four Southern Tribes. The Salt River Pima-Maricopa Indian Community, Ak-Chin Indian Community, and Tohono O'odham Nation have not been consulted as stakeholders despite the fact that FHWA and ADOT are on record as having been directed to do so by at least one other government - the Yavapai-Prescott Indian Tribe. The record further shows that the majority of the tribes affected by the undertaking were not consulted early in the project's planning process via the initial scoping process, and were consequently not consulted about the technical reports, consultants and cultural expertise necessary to promulgate accurate findings.

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[9] 36 C.F.R. § 800.3(f)(2)states, "Involving Indian tribes and Native Hawaiian organizations. The agency official shall make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties. Such Indian tribe or Native Hawaiian organization that requests in writing to be a consulting party shall be one."

[10] *See* South Mountain Freeway (Loop 202) Draft Environmental Impact Statement and Section 4(f) Evaluation, April 2013, Chapter 2-4.

[11] *See Id.*, Chapter 2-4, Table 2-2 (2013).

Code	Issue	Response
301	**Cultural Resources**	As noted in Table 4-47, which begins on page 4-145 of the Final Environmental Impact Statement, the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe were included in the initial Section 106 consultation in 2003. At that time, Yavapai-Prescott Indian Tribe deferred to the Four Southern tribes in a response dated September 10, 2003. Hopi concurred, but did not defer at this time. As more information regarding the project was known (and of aboriginal lands), all of the tribes with aboriginal lands within the project (including the Yavapai-Prescott Indian Tribe) were consulted in 2005, 2006, 2012, and 2013. In August 2005, both the Salt River Pima-Maricopa Indian Community and the Tohono O'odham Nation agreed to be a concurring party to the programmatic agreement. A response from Salt River Pima-Maricopa Indian Community dated August 14, 2012, cited an existing consultation management agreement in place between the Four Southern Tribes and stated that the Four Southern Tribes are in consensus that Gila River Indian Community would take the lead in providing comments for the project. As noted in Table 4-47, which begins on page 4-145, and also on page 4-150 of the Final Environmental Impact Statement, all tribes were contacted early in the study and have been consulted on many aspects of the study, including the cultural resource-related reports produced over the course of the study. Consultation with Native America tribes has been extensive and demonstrates a reasonable and good faith effort to include all interested Native American tribes in the process to take their concerns seriously in the planning effort.

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b. The FHWA and ADOT did not have authority to delegate its statutory obligations under Section 106 to conduct consultation and conduct community and public outreach. *See* 36 C.F.R. §800.8

Section 106 states that, "**[f]ederal agencies** are encouraged to coordinate compliance with section 106 and the procedures in this part with any steps taken to meet the requirements of the National Environmental Policy Act (NEPA). Agencies should consider their Section 106 responsibilities as early as possible in the NEPA process, and plan their public participation, analysis, and review in such a way that they can meet the purposes and requirements of both statutes in a timely and efficient manner (emphasis added)." *Id.* at §800.8(1). Further, Section 106 requires that the agency official shall, "(i) Identify consulting parties…; (ii) Identify historic properties and assess the effects of the undertaking on such properties…; (iii) Consult regarding the effects of the undertaking on historic properties with SHPO/THPO, Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to the affected historic properties, other consulting parties, and the Council, where appropriate, during NEPA scoping, environmental analysis, and the preparation of NEPA documents; (iv) Involve the public in accordance with the agency's published NEPA procedures; and (v) Develop in consultation with identified consulting parties alternatives and proposed measures that might avoid, minimize or mitigate any adverse effects of the undertaking on historic properties and describe them in the EA or DEIS (emphasis added)." *Id.* at §800.8(2). Nowhere in the regulations is the federal agency permitted to delegate these duties, whether through a Programmatic Agreement, or otherwise.

In the instant case, FHWA and ADOT simply delegated its responsibility to consult with the tribal community to the GRIC tribal government. The DEIS appears to suggest that numerous meetings regarding the Freeway project were noticed, hosted and facilitated by the FHWA and ADOT. The DEIS does not clarify whether the GRIC tribal government entities, or any sub-entities thereof actually noticed, hosted and facilitated such meetings. While Section 106 allows for procedural variances when, like in the present case, a DEIS is drafted under the National Environmental Policy Act (the "NEPA"), 42 U.S.C. 4321 et seq., Section 106 does not procedurally allow FHWA or ADOT to delegate the Section 106 initiation and consultation measures to any other entity. *See* 36 C.F.R. §800.8. In other words, FHWA is required to directly initiate and consult tribes and consulting parties. The DEIS record reflects that the FHWA regularly consulted federal and state agencies, however, neglected reasonable and good faith efforts to consult tribes other than the GRIC. The record also shows that FHWA, ADOT and the designated GRIC government entities failed to properly notify and/or consult with GRIC members.

Code	Issue	Response
302	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration did not delegate statutory obligations.
303		Comment noted.
304	**Cultural Resources**	This comment seems to be confusing National Historic Preservation Act Section 106 consultation, project scoping, and Federal Highway Administration/ Arizona Department of Transportation/Gila River Indian Community coordination and planning meetings. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. As noted in Table 4-47, which begins on page 4-145 of the Final Environmental Impact Statement, the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe were included in the initial Section 106 consultation in 2003. At that time, Yavapai-Prescott Indian Tribe deferred to the Four Southern tribes in a response dated September 10, 2003. Hopi concurred, but did not defer at this time. As more information regarding the project was known (and of aboriginal lands), all of the tribes with aboriginal lands within the project (including the Yavapai-Prescott Indian Tribe) were consulted in 2005, 2006, 2012, and 2013. In August 2005, both the Salt River Pima-Maricopa Indian Community and the Tohono O'odham Nation agreed to be a concurring party to the programmatic agreement. A response from Salt River Pima-Maricopa Indian Community dated August 14, 2012, cited an existing consultation management agreement in place between the Four Southern Tribes and stated that the Four Southern Tribes are in consensus that Gila River Indian Community would take the lead in providing comments for the project.

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The DEIS indicates that FHWA and ADOT utilized the GRIC and its sub-entities such as the Transportation Technical Team (the "TTT")[12] to provide notice, host and facilitate numerous meetings on its behalf. *See* Table 2-1. Section 106, particularly §800.8, does not permit the GRIC to act on FHWA and ADOT's behalf to carry out procedural requirements of the project. Many meetings referenced in the DEIS appeared to be "tribal meetings" that included guest presentations by the FHWA and/or ADOT to the Gila River community members. Tables 2-1 and 2-2 in the DEIS appears to comingle the facts of any particular meeting in terms of meeting the agency's responsibilities under Section 106, particularly, §800.8.

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c. **Because FHWA and ADOT failed to consult all federally recognized Indian tribes with reasonable and good faith efforts, the identification of historic properties, assessment of adverse effects, and resolution of adverse effects are inaccurate, incomplete and erroneous.**

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Not only is the South Mountain itself sacred, there are also numerous sites with highly significant meaning and purpose to the GRIC on or near South Mountain and within the Area of Potential Effects of the Freeway project.[13] There are many ancestral burial and archeological sites and ancient shrines throughout the project area and beyond.[14] Further, the Colorado River Indian Tribes,[15] Salt River Pima-Maricopa Indian Community,[16] the Ak-Chin Indian Community,[17] the Tohono O'odham Nation,[18] and the Pascua Yaqui Tribe[19] have expressed and attached traditional, cultural and religious significance to South Mountain.[20]

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[12] *See Id.* Chapter 2, page 2-3. *See also* Table 2-2 crediting various meetings with the TTT.
[13] For example, tribes associate cultural, traditional and religious significance with the Red Mountain, South Back Mountain, and Sandi Muck Mountain.
[14] For an illustration on archaeological sites, please view YouTube, *South Mountain Freeway Protest*, https://www.youtube.com/watch?v=IMws03pJ0iE (viewed July 18, 2013).
[15] *See* the official website of the Colorado River Indian Tribes also known as the "CRIT", available at: http://www.crit-nsn.gov/ (viewed July 8, 2013).
[16] *See* the official website of the Salt River Pima-Maricopa Indian Community available at: http://www.srpmic-nsn.gov/ (viewed July 18, 2013).
[17] *See* the official website of the Ak-Chin Indian Community, http://www.ak-chin.nsn.us/ (viewed July 18, 2013).
[18] *See* the official website of the Tohono O'odham Nation, http://www.tonation-nsn.gov/default.aspx (viewed July 18, 2013).
[19] *See* the official website of the Pascua Yaqui Tribe, http://www.pascuayaqui-nsn.gov/ (viewed July 18, 2013).
[20] The DEIS states "archaeological sites and places considered culturally important by Native American groups would be affected by any of the build alternatives. The Gila River Indian Community (GRIC) and the Salt River Pima-Maricopa Indian Community have both passed Tribal Resolutions designating the South Mountains as a TCP [Traditional Cultural Property] and the Colorado River Indian tribes have said that they also consider the South Mountains a TCP." *See* South Mountain Transportation Corridor Draft Technical Report Summary Cultural Resources p. 4 (August 28, 2008) available at http://www.azdot.gov/southmountainfreeway/PDF/082808_SMCAT_CulturalResources_Summary_Final.pdf) (viewed July 18, 2013).

Code	Issue	Response
305	**Cultural Resources**	Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft Environmental Impact Statement). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. As stated on page 2-8 of the Draft Environmental Impact Statement, the meetings in 2010 between the Gila River Indian Community's Transportation Technical Team, Arizona Department of Transportation, and the Federal Highway Administration were held in response to a request received from the Governor of the Gila River Indian Community and were not a part of the agency or public scoping process. The information provided to the Transportation Technical Team was used by the Team and the Public Information Office in the Gila River Indian Community's outreach effort prior to the February 2012 coordinated referendum. The referendum and the outreach effort were tribal actions and, other than providing requested information to the Gila River Indian Community, the Arizona Department of Transportation and Federal Highway Administration did not participate in these actions.
306	**Cultural Resources**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. As noted in Table 4-47, which begins on page 4-145 of the Final Environmental Impact Statement, the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe were included in the initial Section 106 consultation in 2003. At that time, Yavapai-Prescott Indian Tribe deferred to the Four Southern tribes in a response dated September 10, 2003. Hopi concurred, but did not defer at this time. As more information regarding the project was known (and of aboriginal lands), all of the tribes with aboriginal lands within the project (including the Yavapai-Prescott Indian Tribe and the Colorado River Indian Tribes) were consulted in 2005, 2006, 2012, and 2013. In August 2005, both the Salt River Pima-Maricopa Indian Community and the Tohono O'odham Nation agreed to be a concurring party to the programmatic agreement. A response from Salt River Pima-Maricopa Indian Community dated August 14, 2012, cited an existing consultation management agreement in place between the Four Southern Tribes and stated that the Four Southern Tribes are in

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306 (cont.)		consensus that Gila River Indian Community would take the lead in providing comments for the project. Since the beginning of the environmental impact statement process for the proposed freeway, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in an ongoing, open dialogue with the Gila River Indian Community, its Tribal Historic Preservation Officer and Cultural Resource Management Program, regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. The Gila River Indian Community's own Cultural Resource Management Program performed the cultural field investigations and developed recommendations for mitigation for project impacts. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed South Mountain Freeway. The traditional cultural properties identified are culturally important to other Native American tribes as well.
307	**Cultural Resources**	As noted in Table 4-47, which begins on page 4-145 of the Final Environmental Impact Statement, the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe were included in the initial Section 106 consultation in 2003. At that time, Yavapai-Prescott Indian Tribe deferred to the Four Southern tribes in a response dated September 10, 2003. Hopi concurred, but did not defer at this time. As more information regarding the project was known (and of aboriginal lands), all of the tribes with aboriginal lands within the project (including the Yavapai-Prescott Indian Tribe and the Colorado River Indian Tribes) were consulted in 2005, 2006, 2012, and 2013. In August 2005, both the Salt River Pima-Maricopa Indian Community and the Tohono O'odham Nation agreed to be a concurring party to the programmatic agreement. A response from Salt River Pima-Maricopa Indian Community dated August 14, 2012, cited an existing consultation management agreement in place between the Four Southern Tribes and stated that the Four Southern Tribes are in consensus that Gila River Indian Community would take the lead in providing comments for the project. Since the beginning of the environmental impact statement process for the proposed freeway, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in an ongoing, open dialogue with the Gila River Indian Community, its Tribal Historic Preservation Officer and Cultural Resource Management Program, regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. The Gila River Indian Community's own Cultural Resource Management Program performed the cultural field investigations and developed recommendations for mitigation for project impacts. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well and as noted in Table 4-47, which begins on page 4-145 of the Final Environmental Impact Statement, these tribes were included in Section 106 consultation.

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307	As discussed in subsection (b) above, FHWA and ADOT lacked critical cultural expertise and input that could have more accurately shaped the scope of the technical services used to identify the known and potential cultural resources at issue by not making reasonable and good faith efforts to engage the above-referenced tribes. Should the critical consultation with all tribes have been performed as required by the Section 106 regulations, the footprint of the cultural resources identified would be more accurate and would unquestionably fulfill applicability of cultural significance under the NRHP and National Historic Preservation Act. Further, all tribes were not afforded the opportunity early in the project planning to properly select a qualified contractor to perform the cultural resources studies, many of which the FHWA and the ADOT improperly puts off until the "design phase". The scope of work and approving the qualifications of the identifier of cultural sites are critical procedural oversights when tribal input is absent.
	d. Because FHWA and ADOT failed to fully inform Section 106 consulting parties of the potential environmental impacts of the Freeway project, the consulting parties were unable to provide accurate input on the assessment of adverse effects of all known historic properties.
308	Consulting parties and tribes not consulted were not afforded the technical data available to FHWA and ADOT regarding the substantial risk to the environment prior to the close of the Section 106 process. For example, the consulting parties were not timely provided certain reports, including but not limited to the Environmental Protection Agency's Joint Air Toxic Assessment Project issued in 2005. The deficiencies in the initiation of the Section 106 process combined with the lack of data known to the FHWA and ADOT unquestionably left the consulting parties and tribes not consulted at a disadvantage. Tribes involved in the project, whether consulted or not, are unable to provide meaningful consultation in the Section 106 process when the FHWA and ADOT withholds information that may impact the parties' input on the assessment and mitigation processes within the regulations.
309	If the E1 Alternative were built, there are eight confirmed Traditional Cultural Properties that would be adversely affected. Those properties include petroglyphs, artifact scatter, and prehistoric trails. The DEIS and other associated cultural reports do not provide any concurrence on the improperly scoped traditional cultural studies by the parties and non-consulted tribes and does not demonstrate completion of the Section 106 process, particularly the mitigation measures to be invoked.
310	Until the FHWA and ADOT conforms wholly with informed meaningful consultation with consulting parties and affected tribes, the Section 106 process will remain incomplete and non-compliant.

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308	**Cultural Resources**	As noted in Table 4-47, which begins on page 4-145, and also on page 4-159 of the Final Environmental Impact Statement, all tribes were contacted early in the study and have been consulted on many aspects of the study, including the cultural resource-related reports produced over the course of the study. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. As stated above, Section 106 requires federal consultation with tribal authorities on the effects of their undertakings on historic properties. Although the Joint Air Toxics Assessment Project is discussed on pages 4-64 and 4-74 of the Draft and Final Environmental Impact Statements, respectively, Section 106 consultation on this report is not required.
309	**Cultural Resources**	The comment that eight traditional cultural properties would be adversely affected is incorrect. Adverse effects to the South Mountains Traditional Cultural Property and one site that is contributing to the South Mountains Traditional Cultural Property (AZ T:12:197) would occur with the construction of the E1 Alternative. No extant petroglyph sites would be adversely affected. The trail sites were determined eligible for listing in the National Register of Historic Places listing under Criterion D as archaeological sites; therefore, as noted on page 5-2 of the Draft Environmental Impact Statement, generally, cultural resources eligible for listing in the National Register of Historic Places under Criterion D are not eligible for protection under Section 4(f). Through consultation and coordination, the Gila River Indian Community Tribal Historic Preservation Office, the Arizona State Historic Preservation Office, and many other tribal authorities concurred with these recommendations (see Table 4-47 on page 4-145 of the Final Environmental Impact Statement for more details on tribal concurrences). Since the beginning of the environmental impact statement process for the proposed freeway, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in an ongoing, open dialogue with the Gila River Indian Community, its Tribal Historic Preservation Officer and Cultural Resource Management Program, regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. The Gila River Indian Community's own Cultural Resource Management Program performed the cultural field investigations and developed recommendations for mitigation for project impacts. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National

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e. **The DEIS lacks crucial aerial photography, charts, maps and diagrams illustrating the potential destruction of cultural properties and fails to address known impacts to religious practice.**

The DEIS fails to provide aerial photography, maps, charts or diagrams that properly informs the public of the Area of Potential Effects upon known and potential cultural sites and resources. Further, the DEIS fails to address any impacts to air, ground and water directly and indirectly related to the cultural resources impacted during the temporary state of construction of the Freeway. The DEIS fails to address documented concerns regarding religious practice including measures to ensure that religious practitioners gain and maintain uninterrupted access to sacred cultural properties and religious practice locations impacted by the Freeway project. In fact, the FHWA and ADOT have determined that the trails located within the project area do not qualify under the NRHP, however, the DEIS lacks any reference as to whether any one of the trails or all of the trails are routes used for religious practice purposes and therefore, should be afforded a higher value of significance under the criterion. Further, shortcomings in the initiation of the Section 106 process, lack of input from affected tribes, lack of good faith and reasonable efforts by the FHWA and ADOT all contribute to faulty application of the criterion against the properties found within the Area of Potential Effects.

In addition, the DEIS does not confirm that the Section 106 process is complete and that the FHWA and ADOT acquired concurrence by the Tribal Historic Preservation Officer or the State Historic Preservation Officer on its findings. The South Mountain Transportation Corridor Study, Citizens Advisory Team Draft Technical Support Summary, Cultural Resources (2008)[21] (the "SMT Corridor Study") confirms that "[t]he greatest number of prehistoric sites would be impacted by the E1 Alternative…"[22] In fact, the E1 Alternative is determined to impact at least 8 sites described as, "1 artifact scatter (limited activity site); 2 lithic quarries; 1 petroglyph site; 4 trail sites".[23] The SMT Corridor Study confirms that the Section 106 process is incomplete[24] and that mitigation measures including work plans, research designs, methods and excavation strategies, burial agreements with the Arizona State Museum and tribes are all outstanding.[25] Instead of completing the process as required and needed on a project of this magnitude, the FHWA and ADOT opted to propose and execute a seemingly unpopular Programmatic Agreement ("PA")

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[21] *See* South Mountain Transportation Corridor Study, Citizens Advisory Team Draft Technical Support Summary, Cultural Resources (2008) available at: http://www.azdot.gov/southmountainfreeway/PDF/082808_SMCAT_CulturalResources_Summary_Final.pdf (viewed July 19, 2013).
[22] *Id.* at p. 2.
[23] *Id.* at p. 3.
[24] *Id.* at p. 4.
[25] *Id.* at p. 5.

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309 (cont.)		Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well and as noted in Table 4-47, which begins on page 4-145 of the Final Environmental Impact Statement, these tribes were included in Section 106 consultation.
310	**Cultural Resources**	The proposed action's environmental impact statement process has complied with the National Historic Preservation Act Section 106 process, which, for the proposed action, is ongoing and continuing.
311	**Cultural Resources**	The Study Area as shown in Figure 1-1 on page 1-3 of the Draft Environmental Impact Statement includes the area of potential effects. In addition, consultation letters sent to consulting parties included maps and complete reports for their reference. The location of cultural resources are not shown in the Draft Environmental Impact Statement because the publishing of location information would put the sites in danger of pilfering and/or vandalism. Adverse effects to the South Mountains Traditional Cultural Property and one site that is contributing to the South Mountains Traditional Cultural Property (AZ T:12:197) would occur with the construction of the E1 Alternative. No extant petroglyph sites would be adversely affected. The trail sites were determined eligible for listing in the National Register of Historic Places listing under Criterion D as archaeological sites. Through Section 106 consultation and coordination, the Gila River Indian Community Tribal Historic Preservation Office, the Arizona State Historic Preservation Office, and many other tribal authorities concurred with these recommendations (see Table 4-47 on page 4-145 of the Final Environmental Impact Statement for more details on tribal concurrences). As stated above, Section 106 requires federal consultation with tribal authorities on the effects of their undertakings on historic properties. In cases where air, ground, or water attributes were considered important to their eligibility to the National Register of Historic Places, this information would have been addressed during the consultation process. If the Federal Highway Administration had no information suggesting the significance of air, ground, or water attributes, and none of the consulting parties responded to consultation by saying those attributes were important and requesting they be considered, the Federal Highway Administration would have no reason to consider them, and further Section 106 consultation on these attributes would not have been required.
312	**Cultural Resources**	The Study Area as shown in Figure 1-1 on page 1-3 of the Draft Environmental Impact Statement includes the area of potential effects. In addition, consultation letters sent to consulting parties included maps and complete reports for their reference. The location of cultural resources are not shown in the Draft Environmental Impact Statement because the publishing of location information would put the sites in danger of pilfering and/or vandalism. The project would not preclude access to the South Mountains. Adverse effects on traditional cultural practices, including religious activities, would be mitigated through the development and implementation of the traditional cultural property mitigation program being developed for the proposed project through ongoing National Historic Preservation Act Section 106 consultations and by mitigation identified in Chapter 4 of the Draft Environmental Impact Statement that would avoid, reduce, minimize or otherwise mitigate air, ground, and water-related impacts. This applies equally to any impacts during construction of the proposed freeway, should an action alternative be the Selected Alternative. The Draft Environmental Impact Statement describes a proposed action that, after consultation and coordination efforts, would accommodate and preserve (to the

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with certain parties and tribes to address "steps and procedures that would be undertaken to address any effects as they were to become known."[26] The decision to enter into a PA not only removes the project activities from the eyes of the public, but circumvents the statutory requirements and public policy governing the approval process of the project.

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f. **The DEIS fails to confirm that the Tribal Historic Preservation Office has concurred with the FHWA and ADOT's conclusions on eligibility of all cultural sites against the National Registry's criterion.**

The DEIS does not address why the THPO and the GRIC have opted to refrain from concurring on the Section 106 findings. The DEIS should not proceed forward without, in the least, valid Section 106 compliance. The DEIS fails to suggest when concurrence might be reached, why concurrence has not yet been made, and/or any other actions associated with the same.

g. **The DEIS fails to address proposed mitigation measures to the irreversible harm the Freeway project will cause on known cultural resources.**

Without addressing the FHWA and ADOT's planned mitigation of adverse effects upon the known cultural resources, the public, tribes and the Gila River Indian Community remain uninformed and unable to substantively comment on the DEIS. In other words, interested persons are left to speculate on mitigation measures on a large-scale project affecting hundreds of cultural properties. The DEIS does not mention whether it has drafted a mitigation plan, the scope of such a plan, the parties consulted, the measures to be taken, citations to procedural and substantive laws that apply in any such instance, the availability of funding and liability protections, curation agreements, curation space, technical qualifications of on-the-ground archaeologists, curation specialists or assistants, implications and coordination with tribes of any potential implications to the National Graves Protection and Repatriation Act, 25 U.S.C. 3001 et seq.[27] The DEIS confirms that the critical procedural requirement of mitigation in the Section 106 process is lacking.[28]

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[26] *Id.* at p. 7. The PA received little support from tribes on the record.
[27] The Native American Graves Protection and Protection Act ("NAGPRA") requires federal agencies and institutions that receive federal funding to return Native American "cultural items" to lineal descendants and culturally affiliated Indian tribes and Native Hawaiian organizations. Cultural items include human remains, funerary objects, sacred objects, and objects of cultural patrimony. NAGPRA also establishes procedures for the inadvertent discovery or planned excavation of Native American cultural items on federal or tribal lands. While these provisions do not apply to discoveries or excavations on private or state lands, the collection provisions of NAGPRA may apply to Native American cultural items if they come under the control of an institution that receives federal funding.
[28] Mitigation measures lack proper consultation with tribes and consulting parties and are merely speculative as of the date of this Complaint. *See* ADOT, South Mountain Study Team, *Summary*, Table S-4, p. S-27 available

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312 (cont.)		fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community. The Federal Highway Administration recommended the trails within the project area as eligible for listing in the National Register of Historic Places under Criterion D as archaeological sites. Based on review of the traditional cultural property technical summary, the Bureau of Indian Affairs, City of Phoenix, State Historic Preservation Office, Cocopah Tribe, Colorado River Indian Tribes, Fort McDowell Yavapai Nation, Gila River Indian Community, Hopi Tribe, Navajo Nation, San Carlos Apache Tribe, Tonto Apache Tribe, and White Mountain Apache Tribe, the Gila River Indian Community Tribal Historic Preservation Officer and Arizona State Historic Preservation Office concurred with these recommendations.
313	**Cultural Resources**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. Adverse effects to the South Mountains Traditional Cultural Property and one site that is contributing to the South Mountains Traditional Cultural Property (AZ T:12:197) would occur with the construction of the E1 Alternative. No extant petroglyph sites would be adversely affected. The trail sites were determined eligible for listing in the National Register of Historic Places listing under Criterion D as archaeological sites; therefore, as noted on page 5-2 of the Draft Environmental Impact Statement, generally, cultural resources eligible for listing in the National Register of Historic Places under Criterion D are not eligible for protection under Section 4(f). Through consultation and coordination, the Gila River Indian Community Tribal Historic Preservation Office, the Arizona State Historic Preservation Office, and many other tribal authorities concurred with these recommendations (see Table 4-47 on page 4-145 for more details on tribal concurrences).

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314	with certain parties and tribes to address "steps and procedures that would be undertaken to address any effects as they were to become known."[26] The decision to enter into a PA not only removes the project activities from the eyes of the public, but circumvents the statutory requirements and public policy governing the approval process of the project. f. **The DEIS fails to confirm that the Tribal Historic Preservation Office has concurred with the FHWA and ADOT's conclusions on eligibility of all cultural sites against the National Registry's criterion.** The DEIS does not address why the THPO and the GRIC have opted to refrain from concurring on the Section 106 findings. The DEIS should not proceed forward without, in the least, valid Section 106 compliance. The DEIS fails to suggest when concurrence might be reached, why concurrence has not yet been made, and/or any other actions associated with the same. g. **The DEIS fails to address proposed mitigation measures to the irreversible harm the Freeway project will cause on known cultural resources.** Without addressing the FHWA and ADOT's planned mitigation of adverse effects upon the known cultural resources, the public, tribes and the Gila River Indian Community remain uninformed and unable to substantively comment on the DEIS. In other words, interested persons are left to speculate on mitigation measures on a large-scale project affecting hundreds of cultural properties. The DEIS does not mention whether it has drafted a mitigation plan, the scope of such a plan, the parties consulted, the measures to be taken, citations to procedural and substantive laws that apply in any such instance, the availability of funding and liability protections, curation agreements, curation space, technical qualifications of on-the-ground archaeologists, curation specialists or assistants, implications and coordination with tribes of any potential implications to the National Graves Protection and Repatriation Act, 25 U.S.C. 3001 et seq.[27] The DEIS confirms that the critical procedural requirement of mitigation in the Section 106 process is lacking.[28]

[26] *Id.* at p. 7. The PA received little support from tribes on the record.
[27] The Native American Graves Protection and Protection Act ("NAGPRA") requires federal agencies and institutions that receive federal funding to return Native American "cultural items" to lineal descendants and culturally affiliated Indian tribes and Native Hawaiian organizations. Cultural items include human remains, funerary objects, sacred objects, and objects of cultural patrimony. NAGPRA also establishes procedures for the inadvertent discovery or planned excavation of Native American cultural items on federal or tribal lands. While these provisions do not apply to discoveries or excavations on private or state lands, the collection provisions of NAGPRA may apply to Native American cultural items if they come under the control of an institution that receives federal funding.
[28] Mitigation measures lack proper consultation with tribes and consulting parties and are merely speculative as of the date of this Complaint. *See* ADOT, South Mountain Study Team, *Summary*, Table S-4, p. S-27 available

Code	Issue	Response
313 (cont.)		As noted on page 4-159 of the Final Environmental Impact Statement, a programmatic agreement is a document that spells out the terms of a formal, legally binding agreement between lead agencies and other interested parties for the proper treatment and management of affected cultural resources. The programmatic agreement establishes a process for consultation, review, and compliance with federal and State preservation laws as the effects of the project on historic properties become known. Although the Advisory Council on Historic Preservation declined to participate in the programmatic agreement, the Council concerned with the development of the agreement (see Table 4-47, which begins on page 4-145 of the Final Environmental Impact Statement).
314	**Cultural Resources**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.

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with certain parties and tribes to address "steps and procedures that would be undertaken to address any effects as they were to become known."[26] The decision to enter into a PA not only removes the project activities from the eyes of the public, but circumvents the statutory requirements and public policy governing the approval process of the project.

f. **The DEIS fails to confirm that the Tribal Historic Preservation Office has concurred with the FHWA and ADOT's conclusions on eligibility of all cultural sites against the National Registry's criterion.**

The DEIS does not address why the THPO and the GRIC have opted to refrain from concurring on the Section 106 findings. The DEIS should not proceed forward without, in the least, valid Section 106 compliance. The DEIS fails to suggest when concurrence might be reached, why concurrence has not yet been made, and/or any other actions associated with the same.

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g. **The DEIS fails to address proposed mitigation measures to the irreversible harm the Freeway project will cause on known cultural resources.**

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Without addressing the FHWA and ADOT's planned mitigation of adverse effects upon the known cultural resources, the public, tribes and the Gila River Indian Community remain uninformed and unable to substantively comment on the DEIS. In other words, interested persons are left to speculate on mitigation measures on a large-scale project affecting hundreds of cultural properties. The DEIS does not mention whether it has drafted a mitigation plan, the scope of such a plan, the parties consulted, the measures to be taken, citations to procedural and substantive laws that apply in any such instance, the availability of funding and liability protections, curation agreements, curation space, technical qualifications of on-the-ground archaeologists, curation specialists or assistants, implications and coordination with tribes of any potential implications to the National Graves Protection and Repatriation Act, 25 U.S.C. 3001 et seq.[27] The DEIS confirms that the critical procedural requirement of mitigation in the Section 106 process is lacking.[28]

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[26] *Id.* at p. 7. The PA received little support from tribes on the record.
[27] The Native American Graves Protection and Protection Act ("NAGPRA") requires federal agencies and institutions that receive federal funding to return Native American "cultural items" to lineal descendants and culturally affiliated Indian tribes and Native Hawaiian organizations. Cultural items include human remains, funerary objects, sacred objects, and objects of cultural patrimony. NAGPRA also establishes procedures for the inadvertent discovery or planned excavation of Native American cultural items on federal or tribal lands. While these provisions do not apply to discoveries or excavations on private or state lands, the collection provisions of NAGPRA may apply to Native American cultural items if they come under the control of an institution that receives federal funding.
[28] Mitigation measures lack proper consultation with tribes and consulting parties and are merely speculative as of the date of this Complaint. *See* ADOT, South Mountain Study Team, *Summary*, Table S-4, p. S-27 available

Code	Issue	Response
315	**Cultural Resources**	Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. Mitigation for effects to cultural resources is discussed on page 4-146 of the Draft Environmental Impact Statement and in Chapter 5 as *Measures to Minimize Harm* which are presented at the end of each resource protected under Section 4(f) . These include maintaining access to important sites, the commitment to additional consultation during design, a traditional cultural property evaluation, and others.
316	**Cultural Resources**	Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received. Refer to Chapter 2 in its entirety and text beginning on page 4-128 of the Draft Environmental Impact Statement.
317	**Cultural Resources**	The Transportation Technical Team was discussed on page 2-3 of the Draft Environmental Impact Statement.

(Comment codes 316 and 317 are on next page)

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II. The FHWA and ADOT failed to consult the Gila River Indian Community.

As a result of the initiation of the project, the GRIC organized itself to effectively plan and negotiate proposed road modifications within the Gila River Indian Reservation. In particular, the GRIC established a Transportation Technical Team (the "TTT"). *See* Gila River Tribal Resolution GR -76-07 (July 5, 2007).

The FHWA and ADOT met with TTT. The TTT held meetings in the Gila River Indian Community's seven (7) districts. *See* Table 2-1. As discussed above, FHWA and ADOT do not have authority to delegate its consultation and public/community outreach to tribal government or any of tribal government's sub-entities. In other words, the FHWA and ADOT failed to make sufficient and direct efforts to engage Community members. Instead, the FHWA and ADOT substituted its duty for community outreach narrowly to tribal government and/or its sub-entities. The result is that Community members are uniformed, uninvolved and insignificant in the participation of the Freeway project. This outcome is contrary to the public policy as set forth in the NEPA.

For example, FHWA held only one public hearing on May 21, 2013. On April 30, 2013, FHWA and ADOT explicitly offered transportation assistance through the issuance of the City of Phoenix bus passes to GRIC members to attend the only public hearing on May 21. However, FHWA and ADOT never distributed bus passes to GRIC members that wished to attend the May 21 Hearing. *See Statement by Lori Riddle (July 22, 2013).* Therefore, the efforts to engage the Community were disingenuous.

III. The DEIS that proposes the selection of the E1 Alternative, the alternative that results in irreversible damage to traditional cultural properties (South Mountain), erroneously concludes that Section 4(f) of the United States Department of Transportation Act of 1996 does not apply and is violative of Environmental Justice.

The Department of Transportation Act (DOT Act) of 1966 includes a special provision, Section 4(f), which stipulates that the FHWA and other DOT agencies cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless the following conditions apply: (1) there is no feasible and prudent alternative to the use of land, and (2) the action includes all possible planning to minimize harm to the property resulting from use.

Examples of Section 4(f) protected resources are public school playgrounds, public parks, recreational land, wildlife refuges, traditional cultural properties, and historic sites. There are two types of transportation impacts that Section 4(f) looks at direct

at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/south-mountain-loop-202-docs/EIS/summary/Summary.pdf (viewed July 18, 2013).

Code	Issue	Response
318	**Cultural Resources**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer. As stated on page 2-8 of the Draft Environmental Impact Statement, the meetings in 2010 between the Gila River Indian Community's Transportation Technical Team, Arizona Department of Transportation, and the Federal Highway Administration were held in response to a request received from the Governor of the Gila River Indian Community . The information provided to the Transportation Technical Team was used by the Team and the Public Information Office in the Gila River Indian Community's outreach effort prior to the February 2012 coordinated referendum. The referendum and the outreach effort were tribal actions and, other than providing requested information to the Gila River Indian Community, the Arizona Department of Transportation and Federal Highway Administration did not participate in these actions.
319	**Tribal Involvement**	The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All advertisements for the hearing provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations.

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II. **The FHWA and ADOT failed to consult the Gila River Indian Community.**

As a result of the initiation of the project, the GRIC organized itself to effectively plan and negotiate proposed road modifications within the Gila River Indian Reservation. In particular, the GRIC established a Transportation Technical Team (the "TTT"). *See* Gila River Tribal Resolution GR -76-07 (July 5, 2007).

The FHWA and ADOT met with TTT. The TTT held meetings in the Gila River Indian Community's seven (7) districts. *See* Table 2-1. As discussed above, FHWA and ADOT do not have authority to delegate its consultation and public/community outreach to tribal government or any of tribal government's sub-entities. In other words, the FHWA and ADOT failed to make sufficient and direct efforts to engage Community members. Instead, the FHWA and ADOT substituted its duty for community outreach narrowly to tribal government and/or its sub-entities. The result is that Community members are uninformed, uninvolved and insignificant in the participation of the Freeway project. This outcome is contrary to the public policy as set forth in the NEPA.

For example, FHWA held only one public hearing on May 21, 2013. On April 30, 2013, FHWA and ADOT explicitly offered transportation assistance through the issuance of the City of Phoenix bus passes to GRIC members to attend the only public hearing on May 21. However, FHWA and ADOT never distributed bus passes to GRIC members that wished to attend the May 21 Hearing. *See Statement by Lori Riddle (July 22, 2013).* Therefore, the efforts to engage the Community were disingenuous.

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III. **The DEIS that proposes the selection of the E1 Alternative, the alternative that results in irreversible damage to traditional cultural properties (South Mountain), erroneously concludes that Section 4(f) of the United States Department of Transportation Act of 1996 does not apply and is violative of Environmental Justice.**

The Department of Transportation Act (DOT Act) of 1966 includes a special provision, Section 4(f), which stipulates that the FHWA and other DOT agencies cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless the following conditions apply: (1) there is no feasible and prudent alternative to the use of land, and (2) the action includes all possible planning to minimize harm to the property resulting from use.

Examples of Section 4(f) protected resources are public school playgrounds, public parks, recreational land, wildlife refuges, traditional cultural properties, and historic sites. There are two types of transportation impacts that Section 4(f) looks at direct

at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/south-mountain-loop-202-docs/EIS/summary/Summary.pdf (viewed July 18, 2013).

Code	Issue	Response
320	**Section 4(f) and Section 6(f)**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process presented in Chapter 3 of the Draft Environmental Impact Statement. The preferred alternative was the outcome to this process. An alternative on the Gila River Indian Community that could have avoided the South Mountains was considered but eliminated from study after the Gila River Indian Community rejected the alternative by referendum. The Draft Environmental Impact Statement concludes that Section 4(f) does apply to the South Mountains Traditional Cultural Property and Chapter 5 of the Draft Environmental Impact Statement presents a robust and fully disclosed Section 4(f) evaluation (see discussion in the Draft Environmental Impact Statement, starting on page 5-26). The outcome of this process was the determination that there was no prudent and feasible alternative to the E1 Alternative. A thorough feasible and prudent avoidance analysis of the South Mountains was conducted as presented in Chapter 5 of the Draft and Final Environmental Impact Statements and concluded avoidance to the direct use of the resource was not feasible and prudent. In support of this response and given the concerns about the South Mountains, consider the following comment from the U.S. Department of the Interior on the Draft Environmental Impact Statement: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources." The complete letter can be found in Appendix 7, Volume III, on page B4 of the Final Environmental Impact Statement.
321	**Environmental Justice and Title VI**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In

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II. **The FHWA and ADOT failed to consult the Gila River Indian Community.**

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The FHWA and ADOT met with TTT. The TTT held meetings in the Gila River Indian Community's seven (7) districts. *See* Table 2-1. As discussed above, FHWA and ADOT do not have authority to delegate its consultation and public/community outreach to tribal government or any of tribal government's sub-entities. In other words, the FHWA and ADOT failed to make sufficient and direct efforts to engage Community members. Instead, the FHWA and ADOT substituted its duty for community outreach narrowly to tribal government and/or its sub-entities. The result is that Community members are uniformed, uninvolved and insignificant in the participation of the Freeway project. This outcome is contrary to the public policy as set forth in the NEPA.

For example, FHWA held only one public hearing on May 21, 2013. On April 30, 2013, FHWA and ADOT explicitly offered transportation assistance through the issuance of the City of Phoenix bus passes to GRIC members to attend the only public hearing on May 21. However, FHWA and ADOT never distributed bus passes to GRIC members that wished to attend the May 21 Hearing. *See Statement by Lori Riddle (July 22, 2013).* Therefore, the efforts to engage the Community were disingenuous.

III. **The DEIS that proposes the selection of the E1 Alternative, the alternative that results in irreversible damage to traditional cultural properties (South Mountain), erroneously concludes that Section 4(f) of the United States Department of Transportation Act of 1996 does not apply and is violative of Environmental Justice.**

322 The Department of Transportation Act (DOT Act) of 1966 includes a special provision, Section 4(f), which stipulates that the FHWA and other DOT agencies cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless the following conditions apply: (1) there is no feasible and prudent alternative to the use of land, and (2) the action includes all possible planning to minimize harm to the property resulting from use.

323 Examples of Section 4(f) protected resources are public school playgrounds, public parks, recreational land, wildlife refuges, traditional cultural properties, and historic sites. There are two types of transportation impacts that Section 4(f) looks at direct

at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/south-mountain-loop-202-docs/EIS/summary/Summary.pdf (viewed July 18, 2013).

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321 (cont.)		certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
322	**Section 4(f) and Section 6(f)**	Chapter 5 of the Draft and Final Environmental Impact Statements are dedicated to the discussion of Section 4(f) of the Department of Transportation Act of 1966.
323	**Section 4(f) and Section 6(f)**	When there is a direct use (take) of a Section 4(f) property, analysis to determine whether proximity impacts would result in a constructive use is not applicable (23 Code of Federal Regulations § 774.15) (see Draft Environmental Impact Statement page 5-27). Constructive use would not incorporate land from the Section 4(f) resource, but has proximity impacts so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired. Approximately 32 acres of the over 16,000-acre Phoenix South Mountain Park/Preserve and the South Mountains Traditional Cultural Property would be converted to a transportation corridor. The park would still function as a park, offering recreation, interaction with the Sonoran Desert, etc. Although access to the traditional cultural property would be different, Native Americans would still have access to the traditional cultural property and would still be able engage in traditional activities associated with the mountains. The impact on the traditional cultural property would not jeopardize its eligibility for listing in the National Register of Historic Places. Through the consultation process, the Gila River Indian Community Tribal Historic Preservation Officer has been involved in developing measures to minimize harm to the traditional cultural property (see page 5-27 of the Draft Environmental Impact Statement).

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impacts: When a 4(f) resource is converted to use for transportation, such as the thirty-one (31) acres of South Mountain for the proposed freeway, as well as a TCP that would be destroyed, if built, indirect impacts including proximity impacts that significantly impair the use of a 4(f) resource are relevant. For example, indirect impacts including proximity impacts could include increased noise levels, changes to views, lighting pollution, or obstructed access to the 4(f) resource (cultural and religious practice). Indirect impacts can intrinsically lead to direct impacts, if the indirect impacts result in the 4(f) resource no longer functioning as it did prior to the Freeway project. This case certainly applies in the present case.

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The DEIS acknowledges that the South Mountain is sacred to the GRIC and other tribes, is designated as a TCP[29], and is consequently eligible under the NRHP. The DEIS indicates that ten locations have been identified by GRIC as places of cultural importance: the South Mountains, two prehistoric village sites, an active shrine site, two prehistoric petroglyph sites, and four prehistoric trail sites, which are eligible as TCPs. The FHWA and ADOT in consultation with the GRIC confirmed the eligibility of two properties. Five TCPs have been identified within the Area of Potential Effects. The DEIS specifically states that the South Mountains were determined eligible for NRHP listing as a TCP under Criteria A and B.[30]

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Despite the above findings and conclusions, however, the DEIS suggests that "the E1 Alternative was designed in such a way as to avoid a site that is a contributing element to the South Mountains TCP, resulting in no direct use of this TCP element. A right of way fence would limit access to the site by freeway users, but Community members would continue to gain access to the site as they currently do."[31]

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Finally, the DEIS outright finds that, "…even with mitigation, implementation of the proposed action would alter the direct physical connection Community members have between their homeland and the South Mountains and would restrict the ability to visit or use these locations in a traditional cultural manner." What is most perplexing is that the DEIS makes an unsubstantiated claim that "…alternatives to avoid use of the South Mountains TCP were evaluated and determined to be not prudent and feasible." In other words, the FHWA and ADOT found the E1 Alternative to be the most prudent and feasible option for the Freeway project.

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[29] *See* ADOT, South Mountain Study Team, *Summary,* p. 35 available at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/south-mountain-loop-202-docs/EIS/summary/Summary.pdf (viewed July 19, 2013).
[30] *See* ADOT, South Mountain Study Team, *Summary* , p. S-27 available at http://www.azdot.gov/Highways/Valley_Freeways/Loop_202/South_Mountain/PDF/south-mountain-loop-202-docs/EIS/summary/Summary.pdf.
[31] *Id.*

Code	Issue	Response
324	**Cultural Resources**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact statement in several locations, notably pages 4-130 and 5-26. Not all of the ten resources identified by the Cultural Resource Management Program as culturally important qualified as traditional cultural properties.
325	**Cultural Resources**	Comment noted.
326	**Section 4(f) and Section 6(f)**	In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process presented in Chapter 3 of the Draft Environmental Impact Statement. The Preferred Alternative was the outcome to this process. The Draft Environmental Impact Statement concludes that Section 4(f) applies to the South Mountains Traditional Cultural Property and Chapter 5 of the Draft Environmental Impact Statement presents a robust and fully disclosed Section 4(f) evaluation (see discussion in the Draft Environmental Impact Statement, starting on page 5-26). The outcome of this process was the determination that there was no prudent and feasible alternative to the E1 Alternative. A thorough feasible and prudent avoidance analysis of the South Mountains was conducted as presented in Chapter 5 of the Draft and Final Environmental Impact Statements and concluded avoidance to the direct use of the resource was not feasible and prudent. In support of this response and given the concerns about the South Mountains, consider the following comment from the U.S. Department of the Interior on the Draft Environmental Impact Statement: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources." The complete letter can be found in Appendix 7, Volume III, on page B4 of the Final Environmental Impact Statement.

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327	In addition, the DEIS fails to address the cultural and religious significance of microphylla bursera (elephant tree) also known as "uhs bakam" to Native Americans. The DEIS consequently fails to assess the value of this culturally significant plant as impacted by the proposed project. More specifically, the project proposes to destroy the Bursera Trail and the uhs bakam, used for medicinal and ceremonial purposes, is known to be associated with this particular trail. Elephant tree is a "protected" plant and its presence is rare in the United States. Muhadag (South Mountain) is known to being the plant's northernmost point of location. The more popular location of this plant is in Sonora, Mexico. Local Native Americans are well aware that the only access to harvest Elephant Tree is at Muhadag other than a few remote locations near Yuma, Arizona. The Yuma location requires access via horseback and/or all-terrain vehicle. Reference to uhs bakam must also include technical data support, avoidance and mitigation plans in order to preserve this rare and highly coveted medicine and religious resource. Destroying this particular resource and/or restricting access to it has broad yet serious implications to Native Americans and religious practitioners that rely on this sacred resource.
328	Conclusively, the DEIS has failed to identify at least three Section 4(f) resources. In addition, the DEIS incorrectly analyzes the impact to any Section 4(f) resources in the west end of SMPP. While there will not be a direct use of these trails, there will clearly be a *constructive* use of these trails. It is tragic that the solitude, peacefulness and beauty experienced on these trails (old and new) will be so dramatically diminished by the proposed action. The severe impacts should be included in a revised DEIS.
329	The Section 4(f) Evaluation is incomplete and filled with misstatements, therefore the analysis is deficient. Figure 5-6 needs to be amended to include the trails and developed measures to minimize harm. As a whole, this report needs to be amended and alternatives reevaluated to avoid impact and/or evaluate measures to minimize harm.
330	As an overall final editorial, it seems tragic that the process went out of its way to realign the proposed project to preserve other Section 4(f) resources (Hudson Farm, Barnes Dairy Farm, and Hackin Farmstead, all on private property) when it is most certain they are only being preserved to be eventually demolished by future development, yet other Section 4(f) resources such as the trails in SMPP, which will be used by thousands of people for many years to come, are discounted, devalued and dismissed as an important protected resource.
331	Many of the statements in the Section 4(f) Evaluation are clearly pre-decisional and the evaluation was not done by or with a professional who understands the SMPP, its trail system or the City of Phoenix General Plan. This leads to a misleading analysis. The public uses the DEIS as a tool for information, yet the information is not only incomplete, it is also wrong. The Section 4(f) Evaluation needs to be revised.

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Code	Issue	Response
327	**Cultural Resources**	Adverse impacts to culturally important natural resources (plants, animals, landscapes) would be addressed through the traditional cultural property mitigation program (currently in its draft form as jointly drafted by the Arizona Department of Transportation and the Gila River Indian Community). (See Draft Environmental Impact Statement pages 4-131 and 5-27 for more discussion.) The Bursera trail is more than ¼ mile from the proposed freeway and is analyzed in the Final Environmental Impact Statement on page 5-9. The trail is within ¼ mile of the planned Chandler extension and residential development; however, these trails do not have noise-sensitive activities or viewshed characteristics that contribute to their importance as Section 4(f) recreational resources.
328	**Section 4(f) and Section 6(f)**	The newest South Mountains trails, the Bursera and the Pyramid, are more than ¼ mile from the proposed freeway and are analyzed in the Final Environmental Impact Statement on page 5-9. The trails are within ¼ mile of the planned Chandler extension and residential development; however, these trails do not have noise-sensitive activities or viewshed characteristics that contribute to their importance as Section 4(f) recreational resources. Discovery of new information not presented in a Draft Environmental Impact Statement as it is published is not failure. Review by agencies and the public of a Draft Environmental Impact Statement equates to a review of a draft report to aid the agencies in making the document more objective and defensible. In this manner, the realization of new information, if recognized as such by the federal lead agency, permits the Arizona Department of Transportation and its representatives to defensibly augment the document's content.
329	**Section 4(f) and Section 6(f)**	Trails maps have been updated, and new trails are analyzed in the Final Environmental Impact Statement because they are within ¼ mile of the Chandler Extension (not the proposed freeway) (see page 5-9). Because none of the action alternatives or options would result in direct or constructive use of the trails, no measures to minimize harm are warranted. Discovery of new information not presented in a Draft Environmental Impact Statement as it is published is not failure. Review by agencies and the public of a Draft Environmental Impact Statement equates to a review of a draft report to aid the agencies in making the document more objective and defensible. In this manner, the realization of new information, if recognized as such by the federal lead agency, permits the Arizona Department of Transportation and its representatives to defensibly augment the document's content.
330	**Section 4(f) and Section 6(f)**	The process upon which Section 4(f) resources were identified and evaluated for feasible and prudent avoidance possibilities followed the rigorous procedural requirements as set forth in Federal Highway Administration Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents and related guidance. The comment suggests trails in the South Mountain Park/Preserve would be subject to direct or constructive use; however, as shown in Chapter 5 of the Draft and Final Environmental Impact Statements, such use would be avoided by the proposed freeway.

(Response 331 begins on next page)

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The disqualification of trails in South Mountain based on the above assessment is inaccurate, far-reaching and just plain wrong. This shows a true lack of knowledge about the SMPP, the trails, Section 4(f) resources and a defensible analysis. Finally, the assessment of the trails in relation to Native American religious practice is lacking and necessary to weigh the Section 4(f) applicability in the present matter. Thus, the trails remain subject to Section 4(f) review and protection.

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IV. The DEIS fails to comply with the Archaeological Resources Protection Act of 1979, 16 U.S.C. 470aa-mm.

The Archaeological Resource Protection Act (the "ARPA") was enacted "...to secure, for the present and future benefit of the American people, the protection of archaeological resources and sites which are on public lands and Indian lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals." 16 U.S.C. 470, Sec. 2(b).

In the present case, the land affected by the Freeway project includes private, public, tribal and National Park land. ARPA governs federal projects that impact public, tribal and National Park land.[32]

The DEIS and FHWA/ADOT have failed to demonstrate compliance with the ARPA regarding permits to excavate archaeological resources on such lands, terms and conditions of the permits, compliance with the requisite qualifications of person/s to carry out the permitted activity, notification to tribes, curatorial measures and compliance, custodial arrangements for the archaeological collection, liabilities for the care and maintenance of the collection, compliance with tribal law governing archaeological excavations,[33] compliance with the Antiquities Act of 1906, 16 U.S.C. 431-433, consent of archaeological activities with Indian tribes,[34] among other provisions.

The FHWA and ADOT should become compliant with the ARPA as the Freeway project, per the DEIS, is planned to adversely impact numerous archaeological sites.

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[32] 16 U.S.C. 470bb, Section 3 (3)(a-b) & (4).
[33] Note that the GRIC has passed resolutions and perhaps other laws that bear the public policy against desecration of the South Mountain. Archaeological excavation would certainly desecrate the South Mountain. The FHWA and ADOT's lack of compliance with ARPA is compounded by the failure to address ARPA's requirement to observe tribal law for the same.
[34] *See* 16 U.S.C. 470bb, Section 5 which states, "[a]ny exchange or ultimate disposition under such regulation of archaeological resources excavated or removed from Indian lands shall be subject to the consent of the Indian or Indian tribe which owns or has jurisdiction over such lands. Following promulgation of regulations under this section, notwithstanding any other provision of law, such regulations shall govern the disposition of archaeological resources removed from public lands and Indian lands pursuant to this Act."

Code	Issue	Response
331	**Section 4(f) and Section 6(f)**	The Section 4(f) evaluation in its entirety represents an exhaustive, comprehensive, objective, and meaningful effort in accordance with requirements of the law and is in no way misleading. Evaluation of each resource included active engagement of resource owners to clarify resource importance and use (extensive interaction with owner/operators of Section 4(f) resources is well documented in the Appendices of the Draft and Final Environmental Impact Statement). The U.S. Department of the Interior [the agency with direct oversight of Section 4(f)] review of the Draft Environmental Impact Statement noted: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources" The complete letter can be found in Appendix 7, Volume III, on page B4 of the Final Environmental Impact Statement. The Section 4(f) evaluation was thorough and complete.
332	**Section 4(f) and Section 6(f)**	The Federal Highway Administration recommended the Native American trails within the project area as eligible for listing in the National Register of Historic Places under Criterion D as archaeological sites. Based on review of the traditional cultural property technical summary, the Bureau of Indian Affairs, City of Phoenix, State Historic Preservation Office, Cocopah Tribe, Colorado River Indian Tribes, Fort McDowell Yavapai Nation, Gila River Indian Community, Hopi Tribe, Navajo Nation, San Carlos Apache Tribe, Tonto Apache Tribe, and White Mountain Apache Tribe, the Gila River Indian Community Tribal Historic Preservation Officer and Arizona State Historic Preservation Office concurred with these recommendations. Trails within Phoenix South Mountain Park/Preserve were not disqualified from Section 4(f) evaluation; they are solely recreational. The City of Phoenix-owned trails within Phoenix South Mountain Park/Preserve were considered collectively as part of the City-owned park/preserve because the analysis indicated that there would be no direct or constructive use of the trails.
333	**Cultural Resources**	The Draft Environmental Impact Statement complies with the Archaeological Resources Protection Act of 1979, 16 United States Code 470aa-mm. Implementing regulations found at 43 Code of Federal Regulations Section 7.1(a) provide regulations to implement provisions of the Archaeological Resources Protection Act by establishing the uniform definitions, standards, and procedures to be followed by all Federal land managers in providing protection for archaeological resources, located on public lands and Indian lands of the United States; therefore, the Archaeological Resources Protection Act applies only to projects on federal or tribal land. The proposed freeway would not be constructed on tribal land and the involvement of federal land would be limited to a parcel owned by the Bureau of Land Management, which is discussed on page 4-14 of the Final Environmental Impact Statement. As discussed on page 4-159 of the Final Environmental Impact Statement, a programmatic agreement was developed for the project to establish a process for consultation, review, and compliance with federal and state preservation laws as the effects of the project on historic properties become known. The programmatic agreement states that any data recovery on federal lands necessitated by the project must be permitted under the Archaeological Resources Protection Act in accordance with the federal land-holding agency and that in the event any data recovery for the project should take place on tribal lands, all applicable permits would be obtained. Because the project is proposed, a programmatic agreement is in place to address data recovery on federal and tribal lands, and no excavations have yet occurred.

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V. **The DEIS results in a clear violation of the Religious Freedom Restoration Act of 1993, 42 USC § 2000bb, (the "RFRA") and the Religious Land Use and Institutionalized Persons Act, 42 U.S.C. § 2000cc et seq. (the "RLUIPA").**

In general under the RFRA, the Government shall not substantially burden a person's exercise of religion even if the burden results from a rule of general applicability, except as provided in subsection (b) of this section. The Government may substantially burden a person's exercise of religion only if it demonstrates that application of the burden to the person— **(1)** is in furtherance of a compelling governmental interest; and **(2)** is the least restrictive means of furthering that compelling governmental interest.

The RLUIPA corrects the shortcomings of RFRA by prohibiting the imposition of burdens on the ability of prisoners to worship as they please and gives churches and other religious institutions a way to avoid burdensome zoning law restrictions on their property use.

Both RFRA and RLUIPA apply in the present case. The FHWA and ADOT, despite noting substantial findings and a lengthy record of the impact of the Freeway project upon the cultural, traditional and religious practice of Native Americans, the FHWA has not argued nor demonstrated a compelling governmental interest that is the least restrictive means to further such a compelling government interest. Instead, FHWA and ADOT suggest that they originated 30 or more design alternatives yet made unsubstantiated claims that 29 of the alternatives were not prudent or feasible. FHWA and ADOT through its DEIS proposes the EI Alternative that is (a) a substantial burden to the exercise of religion upon the Native Americans and tribes that have attached a religious connection with the proposed project's footprint and cultural resources, (b) that FHWA and ADOT intends, through its DEIS to further what it believes is a compelling government interest, and (c) is doing so by electing the most restrictive means upon religious freedom. Therefore, the E1 Alternative for the Freeway project violates RFRA and the project as proposed by the DEIS should not proceed.

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VI. **The United States, through FHWA and ADOT, failed to honor, observe and uphold the United Nations Declaration on the Rights of Indigenous Peoples (the "UNDRIP") when it issued an insufficient DEIS that does not assure all indigenous people the rights that are afforded them under the Declaration.**

The 2007 United Nations Declaration of the Rights of Indigenous Peoples (UNDRIP) affirms that Indigenous people have the right to be who they are, that they have the right to exist as distinct peoples, and that they have the right to "maintain, protect and develop the past, present and future manifestations of their cultures." Further, Indigenous Peoples have the right to "practice and revitalize" their sacred cultural traditions and customs. The UNDRIP affirms the rights of indigenous peoples to "manifest, practice, develop and teach their spiritual and religious traditions, customs and ceremonies," and "to maintain, protect, and have access in privacy to their religious and cultural sites." The UNDRIP further

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Code	Issue	Response
334	**Cultural Resources**	The Religious Land Use and Institutionalized Persons Act, by its terms, has no application here. The Draft Environmental Impact Statement describes a proposed action that, after consultation and coordination efforts, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community. Even if a substantial burden existed, the construction of roads to meet regional transportation needs is a central and compelling function of government, and the project is designed to accomplish that compelling function with the least impact possible under the circumstances. The Arizona Department of Transportation and Federal Highway Administration have been fully attentive to concerns expressed by the Gila River Indian Community and reiterate that position in this comment; the agencies have taken these concerns into account in describing potential impacts in the Draft Environmental Impact Statement, in ensuring that access to South Mountain is preserved, and in developing and recommending the implementation of numerous mitigation measures.
335	**Cultural Resources**	The United States has confirmed that the United Nations Declaration on the Rights of Indigenous Peoples Declaration is "not legally binding or a statement of current international law" and is limited to "moral and political force." *Announcement of U.S. Support for the United Nations Declaration on the Rights of Indigenous Peoples*, U.S. State Department (December 17, 2010) (available at: state.gov/documents/organization/154782.pdf). The government's Announcement further clarified that the United States "understands [that the Declaration] calls for a process of meaningful consultation with tribal leaders, but not necessarily the agreement of those leaders, before the actions addressed in those consultations are taken." The Draft Environmental Impact Statement describes a proposed action that, after consultation and coordination efforts, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community.

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recognizes that much of what Indigenous peoples hold sacred in this world has been taken or lost "without their free, prior and informed consent or in violation of their laws, traditions and customs," and it calls for states to provide redress "through effective mechanisms" and "through fair, transparent and effective mechanisms developed in conjunction with indigenous peoples concerned." The phrase "through effective mechanisms" appears twice in Articles 11 and 12, serving to underscore the fact that nation states should utilize the power of regulatory, legislative and other authorities to assure that the rights of Indigenous peoples to practice and worship in sacred sites and continue religious and cultural ways of living are secure. Article 8 of the UNDRIP specifically prohibits the "forced assimilation or destruction of Indigenous culture."

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In the present case, civil rights and human rights within the UNDRIP mandate that an evaluation of the traditional cultural properties be performed with direct, informed with the Indigenous Peoples' free, prior and informed consent. Here, the Indigenous Peoples are the tribes affected by the Freeway project. Free, prior and informed consent must occur *before* any route of the proposed project can be selected. Article 7 of the UNDRIP afford Indigenous peoples the right to "decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual well-being and the lands they occupy or otherwise use, and to exercise control over their economic, social and cultural development". In no way does the UNDRIP sanctify or suggest validity of the FHWA's incomplete, in accurate and unfounded Section 106 process nor its finding that the proposed Freeway project is exempted from Section 4(f) protections.

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In other words, FHWA continues to violate the rights afforded to the tribes as the affected Indigenous Peoples in the present matter by proceeding with the E1 Alternative of the Freeway project in the manner so described in the April 2013 DEIS. Further, the United States, through its FHWA in the present matter, is continuing to violate Articles 11&12 by failing to afford civil and human rights outlined in the UNDRIP.

CONCLUSION

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The FHWA and ADOT's proposed South Mountain Freeway project does not meet the requirements of the NEPA, Section 4(f) of the Department of Transportation Act, the NHPA, the ARPA, the RFRA, the RLUIPA, and the UNDRIP. FHWA and ADOT should re-initiate the Section 106 process with reasonable and good faith efforts to consult all tribes and amend any and all technical studies identifying, assessing, evaluating and mitigating adverse impacts to cultural resources with tribal input. Further, FHWA and ADOT should eliminate alternative routes that are located near or through the South Mountain, the Gila River Indian Community and other sites considered of sacred or of cultural significance, correct the DEIS and take future action to become compliant with all applicable laws, ensure that all tribes and Indigenous Peoples are afforded their basic human and civil rights as outlined in the UNDRIP, and appropriately include counsel from air toxicology experts and the findings of the Environmental Protection Agency's Joint Air Toxic Assessment Project issued in 2005.

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Code	Issue	Response
336	**Cultural Resources**	As described in the Draft Environmental Impact Statement, the consultation process with Native American tribes, and in particular with the Gila River Indian Community, was lengthy, repeated, and extensive. Traditional cultural properties were evaluated through consultation with affected tribes and are described in the Draft Environmental Impact Statement. Although the consent of tribal leaders is not required, as the United States made clear in its decision discussed in an earlier response, the Tribal Historic Preservation Officer concurs with the mitigation measures to be imposed in connection with the E1 Alternative affecting a small portion of the South Mountains. The quoted language in the comment attributed to Article 7 of the Declaration does not appear there. The language appears to derived from the International Labor Organization's 1989 Indigenous and Tribal Peoples Convention (Convention No. 169). Convention 169 has never been ratified by the United States, which has not agreed to align legislation, policies, and programs with the Convention as a legal requirement. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. A thorough feasible and prudent avoidance analysis of the South Mountains was conducted as presented in Chapter 5 of the Draft and Final Environmental Impact Statements and concluded avoidance to the direct use of the resource was not feasible and prudent. In support of this response, consider the following review from the U.S. Department of the Interior on the Draft Environmental Impact Statement: comment: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources." The complete letter can be found in Appendix 7, Volume III, on page B4 of the Final Environmental Impact Statement.
337	**Cultural Resources**	The Draft Environmental Impact Statement describes a proposed action that, after consultation and coordination efforts, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community.

(Response 338 begins on next page)

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339	Finally, the National Advisory Council on Historic Preservation should conduct a Council review in accordance with Section 106, 36 C.F.R. §800.8(c)(2) and §800.9 to fully assess the FHWA and ADOT's actions and insufficiencies under the Section 106 process. Further, the Council should have the opportunity to review the abundant record that clearly demonstrates that the agencies failed to carry out their responsibilities assigned under Section 106 and the NEPA. The Council should therefore conduct a detailed case review to improve performance under Section 106 and/or correct the Section 106 and NEPA deficiencies. *See Id.* Upon findings, the Council may consider a recommendation to issue a stop work order to the Department of Transportation until Section 106 and NEPA compliance is attained.

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Code	Issue	Response
338	**Cultural Resources**	The Draft Environmental Impact Statement is the result of careful study and complies with the National Environmental Policy Act, Section 4(f) of the Department of Transportation Act, the National Historic Preservation Act, the Archaeological Resource Protection Act, the Religious Freedom Restoration Act, the Religious Land Use and Institutionalized Persons Act, and the United Nations Declaration on the Rights of Indigenous Peoples
339	**Cultural Resources**	As noted in the Final Environmental Impact Statement in Table 4-47 beginning on page 4-145, the National Advisory Council on Historic Preservation has been consulted. The Council declined to participate in the project twice, but encouraged development of a programmatic agreement without its involvement.

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STATEMENT BY LORI RIDDLE
JULY 22, 2013

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There were very few meetings, very little public participation. The very first invite extended was days after the DEIS was released which was April 25th, 2013. The meeting invite was on April 30th, 2013 at 3pm in GRIC at the Governance Center.

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Present were the TTT, Governor and Lt Governor (who is Chair of the TTT), various tribal departments, a rep from ADOT (who I can't recall), a rep from MAG, Senior Engineer Bob Hazlett as well as a few of the grassroots organizers. Represented were at least organizers from 5 groups. During this meeting we were given 3 copies of the DEIS to divide among our groups. A few days prior a community member attempted to call to find out how to obtain a copy of the DEIS, she was told in order to get a hard copy she would have to pay 50.00 dollars. During the April 30th meeting they also advised us about the 50.00 dollar charge for hard copies. At this meeting they also told us that free bus service to the May 21st DEIS public comment hearing in Phoenix at the Phoenix Convention Center. Details about how the free bus rides to the hearing saying community members could catch the bus in two locations and even take the light rail, but no other details regarding the bus service. They also went through the scenario of what to expect at the hearing, how it would be set up, etc. At the beginning of the meeting the ground rules set as relayed by TTT's David White and Stephen Lewis both individuals head of the TTT. We were not allowed to speak about anything else but what the process was going to be like, at this point there wasn't any mention that the Phoenix hearing would have some differences than the community forums. It was at this meeting where GRIC Lt Gov. had to officially request that a meeting (or two) be held in GRIC for community members that couldn't make the public hearing. At this meeting the handouts "Fact sheet" and "How to participate" were distributed. That's all I can recall.

A few times I attempted to call the number provided on the handouts, which also had a recording say the they couldn't receive any more messages, the box was full, or something to that effect. I had also heard similar accounts from other people who were attempting to call the number. On the Thursday before the hearing I started to get worried because there was no further mention of free transport besides what was relayed to us during the April 30th meeting. I called the number provided and was able to have an opportunity to leave a voice message in which I said something to the effect of: Hello my name is Lori Riddle from the Gila River Indian Community and I'm trying to get some further information on bus service, passes or vouchers for my community members. How will this work? Would someone give me a call on my cell #520-610-3405, thank you.

No Response!!!!

So on the day of the Phoenix hearing May 21st, 2013 I lingered several hours. I only recognized Mr. Bob Hazlett from MAG, I approached Mr. Hazlett and asked him, "So who's in charge here"? He chuckled but didn't answer, I told him I ask because I have some concerns. I told him there's a problem with the number that's always full and can't take anymore new messages, his response, "Yes, we just found out today that it only holds so many messages (I think the number he gave me was 13)". So I told him maybe they need to empty that a few times a day? The other thing I mentioned was that I had left a

Code	Issue	Response
340	**Public Involvement**	Offers to the Gila River Indian Community Manager to host a public outreach event on the Gila River Indian Community began in summer 2012. The Gila River Indian Community first officially responded to this offer at the April 30, 2013, meeting of the Transportation Technical Team. During this meeting, the Gila River Indian Community Manager requested a Gila River Indian Community Forum be conducted on the Gila River Indian Community following the public hearing. This was the only request the Arizona Department of Transportation received from the Gila River Indian Community regarding whether the Arizona Department of Transportation could hold a public outreach event during the public comment period. The Arizona Department of Transportation agreed to do so, and a Gila River Indian Community Forum was held on June 22, 2013, at the Komatke Boys & Girls Club on the Gila River Indian Community. The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing, and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Gila River Indian Community Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 (Papago and Maricopa freeways) and State Route 202L (Santan Freeway). These electronic notices included notice of availability of the Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013); and closing of the Draft Environmental Impact Statement public comment period (June 2013). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area.
341	**Public Involvement**	As stated on page 2-8 of the Draft Environmental Impact Statement, the meetings in 2010 between the Gila River Indian Community's Transportation Technical Team, Arizona Department of Transportation, and the Federal Highway Administration were held in response to a request received from the Governor of the Gila River Indian Community and were not a part of the agency or public scoping process. The information provided to the Transportation Technical Team was used by the Team and the Public Information Office in the Gila River Indian Community's outreach effort prior to the February 2012 coordinated referendum. The referendum and the outreach effort were tribal actions and, other than providing requested information to the Gila River Indian Community, the Arizona Department of Transportation and Federal Highway Administration did not participate in these actions.

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STATEMENT BY LORI RIDDLE
JULY 22, 2013

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No Response!!!!

343

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Code	Issue	Response
342	**Public Involvement**	The initial hotline capacity was 20 messages; it was expanded to 80 on May 17, 2013. Any questions that came in regarding how to participate, including any shuttle bus or transportation questions, were forwarded to one individual to address. Conversation record log sheets were kept for these efforts.
343	**Public Involvement**	For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All advertisements regarding the public hearing provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations. Transportation to the Gila River Indian Community forum was not provided. As noted in Chapter 2 of the Final Environmental Impact Statement, efforts to involve the Gila River Indian Community in the environmental impact statement process have been extensive. Public involvement with the Gila River Indian Community was conducted as requested by the tribal government. Prior to October 2005, early efforts to involve the Gila River Indian Community included attending tribal meetings and monthly meetings with Gila River Indian Community Departments (see discussion beginning on page 2-8 of the Draft and Final Environmental Impact Statements). On October 14, 2005, the Gila River Indian Community requested that all project-related communications take place at a government-to-government level (see letter on page A152 of Appendix 1-1). This request was honored by the Arizona Department of Transportation and Federal Highway Administration. All public involvement efforts were implemented by the Gila River Indian Community's public involvement officer.

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message on the number and relayed the message I had left the week prior. After that I said so how was this supposed to work? Because we could have gotten more tribal members present. He shrugged his shoulders and said, "Well it's too late now". Also on the day of the Phoenix hearing the participants received the small booklet "SMTN Meeting Guide". This was the first time we as community members had seen this. The guide did say the community forums were going to be utilizing a different format. It also listed only 1 GRIC forum and listed it as tentative.

344 The meeting in GRIC was short notice fliers went out to the community literally days before the event. Before this event at least three weeks prior one community organizer emailed a request urging GRIC to provide transport to community members to the meeting. There is a lack of community members without vehicles. No response. Lastly a few days before organizers and community voiced their concerns over the inability to voice, in open forum, their concerns at this meeting. We additionally asked again if transport would be provided, they finally said yes, but us organizers had to provide a list of community members who needed transport. This was not expected, it was too short of notice to gather all that information. The day of the GRIC forum were dissatisfied the lack of inability to openly voice their concerns. The video was looped, as posted on ADOT's website, throughout the day.

345 Previously, in two district meetings that I had attended one in district six and the other in district four. There were concerns about ADOT not coming to present the information themselves. The one elder in district six asked who they were working for? He (the elder) stated that he felt like the TTT should not have been presenting the information but ADOT should have been the ones bringing this information to the community. That same consensus was expressed at the district four meeting.

Signed,

Lori Riddle

July 22, 2013

Code	Issue	Response
344	**Public Involvement**	The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing, and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Gila River Indian Community Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along the Interstate 10 (Papago and Maricopa freeways) and State Route 202L (Santan Freeway). These electronic notices included notice of availability of the Draft Environmental Impact Statement (distributed on April 26, 2013); public hearing (distributed on May 10, 2013); the community forums (distributed on May 29, 2013); and closing of the Draft Environmental Impact Statement public comment period (June 2013). In addition, anyone who had attended a previous meeting on the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area.
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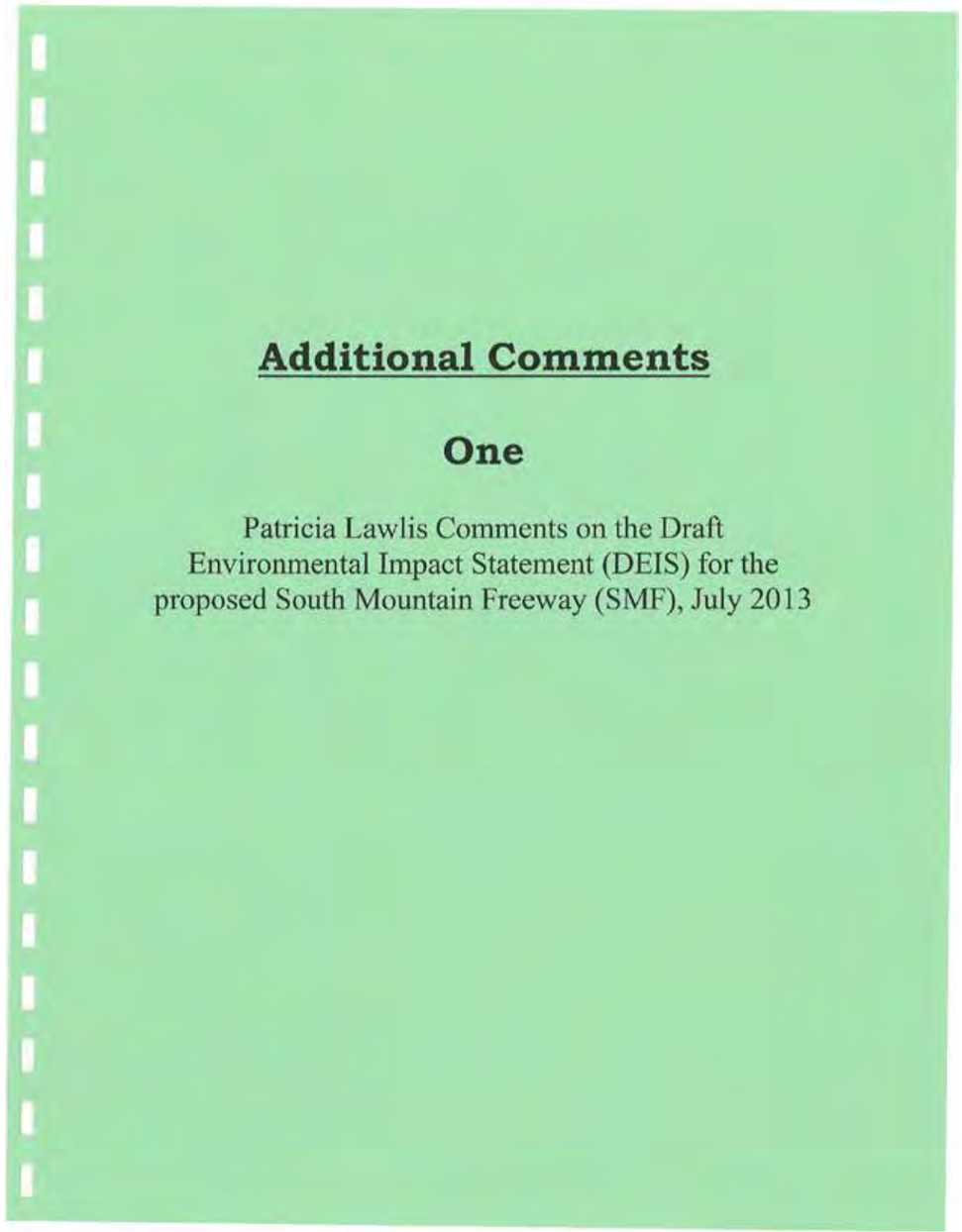

Additional Comments

One

Patricia Lawlis Comments on the Draft
Environmental Impact Statement (DEIS) for the
proposed South Mountain Freeway (SMF), July 2013

Code	Issue	Response

Code	Comment Document

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Comments on the Draft Environmental Impact Statement (DEIS) for the proposed South Mountain Freeway (SMF), July 2013

It is the job of the Maricopa Association of Governments (MAG) and the Arizona Department of Transportation (ADOT) to plan for transportation throughout the Valley of the Sun. This includes proper planning for keeping unnecessary traffic out of the valley as well as planning for the proper flow of traffic throughout the area. It also includes planning for moving people around using all modes of transportation, and it should include new and visionary ideas for handling the transportation needs of the valley.

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Based on the MAG and ADOT mandates, the purpose and need of the South Mountain Freeway (SMF) should be well thought out and based on extensive modeling and analysis. Instead, what we see in the Draft Environmental Impact Statement (DEIS) is the perpetuation of a pre-determined idea from 30 years ago that is neither well thought out nor based on any type of valid modeling and analysis. It is just "we need more freeways," and this one has been especially designed for trucks to travel through the South Mountain corridor. The fact that the geography of the South Mountain corridor doesn't support a freeway doesn't matter. This freeway plan appears to be nothing but a political response to the desires of the trucking industry.

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Purpose and Need (P&N)

In fact, the SMF was no visionary idea 30 years ago (DEIS page 1-8). From the very beginning, it was planned as a Phoenix bypass. At that time, the Phoenix metropolitan area was not as spread out as it is now. Yet MAG was supposedly looking at growth patterns and trying to plan for 30 years into the future (which is now). It should have been clear even then that the metropolitan area would spread far beyond the extent of the SMF and that a bypass should be out farther from the core of the city. Pollution was bad enough at that time that planning should have been directed at getting more vehicle pollutants out of the metropolitan area. Yet it wasn't until much more recently that SR-85 from I-10 at Buckeye to I-8 at Gila Bend to I-10 at Casa Grande was designated as a truck bypass to direct a significant source of pollution out of the city core. And even then, the truck bypass was identified only under pressure from the Environmental Protection Agency (EPA) and the Arizona Department of Environmental Quality (ADEQ). And MAG persisted with claiming a need for the SMF – no longer calling the SMF a truck bypass, but intending that nevertheless. Why should we believe that MAG can do a better job of looking at 30 years into the future now than they could 30 years ago?

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It is clear from the DEIS, as well as from previous MAG and ADOT statements and actions, that the SMF is intended to be a truck bypass, and that it is currently being disguised as a "regional" highway, which evidently seems to mean that it would be primarily for truck traffic to and from the commercial area around 51st Avenue. The SMF would negate the current truck bypass. An analysis of truck traffic patterns, and

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346		Comment noted.
347	**Purpose and Need**	Creating a truck bypass is not a goal of the proposed action. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicles using the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed freeway, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85 (see page 3-64 of the Final Environmental Impact Statement).
348	**Purpose and Need**	As presented in Chapter 1, *Purpose and Need*, an objective and unbiased examination of the existing and planned future transportation network in the Study Area was undertaken to determine if the catalyst for the need for the Environmental Impact Statement (being the proposed action) was still warranted. As explained in the chapter, the examination successfully attempted to provide an answer to whether or not a transportation problem(s) exist and would continue to exist in the foreseeable future. The analysis was undertaken in accordance with the National Environmental Policy Act and Federal Highway Administration guidance and policy for implementing the National Environmental Policy Act. The results confirmed the transportation problems as framed in the region's adopted long range transportation plans (both past and present) still exist and would continue to exist in the foreseeable future. The need for action was not to implement the long range plan objectives but to correct a transportation problem in the region; a beneficial outcome in doing so was consistency with the region's long range transportation planning activities. The purpose and need criteria used to frame the transportation problem are described (see Figures 1-8, 1-9, 1-10, 1-11, 1-12, and 1-13). As summarized in the section, *Conclusions*, beginning on page 1-21 of the Draft Environmental Impact Statement, the analysis confirmed that without a major transportation facility in the Study Area, the region's transportation network (as recognized in over 25 years of transportation planning) will not be able to efficiently move goods and people throughout the region without major investments in the region.
349	**Purpose and Need**	The Maricopa Association of Governments regional travel demand model projects that truck traffic will represent approximately 10 percent of the total traffic on the proposed action. Chapter 1, *Purpose and Need*, does not have a truck bypass as a goal of the proposed action. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing

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particularly the shifting of a truck bypass from outside the metropolitan area to an area close to downtown is ignored throughout the DEIS, although such an analysis is also prescribed by the National Environmental Policy Act (NEPA).

350 At one point when funds were short for completing the SMF (early 90s), one idea that ADOT considered was allowing the highway to be built as a toll road. Then, an independent group interested in possibly building this toll road did an analysis of the cost-effectiveness of such a highway (very strongly correlated with the need for the highway). The result of their analysis was that they declined to build the freeway, a clear indication of the lack of need.

351 Rather than dropping the idea of the SMF and re-examining the real needs of the region, MAG and ADOT persisted with the SMF plan.

352 As the CANAMEX highway idea matured, it was designed to go near or through Phoenix. Unless or until I-11 is built, according the CANAMEX website, the CANAMEX would follow I-10, and truckers would certainly find the SMF "short cut" to be most appealing. But ADOT denied the intention of using the SMF for a truck bypass, so they also denied the intention of using it for the CANAMEX. ADOT officially declared that the truck bypass along SR 85 would be a part of CANAMEX. Yet this contradicts assertions on the CANAMEX web site.

Of course, truck drivers can read maps and see when a short cut exists for them, so a true analysis of the situation would show the CANAMEX traffic using the SMF, regardless of what the "official" route of the CANAMEX is designated to be. ADOT's official response to that is that they "can't help" what truckers do but they expect most of them to use the truck bypass. Really!? Isn't it a part of their job of planning to provide realistic transportation corridors that will induce the traffic to use the appropriate corridors? And to look at all possible means of transportation to satisfy the entire needs of an area? A proper analysis should definitively show where the traffic, including the truck traffic, would really go.

Recently, when ADOT improved SR 85, it became a 4-lane highway, but it was not made a freeway. One motivation for this lack of foresight was apparently because as long as it is not a freeway it cannot be designated as an interstate highway. A freeway bypass could be designated as I-10 and take all pass-through traffic away from the Phoenix metropolitan area. This would serve as a bypass for both truck and automobile traffic. Yet this has apparently never been considered. Or has it been purposely ignored? It is certainly not in the DEIS.

The DEIS states (page 5-20) that a tunnel option through South Mountain was rejected because it would limit the ability of trucks hauling hazardous materials to use the SMF. This is just another indication that the SMF is intended as a truck bypass.

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349 (cont.)		traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Commercial trucks would use the proposed action. As with all other freeways in the Maricopa Association of Governments region, trucks would use it for the through transport of freight, for transport to and from distribution centers, and for transport to support local commerce. And as with travel on all other freeways in the Maricopa Association of Governments region, the primary users of the proposed action would be automobiles. The trucking industry depends on the efficient and fast movement of freight and on travel time savings. Trucking destinations in the Phoenix metropolitan area (either distribution centers or for local commerce) would still need trucks to enter congested areas. Choosing to travel on the proposed action rather than Interstate 10 would not translate to any substantial travel time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85 (see page 3-64 in the Final Environmental Impact Statement).
350	**Alternatives**	In 1996, a consortium of private companies proposed to build the South Mountain Freeway as a toll road. The consortium later withdrew its proposal, saying the project was not financially feasible (see Alignment Recommendation South Mountain Corridor Loop 202, as noted on page 1-8 of the Draft Environmental Impact Statement). The determination not to construct the freeway as a toll road was not an indication that the freeway was not needed. In the executive summary to the above referenced report, the proposers state: "The Arizona Transportation Group, LLC still believes that the construction and financing of the South Mountain Portion of the Loop 202 as a toll road is feasible and looks forward to teaming with the Arizona Department of Transportation to provide this important segment of the Maricopa County's regional highway system." The reason the proposal was determined to not be financially feasible was because the public and policy-makers were not supportive of paying support tolls.
351	**Purpose and Need**	Chapter 1, *Purpose and Need*, examines the purpose and need for the proposed action in terms of defining a transportation problem. In doing so, assumptions associated with past need for the freeway were discounted as part of the environmental impact statement process. The results of the purpose and need analyses included the determination that a transportation problem (similar to the type of problem that has been represented in past Regional Transportation Plans) still exists in the area and that this problem is similar in characteristics to the transportation problem that existed in prior years. The alternatives analyses considered numerous modal alternatives, and it was concluded through a robust screening process that a road facility would best address the transportation problem defined.
352	**Trucks**	The 1995 Congressional federal definition states: "In the State of Arizona, the CANAMEX Corridor shall generally follow – (i) I-19 from Nogales to Tucson; (ii) I-10 from Tucson to Phoenix; and (iii) United States Route 93 in the vicinity of Phoenix to the Nevada Border." (*Source*: <canamex.org/canamex/federal-definition>)

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particularly the shifting of a truck bypass from outside the metropolitan area to an area close to downtown is ignored throughout the DEIS, although such an analysis is also prescribed by the National Environmental Policy Act (NEPA).

At one point when funds were short for completing the SMF (early 90s), one idea that ADOT considered was allowing the highway to be built as a toll road. Then, an independent group interested in possibly building this toll road did an analysis of the cost-effectiveness of such a highway (very strongly correlated with the need for the highway). The result of their analysis was that they declined to build the freeway, a clear indication of the lack of need.

Rather than dropping the idea of the SMF and re-examining the real needs of the region, MAG and ADOT persisted with the SMF plan.

As the CANAMEX highway idea matured, it was designed to go near or through Phoenix. Unless or until I-11 is built, according the CANAMEX website, the CANAMEX would follow I-10, and truckers would certainly find the SMF "short cut" to be most appealing. But ADOT denied the intention of using the SMF for a truck bypass, so they also denied the intention of using it for the CANAMEX. ADOT officially declared that the truck bypass along SR 85 would be a part of CANAMEX. Yet this contradicts assertions on the CANAMEX web site.

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352 (cont.)		The definition was intentionally left broad so that local, regional, and state agencies could further define the specific routes for the corridor. In April 2001, the Maricopa Association of Governments Regional Council formally adopted the route depicted in the map on page 3-64 as the CANAMEX Corridor within Maricopa County. As noted on page 3-64 of the Draft Environmental Impact Statement, in the Maricopa County area the CANAMEX Corridor is to follow Interstate 10 from Tucson to Interstate 8 near Casa Grande, Interstate 8 west to State Route 85 near Gila Bend, State Route 85 north to Interstate 10 northwest of Buckeye, Interstate 10 west to Wickenburg Road, Wickenburg Road to Vulture Mine Road west of Wickenburg, and then connect with the planned U.S. Route 93/U.S. Route 60 Wickenburg Bypass.
353	**Trucks**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; truck traffic would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement). The *Regional Transportation Plan* includes provisions for improving State Route 85 north of the Gila River to a freeway-type facility. There is no intention to change the designation of existing Interstate highways through Arizona. The State Route 85/Interstate 8 corridor is signed as the Phoenix bypass and will continue to provide a bypass route. The CANAMEX and Phoenix truck bypass (Interstate 8/State Route 85) routes are not mandatory for truck traffic; they are recommended. The Arizona Department of Transportation does not enforce these routes. It is not anticipated that these routes would be enforced as mandatory in the future. The reader is referred to page 3-64 of the Draft Environmental Impact Statement that elaborates on the relation of truck traffic and the proposed action.
354	**Alternatives**	The *Regional Transportation Plan* includes provisions for improving State Route 85 north of the Gila River to a freeway-type facility. There is no intention to change the designation of existing Interstate highways through Arizona. The State Route 85/Interstate 8 corridor is signed as the Phoenix bypass and will continue to provide a bypass route.
355	**Alternatives**	The noted text is but one of many factors that were used to eliminate the tunnel options through the South Mountains. The text boxes on pages 3-16 and 3-17 of the Draft Environmental Impact Statement discuss the additional factors that weighed as strong negatives for tunnel options: impacts, engineering factors, maintenance costs and issues, security, constructibility, and construction costs. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicles using the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck

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356	Perhaps the original intent of the SMF truck bypass was to provide a more convenient route for trucks going in and out of the commercial area around 51st Avenue. Such thinking, however, indicates a decided lack of true regional planning. Any form of valid traffic analysis of the entire region immediately shows that in addition to the CANAMEX traffic, other interstate truck traffic would also prefer this "short cut" to the desirable (in terms of clean air) truck bypass route along SR 85. Any traffic solution that brings more truck traffic through the metropolitan area is not a viable solution. So the SMF is not a viable solution. The truck bypass must stay outside of the metropolitan area.
357	A valid and extensive analysis of the transportation needs of the South Mountain corridor has not been conducted. Such an analysis would show the true needs of local residents (as opposed to induced needs) as well as a detailed breakdown of truck traffic within and through the entire area, including CANAMEX trucks, pass-through trucks, and trucks with an origin and destination (O&D) of the commercial area near 51st Avenue. Such a valid analysis would show that any true need for regional transportation could be at least partly satisfied by modes other than automobile traffic (such as light rail). There is a need for traffic to be able to get in and out of Laveen without having to compete with trucks on the arterial streets, but this could be satisfied by a highway from Laveen to I-10 West. It is the O&D truck needs that require a freeway, but even these needs could be satisfied by a freeway spur from I-10 West to the commercial area around 51st Avenue. The South Mountain corridor is not a viable location for such truck traffic.
	To be more specific in terms of the DEIS, ADOT justifies the Purpose and Need (P&N) for the construction of the SMF in Chapter 1. There are many specific difficulties with this "justification." 1. The socio-economic data projections presented in the P&N and elsewhere in the DEIS are faulty. The socio-economic data used in the DEIS was developed by MAG using 2005 census data. When the results of the 2010 U.S. Census results became available, it was obvious that MAG's forecast of socio-economic data based on the 2005 special Census were too high by a large margin. 2. Since socio-economic data are the starting point for the MAG Travel Model, the travel-related forecasts presented in the P&N and elsewhere in the DEIS are faulty. Since MAG plans to update the socio-economic projections, why exactly did ADOT release a DEIS before the updates were ready? Because the changes will be extensive, sufficient time must be allowed for a second review of the DEIS prior to the preparation of the FEIS. 3. The forecast of vehicle miles of travel lacks credibility because it is contrary to national trends and also because the methodology used for computation is not explained clearly. Figure 1-4 in the Purpose and Need chapter of the DEIS discusses daily vehicle miles of travel (VMT) at one rate while the Regional Transportation Plan (RTP) uses different data. A further consideration is that travel surveys nationally and in the MAG region indicate
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355 (cont.)		traffic would represent approximately 10 percent of the total traffic on the proposed freeway, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60; therefore, planning must account for trucks using the proposed freeway.
356	**Trucks**	The signed truck bypass for the Phoenix metropolitan area is today and will continue to be State Route 85 and Interstate 8. The Maricopa Association of Governments regional travel demand model projects that truck traffic will represent approximately 10 percent of the total traffic on the proposed action. Chapter 1, *Purpose and Need*, does not have a truck bypass as a goal of the proposed action. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Commercial trucks would use the proposed action (as noted on page 3-64 of the Draft Environmental Impact Statement). As with all other freeways in the Maricopa Association of Governments region, trucks would use it for the through transport of freight, for transport to and from distribution centers, and for transport to support local commerce. And as with travel on all other freeways in the Maricopa Association of Governments region, the primary users of the proposed action would be automobiles. The trucking industry depends on the efficient and fast movement of freight and on travel time savings. Trucking destinations in the Phoenix metropolitan area (either distribution centers or for local commerce) would still need trucks to enter congested areas. Choosing to travel on the proposed action rather than Interstate 10 would not translate to any substantial travel time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
357	**Purpose and Need, Alternatives**	As presented in Chapter 1, *Purpose and Need*, of the Draft Environmental Impact Statement, an objective and unbiased examination of the existing and planned future transportation network in the Study Area was undertaken to determine if the catalyst for the need for the Environmental Impact Statement (being the proposed action) was still warranted. As explained in the chapter, the examination successfully attempted to provide an answer to whether or not a transportation problem(s) exist and would continue to exist in the foreseeable future. The analysis was undertaken in accordance with the National Environmental Policy Act and Federal Highway Administration guidance and policy for implementing the National Environmental Policy Act. The results confirmed the transportation problems as framed in the region's adopted long range transportation plans (both past and present) still exist and would continue to exist in the foreseeable future. This problem is associated with east-west regional mobility in the southwestern region of the Phoenix metropolitan area. The traffic analysis does evaluate the applicability of alternative modes to meet the needs for regional transportation. Figure 3-14 shows that transit enhancements (such as light rail), roadway enhancements (such as more arterial street lanes), and

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Perhaps the original intent of the SMF truck bypass was to provide a more convenient route for trucks going in and out of the commercial area around 51st Avenue. Such thinking, however, indicates a decided lack of true regional planning. Any form of valid traffic analysis of the entire region immediately shows that in addition to the CANAMEX traffic, other interstate truck traffic would also prefer this "short cut" to the desirable (in terms of clean air) truck bypass route along SR 85. Any traffic solution that brings more truck traffic through the metropolitan area is not a viable solution. So the SMF is not a viable solution. The truck bypass must stay outside of the metropolitan area.

A valid and extensive analysis of the transportation needs of the South Mountain corridor has not been conducted. Such an analysis would show the true needs of local residents (as opposed to induced needs) as well as a detailed breakdown of truck traffic within and through the entire area, including CANAMEX trucks, pass-through trucks, and trucks with an origin and destination (O&D) of the commercial area near 51st Avenue. Such a valid analysis would show that any true need for regional transportation could be at least partly satisfied by modes other than automobile traffic (such as light rail). There is a need for traffic to be able to get in and out of Laveen without having to compete with trucks on the arterial streets, but this could be satisfied by a highway from Laveen to I-10 West. It is the O&D truck needs that require a freeway, but even these needs could be satisfied by a freeway spur from I-10 West to the commercial area around 51st Avenue. The South Mountain corridor is not a viable location for such truck traffic.

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To be more specific in terms of the DEIS, ADOT justifies the Purpose and Need (P&N) for the construction of the SMF in Chapter 1. There are many specific difficulties with this "justification."

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1. The socio-economic data projections presented in the P&N and elsewhere in the DEIS are faulty. The socio-economic data used in the DEIS was developed by MAG using 2005 census data. When the results of the 2010 U.S. Census results became available, it was obvious that MAG's forecast of socio-economic data based on the 2005 special Census were too high by a large margin.
2. Since socio-economic data are the starting point for the MAG Travel Model, the travel-related forecasts presented in the P&N and elsewhere in the DEIS are faulty. Since MAG plans to update the socio-economic projections, why exactly did ADOT release a DEIS before the updates were ready? Because the changes will be extensive, sufficient time must be allowed for a second review of the DEIS prior to the preparation of the FEIS.

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3. The forecast of vehicle miles of travel lacks credibility because it is contrary to national trends and also because the methodology used for computation is not explained clearly. Figure 1-4 in the Purpose and Need chapter of the DEIS discusses daily vehicle miles of travel (VMT) at one rate while the Regional Transportation Plan (RTP) uses different data. A further consideration is that travel surveys nationally and in the MAG region indicate

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357 (cont.)		system management and demand management strategies could address a portion of the system-wide demand; however, even with these improvements, the proposed freeway would still be a greatly needed element of the overall transportation system. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. According to 23 Code of Federal Regulations §771.111(f)," the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope…". The proposed action should satisfy the project need and should be considered in the context of the local area socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need. For a true understanding of origins and destinations of all vehicles, including trucks, that would use the freeway, please refer to Figure 3-18, on Draft Environmental Impact Statement page 3-36. The reader is referred to page 3-64 of the Draft Environmental Impact Statement that elaborates on the relation of truck traffic and the proposed action.
358		See responses to specific comments below.
359	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
360	**Purpose and Need**	The comment relies on national trends for travel; however, the local conditions and setting of the Phoenix metropolitan area are not consistent with areas of high-density cities in other parts of the country. In Maricopa County, daily vehicle miles

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361	that travel statistics such as trip length, VMT per person, and VMT per household have been steady over time in recent years, contradicting both the DEIS and the RTP. 4. As presented in the DEIS, the P&N defines the need as "completing the Regional Freeway System," "adding capacity to the regional freeway and arterial system," and "serving travel needs in the Southwest area." No compelling need specifically for the SMF is presented. The P&N statement in the DEIS is very general and is focused on the need to add freeway capacity but not focused on building the SMF. The problems identified that lead to the proposed action (not direct quotes) are: a. Accommodating population and employment growth in the Phoenix Metropolitan Area. b. Completing the Regional Freeway and Highway System, that was delineated about 30 years ago. c. Providing additional freeway capacity to reduce congestion in the Urban Core. d. Serving travel needs in the Southwest portion of the Metropolitan Area. The P&N in the DEIS did not address the compelling problems and needs in the Study Area that the SMF would be intended to alleviate. Specific evaluation criteria should have been developed to assess the effectiveness of each alternative to alleviate, wholly or partially, each of the problems in the Study Area. This lack of specificity in the P&N affects the identification of alternatives and the evaluation of alternatives.
362	5. Some reasonable and feasible alternatives were eliminated early in the screening process. There is no technical or scientific rationale or justification presented as to why the project Study Area comprises the precise area it does. The impression is that these boundaries were drawn for political and procedural reasons to comport with MAG's and ADOT's previous planning efforts, rather than to allow a comprehensive, objective NEPA assessment. Specifically, this Study Area appears configured so as to exclude freeway alternatives further south or west and, thus, to deliberately avoid evaluation of other "reasonable alternatives" to the Pecos Road alignment. Although outside of MAG jurisdiction, alternatives in Pinal and Pima Counties should have been given due consideration. The DEIS was not properly scoped. 6. The Description of the Proposed Action in the Summary Chapter fails to provide details essential for informed decision-making. The action is described generally as building a freeway in compliance with the RTP. 7. Since the evaluation of alternatives is based on the travel forecasts (among other considerations), the evaluations are faulty. As stated in Item 2 above, the travel forecasts, in turn, are faulty because they are based on faulty socio-economic forecasts. 8. Some potential impacts, including impacts on the arterial street system adjoining proposed interchanges, construction impacts, and the impacts of

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360 (cont.)		traveled levels increased by almost 2 percent between 2011 and 2012, and the 2012 daily vehicle miles traveled approached the 2007 prerecession peak. (*Source*: the Arizona Department of Transportation's Multimodal Planning Division's Highway Performance Monitoring System Data for calendar years 2012 and 2011). Even if the trend of vehicle miles traveled "per capita" decreasing were to continue, the total vehicle miles traveled in the region would still increase along with increases in total population.
361	**Purpose and Need**	Analysis of the purpose and need for the proposed action followed National Environmental Policy Act and Federal Highway Administration implementing guidance on the subject matter and used state-of-the-practice analytical tools, as pointed out in Table 1-3, "Traffic Analysis Tools," on page 1-13 of the Draft Environmental Impact Statement. The results of the analysis determined that a transportation problem does exist and that problem will continue in the foreseeable future (see section, *Conclusions*, on page 1-21). As noted on page 3-1 in the section, *Reconfirm the Purpose and Need for the Proposed Action*, a continuous validation process was undertaken throughout the environmental impact statement process to ensure past conclusions in the environmental impact statement process remained valid. The Draft Environmental Impact Statement—particularly in Chapter 1, *Purpose and Need*, and Chapter 3, *Alternatives*—thoroughly explains how the process of establishing a purpose and need for the proposed action followed nationally accepted guidance and policy. Examples of how the purpose and need analyses were appropriately applied include the: · section, *Context of Purpose and Need in the EIS Process*, on page 1-1 · sidebar, "*A proposed action's purpose and documentation should:*", on page 1-1 · sidebar, "*How are MAG data used in the DEIS?*", on page 1-4 · sidebar, "*What is the MAG regional demand model?*", on page 1-5 · sidebar, "*How will the economic downturn affect growth rates?*", on page 1-11 · section, *Need Based on Regional Transportation Demand and Existing and Projected Transportation System Capacity Deficiencies*, beginning on page 1-13 · section, *Conclusions*, on page 1-21 · section, *Reconfirm the Purpose and Need for the Proposed Action*, on page 3-1 · section, *Responsiveness of the Proposed Freeway to Purpose and Need Criteria*, beginning on page 3-27 Figure 1-8, "Average Daily Traffic Volumes on Freeways and Arterial Streets (without the Proposed Action, 2010 and 2035," illustrates the demands placed on the transportation network in the region. Figure 1-12, "Met and Unmet Demand, 2010 and 2035," summarizes demand and capacity deficiencies associated with the identified transportation problem. The reader is referred to Draft Environmental Impact Statement Chapter 3, *Alternatives*, and, specifically, the section, *Alternatives Development and Screening Process Conclusions*, beginning on page 3-26, noting "... a comprehensive set of alternatives including all modes was considered ... assurance that the screening process was an open process ... a logical, sequential, step-by-step process using data and expertise from multiple disciplines ..." to demonstrate all possibilities were considered.
362	**Purpose and Need**	The parameters for delineation of the Study Area are described in Chapter 1, *Purpose and Need*, as the area defining the transportation problem. As presented in the chapter, transportation models were used to determine where the characteristics of the transportation problem would diminish, and, generally, it is

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that travel statistics such as trip length, VMT per person, and VMT per household have been steady over time in recent years, contradicting both the DEIS and the RTP.

4. As presented in the DEIS, the P&N defines the need as "completing the Regional Freeway System," "adding capacity to the regional freeway and arterial system," and "serving travel needs in the Southwest area." No compelling need specifically for the SMF is presented. The P&N statement in the DEIS is very general and is focused on the need to add freeway capacity but not focused on building the SMF. The problems identified that lead to the proposed action (not direct quotes) are:

    a. Accommodating population and employment growth in the Phoenix Metropolitan Area.
    b. Completing the Regional Freeway and Highway System, that was delineated about 30 years ago.
    c. Providing additional freeway capacity to reduce congestion in the Urban Core.
    d. Serving travel needs in the Southwest portion of the Metropolitan Area.

    The P&N in the DEIS did not address the compelling problems and needs in the Study Area that the SMF would be intended to alleviate. Specific evaluation criteria should have been developed to assess the effectiveness of each alternative to alleviate, wholly or partially, each of the problems in the Study Area. This lack of specificity in the P&N affects the identification of alternatives and the evaluation of alternatives.

5. Some reasonable and feasible alternatives were eliminated early in the screening process. There is no technical or scientific rationale or justification presented as to why the project Study Area comprises the precise area it does. The impression is that these boundaries were drawn for political and procedural reasons to comport with MAG's and ADOT's previous planning efforts, rather than to allow a comprehensive, objective NEPA assessment. Specifically, this Study Area appears configured so as to exclude freeway alternatives further south or west and, thus, to deliberately avoid evaluation of other "reasonable alternatives" to the Pecos Road alignment. Although outside of MAG jurisdiction, alternatives in Pinal and Pima Counties should have been given due consideration. The DEIS was not properly scoped.
6. The Description of the Proposed Action in the Summary Chapter fails to provide details essential for informed decision-making. The action is described generally as building a freeway in compliance with the RTP.
7. Since the evaluation of alternatives is based on the travel forecasts (among other considerations), the evaluations are faulty. As stated in Item 2 above, the travel forecasts, in turn, are faulty because they are based on faulty socio-economic forecasts.
8. Some potential impacts, including impacts on the arterial street system adjoining proposed interchanges, construction impacts, and the impacts of

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362 (cont.)		at these locations where the definition of the Study Area took shape. This effort was coordinated with stakeholder agencies, including the U.S. Environmental Protection Agency. Alternatives considered in the Draft Environmental Impact Statement included many that were located outside of the Study Area. Examples include the Riggs Road Alternative (see page 3-9), the State Route 85/Interstate 8 Alternative (see page 3-9), the U.S. Route 60 Extension (see page 3-12), the Interstate 10 Spur (see page 3-12), and the Central Avenue Tunnel (see page 3-12).
363	**Purpose and Need**	As pointed out on page S-1, in the sidebar, "*What you will find in the Summary chapter,*" the text in the Summary is not the "final word," and readers are urged to turn to the main text when questions about Summary content arise. While proposed action is summarily defined on page 1-1 of the Draft Environmental Impact Statement as the "construction and operation of a major transportation facility," design specifics for each action alternative are found in text beginning on page 3-40 of the Final Environmental Impact Statement. Sufficient detail is provided to: ensure meaningful comparison and analyses of the alternatives in reference to operational characteristics, cost, and impacts; and to convey to sufficient information to reviewers of the characteristics of each alternative in accordance with 23 Code of Federal Regulations 771 Environmental Impact and Related Procedures or in the Federal Highway Administration Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents. It is clear, as pointed out in Chapter 3, *Alternatives*, that a beneficial outcome of the alternatives screening process—a "... logical, sequential, step-by-step process using data and expertise from multiple disciplines ... (page 3-27)"—was that the mode determined to be appropriate for addressing the identified transportation problem was a highway that, in turn, was consistent with local and regional plans (as supported by stakeholder jurisdictions). But nowhere in the Draft Environmental Impact Statement is reference made that the proposed action is needed to comply with the *Regional Transportation Plan*. The analysis of the proposed action's purpose and need would have ended the environmental impact statement process at that point if a need in the form of a transportation problem had not been identified, and this is disclosed in the Draft Environmental Impact Statement.
364	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.

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truck traffic are not addressed at all or are not addressed in detail sufficient for a DEIS for an Action Alternative (as opposed to a programmatic action such as the adoption of the RTP).

366 **9.** None of the Action Alternatives would alleviate the anticipated capacity deficiencies identified in the P&N. Despite the expenditure of about $3 billion to build the SMF and despite the displacement of many residences and business establishments, there would be capacity deficiencies at levels comparable to the No Action Alternative on freeways and arterials throughout the metropolitan area and on the SMF itself. While the levels of congestion may be slightly less, Level of Service E and F conditions would prevail at approximately the same levels and durations in 2035 with or without an Action Alternative.

367 **10.** Appropriate mitigation measures were not proposed to mitigate the impacts of the Action Alternatives. Assuming for discussion purposes that the Preliminarily Preferred Action Alternative is implemented, appropriate mitigation measures should have been in the EIS. Some appropriate mitigation measures would have included:

- Placement of truck weight limits on the SMF
- Restricting trucks carrying hazardous materials (hazmats) from using the SMF
- Upgrading the currently-designated CANAMEX Route via I-10/I-8/SR-85/I-10 to full freeway standards
- Development of an east-west truck route to by-pass the Phoenix metropolitan area
- Formulation and inclusion in the RTP of a plan for arterials in the Southwest area to help guide development patterns so that desirable options are not precluded

11. Based on these traffic and circulation considerations, none of the Action Alternatives should be selected as the Preliminarily Preferred Alternative.

A specific NEPA violation we found in the DEIS is that the route for the SMF has been predetermined practically since its inception. Even in the 1985 Maricopa Elections materials the "Southwest Loop" is shown with the Pecos Road and 59th Avenue alignments east and west. Since that time millions of dollars have been spent purchasing right-of-way along these alignments, yet nothing has been spent on any other alternative alignments, including the Loop 101 alignment recommended by the SMCAT (and rejected by MAG) and the 71st Avenue alignment. Both of these western alternatives are supposedly still being considered, but it is clear that they are not really considered alternatives.

Additionally, in 1998, the tribal government of the Gila River Indian Community (GRIC) approved a route for the SMF along Riggs Road on tribal land when it adopted the Gila Borderlands Regional Planning Study (Arizona Republic, *1998 plan*

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365	**Traffic**	The proposed freeway would include improvements along arterial streets at interchange locations to facilitate the movement of traffic on, off, and across the freeway. The arterial street improvements are included within the right-of-way footprint used for the analysis of impacts.
366	**Traffic**	The traffic operational characteristics comparison between the action and No-Action alternatives is presented beginning on page 3-27 of the Final Environmental Impact Statement. The analysis shows that the action alternatives would: · reduce overall traffic on the arterial street system (see Figures 3-12 and 3-13) · optimize travel on the region's freeway system (see Figure 3-12) · reduce the capacity deficiency to levels better than experienced today (see Figures 1-12 and 3-14) · reduce the duration of level of service E or F conditions in key areas of the region's freeway system (see Figure 3-15) · improve travel times on trips within the Study Area and across the region (see Figure 3-17 and Table 3-8) · provide improved regional mobility for areas projected to experience growth in the next 25 years (see Figures 1-7 and 3-18) When all of this is considered in the realm of travel time savings for motorists in the region, the user benefits approximate $200 million per year (see Table 4-26).
367	**Hazardous Materials**	The obligation of the Arizona Department of Transportation and Federal Highway Administration, as the federal lead agency, in accordance with the National Environmental Policy Act is to assess if the proposed action and its alternatives would lead to significant adverse environmental impacts, disclose those impacts and identify mitigation to reduce the impact below a level of significance (and if such mitigation is unavailable, disclose that such an impact would occur but not be mitigated). Sufficient mitigation under these terms is presented throughout Chapters 3, 4 and 5 of the Draft Environmental Impact Statement. In terms of suggested mitigation examples in the comment, consider: · As it relates to transport of hazardous materials, Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; truck traffic would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement). · Improvements to State Route 85 are included in the *Regional Transportation Plan*, and the plan is to continue to improve this corridor until it is completely access-controlled with a freeway section north of the Gila River. · The *Regional Transportation Plan* is not the primary source of funding for expansion of the arterial street system. Funding for the arterial street system generally comes from the local jurisdiction or through impact fees for development. It is anticipated that the arterial street network within the Study Area will be expanded in this same manner. The Maricopa Association of Governments regional travel demand model includes assumptions related to arterial street expansion based on local jurisdictions' general planning. In the case of the Study Area, it is assumed that most of the arterial street network would be built out by 2035.

truck traffic are not addressed at all or are not addressed in detail sufficient for a DEIS for an Action Alternative (as opposed to a programmatic action such as the adoption of the RTP).

9. None of the Action Alternatives would alleviate the anticipated capacity deficiencies identified in the P&N. Despite the expenditure of about $3 billion to build the SMF and despite the displacement of many residences and business establishments, there would be capacity deficiencies at levels comparable to the No Action Alternative on freeways and arterials throughout the metropolitan area and on the SMF itself. While the levels of congestion may be slightly less, Level of Service E and F conditions would prevail at approximately the same levels and durations in 2035 with or without an Action Alternative.
10. Appropriate mitigation measures were not proposed to mitigate the impacts of the Action Alternatives. Assuming for discussion purposes that the Preliminarily Preferred Action Alternative is implemented, appropriate mitigation measures should have been in the EIS. Some appropriate mitigation measures would have included:

    - Placement of truck weight limits on the SMF
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    - Development of an east-west truck route to by-pass the Phoenix metropolitan area
    - Formulation and inclusion in the RTP of a plan for arterials in the Southwest area to help guide development patterns so that desirable options are not precluded

11. Based on these traffic and circulation considerations, none of the Action Alternatives should be selected as the Preliminarily Preferred Alternative.

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A specific NEPA violation we found in the DEIS is that the route for the SMF has been predetermined practically since its inception. Even in the 1985 Maricopa Elections materials the "Southwest Loop" is shown with the Pecos Road and 59th Avenue alignments east and west. Since that time millions of dollars have been spent purchasing right-of-way along these alignments, yet nothing has been spent on any other alternative alignments, including the Loop 101 alignment recommended by the SMCAT (and rejected by MAG) and the 71st Avenue alignment. Both of these western alternatives are supposedly still being considered, but it is clear that they are not really considered alternatives.

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368	**Alternatives**	The Arizona Department of Transportation, with concurrence from the Federal Highway Administration, has determined that the proposed freeway (as made up by the W59 and E1 Alternatives) is the preferred solution to the transportation problem identified in the Draft Environmental Impact Statement. However, all alternatives discussed in the Draft and Final Environmental Impact Statement, including the No-Action Alternative, are still under consideration. The selection of an alternative will be made in a record of decision issued by the Federal Highway Administration for the proposed project. All of the alternatives were subjected to a thorough evaluation using a multidisciplinary set of criteria in accordance with National Environmental Policy Act and federal Highway Administration guidance.
369	**Alternatives**	The comment suggests the environmental impact statement process was biased by a history of property acquisitions within the Study Area. More specifically, properties falling within the limits of the Preferred Alternative, as identified in the Final Environmental Impact Statement, were targeted for acquisition. As noted in text on page 3-54 of the Final Environmental Impact Statement, the Arizona Department of Transportation began acquiring land for the original alignment in 1988. Between 1988 and 2001, the Arizona Department of Transportation acquired approximately 293 acres. Most of this land (258 acres) is located in the Eastern Section along Pecos Road. In 2006, the Arizona Department of Transportation began protective and hardship land acquisition in the alignment right-of-way footprint for the W59 and E1 Alternatives. Between 2006 and October 2013, the Arizona Department of Transportation purchased 326 acres (303 in the Western Section and 23 in the Eastern Section). The process for hardship and advanced acquisitions is explained in text on page 4-50 of the Final Environmental Impact Statement. The comment infers that by taking such action, the objective equal consideration of the alternatives studied in detail in the Draft and Final Environmental Impact Statements is tainted. Advanced acquisitions in parallel to a National Environmental Policy Act environmental determination process is not unprecedented and is common practice. In this case, property acquisitions by the Arizona Department of Transportation for purposes of implementing the proposed action are done at risk as communicated to the agency by the Federal Highway Administration. If another action alternative were to be ultimately selected, the agency would likely have to place the acquired properties on the market for sale and purchase. The Arizona Department of Transportation attempts to balance the risk against its mission of timely delivery of transportation infrastructure to the driving public. Further, Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative. While the South Mountain Citizens Advisory Team recommended the W101 Alternative, all stakeholders' input was accounted for—including regional leaders, municipalities, members of the public, and members of the South Mountain Citizens Advisory Team—before identifying the W59 Alternative as the Preferred Alternative (see Draft Environmental Impact Statement pages 3-65 and 3-68). Both Riggs Road and Queen Creek Road Alternatives were considered (see Figure 3-5 on page 3-7 of the Final Environmental Impact Statement). While these alternatives might serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an

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370	*for South Mountain Freeway passed over*, March 25, 2013). Three years later, the state moved on with its SMF plan, without considering the GRIC plan. At another time, the GRIC proposed a Queen Creek Road alignment (Arizona Republic, *Tribe Against South Mountain Freeway on land – for now*, January 20, 2010). This proposal was also rejected by ADOT. Throughout the DEIS, and throughout the time leading up to the publication of the DEIS, the inappropriate restrictions on the scoping of the study precluded the consideration of viable alternatives to the SMF. With the apparent need for a freeway that could handle considerable truck traffic, including hazmats, the natural consideration would have been the route that is currently the "Phoenix truck bypass" – SR-85 from I-10 at Buckeye to I-8 at Gila Bend to I-10 at Casa Grande. This route could become the I-10 and provide a bypass for all pass-through traffic, including the CANAMEX traffic. With appropriate access provided from the commercial area around 51st Avenue, it could also provide a main route for O&D traffic. It should at least be considered as an alternative. The planned route for I-11, looping southwest from I-10 west of downtown Phoenix, through Rainbow Valley, then rejoining I-10 near Casa Grande, should also be a considered alternative. It could accommodate all the truck traffic bypassing Phoenix with a shorter route than the current truck bypass. If the primary reason for wanting the SMF is to accommodate O&D truck traffic (although this is not stated in the DEIS, it is easy to come to this conclusion from what is stated), another alternative that should be considered is to create a freeway spur from I-10 West and/or from the real truck bypass into the commercial area around 51st Avenue. The point is that viable alternatives to the SMF exist, but the SMF is not a viable alternative itself. No amount of attempting to exclude alternatives through inappropriate scoping will make the SMF viable. If the need exists for accommodating truck traffic, several alternatives are available for consideration. ADOT should start over, state the real P&N, and produce a reasonable DEIS. This DEIS is fatally flawed, at least in part because the true P&N are disguised to try to force a non-viable solution. **Air Quality** The modeling of air pollution impacts in the DEIS do not include the issues involved with truck traffic. There are 3 specific "classes" of truck traffic that should have been considered: 1. Pass-through traffic that now uses the official truck bypass 2. CANAMEX traffic 3. Origination and Destination (O&D) traffic to/from the commercial area around 51st Avenue Many years ago, the idea of a truck bypass came up because there were chronic issues about air quality in the Phoenix metro area. The air quality was so bad and for

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369 (cont.)		integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. These alternatives would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road and Queen Creek Road Alternatives would not meet the project's purpose and need criteria and were eliminated from further study.
370	**Trucks**	The environmental impact statement process was undertaken in accordance with National Environmental Policy Act and related legislation. As explained throughout these responses, Chapter 1, *Purpose and Need*, of the Draft Environmental Impact Statement does not have a truck bypass as a goal of the proposed action. These comments continuously and erroneously suggest that the only purpose of the proposed action is to serve truck traffic; however, none of the traffic analysis presented in the Draft and Final Environmental Impact Statements or elsewhere supports this contention. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. The Maricopa Association of Governments travel demand model projects trucks will represent approximately 10 percent of the total traffic on the proposed freeway (this would equate to approximately 15,000 trucks per day based on an average total daily volume of 150,000 vehicles). See Figure 3-18, on page 3-36 of the Draft Environmental Impact Statement, for information related to use of the freeway. Other existing facilities (such as State Route 85 and Interstate 8) and future facilities (such as Interstate 11) serve a specific purpose of providing a truck route. These facilities would not address the need identified for the proposed action. Therefore, they are not appropriate responses and were eliminated from consideration. The signed truck bypass for the Phoenix metropolitan area is today and will continue to be State Route 85 and Interstate 8. The Maricopa Association of Governments regional travel demand model projects that truck traffic will represent approximately 10 percent of the total traffic on the proposed action. The reader is referred to page 3-64 of the Draft Environmental Impact Statement that elaborates on the relation of truck traffic and the proposed action. According to 23 Code of Federal Regulations §771.111(f)," the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope...". The proposed action should satisfy the project need and should be considered in the context of the local area socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need.

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for South Mountain Freeway passed over, March 25, 2013). Three years later, the state moved on with its SMF plan, without considering the GRIC plan. At another time, the GRIC proposed a Queen Creek Road alignment (Arizona Republic, *Tribe Against South Mountain Freeway on land – for now*, January 20, 2010). This proposal was also rejected by ADOT.

Throughout the DEIS, and throughout the time leading up to the publication of the DEIS, the inappropriate restrictions on the scoping of the study precluded the consideration of viable alternatives to the SMF. With the apparent need for a freeway that could handle considerable truck traffic, including hazmats, the natural consideration would have been the route that is currently the "Phoenix truck bypass" – SR-85 from I-10 at Buckeye to I-8 at Gila Bend to I-10 at Casa Grande. This route could become the I-10 and provide a bypass for all pass-through traffic, including the CANAMEX traffic. With appropriate access provided from the commercial area around 51st Avenue, it could also provide a main route for O&D traffic. It should at least be considered as an alternative. The planned route for I-11, looping southwest from I-10 west of downtown Phoenix, through Rainbow Valley, then rejoining I-10 near Casa Grande, should also be a considered alternative. It could accommodate all the truck traffic bypassing Phoenix with a shorter route than the current truck bypass. If the primary reason for wanting the SMF is to accommodate O&D truck traffic (although this is not stated in the DEIS, it is easy to come to this conclusion from what is stated), another alternative that should be considered is to create a freeway spur from I-10 West and/or from the real truck bypass into the commercial area around 51st Avenue.

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372 **Air Quality**

The modeling of air pollution impacts in the DEIS do not include the issues involved with truck traffic. There are 3 specific "classes" of truck traffic that should have been considered:

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Many years ago, the idea of a truck bypass came up because there were chronic issues about air quality in the Phoenix metro area. The air quality was so bad and for

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370 (cont.)		For a true understanding of origins and destinations of all vehicles, including trucks, that would use the proposed freeway, please refer to Figure 3-18 on page 3-36 of the Draft Environmental Impact Statement. Public and agency scoping is discussed in Chapter 6 of the Draft Environmental Impact Statement. As discussed in Chapter 6, these scoping efforts were extensive.
371	**Purpose and Need**	The Draft Environmental Impact Statement and the environmental impact statement process it documents represent a robust, comprehensive, objective, defensible implementation of National Environmental Policy Act guidance, intent, and spirit. The Draft Environmental Impact Statement—particularly in Chapter 1, *Purpose and Need*, and Chapter 3—*Alternatives*, thoroughly explains how the process of establishing a purpose and need for the proposed action followed nationally accepted guidance and policy. Examples of how the purpose and need analyses were appropriately applied include the: · section, *Context of Purpose and Need in the EIS Process*, on page 1-1 · sidebar, "*A proposed action's purpose and documentation should:*", on page 1-1 · sidebar, "*How are MAG data used in the DEIS?*", on page 1-4 · sidebar, "*What is the MAG regional demand model?*", on page 1-5 · sidebar, "*How will the economic downturn affect growth rates?*", on page 1-11 · section, *Need Based on Regional Transportation Demand and Existing and Projected Transportation System Capacity Deficiencies*, beginning on page 1-13 · section, *Conclusions*, on page 1-21 · section, *Reconfirm the Purpose and Need for the Proposed Action*, on page 3-1 · section, *Responsiveness of the Proposed Freeway to Purpose and Need Criteria*, beginning on page 3-27 In short, assessment of the purpose and need for the proposed action and consideration of alternatives were undertaken in an objective, defensible manner in accordance with National Environmental Policy Act guidance and intent; past South Mountain Freeway-related determinations were accounted for as only criteria in a multitiered, multidisciplinary screening process (see the sections, *Conclusions*, on pages 1-21 and 3-70. Table 3-9, "Implementation of the Proposed Freeway as the Appropriate Modal Alternative to Satisfy Purpose and need Criteria, 2035," further presents information supporting the conclusion. No mention is made of the purpose and need of the proposed action being to serve as a truck bypass. Information pertaining to truck routes in the region is presented on page 3-64 of the Draft Environmental Impact Statement, in the text box, "*Trucking in the MAG Region*." The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.

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373 Many years ago, the idea of a truck bypass came up because there were chronic issues about air quality in the Phoenix metro area. The air quality was so bad and for

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372	**Air Quality**	The air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in *Guideline for Modeling Carbon Monoxide from Roadway Intersections* (A-OAQPS, 1992). Inputs to the model were based on U.S. Environmental Protection Agency-recommended values or were selected to provide a conservative estimate of impacts. Modeling methodology and results were reviewed by the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. The Maricopa Association of Governments travel demand model projects trucks will represent approximately 10 percent of the total traffic on the proposed freeway (this would equate to approximately 15,000 trucks per day based on an average total daily volume of 150,000 vehicles). See Figure 3-18, on page 3-36 of the Draft Environmental Impact Statement, for information related to use of the freeway. The air quality analyses considered the full vehicle fleet, including diesel trucks, as discussed above (see Final Environmental Impact Statement page 4-68).
373	**Trucks**	The 1995 Congressional federal definition states: "In the State of Arizona, the CANAMEX Corridor shall generally follow – (i) I-19 from Nogales to Tucson; (ii) I-10 from Tucson to Phoenix; and (iii) United States Route 60 in the vicinity of Phoenix to the Nevada Border." (Source: <canamex.org/canamex/federal-definition>) The definition was intentionally left broad so that local, regional, and state agencies could further define the specific routes for the corridor. In April 2001, the Maricopa Association of Governments Regional Council formally adopted the route depicted in the map on page 3-64 as the CANAMEX Corridor within Maricopa County. As noted on page 3-64 of the Draft Environmental Impact Statement, in the Maricopa County area the CANAMEX Corridor is to follow Interstate 10 from Tucson to Interstate 8 near Casa Grande, Interstate 8 west to State Route 85 near Gila Bend, State Route 85 north to Interstate 10 northwest of Buckeye, Interstate 10 west to Wickenburg Road, Wickenburg Road to Vulture Mine Road west of Wickenburg, and then connect with the planned U.S. Route 93/U.S. Route 60 Wickenburg Bypass.

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	so long that public policy makers suggested designating a bypass for truck traffic around the urban core as one of the strategies to reduce particulate matter from truck exhaust in urban Maricopa County. The designated truck bypass is from I-10 at Buckeye to I-8 at Gila Bend to I-10 at Casa Grande. ADOT says this bypass is also the designated route of the CANAMEX Highway, although the CANAMEX web site contradicts this assertion, saying I-10 is the designated CANAMEX route. If the SMF were built, the bypass route, which has few amenities, would be a substantially longer route, about 55-60 miles longer than the route using the SMF. There is no law that would force trucks to use the longer route, so it is entirely likely that most of these trucks would come through Phoenix, negating the whole bypass strategy, and negating a public policy decision. But the reversal of this public policy decision is never mentioned in the DEIS.
374	The DEIS does not consider the additional air pollution from truck traffic from Mexico. The DEIS briefly mentions the issue, but it claims it has no way to know what impact this would be. This is not true. We know exactly the number of trucks arriving from Mexico and their destinations in the US, so this is data that is available for the DEIS. It is also absurd to dismiss this issue by claiming the CANAMEX traffic would use the truck bypass. Since it is likely that at least most of the CANAMEX traffic would use the SMF, this issue should have been studied.
	Trucks originating in Mexico will be fueled with diesel that doesn't meet the CARB diesel standards adopted by Arizona over a decade ago. In Mexico, there is no regulation about the sulfur in diesel fuel. In Arizona, the law was changed to allow only diesel fuel to be sold that has had 98% of the sulfur removed. This was another part of the strategy to bring Maricopa County into compliance with the particulate matter standards required by the Clean Air Act (CAA). There was extensive modeling of the effect of adopting the CARB diesel standards and a discussion of this in the Arizona legislature, where it passed, so the data is in government hands.
375	The DEIS has no analysis of the current or enhanced increase in freight volume resulting from the port activity in Guyamas and Puerto Colonet and the Union Pacific rail efforts moving that freight from those ports into Tucson and then north to Phoenix. Also there is the expectation of a new Union Pacific rail yard at Picacho Peak, which would handle tens of thousands of containers originating in California and Tucson ports. This additional planned container traffic would result in a significant increase in freight flows to Phoenix, specifically to the hubs along 51st Avenue.
	Chapter 3 describes freight and trucks as pass through, but that is misleading. The freight enters Phoenix and is deposited, then is "exchanged" for loads heading in the opposite direction. So even though 70% of the freight passes through Phoenix, it is O&D traffic that terminates in Phoenix as a transfer point.
	There is also the issue of the 51st Avenue tank farm and the tanker truck traffic that the SMF would get as a result of a new shortcut for these trucks. Expectations for an

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374	**Trucks**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; truck traffic would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement). Trucks crossing from Mexico to Arizona are restricted to the commercial zones within 25 miles of the border. The Federal Motor Carrier Safety Administration is administering a United States-Mexico cross-border, long-haul trucking pilot program. The program tests and demonstrates the ability of Mexico-based motor carriers to operate safely in the United States beyond the municipalities and commercial zones along the United States-Mexico border (see <fmcsa.dot.gov/intl-programs/trucking/trucking-program.aspx>). Petróleos Mexicanos (better known as Pemex), the Mexican state-owned petroleum company, has guaranteed 15 parts per million in its sulfur diesel fuel in the border region (see <http://transportpolicy.net/index.php?title=Mexico:_Fuels:_Diesel_and_Gasoline>). As explained on pages 4-69 and 4-77 of the Draft and Final Environmental Impact Statements, respectively, the emissions analysis conducted for the project shows that future mobile source air toxics emissions will be lower than current levels. This analysis included projected truck traffic.
375	**Trucks**	Like other "loop" freeways in the Phoenix metropolitan area, the proposed freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicles on the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that trucks would represent approximately 10 percent of the total traffic on the proposed action, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. The road network in the Maricopa Association of Governments travel demand model includes the Interstate 8 and State Route 85 corridor. So, while the roads are not in the Study Area for the proposed action, traffic and trip distributions along the corridor are included in the traffic analysis for the proposed action. Any traffic, including trucks, that would shift from the Interstate 8 and State Route 85 corridor to the proposed action would be included in the vehicle mix considered in the analysis. The disclosure of the air quality consequences of the proposed action, beginning on page 4-65 of the Draft Environmental Impact Statement, include projected truck traffic in the analysis. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The air quality analyses were updated using the updated projections related to regional traffic (see section beginning on page 4-68 of the Final Environmental Impact Statement). No substantial differences between the conclusions of the Draft and Final Environmental Impact Statements resulted from this update.

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The DEIS does not consider the additional air pollution from truck traffic from Mexico. The DEIS briefly mentions the issue, but it claims it has no way to know what impact this would be. This is not true. We know exactly the number of trucks arriving from Mexico and their destinations in the US, so this is data that is available for the DEIS. It is also absurd to dismiss this issue by claiming the CANAMEX traffic would use the truck bypass. Since it is likely that at least most of the CANAMEX traffic would use the SMF, this issue should have been studied.

Trucks originating in Mexico will be fueled with diesel that doesn't meet the CARB diesel standards adopted by Arizona over a decade ago. In Mexico, there is no regulation about the sulfur in diesel fuel. In Arizona, the law was changed to allow only diesel fuel to be sold that has had 98% of the sulfur removed. This was another part of the strategy to bring Maricopa County into compliance with the particulate matter standards required by the Clean Air Act (CAA). There was extensive modeling of the effect of adopting the CARB diesel standards and a discussion of this in the Arizona legislature, where it passed, so the data is in government hands.

The DEIS has no analysis of the current or enhanced increase in freight volume resulting from the port activity in Guyamas and Puerto Colonet and the Union Pacific rail efforts moving that freight from those ports into Tucson and then north to Phoenix. Also there is the expectation of a new Union Pacific rail yard at Picacho Peak, which would handle tens of thousands of containers originating in California and Tucson ports. This additional planned container traffic would result in a significant increase in freight flows to Phoenix, specifically to the hubs along 51st Avenue.

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Chapter 3 describes freight and trucks as pass through, but that is misleading. The freight enters Phoenix and is deposited, then is "exchanged" for loads heading in the opposite direction. So even though 70% of the freight passes through Phoenix, it is O&D traffic that terminates in Phoenix as a transfer point.

There is also the issue of the 51st Avenue tank farm and the tanker truck traffic that the SMF would get as a result of a new shortcut for these trucks. Expectations for an

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376	**Purpose and Need**	Some trucks would use the proposed freeway to avoid Interstate 10 through downtown Phoenix, but this is not the primary purpose of the proposed action. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary user vehicles of the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed action, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Draft Environmental Impact Statement, trucking destinations in the Phoenix metropolitan area would still prompt truck drivers to enter congested areas. Choosing to travel on the proposed freeway versus Interstate 10 would not produce substantial travel-time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.

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377	increase from the transmix pipeline, which would result in an increase in tanker truck traffic, should have been considered in a truck analysis. If all this additional pollution had been honestly quantified and factored in, it would likely have shown a huge net increase in air pollution from the SMF, and associated increases in asthma, heart disease, premature death, and other adverse health impacts. In 2005, there was an extensive air monitoring of certain toxic chemicals (air toxics) conducted by EPA and ADEQ in a joint effort named the Joint Air Toxics Assessment Program (JATAP). The monitoring sites included a site near St. Johns on the GRIC, and some in west Phoenix and South Phoenix. The JATAP monitoring results were reported in 2006, during a time the data for the DEIS was being gathered, and it found levels of certain toxic chemicals associated with vehicular emissions were above the standard of a one in a million chance of cancer in a lifetime of exposure in the west Phoenix, south Phoenix, and GRIC sites. The JATAP monitoring found in the high end of the monitoring levels, formaldehyde at 34 times this standard; benzene at 8 times this standard, 1,3 butadiene at 7.5 times this standard, and acetaldehyde at 3.4 times this standard. And, remember, citizens are being subjected to all of these carcinogens, not just one. Some of these chemicals are attributed to "mobile sources," or vehicular traffic burning hydrocarbons. Clearly, adding more vehicular traffic emissions by building a freeway where there had not been one would add to this toxic burden. The JATAP results are not included in the DEIS, but instead there is a mention of the uncertainty of the risk from these air toxics standards, which is not true. The cancer risk standards have been promulgated and published by EPA after extensive research and study, and they are well known. The portion of Maricopa County that is characterized as the Phoenix metro area has had problems for decades meeting the air quality standards for particulate matter (PM) and other criteria pollutants. Ozone levels are too high in the East Valley and Fountain Hills, for example. There have been several exceedances of the standards for PM set by EPA under the authorities given the agency by the Clean Air Act (CAA). The problem has been so bad over the years that every possible delay and postponement allowed under the CAA to come up with a plan to meet regulatory levels of particulate matter have now been exhausted. So, currently, EPA is examining sanctions that include blocking a billion dollars in highway funds. The Arizona Department of Environmental Quality (ADEQ) has tried to explain away the several exceedances of the PM standards in the last year or so by blaming it on dust storms and weather-related problems. But these were not all related to weather. Almost every one of these PM exceedances have been detected at the air quality monitor at 43rd Avenue and Broadway Road. The placement of a freeway about a mile upwind from a monitor that has had all these high levels seems foolish and short sighted. And the impacts and risks of this were not examined in the DEIS. Nor 8

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377	**Air Quality, Health Risk Assessment**	The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). **The Role of Health Risk Assessment in a National Environmental Policy Act Context** The Federal Highway Administration's National Environmental Policy Act documents are developed under two guiding regulations: the Council on Environmental Quality's National Environmental Policy Act regulations applicable to all federal agencies (40 Code of Federal Regulations Parts 1500–1508) and the Federal Highway Administration's implementing regulations governing Federal Highway Administration National Environmental Policy Act documents (23 Code of Federal Regulations Part 771). In its mobile source air toxics guidance, the Federal Highway Administration discusses 40 Code of Federal Regulations Part 1502.22 and acknowledges that while much work has been done to assess the overall health risk of mobile source air toxics, analytical tools and techniques for assessing project-specific health outcomes as a result of lifetime exposures to mobile source air toxics remain limited. These limitations impede the ability to evaluate the potential health risks attributable to exposure to mobile source air toxics as part of the decision-making process in the National Environmental Policy Act context. However, as with any analysis that the Federal Highway Administration conducts for National Environmental Policy Act purposes, the Federal Highway Administration's approach for mobile source air toxic analysis in National Environmental Policy Act documents is informed not just by 40 Code of Federal Regulations Part 1502.22, but by all applicable Council on Environmental Quality requirements. Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining

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377 (cont.)		current conditions in the affected environment (to the extent that the monitoring data are current),they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The appropriateness of air toxics health risk assessment as an analysis method for National Environmental Policy Act documents is discussed below, in the context of Council on Environmental Quality requirements for these documents. In addition to the 40 Code of Federal Regulations Part 1502.22 provisions regarding uncertainty and limitations discussed in the Federal Highway Administration's MSAT Interim Guidance Appendix C, three other provisions of the Council on Environmental Quality regulations are particularly relevant to the topic of health risk assessment: *40 Code of Federal Regulations § 1500.1(b): NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.* *40 Code of Federal Regulations § 1502.1: An environmental impact statement is more than a disclosure document. It shall be used by Federal officials in conjunction with other relevant material to plan actions and make decisions.* *40 Code of Federal Regulations § 1502.2: (a) Environmental impact statements shall be analytic rather than encyclopedic. (b) Impacts shall be discussed in proportion to their significance.(c) Environmental impact statements shall be kept concise and shall be no longer than absolutely necessary to comply with NEPA and with these regulations.* Section 1500.1(b) states that information for decision making must be of high quality and based on accurate scientific analysis. Air toxics health risk assessments can involve large uncertainties. The mobile source air toxic health risk assessment uncertainty builds on itself—each step of the analysis involves uncertainties, including modeling traffic and then modeling emissions, and using this estimated output to model dispersion/concentrations, which provide information for estimating or assuming exposures to those concentrations, and finally predicting health outcomes. Major uncertainties are associated with traffic and emissions projections over a 70-year period, and dispersion models are typically held to a "factor of 2" performance standard. Health impacts of mobile source air toxics in the U.S. Environmental Protection Agency Integrated Risk Information System are based on a 70-year lifetime exposure, which introduces significant uncertainty (e.g., on average, people in the United States change residence approximately once every 8 years and change jobs once every 3). Finally, as noted above, the U.S. Environmental Protection Agency's Integrated Risk Information System provides toxicity (risk) values for various pollutants and routes of exposure; in a health risk assessment, the Federal Highway Administration would compare

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377 (cont.)		calculated concentrations of mobile source air toxic pollutants to the Integrated Risk Information System values to estimate health risk. In the Integrated Risk Information System, the U.S. Environmental Protection Agency states the toxicity values are believed to be accurate to within an order of magnitude (a factor of 10). The total cumulative uncertainty involved in highway project health risk assessment is much larger than the change in emissions attributable to projects (typically a few percentage points). In this context, the information would not necessarily have a strong nexus to the requirements for high-quality information and accurate scientific analysis. Section 1500.1(b) also directs agencies to focus their National Environmental Policy Act analysis and documentation on issues that are truly significant to the action in question. In the context of mobile source air toxics, the Federal Highway Administration must consider whether changes in mobile source air toxic emissions attributable to a project have the potential for significant health risk. Using cancer risk as an example, the U.S. Environmental Protection Agency estimates that the overall risk of cancer in the United States is approximately 330,000 in a million, and that air toxics (from all sources) are responsible for a risk of approximately 50 in a million. In its most recent mobile source air toxics rule-making, the U.S. Environmental Protection Agency estimated mobile source air toxic cancer risk, after implementation of emissions controls, at approximately 5 in a million (or 0.0015 percent of overall cancer risk from any cause). For the Preferred Alternative, the mobile source air toxic emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxic emissions between the Preferred and No Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxic emissions would decrease by more than 80 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see the discussion beginning on page 4-77 of the Final Environmental Impact Statement). In summary, available information from the U.S. Environmental Protection Agency indicates that mobile source air toxics are a small component of overall cancer risk, and the analysis for the Final Environmental Impact Statement indicates both that the Preferred Alternative would result in a small change in the emissions contributing to this risk and that emissions will decline by a large amount regardless of alternative.

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377 (cont.)		As described above and in the air quality technical report, results from the health risk assessment would be influenced more by the uncertainty introduced into the process through assumptions and speculations rather than by genuine insight into the actual health impacts directly attributable to mobile source air toxic exposure associated with a project. Therefore, outcomes of such a health risk assessment do not provide useful information for decision makers, as required by Section 1502.1. The Federal Highway Administration emissions analysis meets the requirement to produce information that is useful for both disclosure and decision making because it allows the public and decision makers to see which alternative has less mobile source air toxic emissions, with much less uncertainty than a health risk assessment. Given the uncertainty of a mobile source air toxic health risk assessment, the Federal Highway Administration instead addresses the potential impacts of mobile source air toxics through an emissions assessment in its National Environmental Policy Act documents. For smaller projects with a lower likelihood of a meaningful impact, this discussion is qualitative. For larger projects, emissions analysis is conducted. The Federal Highway Administration approach is consistent with the Council on Environmental Quality's direction in Section 1502.2(b) to discuss impacts in proportion to their significance. The results of an emissions analysis can be summarized concisely in a National Environmental Policy Act document and provide useful information for decision makers (e.g., an alternative that has lower emissions is likely to be "better" from a mobile source air toxics health risk standpoint than one that has higher emissions). While the U.S. Environmental Protection Agency and the Federal Highway Administration both agree on the usefulness of addressing mobile source air toxics in National Environmental Policy Act documents for highway projects, the agencies disagree about the value of health risk assessment as a method for doing so.

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377 (cont.)		Another consideration with respect to health impacts is that the Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No-Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the Preferred Alternative would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the roadway network. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. The Federal Highway Administration determined that a supplemental environmental impact statement is not required at this time because there were no changes to the proposed action that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement nor is there new information relevant to environmental concerns and bearings on the proposed action or its impacts that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement.

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increase from the transmix pipeline, which would result in an increase in tanker truck traffic, should have been considered in a truck analysis.

If all this additional pollution had been honestly quantified and factored in, it would likely have shown a huge net increase in air pollution from the SMF, and associated increases in asthma, heart disease, premature death, and other adverse health impacts.

In 2005, there was an extensive air monitoring of certain toxic chemicals (air toxics) conducted by EPA and ADEQ in a joint effort named the Joint Air Toxics Assessment Program (JATAP). The monitoring sites included a site near St. Johns on the GRIC, and some in west Phoenix and South Phoenix. The JATAP monitoring results were reported in 2006, during a time the data for the DEIS was being gathered, and it found levels of certain toxic chemicals associated with vehicular emissions were above the standard of a one in a million chance of cancer in a lifetime of exposure in the west Phoenix, south Phoenix, and GRIC sites. The JATAP monitoring found in the high end of the monitoring levels, formaldehyde at 34 times this standard; benzene at 8 times this standard, 1,3 butadiene at 7.5 times this standard, and acetaldehyde at 3.4 times this standard. And, remember, citizens are being subjected to all of these carcinogens, not just one. Some of these chemicals are attributed to "mobile sources," or vehicular traffic burning hydrocarbons. Clearly, adding more vehicular traffic emissions by building a freeway where there had not been one would add to this toxic burden.

The JATAP results are not included in the DEIS, but instead there is a mention of the uncertainty of the risk from these air toxics standards, which is not true. The cancer risk standards have been promulgated and published by EPA after extensive research and study, and they are well known.

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The portion of Maricopa County that is characterized as the Phoenix metro area has had problems for decades meeting the air quality standards for particulate matter (PM) and other criteria pollutants. Ozone levels are too high in the East Valley and Fountain Hills, for example. There have been several exceedances of the standards for PM set by EPA under the authorities given the agency by the Clean Air Act (CAA). The problem has been so bad over the years that every possible delay and postponement allowed under the CAA to come up with a plan to meet regulatory levels of particulate matter have now been exhausted. So, currently, EPA is examining sanctions that include blocking a billion dollars in highway funds. The Arizona Department of Environmental Quality (ADEQ) has tried to explain away the several exceedances of the PM standards in the last year or so by blaming it on dust storms and weather-related problems. But these were not all related to weather.

Almost every one of these PM exceedances have been detected at the air quality monitor at 43rd Avenue and Broadway Road. The placement of a freeway about a mile upwind from a monitor that has had all these high levels seems foolish and short sighted. And the impacts and risks of this were not examined in the DEIS. Nor

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378	**Air Quality**	The Draft Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency recently determined that Phoenix has attained the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. Fugitive dust and mobile source emissions from construction of the proposed freeway would be controlled by requiring the contractor to comply with the dust-control methods in the Arizona Department of Transportation's *Standard Specifications for Road and Bridge Construction* (2008) and Maricopa County Rule 310, Fugitive Dust Ordinance. Disruption to traffic, especially during peak travel periods, would be minimized by a traffic control plan to help reduce impacts of traffic congestion and associated emissions during construction. These methods are discussed on page 4-85 of the Final Environmental Impact Statement. According to the air quality analyses conducted for the proposed freeway, no violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Therefore, no loss of federal funds would occur.

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has the DEIS examined the dust that would be kicked up during the construction phase, when thousands of tons of dirt would be moved around upwind of the monitor. The proposed path of the SMF would take it over the Salt River bed. To construct the bridges would involve extensive earthmoving. Also, blasting South Mountain would release enormous amounts of dust (PM), and the natural wind currents and prevailing wind patterns would push this PM toward the air monitor at 43rd Avenue.

The SMF could therefore be the most expensive freeway ever built. Not only the construction costs, and the more than $20 million already spent on the DEIS, but then there would be the loss of a billion dollars in highway funds. This is a gift that keeps on giving, or taking, as there would be subsequent billions lost through the years due to PM exceedances.

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The DEIS has not considered the effects of the additional pollution caused by the SMF – particularly the truck traffic – on the school children and elderly in proximity to the freeway route. Studies have shown sharp increases in black carbon on roadways with high levels of diesel traffic. The danger zone extends to about ½ mile from the roadway. The SMF would be within ½ mile of 20 schools with over 11,000 students. There would also be many elderly residents within that range who are particularly susceptible to the effects of air pollution. All would be at risk of adverse health effects including asthma and cardiovascular illness. (Thurston, *The Adverse Human Health Effects of Air Pollution that Result from Traffic-Related Air Pollution*, July 2013)

Effective mitigation of the effects of air pollution could only be achieved by barring truck traffic from the SMF. While effective filters could be placed in homes and schools near the freeway, these filters would not only be prohibitively expensive for all the schools and residences involved, but they would also only be effective for the time the school children and residents remained inside with windows closed. People cannot be expected to live their lives inside. In fact, one of the many reasons people live in Ahwatukee Foothills is because of the weather and the possibility of participating in outdoor activities. School children need to be able to be outside to use playgrounds and sporting facilities. It is hard to imagine how air pollution effects could be mitigated for all the school children participating in and attending sporting events at the Desert Vista High School stadium, for example.

Modeling

There are fundamental problems with the modeling described in the DEIS.

The DEIS uses faulty wind speed data and methodology in doing its modeling. Wind speed is an essential part of the air shed modeling that ADOT used to determine, in part, regional stability – which relates to inversion layers and local weather patterns impacting projected freeway pollution. For example, the DEIS inputs are based on times that are not concurrent with pollution building hours. The DEIS also failed to

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379	**Air Quality**	A common theme in public comments on the proposed project has been the potential impacts of the project on children's health, primarily through vehicle emissions and noise. Many commenters raised concerns about the proximity of the project to schools or other aspects of the project that may affect children. In addition, the U.S. Environmental Protection Agency requested that the Final Environmental Impact Statement address Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. Throughout the Final Environmental Impact Statement, potential impacts on and subsequent mitigation for human health are disclosed and identified, as inherent in the environmental impact statement process. The Final Environmental Impact Statement incorporates an assessment of the potential impacts of the proposed project on all populations, including children. The Final Environmental Impact Statement addresses potential impacts of the project on children in the Chapter 4 environmental consequences analyses. The U.S. Environmental Protection Agency's Toxicity and Exposure Assessments for Children's Health report (see page 4-73 of the Final Environmental Impact Statement) indicated that indoor air concentrations of benzene are usually higher than outdoor levels and that indoor air in smokers' homes is a significant contributor to children's exposures. It mentioned children when identifying the effects of acute exposure to naphthalene. The Final Environmental Impact Statement acknowledges and fully discloses public scoping comments that raised the topic of health effects on neighborhoods and adjacent schools (see page 4-31 of the Final Environmental Impact Statement). The Final Environmental Impact Statement evaluates Clean Air Act criteria air pollutant concentrations in Maricopa County and the Phoenix area (see pages 4-75 to 4-77 of the Final Environmental Impact Statement). With regard to air quality impacts, the Final Environmental Impact Statement addresses children's health impacts within the broader discussion regarding health impacts under the National Ambient Air Quality Standards. Clean Air Act Section 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety and are requisite to protect the public health. As noted by the U.S. Environmental Protection Agency in its 2013 rulemaking for particulate matter, Clean Air Act Section 109's legislative history demonstrates that the primary standards are "to be set at the maximum permissible ambient air level... which will protect the health of any [sensitive] group of the population" (78 *Federal Register* 3086 and 3090) (quoting S. Rep. No. 91-1196, 91st Cong., 2 Sess. 10 [1970]) (alterations in original). Accordingly, the Final Environmental Impact Statement National Ambient Air Quality Standards-based evaluation of criteria air pollutants includes a health-based review of sensitive populations, including children, given the National Ambient Air Quality Standards inherent consideration of those factors. Furthermore, the National Ambient Air Quality Standards-based assessment ensures adequate consideration of health-based issues as "[t]he requirement that primary standards provide an adequate margin of safety was intended to address uncertainties associated with inconclusive scientific and technical information ... and to protect against hazards that research has not yet identified" (78 *Federal Register* 3090). Sensitive receivers for air and noise are already included in the air quality and noise analyses in accordance with State and federal guidance. Both sections, *Air Quality* and *Noise*, beginning on Final Environmental Impact Statement pages 4-68 and 4-88, respectively, have addressed requirements under the National Environmental Policy Act. As stated on page 4-89 of the Final Environmental Impact Statement, over 220 sensitive receivers were evaluated at exterior locations from a traffic noise perspective. All of the receivers represent noise-sensitive land uses in proximity to the proposed project, including homes, schools, and parks, and these receivers would have higher noise levels than similar facilities more distant from the proposed action.

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has the DEIS examined the dust that would be kicked up during the construction phase, when thousands of tons of dirt would be moved around upwind of the monitor. The proposed path of the SMF would take it over the Salt River bed. To construct the bridges would involve extensive earthmoving. Also, blasting South Mountain would release enormous amounts of dust (PM), and the natural wind currents and prevailing wind patterns would push this PM toward the air monitor at 43rd Avenue.

The SMF could therefore be the most expensive freeway ever built. Not only the construction costs, and the more than $20 million already spent on the DEIS, but then there would be the loss of a billion dollars in highway funds. This is a gift that keeps on giving, or taking, as there would be subsequent billions lost through the years due to PM exceedances.

The DEIS has not considered the effects of the additional pollution caused by the SMF – particularly the truck traffic – on the school children and elderly in proximity to the freeway route. Studies have shown sharp increases in black carbon on roadways with high levels of diesel traffic. The danger zone extends to about ½ mile from the roadway. The SMF would be within ½ mile of 20 schools with over 11,000 students. There would also be many elderly residents within that range who are particularly susceptible to the effects of air pollution. All would be at risk of adverse health effects including asthma and cardiovascular illness. (Thurston, *The Adverse Human Health Effects of Air Pollution that Result from Traffic-Related Air Pollution*, July 2013)

380 Effective mitigation of the effects of air pollution could only be achieved by barring truck traffic from the SMF. While effective filters could be placed in homes and schools near the freeway, these filters would not only be prohibitively expensive for all the schools and residences involved, but they would also only be effective for the time the school children and residents remained inside with windows closed. People cannot be expected to live their lives inside. In fact, one of the many reasons people live in Ahwatukee Foothills is because of the weather and the possibility of participating in outdoor activities. School children need to be able to be outside to use playgrounds and sporting facilities. It is hard to imagine how air pollution effects could be mitigated for all the school children participating in and attending sporting events at the Desert Vista High School stadium, for example.

381 **Modeling**

There are fundamental problems with the modeling described in the DEIS.

382 The DEIS uses faulty wind speed data and methodology in doing its modeling. Wind speed is an essential part of the air shed modeling that ADOT used to determine, in part, regional stability – which relates to inversion layers and local weather patterns impacting projected freeway pollution. For example, the DEIS inputs are based on times that are not concurrent with pollution building hours. The DEIS also failed to

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379 (cont.)		Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations § 93.123(a). The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (beginning on page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Through analysis, the Federal Highway Administration has determined that the proposed project would not produce disproportionate impacts on children. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. Full disclosure about *Information Availability Constraints in Analyzing Project-Specific MSATs Impacts* begins on page 4-69 of the Draft Environmental Impact Statement in accordance with Council on Environmental Quality regulations [40 Code of Federal Regulations, Section 1502.22(b)] regarding incomplete or unavailable information. This section includes a basic analysis of the likely mobile source air toxics emissions impacts of the proposed action and the No-Action Alternative, but it is the Federal Highway Administration's view that information to credibly predict project-specific health impacts attributable to changes in mobile source air toxics emissions associated with a proposed set of freeway alternatives is incomplete or unavailable.
380	**Air Quality**	The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. According to the air quality analyses conducted for the proposed freeway, no violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Therefore, no mitigation of these effects is required.
381		Specific comments are addressed below.

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	correlate the morning traffic hours 0500 to 1100 with the build up of tail pipe emissions during an aid shed inversion. The ability to determine CO and particulate concentrations needs accurate wind data measurements during periods expected to have high pollutant concentrations.
383	The South Mountain Transportation Corridor Study (SMTC) – a scoping document/component of the DEIS – confirmed that South Mountain greatly influences the local air shed movement. According to the SMTC, down slopes bring cooler air in the evenings. The SMTC and the DEIS, however, failed to indicate that this process intensifies the morning desert inversion, exacerbating pollutant concentrations. Air quality would worsen by the influence of the mountain and any build option. The mountain creates its own small air shed, which was not evaluated by the DEIS. All reporting data used valley wide components for stated results.
384	The sampling and stability data relied on by the SMTC and the DEIS is inaccurate. ADOT relies on air data taken at the Phoenix airport in the middle of the Valley without terrain conditions that proximate the region impacted by the SMF. Even based on the airport data, however, ADOT finds E and F stability 57% of the time. The actual SMF stability would be much worse, compounding Phoenix airport conditions by stronger temperature inversions because of the mountain's location and size. More pollutants from the freeway next to the ground would be trapped more quickly with significantly higher expected pollutant concentrations in the Ahwatukee Foothills community.
	The DEIS did not use MCAQD DELTA Temperature instruments for calculating inversion conditions to determine accurate pollutant concentration projections. DEIS technical documents clearly show that Maricopa County Air Quality delta T systems data was not used for actual ground level measurements of temperature inversions. Without this data of actual inversion strength, which shows how quickly pollutant concentrations will increase, any modeling cannot accurately reflect the population exposure to those pollutants. Stability and Air Quality modeling conducted by ADOT as set forth in the DEIS provided no useful data and must not be used to determine potential air pollution concentrations of the SMF.
385	ADOT used Aircraft Communications Addressing and Reporting System (ACARS) for vertical temperatures and wind profiles. This method does not correlate to ground level inversion strength for population exposure and is not a scientific method to derive accurate results. Data used does not have any quality assurance or quality control measurements. This means the equipment used does not have proven repeatability to produce the same temperature or wind speed for any given measurement. Moreover, no standard heights were used for correlating air shed temperatures. For example, one data point is measured at 2000 feet, the next is at 3000 feet, separated by miles and not at the same time of day. These random numbers fill air quality modeling functions without actually representing true results.

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382	**Air Quality**	The air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in *Guideline for Modeling Carbon Monoxide from Roadway Intersections* (A-OAQPS, 1992). Inputs to the model were based on U.S. Environmental Protection Agency-recommended values or were selected to provide a conservative estimate of impacts. Modeling methodology and results were reviewed by the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments. Increases in traffic volumes attributable to a project do not necessarily result in an increase in emissions over time because the U.S. Environmental Protection Agency's emissions control regulations and fleet turnover also play a role. In the U.S. Environmental Protection Agency's MOVES model, emissions rates for mobile source air toxics drop by 80 to 90 percent between 2012 and 2025, and MOBILE6.2 estimated a similar reduction. The effects of this are apparent from the mobile source air toxics analysis conducted for the Final Environmental Impact Statement; in the mobile source air toxics study area, total mobile source air toxics emissions would decline by 57 to more than 90 percent even though traffic is expected to increase by 47 percent (Final Environmental Impact Statement Table 4-36 on page 4-82).
383	**Air Quality**	According to the 2013 Arizona Department of Transportation *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns experience flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
384	**Air Quality**	At the request of (then) Arizona State Senator John Huppenthal, short-term monitoring of meteorological conditions at Pecos Road and 24th and 40th streets was conducted during 2006 and 2007. Results of this sampling and data from various Maricopa County Air Quality Department monitoring sites were included in the technical report for informational purposes only.
385	**Air Quality**	The Aircraft Communications Addressing and Reporting System data were not used for modeling; they were included for informational purposes only.

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385	Any results derived from the ACARS data are incomplete, not relevant, and mislead the community with technical jargon trying to show justification of expected air quality concentrations for each build and no build situation. Not only is the data not taken from the freeway project area, the data is randomly gathered at different heights, locations, and times.
386	Notwithstanding that this NEPA process has taken over 12 years, ADOT has not conducted any studies on atmospheric and/or ambient quality/conditions in the Ahwatukee Foothills area. As a result, there is no valid baseline data to input into air quality models that predict how bad the pollution in the area would be. Sites listed for reference to determine air quality for the citizens are nowhere near the impacted area and should not be used to determine air quality north of the Pecos Road alignment. Similarly, there are no temperature soundings for accurate air shed profiling. There are no air toxics measurements taken to understand the current components of the ambient air quality, and there are no wind speed and direction instruments installed as necessary to apply good science for modeling. These wind speed and direction monitors should have been installed north of the Pecos Road alignment east and west throughout the Ahwatukee Foothills community and near South Mountain to show how the Ahwatukee Foothills air shed does not remove tail pipe emissions from the freeway, but actually washes pollutants to the west in the mornings, shifting north near noon, with later winds northeasterly. This normal wintertime pattern, known to all Arizona air quality technical persons, is not shown or reflected in the DEIS.
387	Furthermore, ADOT does not compare the results of their traffic modeling against actual data after freeways are built (1-11 through 1-20). Hence, there is no validation of their use of traffic modeling. The inescapable conclusion is that there is no established validity to the modeling used in the DEIS. Without model validity, there can be no P&N or other justification to support building the SMF.
388	**Traffic Issues** Traffic congestion at the proposed 59th Ave/I-10 interchange would make a new "Broadway Curve" traffic congestion disaster, not alleviate traffic congestion. This junction of the SMF with I-10 may have been conceived many years ago, but it is just another example of how ADOT has not used effective modeling. The current situation should have been foreseen long ago. Current traffic congestion between 59th and 51st Avenues on the I-10 during morning and evening rush hours is extreme. Yet there was no mention in the DEIS of the cumulative impacts and effects of traffic congestion at that proposed interchange.
389	Just as the junction of freeways at the Broadway Curve was not properly planned for and engineered, this new interchange at the SMF and I-10 promises to have the same type of traffic congestion problems because of poor planning. Let us not forget

Code	Issue	Response
386	**Air Quality**	At the request of (then) Arizona State Senator John Huppenthal, short-term monitoring of meteorological conditions at Pecos Road and 24th and 40th streets was conducted during 2006 and 2007. Results of this sampling and data from various Maricopa County Air Quality Department monitoring sites were included in the technical report for informational purposes only.
387	**Air Quality**	The air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in Guideline for Modeling Carbon Monoxide from Roadway Intersections (A-OAQPS, 1992). This is accepted methodology.
388	**Traffic**	Construction of the proposed freeway would include widening along Interstate 10 to facilitate entrance and egress of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26, on page 3-49, and in Figure 3-29, on page 3-53 of the Draft Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 were developed in accordance with the Federal Highway Administration's Interstate System Access Informational Guide and has received an initial determination of operational and engineering acceptability from the Federal Highway Administration. Detailed microsimulation models were developed for each of the action alternatives as well as for the No-Action Alternative. The results of the analysis concluded that the action alternatives would not have adverse impacts on traffic operational characteristics along Interstate 10 and would provide as good or better performance than that which would be anticipated with the No-Action Alternative. An assessment of future traffic conditions with and without the proposed freeway is presented in the Draft Environmental Impact Statement, beginning on page 3-27. The traffic conditions presented in these sections are consistent with the environmental impact analysis for elements such for as air quality and noise, and the results of those analyses can be found in their respective sections of Chapter 4 of the Draft Environmental Impact Statement.
389	**Traffic**	Construction of the proposed freeway would include widening along Interstate 10 to facilitate entrance and egress of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26, on page 3-49, and in Figure 3-29, on page 3-53 of the Draft Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 were developed in accordance with the federal Highway Administration's Interstate System Access Informational Guide and has received an initial determination of operational and engineering acceptability from the Federal Highway Administration. While the South Mountain Citizens Advisory Team recommended the W101 Alternative, all stakeholders' input was accounted for—including regional leaders, municipalities, members of the public, and members of the South Mountain Citizens Advisory Team—before identifying the W59 Alternative as the Preferred Alternative (see Draft Environmental Impact Statement pages 3-65 and 3-68). The Draft Environmental Impact Statement has detailed discussion regarding the relative merits and problems with the action alternatives evaluated in the Western Section.

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that ADOT ignored the recommendation of the SMCAT in choosing the 59th Avenue alignment. We can only expect that the new interchange at 59th Avenue also would not be properly engineered to handle all the traffic.

390 The elimination of Pecos Road in building the SMF would be disastrous for local arterial traffic in Ahwatukee Foothills. Not only would there be no interchange at 32nd Street, there would also be no frontage road along the freeway. So Chandler Boulevard would become inundated with traffic, much as it was before Pecos Road was connected to the I-10.

Also, the arterial streets north of Pecos, Liberty Lane and Lakewood Parkway, would become major East-West arterials in the area between Desert Foothills Parkway and 40th Street. Neither Liberty Lane nor Lakewood Parkway were designed for this. They provide access to 4 schools, including Desert Vista High School. Currently, the school bus traffic uses 32nd Street from Pecos Road to get to these schools. Without a SMF interchange at 32nd Street, this bus traffic would clog the already stressed arterials of Liberty Lane and Lakewood Parkway. High school traffic also includes a lot of student cars that would clog the arterials.

391 Furthermore, the elimination of the access to Pecos Road from near 27th Avenue (the road is currently called S. Chandler Boulevard) exacerbates an already difficult access problem for residents in that area. ADOT promised to pave W. Chandler Boulevard to provide residents access to Ahwatukee Foothills further east, but this by no means provides these residents with an acceptable access to/from their homes. Pecos Road currently provides their only access out of their housing area, and it is a direct connect to I-10. With the SMF, Chandler Boulevard would provide their only access out of their housing area, and it would provide a convoluted access for resident to either the SMF or I-10. Egress in case of emergency would be extremely limited.

392 The DEIS lacks a traffic study of the effect the SMF would have on local arterial streets in Ahwatukee Foothills. A study should have been done both for traffic patterns during construction of the SMF as well as patterns that would develop after the SMF would be completed.

393 The people in Laveen desperately need faster access to a freeway and they want the truck traffic off their local arterial streets. But they are currently being held hostage to the SMF, told that it is the only way they can get rid of the truck traffic on their streets and get faster access out of the area for themselves. This is not true. A spur highway to/from I-10 West could easily accomplish both of their objectives. It would also support the objective of getting faster access in/out of the 51st Avenue commercial area for the truck traffic. Yet the DEIS did not mention the consideration of this alternative. ADOT's reaction to such a suggestion has been that it "wouldn't complete the loop" and that it would not allow for O&D regional mobility. The "complete the loop" objective is absurd and the O&D objective gets to the heart of what PARC has said this freeway is all about from the beginning. Yet the truck

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390	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have displaced more than 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The traffic projections for Chandler Boulevard (see Figure 3-12, on page 3-29 of the Draft Environmental Impact Statement) do show a reduction with the proposed freeway when compared with conditions without the proposed freeway. The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. However, temporary detours may be needed during construction. (See page 3-27 of the Draft Environmental Impact Statement.)
391	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange was evaluated but ultimately eliminated because of increased residential displacements and cost. The extension of Chandler Boulevard west of 19th Avenue is included in this project because reasonable access must be maintained to the neighborhoods at the western end of Pecos Road (see Figure 3-33, on page 3-57 in the Draft Environmental Impact Statement). Residents in this area would continue to have a direct connection to Interstate 10 by using the proposed freeway. The travel time savings as a product of using the South Mountain Freeway in comparison with use of Pecos Road would likely offset any additional travel time attributable to the shift in access to Chandler Boulevard. Emergency responders would address the construction of the proposed freeway by amending the local emergency response plan to include the facility.
392	**Traffic**	Existing traffic volumes on the City of Phoenix's streets are available at the City's Web site, <phoenix.gov/streets/traffic/volumemap>. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
393	**Alternatives**	The need identified for the proposed action is to provide regional east–west mobility and to address existing and future transportation system deficiencies. While providing greater access to residents and businesses in Laveen Village to Interstate 10 (Papago Freeway) is a benefit of the proposed action, it is not a primary need identified for the proposed action. According to 23 Code of Federal Regulations §771.111(f)," the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope…". The proposed action should satisfy the project need and should be considered in the context of the local

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	bypass objective has always been downplayed by ADOT, even in the DEIS, in an attempt to mislead the public to bolster public approval of the project. Accordingly, the DEIS has not analyzed the improved O&D regional mobility that would result from a spur highway to/from I-10 West.
394	**Hazardous Materials** The DEIS, starting on page 152, states, "AFFECTED ENVIRONMENT A hazardous materials evaluation for the construction and operation of the proposed freeway was conducted to determine whether: ➢ contaminated soils would be present near potential hazardous materials sites ➢ underground storage tanks would need removal or relocation because of freeway construction ➢ wells and dry wells would be present, providing unintended conduits for preexisting or accidental releases from the construction process to groundwater supplies ➢ during construction activities, workers could encounter soil contaminated with hazardous materials that had not previously been identified"
395	It doesn't mention the transportation of hazardous materials on the new freeway and their associated risks, or the fact that the area where the freeway would connect with I-10 West crosses a site that was identified in the 1980s as contaminated and added to the list of the state of Arizona's Water Quality Assurance Revolving Fund (WQARF), which is the state's equivalent of a Superfund Site. The site has known groundwater contamination and soil contamination. The introduction of hazardous materials and their associated risks into Ahwatukee Foothills by the proposed SMF and its truck traffic would be significant. There are no industries using and emitting toxic chemicals in Ahwatukee Foothills that have reporting requirements under either the Toxics Release Inventory of the Emergency Planning and Community Right to Know Act (EPCRA) or the reporting of fixed facility hazardous materials (chemical) inventories required under the emergency planning provisions of EPCA. The latter, Tier Two chemical inventory reports, are annually required, and are reported to the fire department of jurisdiction (Phoenix Fire Department), the local emergency planning committee (Maricopa County LEPC), and the state emergency response commission (AZSERC). (The requirement for retail gas stations to file Tier Two reports was removed many years ago as long as these stations are in compliance with their reporting under the regulations for underground storage tanks.) The Maricopa County LEPC and the AZSERC are the two emergency planning agencies tasked with developing and updating a comprehensive emergency

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393	**Alternatives**	area socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need.
394		Comment quotes the Draft Environmental Impact Statement.
395	**Hazardous Materials**	The corridor analysis revealed sites that would need further assessment during the property acquisition phase of the project, if an action alternative were to become the Selected Alternative. The Arizona Department of Transportation employs a phased approach to site assessment that allows time for cleanup of any sites found to have hazardous waste issues. The project team concluded from the level of analysis conducted during the environmental impact statement process that the types of sites likely to be acquired contain common hazardous waste issues such as underground storage tanks, asbestos and lead paint in buildings, and other commonly found issues (see page 4-153 of the Draft Environmental Impact Statement). The Arizona Department of Transportation maintains a process for addressing these issues in accordance with all applicable environmental laws and regulations. Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement). The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. The Arizona Department of Public Safety also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on page 4-157 of the Final Environmental Impact Statement). The Arizona Department of Transportation maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Arizona Department of Public Safety on incidents within their jurisdiction. Requirements for shippers are maintained by the Arizona Department of Transportation's Enforcement Compliance Division. The West Van Buren Water Quality Assurance Revolving Fund site was identified and considered during development of the Draft Environmental Impact Statement (see pages 4-97 and 4-153 of the Draft Environmental Impact Statement, and the Draft Initial Site Assessment prepared for the proposed project). These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected medium (groundwater) and the construction zone (near-surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165.

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bypass objective has always been downplayed by ADOT, even in the DEIS, in an attempt to mislead the public to bolster public approval of the project. Accordingly, the DEIS has not analyzed the improved O&D regional mobility that would result from a spur highway to/from I-10 West.

Hazardous Materials

The DEIS, starting on page 152, states,
"AFFECTED ENVIRONMENT
A hazardous materials evaluation for the construction and operation of the proposed freeway was conducted to determine whether:

➢ contaminated soils would be present near potential hazardous materials sites

➢ underground storage tanks would need removal or relocation because of freeway construction

➢ wells and dry wells would be present, providing unintended conduits for preexisting or accidental releases from the construction process to groundwater supplies

➢ during construction activities, workers could encounter soil contaminated with hazardous materials that had not previously been identified"

It doesn't mention the transportation of hazardous materials on the new freeway and their associated risks, or the fact that the area where the freeway would connect with I-10 West crosses a site that was identified in the 1980s as contaminated and added to the list of the state of Arizona's Water Quality Assurance Revolving Fund (WQARF), which is the state's equivalent of a Superfund Site. The site has known groundwater contamination and soil contamination.

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The introduction of hazardous materials and their associated risks into Ahwatukee Foothills by the proposed SMF and its truck traffic would be significant. There are no industries using and emitting toxic chemicals in Ahwatukee Foothills that have reporting requirements under either the Toxics Release Inventory of the Emergency Planning and Community Right to Know Act (EPCRA) or the reporting of fixed facility hazardous materials (chemical) inventories required under the emergency planning provisions of EPCA. The latter, Tier Two chemical inventory reports, are annually required, and are reported to the fire department of jurisdiction (Phoenix Fire Department), the local emergency planning committee (Maricopa County LEPC), and the state emergency response commission (AZSERC). (The requirement for retail gas stations to file Tier Two reports was removed many years ago as long as these stations are in compliance with their reporting under the regulations for underground storage tanks.)

The Maricopa County LEPC and the AZSERC are the two emergency planning agencies tasked with developing and updating a comprehensive emergency

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396	**Hazardous Materials**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement). The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. The Arizona Department of Public Safety also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on page 4-157 of the Final Environmental Impact Statement). The Arizona Department of Transportation maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Arizona Department of Public Safety on incidents within their jurisdiction. Requirements for shippers are maintained by the Arizona Department of Transportation's Enforcement Compliance Division. In the event of an incident with a hazardous materials issue on a State or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, which responds to the accident scene and assesses needs in concert with the incident commander from the responding agency with jurisdiction. If requested, the Arizona Department of Transportation can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation's Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary.

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response plan for Maricopa County and the state of Arizona, respectively. The plan, by statute, requires:

"Each emergency plan shall include (but is not limited to) each of the following:

(1) Identification of facilities subject to the requirements of this subchapter that are within the emergency planning district, identification of routes likely to be used for the transportation of substances on the list of extremely hazardous substances referred to in section 11002(a) of this title, and identification of additional facilities contributing or subjected to additional risk due to their proximity to facilities subject to the requirements of this subchapter, such as hospitals or natural gas facilities.

(2) Methods and procedures to be followed by facility owners and operators and local emergency and medical personnel to respond to any release of such substances.

(3) Designation of a community emergency coordinator and facility emergency coordinators, who shall make determinations necessary to implement the plan.

(4) Procedures providing reliable, effective, and timely notification by the facility emergency coordinators and the community emergency coordinator to persons designated in the emergency plan, and to the public, that a release has occurred (consistent with the emergency notification requirements of section 11004 of this title).

(5) Methods for determining the occurrence of a release, and the area or population likely to be affected by such release.

(6) A description of emergency equipment and facilities in the community and at each facility in the community subject to the requirements of this subchapter, and an identification of the persons responsible for such equipment and facilities.

(7) Evacuation plans, including provisions for a precautionary evacuation and alternative traffic routes.

(8) Training programs, including schedules for training of local emergency response and medical personnel.

(9) Methods and schedules for exercising the emergency plan.

Due to the unique nature of Ahwatukee Foothills, which is a residential area, and not zoned for heavy industrial uses, few hazardous materials transportation issues and risks exist there because none of these chemicals, other than gasoline and diesel, are being transported into the area, other than incidentally adjacent on Interstate 10, which is east of the area. A catastrophic release of hazardous chemicals along the I-10 corridor would have only an indirect effect on Ahwatukee Foothills.

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397	To determine the additional risks of hazardous materials transportation, the Maricopa County LEPC and the AZSERC would also need and utilize hazardous materials commodity flow studies to determine the types and amounts of hazardous materials being transported through or within the county and/or state to meet their respective planning requirements. Of course, the AZSERC does exactly that periodically, and the data and emergency planning is updated. But that data and the relevant analysis is absent in the DEIS.
398	The planning for response to an incident involving the release into the environment of a hazardous material involves using Aereal Locations of Hazardous Atmospheres (ALOHA), RMP*Comp, and Computer Aided Management of Emergency Operations (CAMEO). All are USEPA approved and provided emergency planning screening tools. RMP*Comp is used to predict the effects of a release that would exceed the ALOHA model limit of six miles. The worst case scenario release for chlorine was the only hazardous material being transported on the highways that, in the event of a catastrophic release, would exceed the six-mile ALOHA modeling limit, so RMP*Comp is used to assess the radius of impact for the worst-case chlorine release. ALOHA, RMP*Comp, and CAMEO are all distributed by the USEPA and are software programs provided and periodically updated by USEPA to determine the distance from a release point where there would be a danger to human health and safety. ALOHA can also calculate the levels of a released chemical that could infiltrate nearby buildings, the levels of those chemicals that will likely be in these buildings, and the time it would take for the released chemical(s) to reach their maximum concentration.
	As stated in the reports of the various hazardous materials commodity flow studies conducted in Arizona, ALOHA modeling already indicates, "a catastrophic release of gasoline from a tanker truck could cause areas up to 1.0 mile away to be affected at LOC 3 (a concentration where the general population could experience severe health effects and death) and areas as far as 3.1 miles away to be affected at LOC 1 (enough to cause discomfort in the general population). Credible and catastrophic releases of sulfuric acid would create an evacuation radius of 0.5 miles from the highway and railroad." (LOC means level of concern; LOCs range from 3 down to 1.)
	Ahwatukee Foothills already has some emergency planning needs due to the transportation of gasoline into and within the area. There should already be planning for an incident involving gasoline within a mile of current arterial traffic, including Pecos Road. Schools within a mile of Pecos should have an evacuation plan.
	The proposed SMF would only add exponentially to emergency planning needs and risks as more truck traffic of this chemical and others that are potentially more dangerous in the event of a catastrophic release would be transported immediately adjacent to schools, parks, shopping areas, and other vulnerable facilities in Ahwatukee Foothills. The freeway would be the sole source of these new risks from a hazardous materials incident, thus this would be a very significant impact directly

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397	**Hazardous Materials**	The project team is aware of the Hazardous Materials Commodity Flow Studies that the Arizona State Emergency Response Commission maintains. These studies are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing emergency response plans. If the plan is amended, it is made available to the Arizona Department of Transportation.
398	**Hazardous Materials**	According to 46 *Federal Register* 18026 (March 23, 1981), the environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible. There are no requirements in 23 Code of Federal Regulations 771 Environmental Impact and Related Procedures or in the Federal Highway Administration Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents to address releases of hazardous chemicals due to a transportation incident in National Environmental Policy Act documents for transportation projects like the proposed action. As discussed above, reasonably foreseeable actions are those that are likely to occur or probable, rather than those that are merely possible. If the proposed action is the Selected Alternative in the record of decision, planning for emergency situations would be initiated. If the plan is amended, it is made available to the Arizona Department of Transportation.

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caused by the freeway, and a full analysis of the risks and effects should have been examined in the NEPA process.

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The data and calculations of risk and distance from certain chemicals carried on the highways are documented in the July 9, 2009, report, *The Hazardous Materials Commodity Flow Study Report I-19 Corridor from I-10 to Mexico Border, Arterial Highways and Railways, Pima and Santa Cruz Counties, Arizona*; the October 30, 2006 report, *Hazardous Materials Commodity Flow Study Report I-8 and I-10 Corridors, Arterial Highways and Railways, Yuma, Maricopa, Pinal, Pima and Cochise Counties, Arizona*; and the December 5, 2008 *Hazardous Material Commodity Flow Study I-10 Corridor from SR 85 to California* prepared for the AZSERC. Previous commodity flow study reports would show the same sorts of information.

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One piece of data that is missing is the Hazardous Materials Commodity Flow Study Report for the I-10 to I-8 to SR 85 to I-10 route that was selected as a truck bypass around 2006. (Part of the idea of this particular truck bypass was to route truck traffic away from the Phoenix metro area as a measure to reduce particulate matter air pollution.) According to ADOT, this also is part of the CANAMEX highway system that has been approved via treaties with Mexico and Canada, and this truck bypass has now been officially designated as the route of the CANAMEX.

Clearly, the SMF DEIS should have studied or promulgated this data to determine the traffic of hazardous materials that could be expected to shift to the SMF. Even without this last bit of information, a close approximation should have been calculated and examined in the DEIS.

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HDR, the contractor for ADOT in the November 26, 2008, *SPR 624 Hazardous Materials Transportation in Arizona Literature Review with Findings Report*, would have reviewed all of this information, at a minimum. HDR is also the contractor for ADOT in the NEPA process for the SMF, and should have had access to this same information. There can be no valid reason for excluding any mention or analysis of the risks and additional planning from hazardous materials transportation in the SMF DEIS other than a deliberate exclusion.

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From the beginning of the NEPA process regarding the SMF, Ahwatukee Foothills residents and others have consistently and vociferously raised concerns about the added risks to their community from the transportation of hazardous materials on the new SMF. In doing so they have consistently voiced concerns regarding the additional problems with hazardous materials response in the affected area, as well as evacuation and shelter in place issues. There is also a risk from the consequences of a hazardous materials transportation incident to the communities on the north side of the pass at South Mountain, and Laveen would be at a particularly heightened risk also. Therefore, the same types of impacts that threaten Ahwatukee Foothills would apply to these other communities, but at least these others have alternate escape routes that the community of Ahwatukee Foothills does not have.

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399	**Trucks**	The road network in the Maricopa Association of Governments travel demand model includes the Interstate 8 and State Route 85 corridor. So, while the roads are not in the Study Area for the proposed action, traffic and trip distributions along the corridor are included in the traffic analysis for the proposed action. Any traffic that would shift from the Interstate 8 and State Route 85 corridor to the proposed action would be included in the vehicle mix considered in the analysis. A truck driver traveling from Tucson to Los Angeles and choosing to use Interstate 10 and the proposed freeway would travel 15 miles less than one choosing to use the designated truck bypass along Interstate 8 and State Route 85. Choosing to travel on the proposed action versus Interstate 8 and State Route 85 would not translate to any substantial travel time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
400	**Hazardous Materials**	The 2008 hazardous material report referenced in the comment was prepared to assist the Arizona Department of Transportation in refining its policies and process for determining hazardous materials routing in the state. It was a preliminary document and intended to form a basis of understanding about how other states' planning processes address this issue. The report was not intended to provide specific recommendations for hazardous materials routing, but rather to provide the Arizona Department of Transportation with information to consider in making possible adjustments to its planning process. The recommendations of the report have been taken under advisement by the Arizona Department of Transportation.
401	**Hazardous Materials**	According to 46 *Federal Register* 18026 (March 23, 1981), the environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible. There are no requirements in 23 Code of Federal Regulations 771 Environmental Impact and Related Procedures or in the Federal Highway Administration Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents to address releases of hazardous chemicals due to a transportation incident in National Environmental Policy Act documents for transportation projects like the proposed action. As discussed above, reasonably foreseeable actions are those that are likely to occur or probable, rather than those that are merely possible. If the proposed action is the Selected Alternative in the record of decision, planning for emergency situations would be initiated. If the plan is amended, it is made available to the Arizona Department of Transportation.

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401	As of 2010, the 35.8 square-mile community of Ahwatukee Foothills has a population of 77,249. So if there would be a catastrophic release from a 17-ton chlorine tanker along the Pecos Road alignment, almost all of these 77,249 would be at risk of death or severe injury. In Laveen, there are 35,502 residents who would be at a similar risk. There would also be risks to the residents of the Gila River Indian Community along the Pecos alignment. All of these above mentioned communities would be forever at risk of a very terrible, certain, and quick death from a chlorine release if this freeway gets built. All of these communities would have to be forever on hair trigger alert. They, as communities, would need periodic training and drills to protect them, as well as infrastructure in the form of siren systems and other alert systems, telephone ring down systems, and much more.
402	We know that over a hundred trucks per hour would be the number at the beginning of the freeway's opening, just from localized traffic information, but when the I-10 to I-8 to SR 85 to I-10 truck bypass is negated, there will be much more truck traffic. That number can be quantified, and that is something the DEIS should have done with the millions of dollars already spent. But HDR and ADOT skirted that by claiming in the DEIS that that information is not known and the impacts are unclear. That is absurd; that is precisely the sort of data that is quite available, and must be examined, studied, and analyzed.
403	The fact that the proposed freeway would eliminate the exits from the community at 32nd Street and Pecos would only exacerbate an already difficult position that this community would be in if there were an evacuation or the need for a response to a catastrophic hazardous materials incident. Regular traffic is already voluminous at that intersection: • Pecos (west approach) - Total 22,313 veh/day (2012 count) including 11,727 westbound and 10,586 eastbound volumes. • Pecos (east approach) - Total 28,178 veh/day (2012 count) including 14,331 westbound and 13,847 eastbound volumes • 32nd Street (north approach) - Total 7,807 veh/day (2011 count) including 3,761 northbound and 4,406 southbound volumes. With that access to Pecos Road being removed by the freeway, all of that traffic would have to find another way out and further clog and congest other exit routes. Yet there was no mention or analysis of these issues in the DEIS.
404	The October 30, 2006 report, *Hazardous Materials Commodity Flow Study Report I-8 and I-10 Corridors, Arterial Highways and Railways, Yuma, Maricopa, Pinal, Pima and Cochise Counties, Arizona*, also mentions the risk from a release of chlorine gas and the risks of a catastrophic release during a transportation incident. As stated, RMP*Comp is a USEPA approved emergency planning screening tool used when ALOHA predicts the effects of a release would exceed the ALOHA model limit of six miles. The worst-case scenario release for chlorine was the only material to exceed the six-mile ALOHA limit.

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Code	Issue	Response
402	**Trucks**	The road network in the Maricopa Association of Governments travel demand model includes the Interstate 8 and State Route 85 corridor. So, while the roads are not in the Study Area for the proposed action, traffic and trip distributions along the corridor are included in the traffic analysis for the proposed action. Any traffic that would shift from the Interstate 8 and State Route 85 corridor to the proposed action would be included in the vehicle mix considered in the analysis. A truck driver traveling from Tucson to Los Angeles and choosing to use Interstate 10 and the proposed freeway would travel 15 miles less than one choosing to use the designated truck bypass along Interstate 8 and State Route 85. Choosing to travel on the proposed action versus Interstate 8 and State Route 85 would not translate to any substantial travel time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
403	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange was eliminated based on undesirable residential displacements and cost. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
404	**Hazardous Materials**	The project team is aware of the Hazardous Materials Commodity Flow Studies that the Arizona State Emergency Response Commission maintains. These studies are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing emergency response plans. If the plan is amended, it is made available to the Arizona Department of Transportation.

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405	Since Ahwatukee Foothills is not six miles wide from Pecos Road to South Mountain, it is easy to conclude that, in the event of a catastrophic release of chlorine from a 17-ton tanker of chlorine gas, all of Ahwatukee Foothills would have to either evacuate or shelter in place. Further, an ALOHA modeling indicates that buildings within two miles of the point where the chlorine release occurred would have high enough levels of chlorine gas infiltrate into them to become lethal, which means that shelter in place strategies would not work. The only option would be evacuation, but as chlorine gas flows rapidly at ground level because it is heavier than air, it is unlikely that people would survive long enough to evacuate. Depending on the size of the hole or the rupture of the tanker of chlorine, the tanker could completely empty in a minute or so. And these chlorine truck tankers are quite vulnerable to bullets and other physical trauma. For an objective examination of issues related to a catastrophic release from a chlorine tanker truck, see *Mathematical Modeling and Decision Analysis for Terrorism Defense: Assessing Chlorine Truck Attack Consequence and Countermeasure Cost Effectiveness,* Anthony Michael Barrett. It notes: "Adapting our modeling system to ruptures emptying a tank via flashing two-phase flow through an orifice [80], forming horizontal jets, indicates that such releases could result in approximately the same number of fatalities as an instantaneous release, if such a release takes 10 minutes or less. " page 42 "People in vehicles may be as well off staying where they are, turning off the air-supply fan and sealing the vents, as heading into a nearby building. It may also be dangerous for them to try to drive away, since they may unintentionally drive into higher-concentration areas."
406	"Without fast and effective defense response, release of 17 tons of chlorine from a tank truck in a generic urban area with 2.5 m/s wind and Pasquill stability class F, could result in approximately 4000 (half within ~10 minutes) to 30,000 fatalities (half within ~20 minutes), depending on dose-response model."
405	Chlorine gas in even small concentrations is harmful. A person encountering chlorine gas will have a hard time seeing as the chlorine reacts with the moisture in the eye to create hydrochloric acid. The eyes will tear up and make seeing very difficult. At high enough levels, severe scarring and blindness will result. The same formation of hydrochloric acid will occur in the throat and lungs. People won't be able to take a deep breath or breathe without choking, as mucous membranes in the respiratory system will be quite irritated and will start to weep. Lungs will blister, and the ability to pass oxygen to the blood through the lung membranes will be compromised immediately. Walking, much less running, will be very difficult. A half blinded, gasping person who cannot take a deep breath is not

Code	Issue	Response
405	**Hazardous Materials**	According to 46 *Federal Register* 18026 (March 23, 1981), the environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible. There are no requirements in 23 Code of Federal Regulations 771 Environmental Impact and Related Procedures or in the Federal Highway Administration Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents to address releases of hazardous chemicals due to a transportation incident in National Environmental Policy Act documents for transportation projects like the proposed action. As discussed above, reasonably foreseeable actions are those that are likely to occur or probable, rather than those that are merely possible. If the proposed action is the Selected Alternative in the record of decision, planning for emergency situations would be initiated. If the plan is amended, it is made available to the Arizona Department of Transportation.
406	**Hazardous Materials**	Stability data for the area are likely unavailable, but an "F" stability would probably occur only during the early morning hours and would be associated with drainage winds coming from the northeast that would carry the plume away from inhabited areas. Issues of a severe accident such as the one described exist for many portions of the Phoenix metropolitan area. Fast and effective defense response is critical in the emergency response plans prepared by emergency service providers and discussed on page 4-157 of the Final Environmental Impact Statement.

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405	going to be a match for a cloud of chlorine, and any evacuation, or rescue on any scale, after the arrival of the chlorine gas will be virtually impossible. Handicapped and elderly people, as well as children, would be at a particular disadvantage. People outside would have no place to go to for sheltering in place. Shelter in place strategies, i.e. having people shelter in a building, stop ventilation systems, and block up and seal all air flow, will have to be successful before the chlorine gas arrives. Otherwise, those sheltering will bottle themselves up with a harmful gas. ALOHA modeling indicates that certainly all buildings within a mile of the chlorine release from a 17-ton tanker truck would have such high levels of chlorine gas infiltrate into them that most people there would die, or be very severely injured. Some models put that circle of assured death at closer to two miles away. There are schools and residential areas on the north side of the Pecos Road alignment within a mile of the proposed SMF, and many more within two miles of the freeway alignment. There would be thousands of people at an extreme risk.
407	The prevailing winds push across GRIC land toward the north, toward South Mountain, and also to the west through the 51st Avenue pass. Chlorine fumes from an incident on the Pecos Road alignment will certainly be most likely to blow the cloud into all of Ahwatukee Foothills, then on to the GRIC at 51st Avenue, then into Laveen.
405	There is a pass at 51st Avenue where the proposed truck bypass/freeway is planned. If the chlorine incident happened at the 51st Avenue pass and/or Laveen, the one to two mile kill zone and six+ miles of harm would apply there with just a few minutes to take appropriate action to evacuate or shelter in place. There is the additional problem of handling the people outdoors at parks, bicycling, hiking, shopping, and other activities if such an incident occurred. Strategies would have to be determined well in advance. Law enforcement personnel and emergency responders would need to be trained, drilled, equipped properly, and otherwise prepared for this scenario. If the 17-ton tanker of chlorine empties in minutes, there won't be much the emergency responders can do to stop the leak, but patch kits are available for that purpose. A rupture or hole may be too large to patch, and that size of opening would vent all the chlorine anyway by the time any responders arrived. Limited freeway access and egress becomes a response hindrance also. One responder strategy would be to try to "knock down" the cloud of chlorine with water. To prepare for that, the freeway would have to have a hydrant system with enormous amounts of water and water pressure, as no fire truck would have enough water to last very long. All that water and chlorine would make plenty of hydrochloric acid. The hydrochloric acid would eat away and decay the responding vehicles and equipment, the concrete on the freeway, its culverts, degrade the asphalt pavement, and ruin any metal cables and metal where the acid solution washed to. The freeway would have to be designed so that such an incident would not also destroy it.

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407	**Air Quality**	According to the 2013 Arizona Department of Transportation *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns experience flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

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408	There would also be residual effects. The January 2005 chlorine disaster in Graniteville, South Carolina illustrates some of these. Following the chlorine disaster, Avondale Mills (textile company) officials had spent more than $140 million on cleaning, repairs and damage mitigation from the textile mills machinery that was corroded so severely by the chlorine gas that it had to be replaced, only to find that new equipment brought to the plant quickly corroded because chlorine was still present and reacting with other agents. That the corrosive effects of the chlorine from such a large release would last so long needs to be taken into account in assessing the costs associated with such an incident. The chlorine reacts with moisture to form hydrochloric acid, but over time, one would expect that this would diminish. In assessing the damages from a large-scale chlorine release, emergency responders and emergency planning agencies should look for this lasting effect. The corrosive effects could harm pavement, concrete, industrial infrastructure, and even residential structures and the electrical wiring. A much more detailed decontamination, including pH samplings, should be undertaken in the recovery phase of operations to prevent such devastation. NEPA requires examination of cultural, social, and economic impacts, and the new hazardous materials traffic and risks caused by the SMF would certainly affect all of these topic areas. Despite all of this, there is nothing in the DEIS that even mentions the hazardous materials transportation and risks issue! Yet, it is evident that ADOT plans for hazardous materials being transported on this proposed highway. [Page 5-20].
409	Hazardous Materials has been mostly limited in the DEIS to a discussion of hazardous materials that might be encountered in the soils during construction. Yet, despite this alleged concern, the fact that the proposed path of the freeway crosses contaminated property near Interstate 10 and 55th Avenue is neither mentioned nor examined, much less the financial liability the taxpayers might be assuming by purchasing the contaminated property. That would certainly be an enormous economic impact. Since the 1980s, there has been well-documented groundwater contamination in the area around 51st avenue and Van Buren to 59th Avenue and Van Buren, enough so that it was added to the list of the state of Arizona's Water Quality Assurance Revolving Fund (WQARF), which is the state's equivalent of a Superfund Site. By purchasing this contaminated land for the freeway, the state of Arizona would assume the liability for the clean up of these contaminants, along with the liability for adverse health impacts suffered by workers in the area. This is a type of corporate welfare, as it would remove the liability costs from the various polluters and current property owners that have ground and groundwater pollution issues and transfer it to the people of Arizona.

Code	Issue	Response
408	**Hazardous Materials**	According to 46 *Federal Register* 18026 (March 23, 1981), the environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible. There are no requirements in 23 Code of Federal Regulations 771 Environmental Impact and Related Procedures or in the Federal Highway Administration Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents to address releases of hazardous chemicals due to a transportation incident in National Environmental Policy Act documents for transportation projects like the proposed action. As discussed above, reasonably foreseeable actions are those that are likely to occur or probable, rather than those that are merely possible. If the proposed action is the Selected Alternative in the record of decision, planning for emergency situations would be initiated. If the plan is amended, it is made available to the Arizona Department of Transportation.
409	**Hazardous Materials**	The West Van Buren Water Quality Assurance Revolving Fund site was identified and considered during development of the Draft Environmental Impact Statement (see pages 4-97 and 4-153 of the Draft Environmental Impact Statement, and the Draft Initial Site Assessment prepared for the proposed project). These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected medium (groundwater) and the construction zone (near-surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165.

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410	**Noise pollution** The DEIS cited an outdated noise abatement policy and included an incomplete review of the regulations regarding noise (page 4-80). In particular, the Quiet Communities Act of 1978, promoting the development of state and local noise control programs, should have been discussed. Further, not all receptors that could be impacted by noise from the SMF were identified and impacts predicted for. For example, effects on multiple schools located within 0.5 miles of the proposed SMF were not evaluated (page 4-84). Vibration from blasting is qualitatively discussed in the Topography, Geology, and Soils section (page 4-115) of the DEIS; however, vibration from non-blasting construction activities and from operational impacts is not discussed anywhere within the DEIS. The DEIS discusses the use of noise barriers as a primary means of noise mitigation (page 4-80). The use of noise barriers as proposed in the DEIS is unacceptable. The DEIS states that barriers would not be constructed higher than 20 feet because of cost, aesthetics, and constructability. This is as it should be. Yet in some areas, a 20-foot sound barrier would not achieve acceptable noise abatement (page4-90).
411	The design of a depressed (below ground level) freeway has been rejected, in spite of the fact that this would provide substantial noise abatement. It appears that the SMF is being designed as the "Walmart of freeways" to keep the cost down, regardless of the negative impacts this would have on the communities affected. Raised freeway overpasses from a ground level freeway would propagate traffic noise and pollution at a greater distance.
412	The only other noise mitigation strategy that was considered, according to the DEIS, is the use of rubberized asphalt, which isn't even a proven strategy. Even to the extent that it works to reduce noise, it would not provide enough noise abatement to make the noise pollution levels acceptable at some locations along the proposed freeway route.
413	**Water and Soil Issues** Concerns were raised to ADOT throughout the scoping process about the destruction of supply wells located along Pecos Road if the SMF were built along that alignment. ADOT appears to be aware of these concerns, as an attempt is made to directly address them on page 4-100 of the DEIS. Yet the analysis of wells used for water supply for the Foothills golf courses make use of information that is both outdated and erroneous. This leads to an insufficient analysis that does not make use of the "best available scientific and technical information." ADOT identified that the Foothills Community Association has multiple sources of water available other than the supply well that would be lost because of the SMF. The DEIS identifies effluent, well water, and municipal water supplied by the City of Phoenix as being available. The wastewater treatment plant referenced in the DEIS

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410	**Noise**	The noise analysis has been updated for the Final Environmental Impact Statement using most recent Federal Highway Administration and Arizona Department of Transportation policy and traffic projections provided by the Maricopa Association of Governments in August 2013. This updated analysis begins on page 4-88 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted. As stated in the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, environmental impact statements should be analytic rather than encyclopedic [40 Code of Federal Regulations Part 1502.2(a)]. Those noise regulations of direct consequence to the proposed action were discussed. There are no federal requirements directed specifically to highway traffic induced vibration. All studies the highway agencies have done to assess the impact of operational traffic induced vibrations have shown that both measured and predicted vibration levels are less than any known criteria for structural damage to buildings. The Arizona Department of Transportation Noise Abatement Policy limits noise abatement walls to 20 feet in height.
411	**Drainage**	As noted on page 3-18 of the Draft Environmental Impact Statement, drainage served as the primary design constraint for the Pecos Road segment of the E1 Alternative. Assessments were performed to determine constructibility and effectiveness in avoiding or reducing impacts and to evaluate whether a depressed profile would generate other desired or undesired outcomes. Based on the results of these assessments, further design options were developed and refined in attempts to reduce impacts on the adjacent community. The modifications incorporated alternative drainage designs, use of retaining walls, and other features to reduce right-of-way requirements.
412	**Noise**	As disclosed on page 4-90 of the Draft Environmental Impact Statement, not all noise barriers would be capable of reducing traffic noise levels to levels recommended in the Arizona Department of Transportation's Noise Abatement Policy. The Federal Highway Administration does not recognize rubberized asphalt as a noise abatement methodology; however, the Arizona Department of Transportation will use rubberized asphalt as the driving surface for the proposed freeway.
413	**Water Resources**	The comment is correct that wastewater effluent is not available as a replacement source and is not being used. The City of Phoenix did operate a wastewater reclamation facility in this area, but it was removed from service and demolished. The City of Phoenix still owns the property, but all facilities have been removed from the site. Thus, only two water sources are available for irrigation and lake supply for the Foothills Community Association: the well that would be acquired and potable water from the City of Phoenix. The discussion on page 4-100 of the Draft Environmental Impact Statement has been modified in the Final Environmental Impact Statement to reflect that reclaimed wastewater would not be available; however, the conclusion on page 4-100 is still appropriate. As stated on page 4-100 of the Draft Environmental Impact Statement, "In the event that well replacement were to be impossible, the Arizona Department of Transportation would still replace the water that would be lost through the acquisition."

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was removed by the City of Phoenix in the late 1990s. This key information, that effluent is completely unavailable, was reportedly made available to ADOT. It was not, however, used in the analysis of water supply availability.

414 The analysis of water replacement on page 4-100 is flawed in another way. The analysis is summarized as: "It is understood that finding a suitable location for a new well in this area may be difficult." This difficulty is dismissed by indicating that there are at least two other sources of water, which is erroneous. The only other source is municipal water, which would be prohibitively expensive. Further, the statement that drilling a new well may be difficult seriously downplays the importance of the wells that would be lost, the unique hydrogeology of the area, and the rarity of how productive these particular wells are.

415 In addition to being technically flawed, the analysis presented in the DEIS has been applied in an arbitrary manner. The detailed analysis focused solely on the Foothills Community Association and the potential loss of their wells. The DEIS does not analyze nearby entities that would experience the same impacts, or entities anywhere else along the freeway route. One specific example is the Lakewood Community Association. The supply wells currently used by the Lakewood community would be even more difficult to replace given their large pumping capacity.

416 The analysis of water quality is insufficient. While existing background water quality (page 4-97) is of interest, the more important concern is the potential for the proposed freeway route to impact known areas of contamination. This is not disclosed in the assessment of water resources. There are several basic and readily available data sources that should have been consulted for this analysis. At a minimum: (1) known Leaking Underground Storage Tank (LUST) sites, (2) known State WQARF or Federal CERCLA superfund sites, and (3) known or suspected landfills, either historic or active (the location along the Salt River makes this a particularly important item to assess in the DEIS).

417 There is no section within the DEIS that discussed the unique erosion issues that would be encountered when excavating South Mountain. Making deep cuts into three ridges of the mountain would create an enormous area for potential erosion of the mountain. Yet the DEIS just referenced the use of "erosion control." Erosion control for deep cuts into mountains must include special measures that not only mitigate the effects of erosion at the time the excavation occurs, but also the long-term and continuing effects of erosion. Without a plan and commitment to mitigate the continuing forces of erosion, initial efforts to control erosion will become ineffective within a relatively short time.

418 Regarding the DEIS component addressing the US Army Corps of Engineers section 404 of the Clean Water Act (page 4-112), the 401 certification by ADEQ is in jeopardy. EPA has found that ADOT has routinely failed to comply with contracts with FHWA, USACOE, ADEQ and USFS to maintain, limit or control sediment

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414	**Water Resources**	Page 4-100 of the Draft Environmental Impact Statement states that finding a suitable location for a new well in this area may be difficult. Productivity of the well in bedrock formations is primarily based on intercepting fractures, and that can be very difficult to do. The Arizona Department of Transportation is aware of the difficult conditions that exist in replacing wells in this area. The procedure identified on page 4-100 of the Draft Environmental Impact Statement defines the procedure that the Arizona Department of Transportation would use to replace impacted wells, and also identifies the general costs that the Arizona Department of Transportation would incur to replace the lost water sources. Depending on whether an action alternative were the Selected Alternative, it may be possible to keep the well in its current location, but move the well controls and associated piping to outside of the right-of-way. Such an analysis would be performed later in the design process.
415	**Water Resources**	Because of the public concern expressed during the environmental impact statement process, page 4-100 of the Draft Environmental Impact Statement focuses on the Foothills Community Association to provide more details on the well acquisition, condition assessment, and replacement process used by the Arizona Department of Transportation. This information applies equally to the Lakewood Community Association or any other acquired well in the area.
416	**Hazardous Materials**	The West Van Buren Water Quality Assurance Revolving Fund site was identified and considered during development of the Draft Environmental Impact Statement (see pages 4-97 and 4-153 of the Draft Environmental Impact Statement, and the Draft Initial Site Assessment prepared for the proposed project). These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected medium (groundwater) and the construction zone (near-surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165.
417	**Geology**	Information gained through geotechnical investigations would be used to design the slopes to be stable and to protect against stormwater flows and related erosion. Technical reports addressing rock cut slope designs would be prepared as part of the preliminary and final geotechnical investigations of the selected freeway alignment. Stormwater flows and related erosion from excavated areas would be addressed by implementation of a Stormwater Pollution Prevention Plan and related best practices. Stormwater Pollution Prevention Plans are required on Arizona Department of Transportation construction projects to control and mitigate erosion and loss of soil from the project and off-site movement of eroded sediments. During construction, off-site impacts to soil from erosion related to the freeway construction project are not expected. Implementation of the Stormwater Pollution Prevention Plan and related best practices would keep eroded sediments on site for collection and replacement as appropriate. After construction, grading and drainage and landscape design components of the freeway system would act to control and mitigate erosion.

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discharges into jurisdictional waters of the US. The Gila and Salt Rivers are waters of the US inside this planned project. EPA actions have created an environmental program inside of ADOT. This environmental program has failed to implement the most basic construction mitigations. Statewide highway construction along hillsides have created large and numerous rills (deep cuts down hillsides). These rills wash sediment into our waterways, polluting the ecosystem. ADOT management downplays environmental stewardship. ADEQ, Army Corps of Engineers, and FHWA do not conduct any inspections. Internal ADOT environmental staff does not influence ADOT management. FHWA does not provide funding for continued maintenance of hillside erosion after construction. Statewide, ADOT does not provide its maintenance highway workers funding to mitigate sediment discharges from hillside rills and failed sediment control features of the original construction best management practices. ADOT has failed to protect the environment in nearly all completed construction sites with the same terrain of the SMF. It would be expected that ADOT would not honor their own Statewide Individual Stormwater permit, allowing sediment discharges during and after construction of the freeway. (Haddow, *South Mountain Freeway 202 DEIS Comments Prepared for PARC et al*, 2013)

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All of this points to an expected inadequate response by ADOT to water and soil issues that would arise during and after construction of the SMF. And the DEIS provides nothing to lead to a different conclusion.

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South Mountain Preserve and Park

The DEIS proposed that the SMF would cut through a part of South Mountain Preserve and Park. The DEIS said that the eminent domain claim on the Preserve and Park would be for just a small part of the whole, so it would be of little consequence. To some extent this is a matter of opinion. However, if someone claimed that they just wanted to cut a couple of toes off the foot of the Director of ADOT, his opinion would undoubtedly be that his toes are quite important. We also object quite strongly to the desecration of South Mountain Preserve and Park! It is a living entity that should remain whole, and it should not experience painful losses that result in ugly scars.

We must ask, what part of the word "preserve" does ADOT not understand? The people of Phoenix created the Phoenix Mountain Preserves to do just what the word implies – preserve them. Further, South Mountain Park is the largest wilderness municipal park in this country – some claim in the world. The fact that it is large is what makes it a magnificent wilderness park. And since it is right in the city of Phoenix, it is readily accessible to all the residents of the Valley of the Sun. Recreation is one of the major draws bringing people to this Valley, both to vacation and to live. Yet ADOT indicates in the DEIS that this is of little consequence and implies that it is much more important for trucks to get to their destinations as directly as possible, in spite of any amount of damage they may do to our precious resources, including South Mountain.

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418	**Water Resources and Waters of the United States**	Controlling and treating runoff is a normal function of the Arizona Department of Transportation projects. No evidence is offered to substantiate such statements. The U.S. Army Corps of Engineers, as a cooperating agency, has participated and contributed in each step of the environmental process. The agency has found the logical sequence of decision making to be sound and in line with National Environmental Policy Act requirements. The Arizona Department of Environmental Quality has also contributed to the process. Both agencies as referenced in the comment have oversight roles in project permitting as established in the Clean Water Act (Sections 401, 402, and 404). Extensive mitigation in accordance with the permitting requirements can be found in the *Water Resources* and *Waters of the United States* sections of Chapter 4 of the Final Environmental Impact Statement. The Arizona Department of Transportation is fully obligated and committed to implementation and adherence to those mitigation strategies.
419	**Mitigation**	If an action alternative is the Selected Alternative, the record of decision issued for the project will contain all mitigation measures to be implemented for the project. The Federal Highway Administration and Arizona Department of Transportation will commit to implementation of all mitigation measures in the record of decision.
420	**Section 4(f) and Section 6(f)**	The acreage of parkland to be converted to a transportation use is reported on Draft Environmental Impact Statement page 5-14 in the section, *Direct Use*. Additional text on that page focuses on other concerns associated with the direct use of the park/preserve (see the sidebar on page 5-14, "*The South Mountains in Phoenix's Sonoran Preserve System*") as well as describing the importance of the park in the region. City of Phoenix planning efforts since the mid-1980s illustrate an awareness of the potential for the proposed freeway to affect Phoenix South Mountain Park/ Preserve. In 1989, the South Mountain Park Master Plan was adopted by the Phoenix City Council. The master plan shows the freeway alignment as adopted by the State Transportation Board in 1988. In 1990, the South Mountain Preserve Act was ratified by the Arizona Legislature. The Act did not apply to roadways through a designated mountain preserve if the roadway was in the State Highway System prior to August 15, 1990. The proposed freeway was in the State Highway System prior to 1990. Records prior to the Act suggest a primary reason for the exception was to allow the proposed freeway to go through Phoenix South Mountain Park/ Preserve (see Draft Environmental Impact Statement page 5-14). The project team examined alternatives to avoid the park, but did not identify any feasible and prudent alternatives to avoid impacts. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see pages S-39 and 5-31 of the Draft Environmental Impact Statement). The Arizona Department of Transportation continues to work with park stakeholders to minimize impacts and address concerns. Measures to minimize harm to the park were developed (see the Draft Environmental Impact Statement, starting on page 5-23).

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421	Let us not forget that South Mountain is home to many living species. The DEIS mentioned (Chapter 4) that ADOT was aware that the desert tortoise is a threatened species and that many animals and plants would be permanently affected by the SMF, particularly in South Mountain. However, their mitigation plan is basically to be careful to destroy as few of the living species and their habitat as possible. The SMF would try to put in replacement migration routes for South Mountain animals that migrate to and from the Sierra Estrella. And that's it. The desert tortoise population (especially sensitive since it is a threatened species) would just be diminished, as would its habitat and that of all the species that inhabit the western part of South Mountain. Additional issues that the DEIS does not consider include: • The Sonoran Desert was listed in 2011 as one of the 12 most threatened landscapes in the US by the Cultural Landscape Foundation. Further fragmentation of an endangered ecosystem would have a significantly negative impact. • The increase in fire danger would further threaten a desert ecosystem that has not evolved with fire. • A highway through the ecosystem would increase the types of invasive species and increase their spread because the highway would provide a corridor for their movement. • With the increase in pollutants, there would be an increase in the hazard to humans who hike and bike in South Mountain Park, particularly on the west end. The hazard is not only that the highway would increase the pollutants in the park but also that the activities of walking and bicycling increase exposure to air pollutants. • The increased air pollutants due to the proximity of the highway would also negatively affect many plants, whether airborne or in the soil. • South Mountain contains many iconic plants, such as ironwood, saguaro, Arizona Queen of the Night, elephant tree, ocotillo. Construction kills plants. Those that are removed to be replanted, such as saguaro, historically experience a very high mortality rate. • Specialized species such as elephant tree and saguaro will respond negatively due to loss of habitat. • The western part of South Mountain Park currently has a healthier ecosystem than the eastern or central part of the park because it is a more isolated area and those who use it don't typically abuse it. It provides a sense of wilderness not experienced in any other City Preserve. A highway through the western end of the park would destroy the wilderness and make it the least healthy part of the park.
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421	**Biology, Plants, and Wildlife**	The section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-125 of the Draft Environmental Impact Statement, discloses by what means the proposed action and its alternatives would affect vegetation, wildlife, and wildlife habitat. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the Sonoran desert tortoise. The information used to prepare the analysis in the Draft Environmental Impact Statement (page 4-122) was based on 2011 information retrieved from the Arizona Game and Fish Department (Gopherus agassizii, draft unpublished abstract compiled and edited by the Heritage Data Management System, Phoenix). Current information on threats and connectivity strategies was included in the Biological Evaluation. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). Connectivity is planned to allow wildlife movement beneath the freeway in multiuse crossings (see page 4-125 of the Draft Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use as well as culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
422	**Biology, Plants, and Wildlife**	The comment reflects a concern associated with the cumulative impacts of the proposed action on habitat in the region. A discussion of cumulative impacts addressing this issue can be found in the section, *Secondary and Cumulative Impacts*, beginning on page 4-167 of the Draft Environmental Impact Statement. The proposed project is located primarily adjacent to already developed areas except for at the southwest end of the South Mountains. In this area, multifunctional crossing structures are planned at locations where natural movement corridors occur along major drainages (see pages 4-125, 4-126 and Figure 3-25 on page 3-47 of the Draft Environmental Impact Statement).
423	**Biology, Plants, and Wildlife**	The comment implies that the proposed action would be directly responsible for increased fire potential. While a new road facility could increase the chance of fires originating from cigarettes tossed out windows or from vehicles catching fire on the roadside, the Arizona Department of Transportation designs urban roadside landscaping to minimize the chance of roadside fires spreading beyond the right-of-way. Fires originating on urban highways and spreading to natural preserves is not an issue on similar facilities in the Phoenix area, such as State Route 51 and State Route 101L.
424	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation regularly implements mitigation measures to control and minimize the presence of invasive and noxious species on its facilities and would do the same for this project, in compliance with Executive Order 13112. This requirement is described on page 4-119 of the Draft Environmental Impact Statement. This includes identifying, controlling, and monitoring for invasive species as well as prevention of their incidence in areas where they are not presently found. The Order also includes restoration of native plant species where invasive plant species are found.

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Let us not forget that South Mountain is home to many living species. The DEIS mentioned (Chapter 4) that ADOT was aware that the desert tortoise is a threatened species and that many animals and plants would be permanently affected by the SMF, particularly in South Mountain. However, their mitigation plan is basically to be careful to destroy as few of the living species and their habitat as possible. The SMF would try to put in replacement migration routes for South Mountain animals that migrate to and from the Sierra Estrella. And that's it. The desert tortoise population (especially sensitive since it is a threatened species) would just be diminished, as would its habitat and that of all the species that inhabit the western part of South Mountain.

Additional issues that the DEIS does not consider include:

- The Sonoran Desert was listed in 2011 as one of the 12 most threatened landscapes in the US by the Cultural Landscape Foundation. Further fragmentation of an endangered ecosystem would have a significantly negative impact.
- The increase in fire danger would further threaten a desert ecosystem that has not evolved with fire.
- A highway through the ecosystem would increase the types of invasive species and increase their spread because the highway would provide a corridor for their movement.

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- With the increase in pollutants, there would be an increase in the hazard to humans who hike and bike in South Mountain Park, particularly on the west end. The hazard is not only that the highway would increase the pollutants in the park but also that the activities of walking and bicycling increase exposure to air pollutants.

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- The increased air pollutants due to the proximity of the highway would also negatively affect many plants, whether airborne or in the soil.

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- South Mountain contains many iconic plants, such as ironwood, saguaro, Arizona Queen of the Night, elephant tree, ocotillo. Construction kills plants. Those that are removed to be replanted, such as saguaro, historically experience a very high mortality rate.

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- Specialized species such as elephant tree and saguaro will respond negatively due to loss of habitat.

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- The western part of South Mountain Park currently has a healthier ecosystem than the eastern or central part of the park because it is a more isolated area and those who use it don't typically abuse it. It provides a sense of wilderness not experienced in any other City Preserve. A highway through the western end of the park would destroy the wilderness and make it the least healthy part of the park.

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Code	Issue	Response
425	**Air Quality**	The contribution of mobile sources (traffic) to air quality in the Study Area is addressed beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
426	**Air Quality**	The contribution of mobile sources (traffic) to air quality in the Study Area is addressed beginning on page 4-68 of the Final Environmental Impact Statement. As noted on page 4-69 of the Final Environmental Impact Statement, secondary standards are promulgated to minimize environmental and property damage. Many of the criteria pollutants do not have secondary standards. Primary and secondary standards for particulate matter (PM_{10}) are identical; no threshold is established by the U.S. Environmental Protection Agency for carbon monoxide (CO). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones (see discussion beginning on page 4-68 of the Final Environmental Impact Statement).
427	**Biology, Plants, and Wildlife**	Improved techniques and knowledge regarding the transplanting of protected native plants in Arizona have increased survival rates. The Arizona Department of Transportation has considerable experience transplanting native plants protected by the Arizona Native Plant Law and has experienced a high survival rate. The Arizona Department of Transportation has conducted studies on the best methods to use for transplanting desert species, particularly ironwood trees and saguaros, and was honored by the American Society of Landscape Architects in 2012 for this work. The research results have been incorporated in the procedures for plant salvage for Arizona Department of Transportation projects and throughout the industry. Reports on the research findings are available from the Arizona Department of Transportation Research Center at <azdot.gov/planning/research-center/research/research-reports>.
428	**Biology, Plants, and Wildlife**	Transplanting of protected native plants has been highly successful with application of proper techniques. The loss of habitat is not expected to cause individual nearby plants to respond.
429	**Biology, Plants, and Wildlife**	Information regarding the context and attributes of the South Mountains is described in the Draft and Final Environmental Impact Statements. The habitat characteristics of the Study Area, including those habitats within the park/preserve, can be found in the section, *Biological Resources*, beginning on page 4-125 of the Final Environmental Impact Statement.

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430 All these negative effects on the South Mountain Preserve are completely unacceptable to all who care about the preservation of the Phoenix mountains – and that is the majority of the population of Phoenix.

431 **Environmental Justice**

Three fundamental environmental justice principles apply to the transportation project development process:

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

432 The JATAP monitoring at the St. Johns monitoring site on the GRIC found certain air toxics attributed to "mobile sources," or vehicular traffic burning hydrocarbons. These findings of the air toxics were alarmingly high, many times the "accepted" cancer risk standard set by USEPA.

The St. Johns monitoring site's highest toxic findings:

- formaldehyde at 34 times this standard;
- benzene at 8 times this standard;
- 1,3 butadiene at 7.5 times this standard; and
- acetaldehyde at 3.4 times this standard.

The JATAP study also found that three other air toxics associated with transportation exhaust, Ethylbenzene, m,p-Xylene, and o-Xylene, were detected over 50% of the time at levels above the Maximum Daily Limit set by the state health department.

Residents of the GRIC living around and adjacent to the monitoring site are currently being subjected to all of these carcinogens, not just one. And if a freeway were to be built near this monitoring site on the GRIC, there would be more air toxics in addition to the ones detected at levels that far exceed the USEPA risk standard.

One of the JATAP's findings presented to the EPA National Air Monitoring Conference in November 2006 was, "Annual average concentrations of formaldehyde, acetaldehyde, benzene and 1,3 butadiene were on the high end of the range reported in EPA funded assessments of other US cities." This finding relates to any future proposed freeway in the JATAP study area, which includes in entirety the route of the proposed SMF. It also has huge environmental justice implications

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Code	Issue	Response
430	**Section 4(f) and Section 6(f)**	Chapter 5, *Section 4(f) Evaluation*, and the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement, disclose the potential impacts on the collective resources associated with the South Mountains. Use of the mountains for the purposes of the proposed freeway represents two-tenths of one percent of the total mountain range. Since 1988, and as part of this environmental impact statement process, several measures have been undertaken and will be undertaken to further reduce effects on the mountains. These measures, including narrowing the design footprint, acquiring replacement land immediately adjacent to the mountains, and the provision of highway crossings, are outlined in the *Cultural Resources* and *Biological Resources* sections of Chapter 4 and in text beginning on page 5-23 of the Final Environmental Impact Statement.
431	**Environmental Justice and Title VI**	The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
432	**Air Quality**	40 Code of Federal Regulations Section 1500.1(b) also directs the Federal Highway Administration to focus its National Environmental Policy Act analysis and documentation on issues that are truly significant to the action in question. In the context of mobile source air toxics, the Federal Highway Administration must consider whether changes in mobile source air toxics emissions attributable to a project have the potential for significant health risk. Using cancer risk as an example, the U.S. Environmental Protection Agency estimates that the overall risk of cancer in the United States is approximately 330,000 in a million, and that air toxics (from all sources) are responsible for a risk of approximately 50 in a million. In its most recent mobile source air toxics rule-making, the U.S. Environmental Protection Agency estimated mobile source air toxics cancer risk, after implementation of emissions controls, at approximately 5 in a million (or 0.0015 percent of overall cancer risk from any cause). For the South Mountain Freeway project, the mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). Like most highway projects that have received a mobile source air toxics emissions analysis, the South Mountain Freeway project would result in a negligible change to a very small component of overall cancer risk, and this risk is declining regardless of alternative.

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because, in other words, some of the worst air in the country, in terms of air toxics, was found in the JATAP study, and the high readings on the GRIC are among these highest readings.

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So the air toxics are already worse than many other areas of the United States, and the proposed freeway would add even more. Obviously, adding more vehicular traffic emissions by building a freeway where there had not been one would add to this toxic burden. Yet despite its claims about environmental justice, these real environmental problems were not mentioned in the DEIS, nor was a plan to mitigate these impacts ever mentioned.

The JATAP also showed serious air toxics problems at the West and South Phoenix monitoring sites, and these monitoring sites are in the midst of other low-income and ethnic minority communities, mostly of Hispanic origin. These would also be exacerbated by the addition of another source of mobile toxics. The JATAP and its results mentioned "toxic hot spots near freeways" specifically because freeways cause toxic hotspots for air toxics.

It appears that ADOT and HDR would sacrifice human health and safety to accomplish their goal of building the SMF, and would rather see people on the GRIC, West and South Phoenix suffer and die from cancer than simply conduct an honest and objective NEPA process. That appears to be a violation of the civil rights of the GRIC residents near the St. Johns JATAP monitoring site, as well as the low-income and ethnic minority communities of West and South Phoenix.

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The failure to properly analyze and/or address the air toxics information from the JATAP study is a deliberate violation of the very Environmental Justice issues that ADOT and FHWA claim to be observing. One must conclude that the DEIS itself is an extreme example of environmental injustice, despite its assertions.

The GRIC areas along the proposed freeway have extremely limited access and egress. A chlorine incident and the potential consequences of that are detailed in the comments regarding the DEIS' complete failure to even mention the risks from a hazardous materials incident, much less mitigating the risks. Such an incident would certainly doom the residents of the GRIC around the 51st Avenue pass. This is another severe example of environmental injustice, as no consideration is made for the lifestyle of the Native Americans on the GRIC, and no plan or means for preparing for response to such a disaster is even mentioned in the DEIS.

There is mention in the DEIS of a myriad of organizations and tribes that were approached about the DEIS, but not one environmental justice group in South or West Phoenix, or on the GRIC, were ever contacted. That has to be a deliberate step, as some of these groups even tried to approach ADOT and were rebuffed.

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Code	Issue	Response
432 (cont.)		Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics.
433	**Title VI and Environmental Justice**	For the South Mountain Freeway project, the mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). Like most highway projects that have received a mobile source air toxics emissions analysis, the South Mountain Freeway project would result in a negligible change to a very small component of overall cancer risk, and this risk is declining regardless of alternative.
434	**Environmental Justice and Title VI**	40 Code of Federal Regulations Section 1500.1(b) also directs the Federal Highway Administration to focus its National Environmental Policy Act analysis and documentation on issues that are truly significant to the action in question. In the context of mobile source air toxics, the Federal Highway Administration must consider whether changes in mobile source air toxics emissions attributable to a project have the potential for significant health risk. Using cancer risk as an example, the U.S. Environmental Protection Agency estimates that the overall risk of cancer in the United States is approximately 330,000 in a million, and that air toxics (from all sources) are responsible for a risk of approximately 50 in a million. In its most recent mobile source air toxics rule-making, the U.S. Environmental Protection Agency estimated mobile source air toxics cancer risk, after implementation of emissions controls, at approximately 5 in a million (or 0.0015 percent of overall cancer risk from any cause). For the South Mountain Freeway project, the mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). Like most highway projects that have received a mobile source air toxics emissions analysis, the South Mountain Freeway project would result in a negligible change to a very small component of overall cancer risk, and this risk is declining regardless of alternative.

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because, in other words, some of the worst air in the country, in terms of air toxics, was found in the JATAP study, and the high readings on the GRIC are among these highest readings.

So the air toxics are already worse than many other areas of the United States, and the proposed freeway would add even more. Obviously, adding more vehicular traffic emissions by building a freeway where there had not been one would add to this toxic burden. Yet despite its claims about environmental justice, these real environmental problems were not mentioned in the DEIS, nor was a plan to mitigate these impacts ever mentioned.

The JATAP also showed serious air toxics problems at the West and South Phoenix monitoring sites, and these monitoring sites are in the midst of other low-income and ethnic minority communities, mostly of Hispanic origin. These would also be exacerbated by the addition of another source of mobile toxics. The JATAP and its results mentioned "toxic hot spots near freeways" specifically because freeways cause toxic hotspots for air toxics.

It appears that ADOT and HDR would sacrifice human health and safety to accomplish their goal of building the SMF, and would rather see people on the GRIC, West and South Phoenix suffer and die from cancer than simply conduct an honest and objective NEPA process. That appears to be a violation of the civil rights of the GRIC residents near the St. Johns JATAP monitoring site, as well as the low-income and ethnic minority communities of West and South Phoenix.

The failure to properly analyze and/or address the air toxics information from the JATAP study is a deliberate violation of the very Environmental Justice issues that ADOT and FHWA claim to be observing. One must conclude that the DEIS itself is an extreme example of environmental injustice, despite its assertions.

435 The GRIC areas along the proposed freeway have extremely limited access and egress. A chlorine incident and the potential consequences of that are detailed in the comments regarding the DEIS' complete failure to even mention the risks from a hazardous materials incident, much less mitigating the risks. Such an incident would certainly doom the residents of the GRIC around the 51st Avenue pass. This is another severe example of environmental injustice, as no consideration is made for the lifestyle of the Native Americans on the GRIC, and no plan or means for preparing for response to such a disaster is even mentioned in the DEIS.

436 There is mention in the DEIS of a myriad of organizations and tribes that were approached about the DEIS, but not one environmental justice group in South or West Phoenix, or on the GRIC, were ever contacted. That has to be a deliberate step, as some of these groups even tried to approach ADOT and were rebuffed.

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434 (cont.)		Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics.
435	**Title VI and Environmental Justice**	According to 46 *Federal Register* 18026 (March 23, 1981), the environmental impact statement must discuss reasonably foreseeable actions. These are actions that are likely to occur or probable, rather than those that are merely possible. There are no requirements in 23 Code of Federal Regulations 771 Environmental Impact and Related Procedures or in the Federal Highway Administration Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents to address releases of hazardous chemicals due to a transportation incident in National Environmental Policy Act documents for transportation projects like the proposed action. As discussed above, reasonably foreseeable actions are those that are likely to occur or probable, rather than those that are merely possible. If the proposed action is the Selected Alternative in the record of decision, planning for emergency situations would be initiated. If the plan is amended, it is made available to the Arizona Department of Transportation. The referenced populations are no more uniquely exposed to such an occurrence than other population segments within the Study Area.
436	**Public Involvement**	The Arizona Department of Transportation and Federal Highway Administration provided equal access to the public participation process to the Gila River Indian Community and its members. The Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received. Chapter 2 of the Final Environmental Impact Statement is dedicated to explaining the Gila River Indian Community outreach undertaken for the project. The Gila River Indian Community was provided the same opportunities to participate in the project as all other populations and agencies. The Arizona Department of Transportation advertisement efforts of the public hearing and public forums are documented in Chapter 6 of the Final Environmental Impact Statement beginning on page 6-23. The Gila River Indian Community Communication and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communication and Public Affairs Office. Advertisement text regarding the project, the public comment period, the public hearing, and the various ways for the public to submit comments regarding the South Mountain Freeway Draft Environmental Impact Statement was given to the Gila River Indian Community's Public Information Officer at the

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437	**Religious and Racial Discrimination and Civil Rights Violations** Throughout the DEIS, it is acknowledged that the GRIC and other native American tribes hold *Muhadagi Doog* as a sacred site. From the actual language of the DEIS: "The South Mountains are highly valued and considered sacred by some Native American communities. The Community, which includes the Akimel O'odham (River Pima) and Pee Posh (Maricopa) tribes, and other Native American entities—including the Colorado River Indian Tribes and three O'odham groups: the Salt River Pima-Maricopa Indian Community, the Ak-Chin Community, and the Tohono O'odham Nation—consider the South Mountains to play a role in their cultures, identities, histories, and oral traditions." There is plenty of correspondence in the DEIS and its Appendices in which the GRIC repeatedly asserts and reminds ADOT of this, to no avail. ADOT plans to blast *Muhadagi Doog*. If we were to take a look at the same issue and frame it as a danger to a sacred site that plays a role in cultures, identities, histories, and oral traditions of a white, European-based religion, such as the Roman Catholic Church, we can illuminate how this is clearly religious discrimination, and likely racial discrimination. If Rome, Italy decided there needed to be a freeway that would go through the Vatican and take out just a very small part of the Sistine Chapel, that would be unthinkable to people of the Roman Catholic faith worldwide. Think of the outrage and outcry such a proposal would muster! So what is the difference between the Roman Catholics' beliefs, and *Muhadagi Doog* and the "Native American entities?" Aside from the obvious differences in the race and number of people who practice the religions, the Sistine Chapel is located in Vatican territory. The Vatican is a separate political entity as is the GRIC, so the Vatican can prevent Rome from putting a highway through its territory just as the GRIC can prevent ADOT from putting one through its territory. But the borders of Indian Reservations were arbitrarily determined by white men, and South Mountain didn't happen to end up on the GRIC. So the only recourse of the Gila River and other tribes is to remind ADOT that South Mountain is sacred to them. ADOT acknowledges this but it suits their purpose to say they will just "mitigate it" as they build the SMF.
438	This attitude and planned action deliberately and intentionally violates the civil rights of the "Native American entities." In a 1979 consultation on the issue, the United States commission on civil rights defined religious discrimination in relation to the civil rights guaranteed by the Fourteenth Amendment to the United States Constitution. [Section 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property,
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436 (cont.)		Transportation Technical Team meeting on April 30, 2013. Two advertisements regarding the public hearing, information regarding the location and availability of the Draft Environmental Impact Statement, and a map of the alternatives was placed in the May 2013 monthly issue of the *Gila River Indian News*. The Arizona Department of Transportation Community Relations distributed electronic notices (e-newsletters) through the Government Delivery system to over 12,000 constituents who voluntarily signed up for project alerts along Interstate 10 (Papago, Maricopa, and Santan Freeways). These electronic notices included notice of availability of the Draft Environmental Impact Statement (distributed on April 26, 2013); date of the public hearing (distributed on May 10, 2013); dates of the community forums (distributed on May 29, 2013); and notification in June regarding the close of the Draft Environmental Impact Statement public comment period. In addition, anyone who had attended a previous meeting regarding the proposed action and signed in received all of this information mailed individually. On May 6, 2013, 73,564 mailers were distributed to addresses within the Study Area. The Arizona Department of Transportation provided vouchers for public hearing parking and for public transit to the hearing. For the first time in the State's history, a shuttle bus to the hearing was provided from six locations in the Phoenix area, including two on the Gila River Indian Community (Komatke Boys & Girls Club and the Governance Center in Sacaton). All ads provided telephone numbers and electronic contact information regarding information on the shuttle schedules and pick-up locations.
437	**Cultural Resources**	The cultural and religious places of importance, like the South Mountains, are acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community.
438	**Cultural Resources**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28.

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without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.]

As for racial discrimination, the equal protection clause was originally added to deal with the lack of equal protection provided by law to all in the course of administering justice in the states that had Black codes.

The United States commission on civil rights noted, "Whereas religious civil liberties, such as the right to hold or not to hold a religious belief, are essential for Freedom of Religion (in the United States secured by the First Amendment), religious discrimination occurs when someone is denied "the equal protection of the laws, equality of status under the law, equal treatment in the administration of justice, and equality of opportunity and access to employment, education, housing, public services and facilities, and public accommodation because of their exercise of their right to religious freedom."

Also, the American Indian Religious Freedom Act (AIRFA) is a US federal law and a joint resolution of Congress that was passed in 1978. It was created to protect and preserve the traditional religious rights and cultural practices of American Indians, Eskimos, Aleuts and Native Hawaiians. These rights include, but are not limited to, access of sacred sites, repatriation of sacred objects held in museums, freedom to worship through ceremonial and traditional rites, including within prisons, and use and possession of objects considered sacred. The Act required policies of all governmental agencies to eliminate interference with the free exercise of Native religion, based on the First Amendment, and to accommodate access to and use of religious sites to the extent that the use is practicable and is not inconsistent with an agency's essential functions. It also acknowledged the prior violation of that right.

Clearly, the No Build Alternative is the only viable option that does not constitute a violation of the 14th Amendment to the Constitution and a violation of the AIRFA as any freeway alternative proposed in the DEIS of the SMF requires blasting away part of *Muhadagi Doog*.

Fiscal Impacts

While the SMF would have little positive economic benefit for the state or its residents, it would have adverse economic impacts for numerous reasons, including:

- The loss of approximately one billion dollars in Federal Highway funds at least once right away, and possibly many times later on, because the increase in air pollution would cause exceedences of required standards
- The cost of constructing the SMF, which would end up being far more than the two billions dollars currently predicted by ADOT because of all the issues not properly analyzed in the DEIS
- The loss of value to State Trust Land 620
- The loss of taxes from destroyed homes
- The loss of revenue from affected HOAs

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Code	Issue	Response
438 (cont.)		Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
439	**Cultural Resources**	The American Indian Religious Freedom Act, 42 United States Code Section 1996, provides a policy statement of the United States to "protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian . . . including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites." The Arizona Department of Transportation and Federal Highway Administration complied with the policy stated in the American Indian Religious Freedom Act throughout the environmental impact statement process, as evidenced by consultation efforts, mitigation measures, and a discussion of cultural resources issues in the Draft Environmental Impact Statement. The study would not violate the American Indian Religious Freedom Act because, as stated above, members of the Gila River Indian Community would not be prohibited from continuing to practice their beliefs even if the project goes forward because access to the mountain would be maintained, impacts would be mitigated based on input by the Gila River Indian Community and others, and only a small fraction of the mountain would be affected.
440	**Purpose and Need**	The No-Action Alternative would not satisfy the purpose and need of this important regional transportation project. The E1 Alternative, designed to mitigate impacts as discussed in the Draft Environmental Impact Statement, would not violate the American Indian Religious Freedom Act or the Fourteenth Amendment.

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without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.]

As for racial discrimination, the equal protection clause was originally added to deal with the lack of equal protection provided by law to all in the course of administering justice in the states that had Black codes.

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442

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- The cost of constructing the SMF, which would end up being far more than the two billions dollars currently predicted by ADOT because of all the issues not properly analyzed in the DEIS
- The loss of value to State Trust Land 620
- The loss of taxes from destroyed homes
- The loss of revenue from affected HOAs

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Code	Issue	Response
441	**Economics**	In 2004, the City of Phoenix hired Crystal and Company to perform an analysis of the fiscal, economic, and social impacts of three potential alignments for the South Mountain Freeway. Relative to the Preferred Alternative (W59 and E1 Alternatives), the analysts estimated that, at build-out, the proposed freeway would create over 86,400 jobs and result in annual sales and property tax receipts in excess of $86.5 million. The study estimated that build-out would take approximately 20 years from freeway completion. The traveling public would also benefit from the proposed freeway. When considering travel time savings, this benefit averages approximately $200 million per year between 2020 and 2035 (see Table 4-27 on page 4-67 of the Final Environmental Impact Statement).
442	**Alternatives**	The contribution of mobile sources (traffic) to air quality in the Study Area is addressed beginning on page 4-58 of the Draft Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations,increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones; therefore, no federal funding would be jeopardized. Cost estimates for the proposed freeway, as described beginning on page 3-59 of the Draft Environmental Impact Statement, were developed in accordance with accepted engineering practices by professional engineers. The Arizona Department of Transportation, Federal Highway Administration, Maricopa Association of Governments, and their consultants have peer-reviewed the proposed project's cost estimates in terms of both the quantities and unit costs used in the estimates. In each case, the estimates were found to be reasonable and accurate. The Arizona State Land Department would be compensated for the land acquired as part of freeway construction. The remaining land would continue to be valuable and might have increased value with the improved access provided by the proposed freeway. Impacts on property and sales tax revenues are quantified in the section, *Economic Impacts*, beginning on page 4-46. These impacts would be inconsequential when considered in the context of total tax revenues the City of Phoenix now collects and anticipates collecting in the future. Homeowners associations would be compensated for property acquired for construction of the freeway in accordance with State law. The cost of relocating utilities is included in the total costs presented in the Draft Environmental Impact Statement. It is assumed the reference to the superfund site is to the West Van Buren Water Quality Assurance Revolving Fund site. This site would not be affected by construction of the freeway. The Arizona Department of Transportation is experienced with handling drainage and erosion because they are important issues on every construction project. To minimize these issues, standard practices would be employed with construction, operation, and maintenance of the proposed freeway. Maintenance costs are considered in the project development and are planned in the Arizona Department of Transportation's budget.

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- The cost of moving utilities from Pecos Road
- The cost of cleaning up one superfund site
- The cost of constantly dealing with issues related to drainage and erosion
- The cost of maintaining the freeway

443

Overall Impact on Quality of Life

The negative impact on the community of Ahwatukee Foothills cannot be overstated. The SMF would destroy the type of community that it currently is – one known for peace and quiet. The community has historically experienced a low crime rate, and this would be radically changed upward. Since Ahwatukee Foothills terrain rises away from Pecos Road, views and noise will affect homes up to one mile north of Pecos. Because of the traffic problems that would occur from forcing so much more traffic on arterial streets, response time of police and fire units would suffer significantly. Top-rated schools would very likely be downgraded because of a change in the character of the region.

444

Hundreds of people use Pecos Road for training, cycling, running, skating, etc. Pecos Road is also the site of an annual Senior Olympics Cycling event. They would all experience a loss of recreational opportunities.

445

During times of freeway accidents or maintenance, commercial vehicles, including hazmats, in addition to passenger vehicles would be routed onto adjacent neighborhood arterial streets.

Overall, the impact of the SMF would have very little positive effect on traffic, air pollution, or people in the region. It would provide the people of Laveen and the O&D trucks in the area around 51st Avenue a conduit to I-10, but this could be accomplished by just building a spur freeway from I-10 West to Laveen. On the other hand, the overall negative effects of the SMF would be extreme for the GRIC, Ahwatukee Foothills, South Mountain, and the environment. This demands a selection of the No Build option for the SMF.

Respectfully submitted,

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16426 S 2nd Place
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President, Protecting Arizona's Resources & Children (PARC)
Member, Phoenix Mountains Preservation Council (PMPC)
Member, Sierra Club
Member, Gila River Alliance for a Clean Environment (GRACE)

Code	Issue	Response
443	**Alternatives**	While the E1 Alternative is adjacent to largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see page 4-91 of the Draft Environmental Impact Statement). The proposed freeway would not adversely affect north–south access because the land immediately south of Pecos Road is Gila River Indian Community land, with no existing north–south access. (See the E1 portion of Table 4-9, on page 4-27 Draft Environmental Impact Statement.) While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, it did note that based on its experience there does not appear to be a correlation between crime rates and freeways. Average daily traffic volumes on freeways and arterial streets are projected to increase substantially in and adjacent to the Study Area between 2010 and 2035. Contrary to the statement in the comment, the Draft Environmental Impact Statement notes that the proposed freeway would avert the congestion anticipated on arterial roads. As noted in the Draft Environmental Impact Statement, "The No-Action Alternative would not alleviate projected increases in traffic volumes and congestion on the Interstate and regional freeway systems or on the local street network by the design year 2035. It would instead, lead to worsening traffic congestion and substantial related impacts" (see page S-8 of the Draft Environmental Impact Statement). There is no evidence that the proposed facility would cause people to leave the area. The regions' benefits would remain, and improved access to residences and businesses would make them more desirable.
444	**Alternatives**	The main line of the E1 Alternative would not have a bicycle route as part of the design. Continuous east–west riding would be possible in the neighborhoods adjoining the alternative and along Chandler Boulevard.
445	**Traffic**	Emergency responders would address the construction of the proposed freeway by amending the local emergency response plan to include the facility.

Code	Comment Document

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- The cost of cleaning up one superfund site
- The cost of constantly dealing with issues related to drainage and erosion
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Code	Issue	Response
446	**Alternatives**	The benefits of the proposed freeway in comparison with the No-Action Alternative are described throughout the Draft and Final Environmental Impact Statements. According to 23 Code of Federal Regulations §771.111(f)," the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope...". The proposed action should satisfy the project need and should be considered in the context of the local area socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need. The No-Action Alternative is included for detailed study in accordance with National Environmental Policy Act requirements to compare beneficial and adverse impacts of the action alternatives with those benefits and consequences (adverse impacts) of not proceeding with one of the action alternatives. (Impacts can occur through choosing to do nothing.) The No-Action Alternative would not satisfy the purpose and need of the proposed action (see page 3-40 of the Draft Environmental Impact Statement). The Arizona Department of Transportation, with concurrence from the Federal Highway Administration, identified the W59 and E1 Alternatives as the Preferred Alternative.

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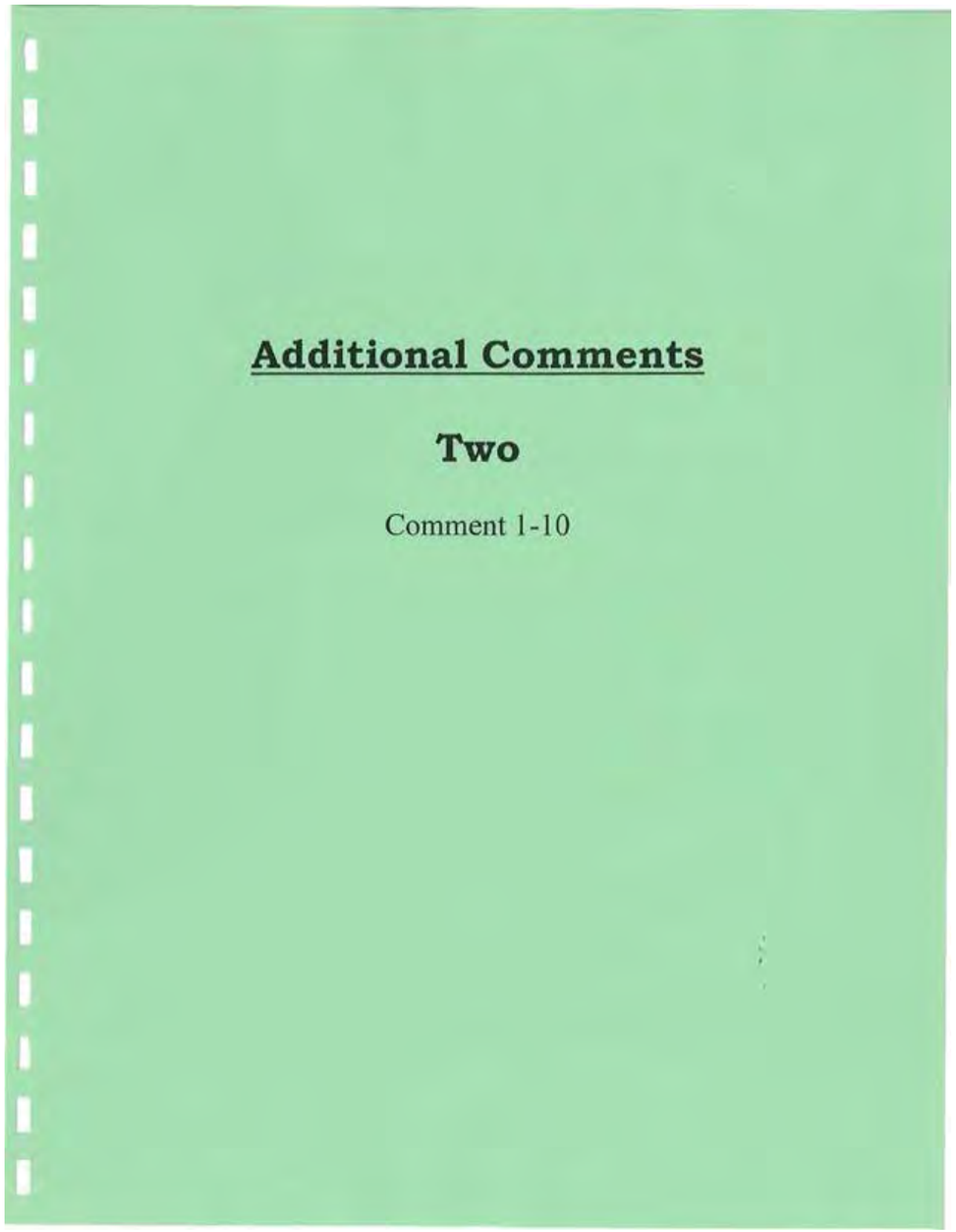

Additional Comments

Two

Comment 1-10

Code	Issue	Response

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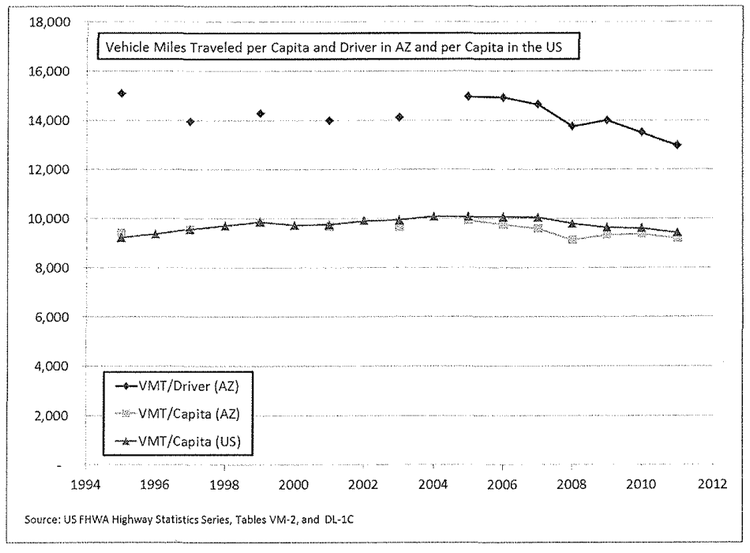
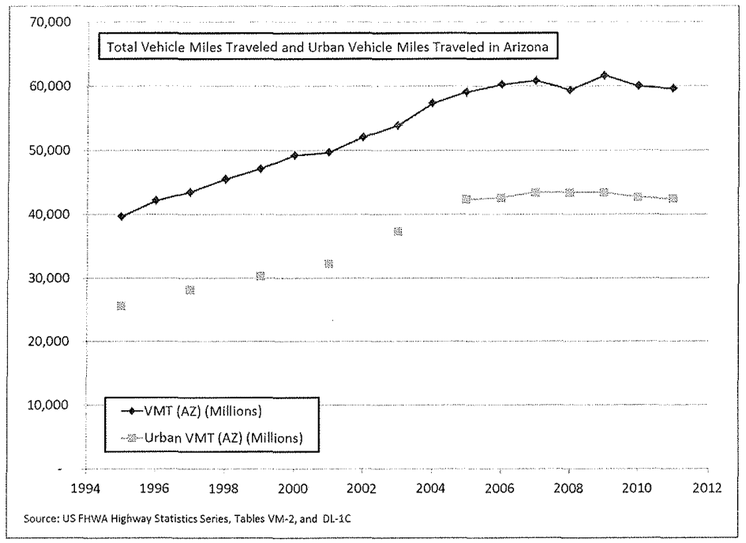
447	**Comment 1.** Figure 1-4 and MAG's travel projections seem to be just linear extensions of long-term trends. But trends in the last decade show stagnation in VMT growth even with population and before the economic downturn. The three figures below show the actual travel trends in Arizona and the United States since 1995. Note that stagnation in travel and declines of nearly 10% in per capita and per driver travel began before the 2008 recession. Recent data show little evidence of recovery in both total and urban travel in Arizona and show a continued decline in travel per capita. If these last decade's actual trends are projected out, there would be much slower growth in VMT in the long run. Thus, we strongly question the basic assumption upon which the entire proposed project rests – continued strong growth in vehicle travel. In fact, we must also question what data was used to develop the trend lines shown in Figure 1-4, since there has been no increase in VMT in Arizona in nearly seven years. It would appear that only the high growth years up until the mid-2000s were used, which seems highly questionable and inaccurate. With a small adjustment in projected growth, following more closely recent trends, we suspect much of the growth in congestion used to justify the project would be erased.  Source: US FHWA Highway Statistics Series, Tables VM-2, and DL-1C

Code	Issue	Response
447	**Purpose and Need**	The information presented in Figure 1-4 and the complementary Figure 1-6 are based on historic Census data and Maricopa Association of Governments socioeconomic projections. The information is for Maricopa County, not Arizona and not the United States. The historical growth in the Maricopa Association of Governments region is discussed in the Draft Environmental Impact Statement, beginning on page 1-5. The critical factors such as available land, mild climate, affordable cost of living, and employment opportunities that led to the historical growth rates in the region remain unchanged. In Maricopa County, daily vehicle miles traveled levels increased by almost 2 percent between 2011 and 2012 and the 2012 daily vehicle miles traveled is approaching the prerecession peak in 2007. (*Source*: Arizona Department of Transportation Multimodal Planning Division Highway Performance Monitoring System Data for the calendar years 2012 and 2011). The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.

Code	Comment Document
447	

Source: US FHWA Highway Statistics Series, Tables VM-2, and DL-1C

Code	Issue	Response

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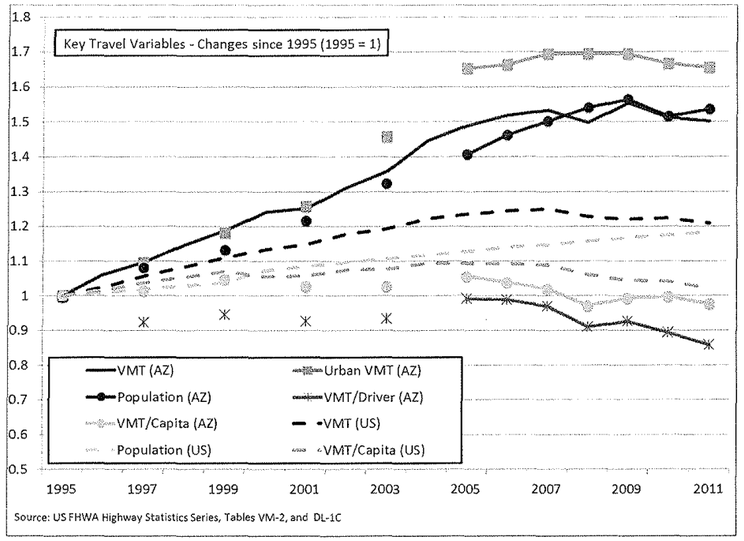
447



Source: US FHWA Highway Statistics Series, Tables VM-2, and DL-1C

448

Comment 2

Figure 1-2 – Many of the "Existing freeways" were under construction or still in planning? (SR-202, northern parts of 101?)

449

Comment 3

Figure 1-5. Are 2035 projections for population locations/growth based on actual permitting of housing units, or just on land potentially available for development?

450

Comment 4

Figure 1-7. How do the growth projections depend on the project implementation? Meaning, without the freeway, congestion in the west valley may limit growth there. Does housing permits in the west valley assume the freeway will be built? Just because they assumed there would be congestion relief doesn't mean the freeway needs to be built. Without the freeway, growth will just happen somewhere

Code	Issue	Response
448	**Purpose and Need**	While portions of State Route 202L (Red Mountain and Santan freeways) were not completed in 2003, they would be completed prior to the start of the planning horizon for the *Regional Transportation Plan* (2006 to 2026). Therefore, they were considered existing facilities during the development of the *Regional Transportation Plan*.
449	**Purpose and Need**	The 2035 projections for population are from the Maricopa Association of Governments socioeconomic projections. These projections are adopted by the Maricopa Association of Governments Regional Council to support transportation studies such as the South Mountain Freeway Draft Environmental Impact Statement. Projections are based on regional growth control totals allocated to subregions based on planned land use and existing land use patterns. Basing 2035 population on actual permitting of housing units would not provide an accurate picture of future population for the horizon year, as permits are typically acquired at the time of construction.
450	**Purpose and Need**	Growth projections for 2035 are not predicated on specific transportation improvements; rather, they are based on future land use plans, as envisioned by their respective jurisdictions. With few exceptions, land in the Study Area is privately owned; zoning requests to develop private land are typically based on these land use plans. In Phoenix in particular, development is occurring regardless of the proposed freeway. Not building the proposed freeway would not likely cause development to go elsewhere, and congestion on the arterial street network and existing freeways would continue to worsen with the No-Action Alternative.

Code	Comment Document
	else. With the freeway, on the other hand, may induce cities to permit more housing in outlying areas, which may reduce the project's effectiveness (induced demand).
451	**Comment 5** Table 3-2. Valley Metro is reportedly studying a light rail connection from Ahwatukee to Central Phoenix via Central south to Baseline to 48th Street south. The current project site is here: http://www.valleymetro.org/projects_and_planning/project_detail/south_central This doesn't mention the extension south to Ahwatukee, but there are rumors it could eventually make that connection.
452	**Comment 6** Table 3-2 and Page 3-6. The Phoenix General Plan is being currently updated from the year-2000 general plan (the last one approved). It may include significant transit oriented land use requirements. ADOT just completed a study which showed that land use can have a very significant impact on travel. http://www.ssti.us/wp/wp-content/uploads/2012/05/AZ-LandUseandTrafficCongestion2012.pdf
453	**Comment 7** Table 3-2. The non-freeway alternatives may each alone not have a large potential, but there may be synergistic effects between them when deployed together. For instance, TDM programs, along with new transit options may reinforce each other.
454	**Comment 8** Figure 1-1 – missing outline of South Mountain park preserve.
455	**Comment 9** Page 3-34. "Time savings would be experienced during peak travel times of the day. Taken individually, savings may not appear to be substantial, but when considered in the context of the hundreds of thousands of drivers, each day, over the course of numerous years, the cumulative time savings would be substantial." Models show very small improvements in travel time for the average driver. To each driver the time savings is so small that it can hardly be called a real, measurable, benefit. The "total time savings" over the entire population is meaningless, since two people's time savings can't add up to be used for any benefit.
456	**Comment 10** The section on fiscal impacts of the project, beginning on page 4-47, discusses changes in the tax base due to the conversion of land from tax-generating to transportation right of way. Another economic

Code	Issue	Response
451	**Alternatives**	The project referenced is in study phases at Valley Metro. The project, as defined, would extend to Baseline Road.
452		Comment noted.
453	**Alternatives**	As noted in Table 3-2, "*Nonfreeway Alternatives Considered and Reasons for the Elimination from Further Study*," elimination would not preclude the use of these elements in combination with the freeway mode.
454	**Alternatives**	It is not necessary to show the outline of Phoenix South Mountain Park/Preserve in the referenced figure because the map is a depiction of the Study Area and the regional context of the project.
455	**Alternatives**	The referenced information as presented in the Draft Environmental Impact Statement is based on analytical results.
456	**Neighborhoods/ Communities**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pages 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

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	impact of the freeway will be a de-valuation of residential properties near the right of way due to environmental nuisances (noise, air quality). We would like to see an estimate of this loss in property values and subsequent loss in tax base. [NOTE: ADOT could respond that there are also increases in property values due to the freeway that they are not taking into account. But, since we are interested in negative impacts, there is still a need to account for declines in property values.]

Code	Issue	Response

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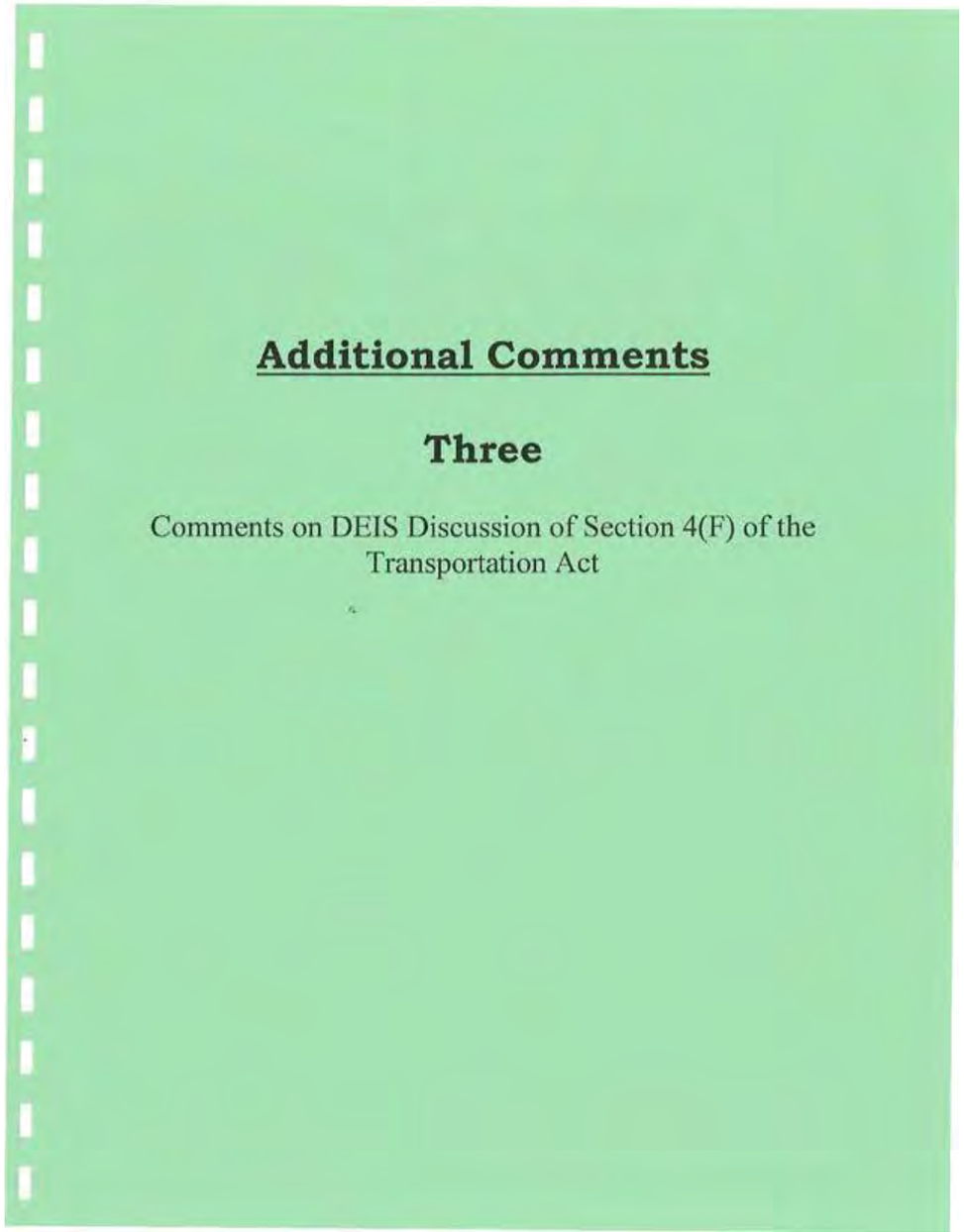


Additional Comments

Three

Comments on DEIS Discussion of Section 4(F) of the Transportation Act

Code	Issue	Response

Code	Comment Document
457	COMMENTS ON DEIS DISCUSSION OF SECTION 4(F) OF THE TRANSPORTATION ACT The South Mountain 202 Draft EIS Section 4(f) Evaluation has not adequately analyzed Section 4(f) resources in SMPP, specifically the trails which are in the western end of the study area. It has erroneously dismissed Section 4(f) resources and has neglected the identification of other Section 4(f) resources. Improper Elimination of a Section 4(f) Resource from the DEIS The following section demonstrates how the DEIS erroneous disqualification Section 4(f) resources (trails) by applying the wrong information, having a lack of knowledge of the project area and the City of Phoenix.
458	In Appendix 5-1, on page A586, the DEIS attempts to disqualify the Section 4(f) trails in the SMPP by quoting a Goal from the Circulation Element of the General Plan: "Since approximately 40 percent of all trips are less than two mile in length, bicycling and walking can help relieve roadway congestion". The DEIS continues to state that since the General Plan indicates that pedestrian trials maintained by the City of Phoenix are used for transportation and that they are not primarily recreational. It is incorrect to select the Circulation Element to qualify if the trails are for pedestrian or recreational use. The Circulation Element refers to trail/paths on the City Circulation (streets/roads) System. The trails in South Mountain are not on roads or sidewalks and not part of the Circulation Element, they are in the park and are strictly recreational, they do not serve a transportation purpose. Thus they remain Section 4(f) resources to be analyzed for direct or constructive impacts. The DEIS than uses the Recreation Element of the General Plan to assert that the City in cooperation with private developers is working to provide trails and therefore these trail are on private land and maintained by the developers and do not adhere to Section 4(f) protection. Again, the trails in South Mountain are not on private land they are on City of Phoenix public land. The National Trail, the Maricopa Trail, the Gila Trail, and the Bursera Trail are all within the park and as such are strictly recreational hiking and biking trails and they are ON public land. Thus they remain Section 4(f) resources to be analyzed for direct or constructive impacts.
459	The last paragraph on p. A586 implies that because the City gets Transportation Enhancement Activity (TEA) Funds to build trails, that the trails in South Mountain are built with TEA funds. This again is an erroneous statement. All the trails in the park fall under the purview of South Mountain and are referenced in the Open Space Element of the 2002 General Plan (P.291). These trails do not receive TEA funds, these trails are built and maintained with City of Phoenix Parks Department funds (some of which come from citizen bonds).
457	As you can see, the disqualification of trail in South Mountain based on the above assessment is inaccurate, far-reaching and just plain wrong. This shows a true lack of knowledge about the SMPP, the trails, Section 4(f) resources and a defensible analysis. Thus they remain Section 4(f) resources to be analyzed for direct or constructive impacts.

Code	Issue	Response
457	**Section 4(f) and Section 6(f)**	The newest South Mountains trails, the Bursera and the Pyramid, are more than ¼ mile from the proposed freeway and are analyzed in the Final Environmental Impact Statement on page 5-9. The trails are within ¼ mile of the planned Chandler extension and residential development; however, these trails do not have noise-sensitive activities or viewshed characteristics that contribute to their importance as Section 4(f) recreational resources. Discovery of new information not presented in a Draft Environmental Impact Statement as it is published is not failure. Review by agencies and the public of a Draft Environmental Impact Statement equates to a review of a draft report to aid the agencies in making the document more objective and defensible. In this manner, the realization of new information, if such instances of new information are validated by the federal lead agency, permits the Arizona Department of Transportation and its representatives to defensibly embellish on the document's content.
458	**Section 4(f) and Section 6(f)**	Trails within Phoenix South Mountain Park/Preserve were not eliminated. City-owned trails within the park were considered collectively as part of the City-owned park. There are no direct or constructive uses of any trails within Phoenix South Mountain Park/Preserve (see discussion beginning on page 5-14 in the Final Environmental Impact Statement).
459	**Section 4(f) and Section 6(f)**	The comment refers to a statement on page A586 of the Appendix to the Draft Environmental Impact Statement. The statement is made in a section entitled, *City of Phoenix Trails System*, which refers to the overall trails system of the City. It is also contained in a section discussing overall eligibility of trails to protection under Section 4(f). No reference to the trails within South Mountain Park/Preserve appears in this statement and there is no attempt to exclude South Mountain Park/Preserve Trails from consideration under Section 4(f). The discussion of resources afforded protection under Section 4(f) contains an analysis of the trails of the South Mountain Park/Preserve (see discussion beginning on page 5-14 of the Final Environmental Impact Statement).

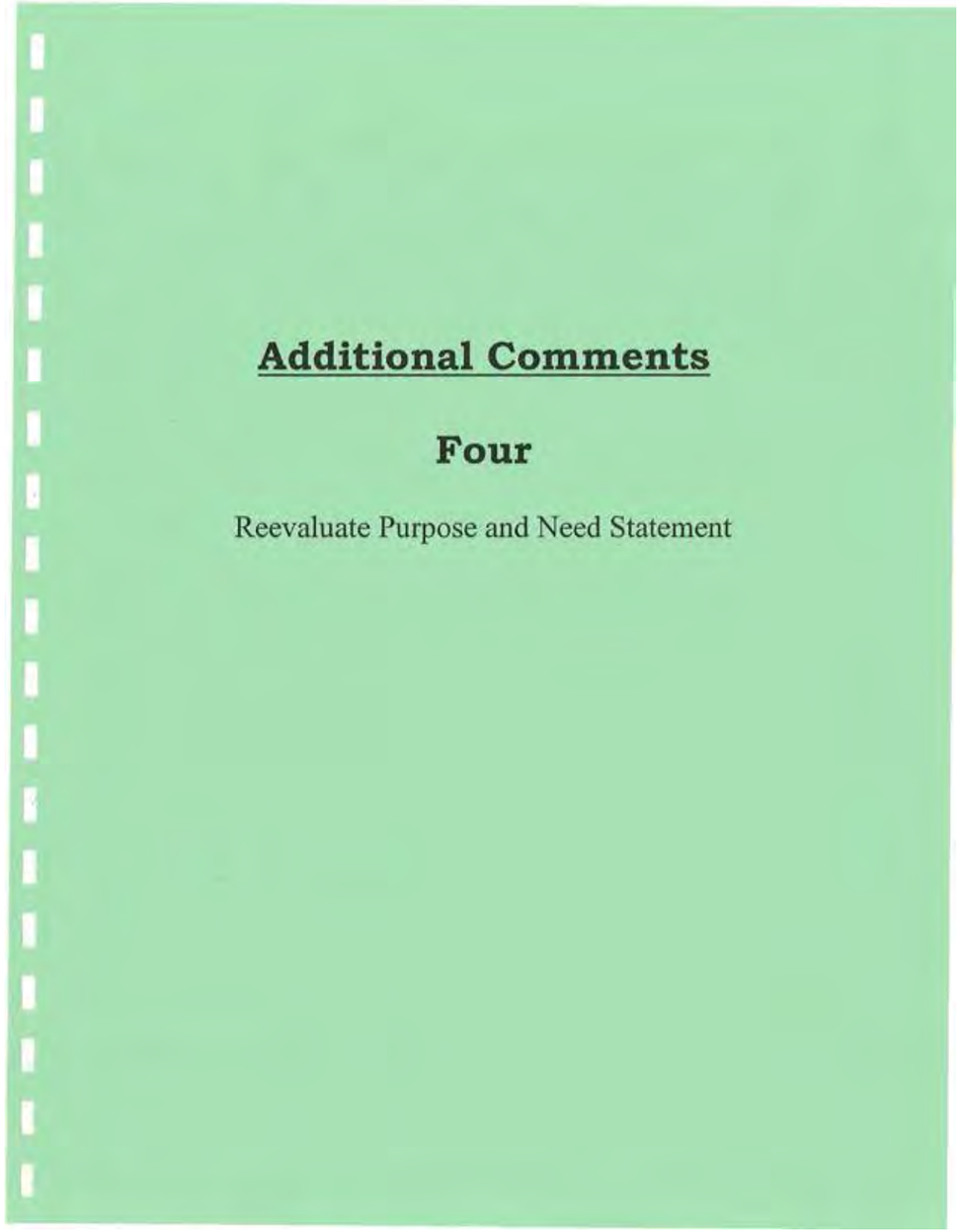
Code	Comment Document
460	Lack of Identification of Section 4(f) Resources The DEIS does not represent the existing conditions in the SMPP relative to the trails. As with many parts of the DEIS, the existing conditions and environmental consequences were authored in 2006-2008 and have not been updated. It is clear from the correspondence in the Appendix that HDR/ADOT has not revisited the study area to document the change in conditions which have occurred.
461	In 2011, the City of Phoenix constructed two new trails in the west end of SMPP. They are accessed by the future 19th Ave trailhead at the end of Chandler Blvd. The trails go west and east on the Main South Ridge. They are called the Bursera Trail and the Pyramid Trail. Additionally another trail exists in the area. It is called the Gila Trail and has been in use and recognized by the City of Phoenix for over 12 years (all identified on Google maps and Google Earth). None of these three trails are mentioned and documented in the DEIS. This is noteworthy as in Chapter 5, p 5-25 the following statement is made: "The cuts would be located in a remote portion of SMPP, not near any trail and barely visible from any of the more readily used trails."
462	Below is a picture taken from the Bursera Trail, high on the ridge, and its view onto the Main Ridge North were the proposed freeway will cut. It is obvious from the picture below that the above statement is no longer true.
463	As you can see, the DEIS has missed identifying three Section 4(f) resources, it has also incorrectly analyzed the impact to any Section 4(f) resources in the west end of SMPP. While there will not be a

Code	Issue	Response
460	**Section 4(f) and Section 6(f)**	The newest South Mountains trails, the Bursera and the Pyramid, are more than ¼ mile from the proposed freeway and are analyzed in the Final Environmental Impact Statement on page 5-9. The trails are within ¼ mile of the planned Chandler extension and residential development; however, these trails do not have noise-sensitive activities or viewshed characteristics that contribute to their importance as Section 4(f) recreational resources.
461	**Section 4(f) and Section 6(f)**	The newest Phoenix South Mountain Park/Preserve trails, the Bursera and Pyramid, have been included in an updated trails map in the Final Environmental Impact Statement. Visual analysis maintains that the cuts would be located in a remote portion of Phoenix South Mountain Park/Preserve, not near any trail and barely visible from any of the more readily used trails. City-owned trails within the park were considered collectively as part of the City-owned park. Discussions with the South Mountain Ranger indicate that the Gila Trail—although well-defined—is not a designated trail within the park. There are no direct or constructive uses of any trails within Phoenix South Mountain Park/Preserve.
462	**Visual Resources**	Visual analysis establishes that the proposed cuts would be in a remote portion of Phoenix South Mountain Park/Preserve, not near any trail, and would be barely visible from any of the more readily used trails. From the view provided, one can also see the development along 51st Avenue. The South Mountains provide views of urban Phoenix, including its freeways.
463	**Section 4(f) and Section 6(f)**	There is no constructive use of the trails within Phoenix South Mountain Park/Preserve, including the ones the comment mentions. The trails are within ¼ mile of the planned Chandler extension and residential development; however, these trails do not have noise-sensitive activities or viewshed characteristics that contribute to their importance as Section 4(f) recreational resources. Although cuts could be seen, this would not render the trail unusable for recreational purposes.

Code	Comment Document
	direct use of these trails, there will clearly be a constructive use of these trails. It is tragic that the solitude, peacefulness and beauty experienced on these trails (old and new) will be so dramatically diminished by the proposed action. This must be include in a constructive use analysis
464	The Section 4(f) Evaluation is incomplete and filled with misstatements, therefore the analysis is deficient. Figure 5-6 needs to be amended to include the trails and developed measures to minimize harm. As a whole, this report needs to be amended and alternatives reevaluated to avoid impact and/or evaluate measures to minimize harm.
465	As an overall final editorial, it seems tragic that the process went out of its way to realign the proposed project to preserve other Section 4(f) resources (Hudson Farm, Barnes Diary Farm, and Hackin Farmstead, all on private property) when it is most certain they are only being preserved to be eventually demolished by future development, yet other Section 4(f) resources such as the trails in SMPP, which will be used by thousands of people for many years to come, are discounted, devalued and dismissed as an important protected resource.
466	Many of the statements in the Section 4(f) Evaluation are clearly pre-decisional and the evaluation was not done by or with a professional who understands the SMPP, its trail system or the City of Phoenix General Plan. This leads to a misleading analysis. The public uses the DEIS as a tool for information, yet the information is not only incomplete by wrong. The Section 4(f) Evaluation needs to be revised.

Code	Issue	Response
464	**Section 4(f) and Section 6(f)**	Trails maps have been updated, and new trails are analyzed in the Final Environmental Impact Statement because they are within ¼ mile of the Chandler Extension (not the proposed freeway) (see page 5-9). Because none of the action alternatives or options would not incorporate land from the Section 4(f) resource, and would have no proximity impacts so severe that the protected activities, features, or attributes that qualifies the trails for protection under Section 4(f) are substantially impaired, no measures to minimize harm are warranted.
465	**Section 4(f) and Section 6(f)**	The process upon which Section 4(f) resources were identified and evaluated for feasible and prudent avoidance possibilities followed the rigorous procedural requirements as set forth in Federal Highway Administration Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents and related guidance. The comment suggests trails in the South Mountain Park/Preserve would be subject to direct or constructive use; however, as shown in Chapter 5 of the Final Environmental Impact Statement, such use would be avoided by the proposed freeway.
466	**Section 4(f) and Section 6(f)**	Trails within Phoenix South Mountain Park/Preserve were not eliminated. City-owned trails within the park were considered collectively as part of the City-owned park. There are no direct or constructive uses of any trails within Phoenix South Mountain Park/Preserve (see discussion beginning on page 5-14 in the Final Environmental Impact Statement). Trails maps have been updated, and new trails are analyzed in the Final Environmental Impact Statement because they are within ¼ mile of the Chandler Extension (not the proposed freeway) (see page 5-9). Because none of the action alternatives or options would not incorporate land from the Section 4(f) resource, and would have no proximity impacts so severe that the protected activities, features, or attributes that qualifies the trails for protection under Section 4(f) are substantially impaired, no measures to minimize harm are warranted. The Section 4(f) evaluation in its entirety represents an exhaustive, comprehensive, objective, and meaningful effort in accordance with requirements of the law. Evaluation of each resource included active engagement of resource owners to clarify resource importance and use (extensive interaction with owner/operators of Section 4(f) resources is well documented in the Appendices of the Final Environmental Impact Statement). The U.S. Department of the Interior [the agency with direct oversight of Section 4(f)] review of the Draft Environmental Impact Statement noted: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources" The complete letter can be found in Appendix 7, Volume III, on page B4 of the Final Environmental Impact Statement. The Section 4(f) evaluation was thorough and complete.

Code	Comment Document



Additional Comments

Four

Reevaluate Purpose and Need Statement

Code	Issue	Response

Code	Comment Document
467	**Reevaluate Purpose and Need Statement** A Purpose and Need statement is meant to address a problem. The South Mountain 202 project is a solution looking for a problem. The 2012 Purpose and Need statement (P&N) in the South Mountain DEIS does not reflect the current problem. On p.1-1, Chapter 1 the following statement is made; "At the beginning of the EIS process, the need for a major transportation facility was reexamined to determine whether such a facility is still needed". This is a false statement as the projects need was not reevaluated under the existing and current conditions of 2010-2013. The P&N statement was developed over 8 years ago when the problem in the Valley was its cycle of rapid suburban growth and sprawl and automobile dependency and it is the same statement that is being currently used. The need for this major transportation facility has changed if the correct and current conditions/problems are reevaluated impartially without prejudice. The purported need for the South Mountain 202 is NOT based on the current need and current existing conditions/problems in the southwest Phoenix Metropolitan Area. The P&N was not adequately reevaluated to reflect the growth trends and conditions which have developed in the last 5-8 years. The conclusions; that the completion of the South Mountain 202 Loop is necessary to meet an existing need is based on an inaccurate misrepresentation of the facts. This document dictates the solution by manipulating the P&N to portray that population growth, housing projections and transportation uses from 2004-2009 are relevant and applicable to the current transportation demands and needs of the Phoenix Metropolitan area. The P&N in the DEIS is not based on most recent data. It does not reflect accurate growth projections, current social demands and economic development, and a change in transportation demand and patterns. The information used for the DEIS is based on outdated and limited information as the shifts have been dramatic in the last three years and very little primary data has been produced at this time to make accurate predictions and projections about the future growth and demands in the valley. The P&N is based on MAG data from 2005-2009 which is then used to project out to 2035. Any projection which uses data from 2005-2009 (because that is all that is available) to extrapolate growth projections does not capture and adjust accurately for what happened from 2008-till 2012. Census data from 2010 (and American Community Survey data from 2010-2011) has only limited value as a snap shot and cannot be used in comparison to the 2000 Census data. Not having access to relevant data is not a excuse for using or recycling old data and conclusions. The data used does not accurately reflect what has and what will be happening to the valley growth patterns, employment and housing development. (p.1-2, Chapter 1 Purpose and Need). It errs by simply using the *historic* data to create future projections. It also relies on what cities have "guestimated" to be their future growth in population and housing starts (much of which is not reality based, but wishful thinking). Social scientists and demographers have been studying the valley and the southwest and have many relevant observations and projections. The valley is still in a period of dramatic change in its growth and recovery and the modeling that MAG uses does not reflect the relevant socioeconomic conditions that are evolving even as we speak (foreclosed real estate market driving speculative and rental acquisitions resulting in a change in homeownership patterns, change in state immigration legislation, more transient workforce which are not tied to homeownership, increase

Code	Issue	Response
467	**Purpose and Need**	At the beginning of the environmental impact statement process, the need for a major transportation facility was reexamined to determine whether such a facility is still needed. Validation of those findings occurred throughout the entire environmental impact statement process. Analysis of the purpose and need for the proposed action followed National Environmental Policy Act and Federal Highway Administration implementing guidance on the subject matter and used state-of-the-practice analytical tools, as pointed out in Table 1-3, "Traffic Analysis Tools," on page 1-13 of the Draft Environmental Impact Statement. The results of the analysis determined that a transportation problem does exist and that problem will continue in the foreseeable future (see section, *Conclusions*, on page 1-21). As noted on page 3-1 in the section, *Reconfirm the Purpose and Need for the Proposed Action*, a continuous validation process was undertaken throughout the environmental impact statement process to ensure past conclusions in the environmental impact statement process remained valid. The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. The Maricopa Association of Governments' control total for Maricopa County is consistent with the "ADOA—Medium Series." The National Environmental Policy Act recognizes 1) that data and projections can change throughout the process, 2) that it is important for the process to account for those changes as they become available, and 3) a reasonable person could conclude that the updated information would lead to substantially different results that could affect the decision-making attributes of the National Environmental Policy Act. This guidance permits disciplinary experts to make study recommendations based on recognized expertise without having to "overstudy everything," thus maintaining the spirit and intent of National Environmental Policy Act directives on timely completion and flexibility in the process. Validation of information has occurred throughout the duration of the environmental impact statement process; the assessment of purpose and need for the proposed action is no different, and analytical validation is part of the Final Environmental Impact Statement.

(Response 467 continues on next page)

Code	Comment Document
468	Reevaluate Purpose and Need Statement A Purpose and Need statement is meant to address a problem. The South Mountain 202 project is a solution looking for a problem. The 2012 Purpose and Need statement (P&N) in the South Mountain DEIS does not reflect the current problem. On p.1-1, Chapter 1 the following statement is made; "At the beginning of the EIS process, the need for a major transportation facility was reexamined to determine whether such a facility is still needed". This is a false statement as the projects need was not reevaluated under the existing and current conditions of 2010-2013. The P&N statement was developed over 8 years ago when the problem in the Valley was its cycle of rapid suburban growth and sprawl and automobile dependency and it is the same statement that is being currently used. The need for this major transportation facility has changed if the correct and current conditions/problems are reevaluated impartially without prejudice. The purported need for the South Mountain 202 is NOT based on the current need and current existing conditions/problems in the southwest Phoenix Metropolitan Area. The P&N was not adequately reevaluated to reflect the growth trends and conditions which have developed in the last 5-8 years. The conclusions; that the completion of the South Mountain 202 Loop is necessary to meet an existing need is based on an inaccurate misrepresentation of the facts. This document dictates the solution by manipulating the P&N to portray that population growth, housing projections and transportation uses from 2004-2009 are relevant and applicable to the current transportation demands and needs of the Phoenix Metropolitan area. The P&N in the DEIS is not based on most recent data. It does not reflect accurate growth projections, current social demands and economic development, and a change in transportation demand and patterns. The information used for the DEIS is based on outdated and limited information as the shifts have been dramatic in the last three years and very little primary data has been produced at this time to make accurate predictions and projections about the future growth and demands in the valley. The P&N is based on MAG data from 2005-2009 which is then used to project out to 2035. Any projection which uses data from 2005-2009 (because that is all that is available) to extrapolate growth projections does not capture and adjust accurately for what happened from 2008-till 2012. Census data from 2010 (and American Community Survey data from 2010-2011) has only limited value as a snap shot and cannot be used in comparison to the 2000 Census data. Not having access to relevant data is not a excuse for using or recycling old data and conclusions. The data used does not accurately reflect what has and what will be happening to the valley growth patterns, employment and housing development. (p.1-2, Chapter 1 Purpose and Need). It errs by simply using the *historic* data to create future projections. It also relies on what cities have "guestimated" to be their future growth in population and housing starts (much of which is not reality based, but wishful thinking). Social scientists and demographers have been studying the valley and the southwest and have many relevant observations and projections. The valley is still in a period of dramatic change in its growth and recovery and the modeling that MAG uses does not reflect the relevant socioeconomic conditions that are evolving even as we speak (foreclosed real estate market driving speculative and rental acquisitions resulting in a change in homeownership patterns, change in state immigration legislation, more transient workforce which are not tied to homeownership, increase

Code	Issue	Response
467 (cont.)		The reader is referred to Draft Environmental Impact Statement Chapter 3, *Alternatives*, and, specifically, the section, *Alternatives Development and Screening Process Conclusions*, beginning on page 3-26, noting "... a comprehensive set of alternatives including all modes was considered ... assurance that the screening process was an open process ... a logical, sequential, step-by-step process using data and expertise from multiple disciplines ..." to demonstrate all possibilities were considered.
468	**Purpose and Need**	The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see page 3-27 of the Draft Environmental Impact Statement). The model projects demand for multiple modes of travel, including automobile, bus, and light rail. Key model inputs used to forecast travel demand in the Study Area included socioeconomic data (based on land use plans and population and economic forecasts), the anticipated average number of vehicle trips within the region on a daily basis, the distribution of transportation modes used by travelers in the region, the capacity of the transportation infrastructure to accommodate regional travel, and the future transportation infrastructure. The project team used the most recent and reliable data available. The Draft Environmental Impact Statement (Chapter 1, *Purpose and Need*, and Chapter 3, *Alternatives*) provides more detail on the data inputs to the modeling effort and discussions of the assumptions used. As noted in the comment, the Maricopa Association of Governments and Arizona Department of Transportation continually study the changes in travel trends and reflect these changes in their travel-generation modeling. Any new information presented in the Final Environmental Impact Statement has been evaluated as to whether it constitutes a substantial change from the information presented in the Draft Environmental Impact Statement. The Federal Highway Administration and Arizona Department of Transportation have examined the data and analysis and have determined that a supplemental environmental impact statement is not warranted.

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in gasoline prices and an increase in fuel efficiencies are creating new driving patterns, decrease in car ownership and VMT as well as an aging population resulting in less VMT, less vehicle ownership by new drivers and more multimodal usage resulting in less automobile VMT, and change in urban form and cites desire to develop a new urban communities). All of these are resulting in the increasing trend of less emphasis on freeways and moving cars and more emphasis on moving people and creating communities. This new national and regional shift is being discussed and acknowledged at all levels (including inside MAG and ADOT itself) yet this did not transfer to the P&N not the DEIS. Instead there is a recycle of the initial statement which is driven by old data and old projections and models. While traffic projections out to 2035 seem easy to conduct for transportation specialists, they are rarely based on anything but a historical perspective, and that has changed dramatically as the valley's growth has leveled off and the southwest as a whole is seeing a change in demographics. This DEIS P&N is the same statement which was introduced to the public in 2004-2005. It is no longer accurate, relevant, or timely and was not revisited thoroughly after the 2008 recession to reflect the different political and socioeconomic climate of the valley. The P&N continues to promote the same conclusions (need) "Build it so we can build more," and "We need freeways for economic development." This no longer reflects the conditions of a valley which began to constrict 4 years ago and is experiencing a change in its development and transportation needs.

469 Because the DEIS P&N is based on outdated and misrepresentational data, the analysis and the recommendations are inaccurate and misleading and reach improper conclusions.

470 While there are multiple problems to be fixed in the Valley metropolitan area: am and pm traffic congestion, reduction of pollution to meet federal air quality standards, need for efficient transportation systems, building a $2.1 billion freeway is NOT the solution to these problems. The solution is through regional planning, focused transportation solutions which respond to community needs, and alleviate of traffic congestion by reducing the induced traffic syndrome.

471 As a final commentary on the P&N: the RTP is a plan which should not be used to codify any ONE transportation project (p.1-2, Chapter 1 Purpose and Need). Residents approved the *plan* NOT one specific *project*. Plans can and should change to reflect the every changing needs of a community. Projects created over 25 years ago, are rarely if ever relevant and salient 30 years later. ADOT cannot justify building the South Mountain 202 by claiming it is in the plan, while they systematically transfer money away from other freeways that are in the plan (and thus NOT building projects that are in the RTP) as a means to build the 202.

472 The DEIS P&N needs to be meaningfully reevaluated as it claims in the opening pages in Chapter 1. This project needs to be reevaluated if there is a need for this project given the pertinent and relevant issues which the southwest valley is facing in this changing transportation environment.

Code	Issue	Response
469	**Purpose and Need**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see page 3-27 of the Draft Environmental Impact Statement). The model projects demand for multiple modes of travel, including automobile, bus, and light rail. Key model inputs used to forecast travel demand in the Study Area included socioeconomic data (based on land use plans and population and economic forecasts), the anticipated average number of vehicle trips within the region on a daily basis, the distribution of transportation modes used by travelers in the region, the capacity of the transportation infrastructure to accommodate regional travel, and the future transportation infrastructure. The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
470	**Purpose and Need**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
471	**Purpose and Need**	As stated in the subject heading referenced in the comment, the text referenced places the *Context of the Proposed Action in Current Regional Transportation Planning*; no text directly or indirectly codifies one transportation project in the *Regional Transportation Plan* as presented in the Final Environmental Impact Statement.
472	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available.

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Code	Issue	Response
472 (cont.)		The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. The National Environmental Policy Act recognizes 1) that data and projections can change throughout the process, 2) that it is important for the process to account for those changes as they become available, and 3) a reasonable person could conclude that the updated information would lead to substantially different results that could affect the decision-making attributes of the National Environmental Policy Act. This guidance permits disciplinary experts to make study recommendations based on recognized expertise without having to "overstudy everything," thus maintaining the spirit and intent of National Environmental Policy Act directives on timely completion and flexibility in the process. Validation of information has occurred throughout the duration of the environmental impact statement process; the assessment of purpose and need for the proposed action is no different, and analytical validation is part of the Final Environmental Impact Statement.

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Additional Comments

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Lakewood Community Association's Concerns & Response to DEIS for Loop 202 (South Mountain Freeway) dated July 20, 2013.

Code	Issue	Response

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LAKEWOOD COMMUNITY ASSOCIATION'S CONCERNS & RESPONSE TO DEIS FOR LOOP 202
(SOUTH MOUNTAIN FREEWAY)

Prepared for

Protect Arizona's Resources and Children (PARC), et al.
Phoenix, Arizona

by
Lakewood Community Association Board of Directors
July 20, 2013

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473	**Lakewood HOA's South Mountain Freeway Concerns:** **1. Loss of Water from Community Water Wells:** The lakes are a centerpiece of the Lakewood community, losing the existing groundwater well supply will have a significant negative impact on the entire community, which consists of approximately 2,800 units. With respect to the Foothills Community Association, the DEIS makes the statement that "It is assumed that a new well location could be found that would produce water comparable in quality and quantity to the acquired well, and that no change in the existing groundwater right would result." The Lakewood Community Association has an even greater dependence on water than the Foothills, and the DEIS statement ignores the significant difficulty that was originally encountered in finding a source of water when Lakewood was incorporated. It is unclear whether or not the loss of the existing well even could be replaced, regardless of costs. With the state of Arizona currently restricting or disallowing man-made lakes in new property development, it is also unclear whether or not municipal water could be used as a source. As a result of the loss of the lakes, the property values in Lakewood would be negatively impacted with grave consequences to the entire community.
474	In addition to financial impacts, there are environmental as well, migratory birds would no longer have Lakewood as a possible stopping point along their migration route, and the destruction of the natural riparian area south of Pecos will be a detriment to the wildlife in the area.
475	**2. Home Valuation** A. Reduction in property values based health/environmental impacts such as air and noise pollution.
476	B. Substantial reduction in property values if access to water is hindered which could endanger the existence of the Lakes. The whole community is based on the existence and proximity to the Lakes. Current property values are based on a lake community and lifestyle. C. Substantial reduction in property values for lake-front homes if Lakes are compromised by water access. D. Ability to resell a Lakewood home would be deleteriously impacted due to air and noise pollution. E. Freeway would disrupt a quiet and clean Lakewood environment which would drive property values lower. F. Lost revenue to HOA from Lakewood home displacements would decrease community facilities and amenities causing downward pressure on property values. G. Freeway would have negative lifestyle impacts which would reduce the value of living in Lakewood and thus cause home values to fall. Lifestyle impacts include reduced access to safe recreation like cycling and roller-blading around community roads due to increased and altered traffic. Freeway noise would also impact outdoor leisure and activities such as community picnics, swimming and outdoor dining. H. Freeway could disrupt the reliable performance of the primary aquifer which supplies Lakewood with its water and thus Lakes. These disruptions could include deviations to surface and ground water flows which feed the aquifer. As this reliable source of water is endangered, the reliability of the Lakes and irrigation of community vegetation would be endangered. This would lead to negative impacts to lake recreation and appearance of the community. Ultimately, the existence of the Lakes themselves could be threatened. This would make Lakewood a much less attractive place to live and substantially decrease home and property valuation.

Code	Issue	Response
473	**Water Resources**	Because of the public concern expressed during the environmental impact statement process, page 4-100 of the Draft Environmental Impact Statement, focuses on the Foothills Community Association to provide more details on the well acquisition, condition assessment, and replacement process used by the Arizona Department of Transportation. The Arizona Department of Transportation understands, and states on page 4-100 of the Draft Environmental Impact Statement, respectively, that finding a suitable location for a new well in this area may be difficult. Depending on whether an action alternative were to become the Selected Alternative, it may be possible to keep certain wells in their current location, but move the well controls and associated piping to outside of the right-of-way. Such an analysis would be performed later in the design process.
474	**Water Resources**	The project would not adversely affect any of the artificial lakes and ponds along Pecos Road and, therefore, would not affect migratory birds using those water features. There are no natural riparian areas or riparian vegetation adjacent to Pecos Road; the vegetation growing along the drainage ditch on the southern side of Pecos Road would not be removed.
475	**Neighborhoods/ Communities**	The reader is referred to the section, *Social Conditions*, beginning on Final Environmental Impact Statement page 4-20, to learn about criteria applied when considering impacts on social conditions and what mitigation is under consideration. Mitigation measures proposed can be found throughout Chapter 4. These have direct application to the reduction of impacts that could affect certain definitions of quality of life. As to property values and the effects of proximity of freeway, numerous studies have been done on the subject and in general, results have varied but with an underlying consensus that many variables contribute to property values. A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pages 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
476	**Water Resources**	The procedure identified on page 4-100 of the Draft Environmental Impact Statement, defines the procedure that the Arizona Department of Transportation would use to replace adversely affected wells, and also identifies the general costs the Arizona Department of Transportation would incur to replace the lost water sources. As noted in this discussion, if it were necessary to provide replacement water instead of a new well, the Arizona Department of Transportation would, in negotiations with the well owner, include the difference between the costs of pumping the well and the costs of the new replacement water source. Which of these outcomes would take place would become known during the final design of the Selected Alternative, should an action alternative be selected.

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Lakewood HOA's South Mountain Freeway Concerns:

1. **Loss of Water from Community Water Wells:**

The lakes are a centerpiece of the Lakewood community, losing the existing groundwater well supply will have a significant negative impact on the entire community, which consists of approximately 2,800 units. With respect to the Foothills Community Association, the DEIS makes the statement that "It is assumed that a new well location could be found that would produce water comparable in quality and quantity to the acquired well, and that no change in the existing groundwater right would result." The Lakewood Community Association has an even greater dependence on water than the Foothills, and the DEIS statement ignores the significant difficulty that was originally encountered in finding a source of water when Lakewood was incorporated. It is unclear whether or not the loss of the existing well even could be replaced, regardless of costs. With the state of Arizona currently restricting or disallowing man-made lakes in new property development, it is also unclear whether or not municipal water could be used as a source. As a result of the loss of the lakes, the property values in Lakewood would be negatively impacted with grave consequences to the entire community.

In addition to financial impacts, there are environmental as well, migratory birds would no longer have Lakewood as a possible stopping point along their migration route, and the destruction of the natural riparian area south of Pecos will be a detriment to the wildlife in the area.

2. **Home Valuation**

A. Reduction in property values based health/environmental impacts such as air and noise pollution.

B. Substantial reduction in property values if access to water is hindered which could endanger the existence of the Lakes. The whole community is based on the existence and proximity to the Lakes. Current property values are based on a lake community and lifestyle.

C. Substantial reduction in property values for lake-front homes if Lakes are compromised by water access.

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D. Ability to resell a Lakewood home would be deleteriously impacted due to air and noise pollution.

E. Freeway would disrupt a quiet and clean Lakewood environment which would drive property values lower.

F. Lost revenue to HOA from Lakewood home displacements would decrease community facilities and amenities causing downward pressure on property values.

G. Freeway would have negative lifestyle impacts which would reduce the value of living in Lakewood and thus cause home values to fall. Lifestyle impacts include reduced access to safe recreation like cycling and roller-blading around community roads due to increased and altered traffic. Freeway noise would also impact outdoor leisure and activities such as community picnics, swimming and outdoor dining.

H. Freeway could disrupt the reliable performance of the primary aquifer which supplies Lakewood with its water and thus Lakes. These disruptions could include deviations to surface and ground water flows which feed the aquifer. As this reliable source of water is endangered, the reliability of the Lakes and irrigation of community vegetation would be endangered. This would lead to negative impacts to lake recreation and appearance of the community. Ultimately, the existence of the Lakes themselves could be threatened. This would make Lakewood a much less attractive place to live and substantially decrease home and property valuation.

Code	Issue	Response
476 (cont.)		Depending on whether an action alternative were to become the Selected Alternative, it may be possible to keep certain wells in their current location, but move the well controls and associated piping to outside of the right-of-way. Such an analysis would be performed later in the design process.
477	**Noise, Air Quality**	The reader is referred to the text box, "*Freeway Awareness*," beginning on Draft Environmental Impact Statement page 4-12, and the text box, "*If My Property Would Be Affected, Can ADOT Purchase the Land in Advance?*", on page 4-43. Property acquisition is governed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. This process outlines determination of property values through the acquisition process. Environmental analyses and noise analyses conducted for and documented in the Draft Environmental Impact Statement comply with the Federal Highway Administration's regulations for implementing National Environmental Policy Act at 23 Code of Federal Regulations 771 and for conducting noise analyses at 23 Code of Federal Regulations 772. These issues are addressed in the Draft Environmental Impact Statement. Sensitive receivers for noise and air are already included in the air quality and noise analyses in accordance with State and federal guidance. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. According to the air quality analyses conducted for the proposed freeway, no violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones; therefore, no mitigation of these effects is required. The noise analysis was also updated for the Final Environmental Impact Statement using most recent Federal Highway Administration and Arizona Department of Transportation policy and traffic projections provided by the Maricopa Association of Governments in August 2013. This updated analysis begins on page 4-88 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted.

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Lakewood HOA's South Mountain Freeway Concerns:

1. **Loss of Water from Community Water Wells:**

The lakes are a centerpiece of the Lakewood community, losing the existing groundwater well supply will have a significant negative impact on the entire community, which consists of approximately 2,800 units. With respect to the Foothills Community Association, the DEIS makes the statement that "It is assumed that a new well location could be found that would produce water comparable in quality and quantity to the acquired well, and that no change in the existing groundwater right would result." The Lakewood Community Association has an even greater dependence on water than the Foothills, and the DEIS statement ignores the significant difficulty that was originally encountered in finding a source of water when Lakewood was incorporated. It is unclear whether or not the loss of the existing well even could be replaced, regardless of costs. With the state of Arizona currently restricting or disallowing man-made lakes in new property development, it is also unclear whether or not municipal water could be used as a source. As a result of the loss of the lakes, the property values in Lakewood would be negatively impacted with grave consequences to the entire community.

In addition to financial impacts, there are environmental as well, migratory birds would no longer have Lakewood as a possible stopping point along their migration route, and the destruction of the natural riparian area south of Pecos will be a detriment to the wildlife in the area.

2. **Home Valuation**

A. Reduction in property values based health/environmental impacts such as air and noise pollution.

B. Substantial reduction in property values if access to water is hindered which could endanger the existence of the Lakes. The whole community is based on the existence and proximity to the Lakes. Current property values are based on a lake community and lifestyle.

C. Substantial reduction in property values for lake-front homes if Lakes are compromised by water access.

D. Ability to resell a Lakewood home would be deleteriously impacted due to air and noise pollution.

E. Freeway would disrupt a quiet and clean Lakewood environment which would drive property values lower.

478 F. Lost revenue to HOA from Lakewood home displacements would decrease community facilities and amenities causing downward pressure on property values.

479 G. Freeway would have negative lifestyle impacts which would reduce the value of living in Lakewood and thus cause home values to fall. Lifestyle impacts include reduced access to safe recreation like cycling and roller-blading around community roads due to increased and altered traffic. Freeway noise would also impact outdoor leisure and activities such as community picnics, swimming and outdoor dining.

480 H. Freeway could disrupt the reliable performance of the primary aquifer which supplies Lakewood with its water and thus Lakes. These disruptions could include deviations to surface and ground water flows which feed the aquifer. As this reliable source of water is endangered, the reliability of the Lakes and irrigation of community vegetation would be endangered. This would lead to negative impacts to lake recreation and appearance of the community. Ultimately, the existence of the Lakes themselves could be threatened. This would make Lakewood a much less attractive place to live and substantially decrease home and property valuation.

Code	Issue	Response
477 (cont.)		A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pages 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
478	**Acquisitions and Relocations**	Land acquisition and relocation assistance services for the project shall be available to all individuals without discrimination in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act). The Uniform Act provides uniform, fair, and equitable treatment of people whose property is impacted or who are displaced as a result of the project, including those with special needs. Advisory assistance services and compensation practices are described in detail in the Arizona Department of Transportation's *Right-of-way Procedures Manual*, located at <azdot.gov/business/RightofWay_Properties/booklets-and-manuals>. For further discussion, see page 4-51 of the Final Environmental Impact Statement and Appendix 4-1. For questions on specific properties, contact the Arizona Department of Transportation Right-of-Way Group at (602) 712-7316. There would be no home displacements in the Lakewood community. For other communities, the compensation to the homeowners' association is dependent on how the subdivision and/or homeowners' association is legally structured.
479	**Acquisitions and Relocations**	The reader is referred to the section, *Social Conditions*, beginning on Draft Environmental Impact Statement page 4-20, to learn about criteria applied when considering impacts on social conditions and what mitigation is under consideration. Mitigation measures proposed can be found throughout Chapter 4. These have direct application to the reduction of impacts that could affect certain definitions of quality of life. As to property values and the effects of proximity of freeway, numerous studies have been done on the subject and, in general, results have varied but with an underlying consensus that many variables contribute to property values. A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pages 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

(Response 480 begins on next page)

Code	Comment Document
478	**3. Home Displacement** A. Freeway right-of-way could encroach on existing Lakewood homes requiring destruction of several family homes. B. Local community neighborhoods within Lakewood would see a serious negative impact or cease to exist due to destruction of homes and relocation of neighbors. C. Loss of community integrity and relationships, especially for small children separated from friends who would be forced to move away due to home displacement. **4. Lost Revenue to HOA** A. Direct assessment revenue losses of $350/home per year for each home displaced. B. Further loss of assessments if vacancy rate increases due to image of Lakewood being a less attractive place to live due to deleterious lifestyle impacts of the freeway. C. Viscous cycle of revenue loss leading to reduction of community services leading to further revenue loss (as vacancy rates increase). **5. Air Quality** A. The air quality cause by increase traffic and trucks will decrease the air quality in our community and pose a serious health risk to the residents of the community. **6. Traffic Flow and Increase Congestion** A. Without access to the freeway at 32nd Street, there will be an increase in traffic flow and congestion between 24th Street and 40th Street within the Lakewood Community boundary. **7. Increase in Noise from Freeway Traffic** B. The noise level will dramatically increase due to the proximity of the freeway and the increase in traffic and trucks in and around our community. **8. Loss of Access to Property South of Pecos** A. The HOA owns land south of Pecos which the freeway will cut off any kind of access to. **9. Water Retention Issues/Concerns** A. The freeway will be changing the water run off patterns and cause water retention concerns. **10. Loss of Bike Paths on Pecos**: A. Our community members will no longer have access to the uniquely long, flat bike lane located on Pecos. **11. Additional Stress on Deteriorating Surface Streets in Community** A. The increase in traffic on the community's surface streets will only add additional stress on our already deteriorating city streets in the community.
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Code	Issue	Response
480	**Water Resources**	The procedure identified on page 4-100 of the Draft Environmental Impact Statement, defines the procedure that the Arizona Department of Transportation would use to replace adversely affected wells, and also identifies the general costs the Arizona Department of Transportation would incur to replace the lost water sources. As noted in this discussion, if it were necessary to provide replacement water instead of a new well, the Arizona Department of Transportation would, in negotiations with the well owner, include the difference between the costs of pumping the well and the costs of the new replacement water source. Which of these outcomes would take place would become known during the final design of the Selected Alternative, should an action alternative be selected. Depending on whether an action alternative were to become the Selected Alternative, it may be possible to keep certain wells in their current location, but move the well controls and associated piping to outside of the right-of-way. Such an analysis would be performed later in the design process.
481	**Acquisition and Relocation**	The reader is referred to the section, *Social Conditions*, beginning on page 4-20 of the Draft Environmental Impact Statement, to learn about criteria applied when considering impacts on social conditions and what mitigation is under consideration. Mitigation measures proposed can be found throughout Chapter 4. These have direct application to the reduction of impacts that could affect certain definitions of quality of life. As to property values and the effects of proximity of freeway, numerous studies have been done on the subject and, in general, results have varied but with an underlying consensus that many variables contribute to property values. A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pages 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document
	3. Home Displacement A. Freeway right-of-way could encroach on existing Lakewood homes requiring destruction of several family homes. B. Local community neighborhoods within Lakewood would see a serious negative impact or cease to exist due to destruction of homes and relocation of neighbors. C. Loss of community integrity and relationships, especially for small children separated from friends who would be forced to move away due to home displacement. 4. Lost Revenue to HOA A. Direct assessment revenue losses of $350/home per year for each home displaced. B. Further loss of assessments if vacancy rate increases due to image of Lakewood being a less attractive place to live due to deleterious lifestyle impacts of the freeway. C. Viscous cycle of revenue loss leading to reduction of community services leading to further revenue loss (as vacancy rates increase).
482	**5. Air Quality** A. The air quality cause by increase traffic and trucks will decrease the air quality in our community and pose a serious health risk to the residents of the community.
	6. Traffic Flow and Increase Congestion A. Without access to the freeway at 32nd Street, there will be an increase in traffic flow and congestion between 24th Street and 40th Street within the Lakewood Community boundary. 7. Increase in Noise from Freeway Traffic B. The noise level will dramatically increase due to the proximity of the freeway and the increase in traffic and trucks in and around our community. 8. Loss of Access to Property South of Pecos A. The HOA owns land south of Pecos which the freeway will cut off any kind of access to. 9. Water Retention Issues/Concerns A. The freeway will be changing the water run off patterns and cause water retention concerns. 10. Loss of Bike Paths on Pecos: A. Our community members will no longer have access to the uniquely long, flat bike lane located on Pecos. 11. Additional Stress on Deteriorating Surface Streets in Community A. The increase in traffic on the community's surface streets will only add additional stress on our already deteriorating city streets in the community.

Code	Issue	Response
482	**Air Quality**	Air Quality analyses conducted for and documented in the Draft and Final Environmental Impact Statements complies with the Federal Highway Administration's regulations for implementing the National Environmental Policy Act at 23 Code of Federal Regulations 771. These issues are addressed in the Draft and Final Environmental Impact Statements. Sensitive receivers for air are already included in the air quality analyses in accordance with State and federal guidance. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. According to the air quality analyses conducted for the proposed freeway, no violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. 40 Code of Federal Regulations Section 1500.1(b) also directs the Federal Highway Administration to focus its National Environmental Policy Act analysis and documentation on issues that are truly significant to the action in question. In the context of mobile source air toxics, the Federal Highway Administration must consider whether changes in mobile source air toxics emissions attributable to a project have the potential for significant health risk. Using cancer risk as an example, the U.S. Environmental Protection Agency estimates that the overall risk of cancer in the United States is approximately 330,000 in a million, and that air toxics (from all sources) are responsible for a risk of approximately 50 in a million. In its most recent mobile source air toxics rule-making, the U.S. Environmental Protection Agency estimated mobile source air toxics cancer risk, after implementation of emissions controls, at approximately 5 in a million (or 0.0015 percent of overall cancer risk from any cause). For the South Mountain Freeway project, the mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). Like most highway projects that have received a mobile source air toxics emissions analysis, the South Mountain Freeway project would result in a negligible change to a very small component of overall cancer risk, and this risk is declining regardless of alternative.

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3. Home Displacement

A. Freeway right-of-way could encroach on existing Lakewood homes requiring destruction of several family homes.

B. Local community neighborhoods within Lakewood would see a serious negative impact or cease to exist due to destruction of homes and relocation of neighbors.

C. Loss of community integrity and relationships, especially for small children separated from friends who would be forced to move away due to home displacement.

4. Lost Revenue to HOA

A. Direct assessment revenue losses of $350/home per year for each home displaced.

B. Further loss of assessments if vacancy rate increases due to image of Lakewood being a less attractive place to live due to deleterious lifestyle impacts of the freeway.

C. Viscous cycle of revenue loss leading to reduction of community services leading to further revenue loss (as vacancy rates increase).

5. Air Quality

A. The air quality cause by increase traffic and trucks will decrease the air quality in our community and pose a serious health risk to the residents of the community.

483 **6. Traffic Flow and Increase Congestion**

A. Without access to the freeway at 32nd Street, there will be an increase in traffic flow and congestion between 24th Street and 40th Street within the Lakewood Community boundary.

484 **7. Increase in Noise from Freeway Traffic**

B. The noise level will dramatically increase due to the proximity of the freeway and the increase in traffic and trucks in and around our community.

485 **8. Loss of Access to Property South of Pecos**

A. The HOA owns land south of Pecos which the freeway will cut off any kind of access to.

486 **9. Water Retention Issues/Concerns**

A. The freeway will be changing the water run off patterns and cause water retention concerns.

487 **10. Loss of Bike Paths on Pecos**:

A. Our community members will no longer have access to the uniquely long, flat bike lane located on Pecos.

488 **11. Additional Stress on Deteriorating Surface Streets in Community**

A. The increase in traffic on the community's surface streets will only add additional stress on our already deteriorating city streets in the community.

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483	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have displaced over 100 homes and would have been located near an existing high school. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
484	**Noise**	Noise analyses conducted for and documented in the Draft and Final Environmental Impact Statements comply with the Federal Highway Administration's regulations for implementing the National Environmental Policy Act at 23 Code of Federal Regulations 771 and for conducting noise analyses at 23 Code of Federal Regulations 772. These issues are addressed in the Draft and Final Environmental Impact Statement. Sensitive receivers for noise are already included in the noise analysis in accordance with State and federal guidance. As stated on page 4-82 of the Draft Environmental Impact Statement, over 220 sensitive receivers were evaluated from a traffic noise perspective. All of the receivers represent noise sensitive land uses in proximity to the proposed project; therefore, these receivers would have higher noise levels than the schools more distant from the proposed action. The noise analysis was also updated for the Final Environmental Impact Statement using most recent Federal Highway Administration and Arizona Department of Transportation policy and traffic projections provided by the Maricopa Association of Governments in August 2013. This updated analysis begins on page 4-88 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted.
485	**Acquisitions and Relocations**	Access to the land south of the proposed freeway would be maintained in a similar way as the access existing today. If reasonable access could not be maintained, the property might be subject to acquisition by the Arizona Department of Transportation in accordance with State law.
486	**Design**	Pecos Road drainage is designed as a pass-through system. In other words, water is allowed to drain along its natural existing pathway underneath the freeway and to Gila River Indian Community land. If an action alternative were to become the Selected Alternative, the E1 Alternative would be constructed aboveground and the existing culverts would extend to pass drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Extending the existing culverts or upsizing the culverts would maintain or improve drainage flows. This would ensure that there would be no adverse flooding impacts to adjacent properties. (See pages 3-18, 4-98, and 4-107 of the Draft Environmental Impact Statement.)
487	**Design**	The main line of the E1 Alternative would not have a bicycle route as part of the design. Continuous east–west riding would be possible in the neighborhoods adjoining the alternative and along Chandler Boulevard.
488	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

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Additional Comments

Six

Comments of Nicoli V. Kuminoff on the DEIS for
South Mountain Freeway, dated July 21, 2013

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July 21, 2013

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South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

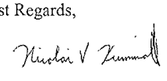
RE: Comments on Draft EIS for South Mountain Freeway (FHWA-AZ-EIS-13-01-D)

Dear South Mountain Study Team,

I am writing to comment on the draft environmental impact statement (DEIS) you released for the Loop 2002 South Mountain Freeway study. As a professional economist, a parent of young children, and a resident of Phoenix, I am deeply concerned about your DEIS. Overall, I think the DEIS reflects an unwarranted bias toward building the freeway with the Pecos Road alignment. After careful review, I cannot help but think that the DEIS systematically overstates the benefits of building the freeway and systematically understates the negative externalities on safety and environmental quality. Furthermore, the DEIS should be forthright about the fact that the precise magnitudes of both the benefits and costs are uncertain. Yet the DEIS has an asymmetric treatment of uncertainty. Economic costs, such as the public health consequences of increased air pollution in Ahwatukee, are dismissed entirely because they are uncertain. Meanwhile, economic benefits, such as the projected reductions in congestion on the I-10, are falsely presented as certain outcomes, despite the deeply uncertain nature of such projections. Finally, the DEIS falls far short of established "best practices" for the analysis of public projects as defined by the U.S. Office of Management and Budget (Circular A-4) and the U.S. Environmental Protection Agency's *Guidelines for Preparing Economic Analysis* (2010). I think it would be highly irresponsible to proceed with building the freeway without first conducting a serious economic analysis that quantifies the benefits and costs, and fully addresses uncertainty.

Please find attached 12 specific comments that explain my concerns with selected aspects of your DEIS. I look forward to seeing your responses in the final EIS. I would be glad to clarify any of the issues I raise to your staff. Feel free to contact me with questions.

Best Regards,



Nicolai V. Kuminoff
kuminoff@gmail.com

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489	**Purpose and Need**	At the beginning of the environmental impact statement process, the need for a major transportation facility was reexamined to determine whether such a facility is still needed. Validation of those findings occurred throughout the entire environmental impact statement process. Analysis of the purpose and need for the proposed action followed National Environmental Policy Act and Federal Highway Administration implementing guidance on the subject matter and used state-of-the-practice analytical tools, as pointed out in Table 1-3, "Traffic Analysis Tools," on page 1-13 of the Draft Environmental Impact Statement. The results of the analysis determined that a transportation problem does exist and that problem will continue in the foreseeable future (see section, *Conclusions*, on page 1-21). The comment implies that the freeway condition was predetermined. As noted on page 3-1 in the section, *Reconfirm the Purpose and Need for the Proposed Action*, a continuous validation process was undertaken throughout the environmental impact statement process to ensure past conclusions in the environmental impact statement process remained valid. The social, environmental, and economic effects of all alternatives, including the No-Action Alternative, are presented in the Draft and Final Environmental Impact Statements.

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490	Comment #1: The DEIS implies that a majority of Maricopa County residents support building the proposed South Mountain Freeway without having any factual basis to support this implication. There are numerous examples of this, especially in the early chapters of the DEIS. One example is the "What do the results of Propositions 300 and 400 tell us" sidebar on page 1-9. The problem is that the proposed South Mountain Freeway was a fairly minor detail in the information provided to voters on the broader regional transportation plan. Voters have never had an opportunity to express their opinions on the South Mountain Freeway separately from other regional transportation projects that were bundled as part of these propositions and were in more immediate need of funding at the time the propositions were presented to voters. Furthermore, neither proposition provided voters with basic details on the South Mountain Freeway such as the expected construction cost and the number of lanes. Furthermore, at the time people voted on proposition 300 the town of Ahwatukee was largely undeveloped. Likewise, the regional transportation plan provided to voters as part of the Proposition 400 election of 2004 failed to anticipate the location, size, use, financial cost and social costs of building the freeway. It is also noteworthy that both votes occurred before the onset of the great recession. The bottom line is that there is no reason to expect that Maricopa county voters would support building the South Mountain Freeway, if they were given the opportunity to vote today. In addition, the question of whether or not voters liked the idea of a new freeway extension 30 years ago or 10 years ago is entirely irrelevant to the question of whether or not it makes sense to build the freeway today.
491	Comment #2: The effort to model the effect of the freeway on ambient concentrations of criteria air pollutants is inadequate and misleading. For example, the discussion of carbon monoxide (CO) in section 4-65 of the DEIS points out that impacts were modeled using information from Maricopa County's current network of air quality monitoring sites in the region. Yet the discussion fails to mention that Maricopa County does not have any air quality monitoring sites in the Ahwatukee foothills (http://alert.fcd.maricopa.gov/alert/Google/v3/air.html). This is a serious flaw in the modeling assessment because the prevailing wind patterns and foothills topography will likely cause most of the emissions of pollutants to be blown into pockets of

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490	**Public Involvement**	The section, *Summary of Past Agency and Public Involvement Pre-EIS Process*, outlines the outreach by the Maricopa Association of Governments and others since the 1980s over the South Mountain Freeway. In that outreach, through the development of the *Regional Transportation Plan*, people were provided opportunities to express concerns over the specifics of the proposed freeway as well as learn about the costs and design of the facility through the years. Construction cost estimates are subject to constant updates just as, for reasons noted in the comment, economic conditions are subject to change. The amount of funding set aside for the proposed action in the *Regional Transportation Plan* is in line with projected costs. Regarding the sidebar on page 1-9 of the Draft Environmental Impact Statement referenced in the comment, the text makes no reference to the proposed action. The comment asserts that the page 1-9 sidebar is an example of the Draft Environmental Impact Statement "implying that a majority of Maricopa County residents supports building the proposed freeway." The sidebar referenced says 1) there is "continued public support for investment in regional transportation projects," 2) "voters in 90 percent of the county's 1,058 voting precincts voted in favor of Proposition 400 and the projects it would fund," and 3) "voters in 81 percent of the 31 voting precincts in the Study Area favored Proposition 400 and the projects it would fund."
491	**Air Quality**	The air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in Guideline for Modeling Carbon Monoxide from Roadway Intersections (A-OAQPS, 1992). Inputs to the model were based on U.S. Environmental Protection Agency-recommended values or were selected to provide a conservative estimate of impacts. Modeling methodology and results were reviewed by the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments. As noted on page 4-65 of the Draft Environmental Impact Statement, over 700 receptors were modeled for carbon monoxide concentrations. Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations Part 93.123(a). The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement.

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492	localized air pollution above residential neighborhoods in Ahwatukee in between the freeway and South Mountain Park. Comment #3: Failure to model the impact of the freeway on ground level ozone concentrations above residential neighborhoods in Ahwatukee is a serious problem as emissions generated by the freeway may very well exceed national standards for 8-hour ambient ozone concentrations. As noted earlier, the prevailing wind patterns and topography of the region are likely to cause most of the emissions to sit in air pockets above residential neighborhoods in Ahwatukee. Furthermore, these neighborhoods are highly populated by families with young children who are identified by the Environmental Protection Agency as being a "sensitive group" with respect to ozone (Federal Registrar, Vol. 64, No. 149, Wednesday, August 4, 1999, Rules and Regulations). Comment #4: The lack of air quality monitors in the Ahwatukee foothills area undermines the credibility of the entire air quality assessment provided in the DEIS. Air quality monitors are needed to inform the assessment of potential effects of the freeway on air quality. The current assessment does not make a serious attempt to model air quality impacts in Ahwatukee, which contains the neighborhoods that will experience the largest negative effects of increased air pollution generated by the freeway. Comment #5: The DEIS's overall conclusion that building the freeway will not cause an increase in violations of federal ambient air quality standards is misleading. This conclusion simply exploits the current placement of air quality monitors. By providing an incentive for truckers and non-local drivers to avoid traveling through central Phoneix, the South Mountain freeway will divert air pollution away from the areas that have air quality monitors and into areas that do not have air quality monitors, such as the Ahwatukee foothills. Ambient air quality will surely worsen in Ahwatukee and may very well violate federal standards for the criteria pollutants. Of course this will not cause any violations if there are no air quality monitors to measure the violations. This highlights the need for a more serious assessment of air pollution impacts from the proposed freeway, and it also highlights the need to place air quality monitors at several locations in the Ahwatukee foothills. 3

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492	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the *Regional Transportation Plan* that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014. A common theme in public comments on the proposed project has been the potential impacts of the project on children's health, primarily through vehicle emissions and noise. Many commenters raised concerns about the proximity of the project to schools or other aspects of the project that may affect children. In addition, the U.S. Environmental Protection Agency requested that the Final Environmental Impact Statement address Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. Throughout the Final Environmental Impact Statement, potential impacts on and subsequent mitigation for human health are disclosed and identified, as inherent in the environmental impact statement process. The Final Environmental Impact Statement incorporates an assessment of the potential impacts of the proposed project on all populations, including children. The Final Environmental Impact Statement addresses potential impacts of the project on children in the Chapter 4 environmental consequences analyses. The U.S. Environmental Protection Agency's Toxicity and Exposure Assessments for Children's Health report (see page 4-73 of the Final Environmental Impact Statement) indicated that indoor air concentrations of benzene are usually higher than outdoor levels and that indoor air in smokers' homes is a significant contributor to children's exposures. It mentioned children when identifying the effects of acute exposure to naphthalene. The Final Environmental Impact Statement acknowledges and fully discloses public scoping comments that raised the topic of health effects on neighborhoods and adjacent schools (see page 4-31 of the Final Environmental Impact Statement). The Final Environmental Impact Statement evaluates Clean Air Act criteria air pollutant concentrations in Maricopa County and the Phoenix area (see pages 4-75 to 4-77 of the Final Environmental Impact Statement). With regard to air quality impacts, the Final Environmental Impact Statement addresses children's health impacts within the broader discussion regarding health impacts under the National Ambient Air Quality Standards. Clean Air Act Section 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety and are requisite to protect the public health. As noted by the U.S. Environmental Protection Agency in its 2013 rulemaking for particulate matter, Clean Air Act Section 109's legislative history demonstrates that the primary standards are "to be set at the maximum permissible ambient air level... which will protect the health of any [sensitive] group of the population" (78 *Federal Register* 3086 and 3090) (quoting S. Rep. No. 91-1196, 91st Cong., 2 Sess. 10 [1970]) (alterations in original). Accordingly, the Final Environmental Impact Statement National Ambient Air Quality Standards-based evaluation of criteria air pollutants includes a health-based review of sensitive populations, including children, given the National Ambient Air Quality Standards inherent consideration

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localized air pollution above residential neighborhoods in Ahwatukee in between the freeway and South Mountain Park.

Comment #3: Failure to model the impact of the freeway on ground level ozone concentrations above residential neighborhoods in Ahwatukee is a serious problem as emissions generated by the freeway may very well exceed national standards for 8-hour ambient ozone concentrations. As noted earlier, the prevailing wind patterns and topography of the region are likely to cause most of the emissions to sit in air pockets above residential neighborhoods in Ahwatukee. Furthermore, these neighborhoods are highly populated by families with young children who are identified by the Environmental Protection Agency as being a "sensitive group" with respect to ozone (Federal Registrar, Vol. 64, No. 149, Wednesday, August 4, 1999, Rules and Regulations).

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Comment #4: The lack of air quality monitors in the Ahwatukee foothills area undermines the credibility of the entire air quality assessment provided in the DEIS. Air quality monitors are needed to inform the assessment of potential effects of the freeway on air quality. The current assessment does not make a serious attempt to model air quality impacts in Ahwatukee, which contains the neighborhoods that will experience the largest negative effects of increased air pollution generated by the freeway.

494 493

Comment #5: The DEIS's overall conclusion that building the freeway will not cause an increase in violations of federal ambient air quality standards is misleading. This conclusion simply exploits the current placement of air quality monitors. By providing an incentive for truckers and non-local drivers to avoid traveling through central Phoneix, the South Mountain freeway will divert air pollution away from the areas that have air quality monitors and into areas that do not have air quality monitors, such as the Ahwatukee foothills. Ambient air quality will surely worsen in Ahwatukee and may very well violate federal standards for the criteria pollutants. Of course this will not cause any violations if there are no air quality monitors to measure the violations. This highlights the need for a more serious assessment of air pollution impacts from the proposed freeway, and it also highlights the need to place air quality monitors at several locations in the Ahwatukee foothills.

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492 (cont.)		of those factors. Furthermore, the National Ambient Air Quality Standards-based assessment ensures adequate consideration of health-based issues as "[t]he requirement that primary standards provide an adequate margin of safety was intended to address uncertainties associated with inconclusive scientific and technical information ... and to protect against hazards that research has not yet identified" (78 *Federal Register* 3090). Sensitive receivers for air and noise are already included in the air quality and noise analyses in accordance with State and federal guidance. Both sections, *Air Quality* and *Noise*, beginning on Final Environmental Impact Statement pages 4-68 and 4-88, respectively, have addressed requirements under the National Environmental Policy Act. As stated on page 4-89 of the Final Environmental Impact Statement, over 220 sensitive receivers were evaluated at exterior locations from a traffic noise perspective. All of the receivers represent noise-sensitive land uses in proximity to the proposed project, including homes, schools, and parks, and these receivers would have higher noise levels than similar facilities more distant from the proposed action. Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations § 93.123(a). The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (beginning on page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Through analysis, the Federal Highway Administration has determined that the proposed project would not produce disproportionate impacts on children.
493	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analyses. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement.
494	**Air Quality**	The air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in Guideline for Modeling Carbon Monoxide from Roadway Intersections (A-OAQPS, 1992). Inputs to the model were based on U.S. Environmental Protection Agency-recommended values or were selected to provide a conservative estimate of impacts. Modeling methodology and results were reviewed by the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments. Included in the analyses are data on the proposed vehicles using the proposed freeway, including heavy trucks.

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495	Comment #6: Pages 4-69 and 4-70 provide a deeply flawed rationale for ignoring the impact of the freeway on human health outcomes. The DEIS claims that decision makers should not be provided with information on health outcomes of building the freeway because the magnitudes of those outcomes are judged by DOT to be highly uncertain. I will explain three problems with this logic: A. Ignoring uncertainty violates federal standards for evaluating public projects, as outlined by the United States Office of Management and Budget's Circular A-4 (http://www.whitehouse.gov/omb/circulars_a004_a-4) and the United States Environmental Protection Agency's *Guidelines for Preparing Economic Analysis*. For example, OMB Circular A-4 has a special section devoted to the appropriate treatment of uncertainty in the evaluation of public projects. It clearly states that uncertainty outcomes should be quantified and this information should be provided for public review and to decision makers. For example, it instructs analysts involved in the preparation of impact statements that "*the important uncertainties connected with your regulatory decisions need to be analyzed and presented as part of the overall regulatory analysis*" and that "*by assessing the sources of uncertainty and the way in which benefit and cost estimates may be affected under plausible assumptions, you can shape your analysis to inform decision makers and the public about the effects and the uncertainties of alternative regulatory actions*" and that "*wherever possible, you should use appropriate statistical techniques to determine a probability distribution of the relevant outcome.*" It also states that "*when uncertainty has significant effects on the final conclusion about net benefits, your agency should consider additional research prior to rulemaking. The cost of being wrong may outweigh the benefits of a faster decision. This is true especially for cases with irreversible or large upfront investments.*" B. The South Mountain Freeway is likely to have large negative health effects. The large impacts of air pollution on morbidity and mortality are well documented as is the fact 4

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494 (cont.)		As noted on page 4-65 of the Draft Environmental Impact Statement, over 700 receptors were modeled for carbon monoxide concentrations. Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations Part 93.123(a). The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement.
495	**Air Quality, Health Risk Assessment**	The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). **The Role of Health Risk Assessment in a National Environmental Policy Act Context** The Federal Highway Administration's National Environmental Policy Act documents are developed under two guiding regulations: the Council on Environmental Quality's National Environmental Policy Act regulations applicable to all federal agencies (40 Code of Federal Regulations Parts 1500–1508) and the Federal Highway Administration's implementing regulations governing Federal Highway Administration National Environmental Policy Act documents (23 Code of Federal Regulations Part 771). In its mobile source air toxics guidance, the Federal Highway Administration discusses 40 Code of Federal Regulations Part 1502.22 and acknowledges that while much work has been done to assess the overall health risk of mobile source air toxics, analytical tools and techniques for assessing project-specific health outcomes as a result of lifetime exposures to mobile source air toxics remain limited. These limitations impede the ability to evaluate the potential health risks attributable to exposure to mobile source air toxics as part of the decision-making process in the National Environmental Policy Act context. However, as with any analysis that the Federal Highway

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495 (cont.)		Administration conducts for National Environmental Policy Act purposes, the Federal Highway Administration's approach for mobile source air toxic analysis in National Environmental Policy Act documents is informed not just by 40 Code of Federal Regulations Part 1502.22, but by all applicable Council on Environmental Quality requirements. The appropriateness of air toxics health risk assessment as an analysis method for National Environmental Policy Act documents is discussed below, in the context of Council on Environmental Quality requirements for these documents. In addition to the 40 Code of Federal Regulations Part 1502.22 provisions regarding uncertainty and limitations discussed in the Federal Highway Administration's MSAT Interim Guidance Appendix C, three other provisions of the Council on Environmental Quality regulations are particularly relevant to the topic of health risk assessment: *40 Code of Federal Regulations § 1500.1(b): NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.* *40 Code of Federal Regulations § 1502.1: An environmental impact statement is more than a disclosure document. It shall be used by Federal officials in conjunction with other relevant material to plan actions and make decisions.* *40 Code of Federal Regulations § 1502.2: (a) Environmental impact statements shall be analytic rather than encyclopedic. (b) Impacts shall be discussed in proportion to their significance.(c) Environmental impact statements shall be kept concise and shall be no longer than absolutely necessary to comply with NEPA and with these regulations.* Section 1500.1(b) states that information for decision making must be of high quality and based on accurate scientific analysis. Air toxics health risk assessments can involve large uncertainties. The mobile source air toxic health risk assessment uncertainty builds on itself—each step of the analysis involves uncertainties, including modeling traffic and then modeling emissions, and using this estimated output to model dispersion/concentrations, which provide information for estimating or assuming exposures to those concentrations, and finally predicting health outcomes. Major uncertainties are associated with traffic and emissions projections over a 70-year period, and dispersion models are typically held to a "factor of 2" performance standard. Health impacts of mobile source air toxics in the U.S. Environmental Protection Agency Integrated Risk Information System are based on a 70-year lifetime exposure, which introduces significant uncertainty (e.g., on average, people in the United States change residence approximately once every 8 years and change jobs once every 3). Finally, as noted above, the U.S. Environmental Protection Agency's Integrated Risk Information System provides toxicity (risk) values for various pollutants and routes of exposure; in a health risk assessment, the Federal Highway Administration would compare calculated

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495 (cont.)		concentrations of mobile source air toxic pollutants to the Integrated Risk Information System values to estimate health risk. In the Integrated Risk Information System, the U.S. Environmental Protection Agency states the toxicity values are believed to be accurate to within an order of magnitude (a factor of 10). The total cumulative uncertainty involved in highway project health risk assessment is much larger than the change in emissions attributable to projects (typically a few percentage points). In this context, the information would not necessarily have a strong nexus to the requirements for high-quality information and accurate scientific analysis. Section 1500.1(b) also directs agencies to focus their National Environmental Policy Act analysis and documentation on issues that are truly significant to the action in question. In the context of mobile source air toxics, the Federal Highway Administration must consider whether changes in mobile source air toxic emissions attributable to a project have the potential for significant health risk. Using cancer risk as an example, the U.S. Environmental Protection Agency estimates that the overall risk of cancer in the United States is approximately 330,000 in a million, and that air toxics (from all sources) are responsible for a risk of approximately 50 in a million. In its most recent mobile source air toxics rule-making, the U.S. Environmental Protection Agency estimated mobile source air toxic cancer risk, after implementation of emissions controls, at approximately 5 in a million (or 0.0015 percent of overall cancer risk from any cause). For the Preferred Alternative, the mobile source air toxic emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxic emissions between the Preferred and No Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxic emissions would decrease by more than 80 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see the discussion beginning on page 4-77 of the Final Environmental Impact Statement). In summary, available information from the U.S. Environmental Protection Agency indicates that mobile source air toxics are a small component of overall cancer risk, and the analysis for the Final Environmental Impact Statement indicates both that the Preferred Alternative would result in a small change in the emissions contributing to this risk and that emissions will decline by a large amount regardless of alternative.

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495 (cont.)		As described above and in the air quality technical report, results from the health risk assessment would be influenced more by the uncertainty introduced into the process through assumptions and speculations rather than by genuine insight into the actual health impacts directly attributable to mobile source air toxic exposure associated with a project. Therefore, outcomes of such a health risk assessment do not provide useful information for decision makers, as required by Section 1502.1. The Federal Highway Administration emissions analysis meets the requirement to produce information that is useful for both disclosure and decision making because it allows the public and decision makers to see which alternative has less mobile source air toxic emissions, with much less uncertainty than a health risk assessment. Given the uncertainty of a mobile source air toxic health risk assessment, the Federal Highway Administration instead addresses the potential impacts of mobile source air toxics through an emissions assessment in its National Environmental Policy Act documents. For smaller projects with a lower likelihood of a meaningful impact, this discussion is qualitative. For larger projects, emissions analysis is conducted. The Federal Highway Administration approach is consistent with the Council on Environmental Quality's direction in Section 1502.2(b) to discuss impacts in proportion to their significance. The results of an emissions analysis can be summarized concisely in a National Environmental Policy Act document and provide useful information for decision makers (e.g., an alternative that has lower emissions is likely to be "better" from a mobile source air toxics health risk standpoint than one that has higher emissions). While the U.S. Environmental Protection Agency and the Federal Highway Administration both agree on the usefulness of addressing mobile source air toxics in National Environmental Policy Act documents for highway projects, the agencies disagree about the value of health risk assessment as a method for doing so.

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495 (cont.)		Another consideration with respect to health impacts is that the Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the Preferred Alternative would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the roadway network. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. The Federal Highway Administration determined that a supplemental environmental impact statement is not required at this time because there were no changes to the proposed action that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement nor is there new information relevant to environmental concerns and bearings on the proposed action or its impacts that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement.

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Comment #6: Pages 4-69 and 4-70 provide a deeply flawed rationale for ignoring the impact of the freeway on human health outcomes. The DEIS claims that decision makers should not be provided with information on health outcomes of building the freeway because the magnitudes of those outcomes are judged by DOT to be highly uncertain. I will explain three problems with this logic:

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A. Ignoring uncertainty violates federal standards for evaluating public projects, as outlined by the United States Office of Management and Budget's Circular A-4 (http://www.whitehouse.gov/omb/circulars_a004_a-4) and the United States Environmental Protection Agency's *Guidelines for Preparing Economic Analysis*. For example, OMB Circular A-4 has a special section devoted to the appropriate treatment of uncertainty in the evaluation of public projects. It clearly states that uncertainty outcomes should be quantified and this information should be provided for public review and to decision makers. For example, it instructs analysts involved in the preparation of impact statements that "*the important uncertainties connected with your regulatory decisions need to be analyzed and presented as part of the overall regulatory analysis*" and that "*by assessing the sources of uncertainty and the way in which benefit and cost estimates may be affected under plausible assumptions, you can shape your analysis to inform decision makers and the public about the effects and the uncertainties of alternative regulatory actions*" and that "*wherever possible, you should use appropriate statistical techniques to determine a probability distribution of the relevant outcome.*" It also states that "*when uncertainty has significant effects on the final conclusion about net benefits, your agency should consider additional research prior to rulemaking. The cost of being wrong may outweigh the benefits of a faster decision. This is true especially for cases with irreversible or large upfront investments.*"

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B. The South Mountain Freeway is likely to have large negative health effects. The large impacts of air pollution on morbidity and mortality are well documented as is the fact

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496	**Impacts**	Comment is duly noted. The Draft Environmental Impact Statement notes matters of uncertainty throughout the entire document. Examples include study findings in the sections, *Air Quality, Noise, Visual Resources, Land Use, Displacements and Relocations, and Cultural Resources* in Chapter 4. In Chapter 3, *Alternatives*, reference is made to continued monitoring of design and cost to account for needed updates. On page 4-1, in the text box, "*Can the Impacts Change and, If So, How?*", text is presented on how such dynamics are tracked.

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that these impacts are largest for sensitive groups such as children and seniors. This is of special concern due to the large proportion of families with young children and communities of seniors in Ahwatukee. See the EPA's (2011) *Second Prospective Study 1990-2020 of the Clean Air Act* and the associated appendices for the epidemiological consensus on health impacts and calibrated dose-response functions. The range of potential health impacts should be quantified and monetized using standard measures of the "value of a statistical life" consistent with best practices in regulatory evaluation established in the OMB and EPA guidelines. Even the lower bound on number of lives lost is likely to be sufficiently high to raise serious concerns for policy makers.

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C. The effects of the freeway on health outcomes are no more uncertain than the effects of the freeway on commute times. Yet, there is no mention of uncertainty in commute times. Throughout the DEIS, the economic benefits of building the freeway are conveyed with a false sense of precision whereas the environmental costs are dismissed altogether because they are uncertain. This asymmetric treatment of uncertainty has the effect of biasing the DEIS in favor of building the freeway with the Pecos road alignment.

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Comment #7: The DEIS fails to adequately address the uncertainty of benefits from building the freeway. For example, the actual reduction in commute time that would be realized if the freeway were to be build will depend on several sources of uncertainty, including but not limited to: (i) future patterns of residential development; (ii) future location choices made by firms; (iii) future residential and job location choices made by workers; (iv) future trends in telecommuting; (v) future trends in "flex-time" and the ability of workers to commute during off-peak hours; (vi) future trends in the national economy; (vii) future trends in in the international economy and trade that influence the rate of trucking through Phoenix; (viii) future trends in automobile design; (ix) the impact of building the freeway on the desirability of living in Ahwatukee; and (x) future trends in the price of gasoline, electricity, and other factors affecting commuting costs. These sources of uncertainty should be carefully analyzed and policy makers should be informed

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497	**Environmental Analysis**	40 Code of Federal Regulations § 1500.1(b): NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. The Council on Environmental Quality regulations state information for decision making must be of high quality and based on accurate scientific analysis. The models, methods, and assumptions used throughout the Draft Environmental Impact Statement account for reasonably foreseeable future conditions and dismiss speculative considerations.

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about the statistical distribution of possible outcomes for commute times. More broadly, sources of uncertainty should be addressed throughout the discussion of benefits of building the freeway.

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Comment #8: The DEIS systematically overstates the likely benefits of building the freeway to Phoenix commuters. The estimated benefits are based on statistics for projected future traffic patterns provided by the Maricopa Association of Governments. However, these statistics are primarily extrapolations of past trends. In other words, they are "made up". They are not derived from a consistent model of residential location choice or a realistic model of commuting choices. It is difficult to believe that many workers would make residential and job location choices that would induce them to use the new freeway. Projections for future traffic congestion also fail to incorporate future growth in the share of workers who work from home or are allowed the flexibility to commute during off-peak hours. Furthermore, estimates for the opportunity cost of time used to quantify the value of reduced commute times are not consistently linked to the actual commuters who use the freeway during peak hours, but are likely driven by high-income commuters living in places such as Scottsdale who will not use the new freeway if it is build. In addition, the models of traffic congestion in the DEIS are inadequate for estimating the impact of the freeway on commute times. The DEIS fails to provide even the most basic facts about commuting. For example, what fraction of today's metro area commuters would experience a shorter commute (in terms of physical distance) if the South Mountain Freeway were built? This information can easily be obtained from the U.S. Census Bureau's annual Public Use Microdata Sample of respondents to the *American Community Survey*, which provides information on workers' house locations, job locations, time leaving home to go to work, and travel times.

499 498

Comment #9: Throughout the DEIS, the analysis of benefits of building the freeway is based on a false premise that the demand for transportation will be the same whether or not the freeway is built. This results in overstatement of the benefits of building the freeway. In reality, building the freeway is likely to change residential development patterns which, in turn, will increase the demand for using the freeway relative to the demand if the freeway had not been built. In other words, building the freeway will increase the demand for using the freeway due to increases in

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498	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. While new projections based on the 2010 Census showed a lower anticipated population in 2035 than the previous projections, the need for the freeway has not changed. The traffic analysis demonstrated that the proposed project is needed today. The models, methods, and assumptions used throughout the Draft Environmental Impact Statement account for reasonably foreseeable future conditions and rightfully dismiss speculative considerations. As examples, the Maricopa Association of Governments, as the federally designated regional transportation planning agency, is nationally recognized as a leader in air quality modeling and traffic modeling and forecasting. The models used account for the assumptions made in the comment.
499	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see page 3-27 of the Draft Environmental Impact Statement). The model is run with and without the proposed freeway. Traffic projections are regularly updated by the Maricopa Association of Governments based on studies of travel patterns and changes in land use conditions. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011.

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driving by current residents, increases in commercial traffic, and increased migration to areas near the freeway. These "feedback effects" will increase congestion on the freeway, diminishing its benefits, especially for existing residents of Phoenix. This effect is well known to transportation economists as "The Fundamental Law of Road Congestion". Yet recognition of this effect is completely missing from the transportation models throughout the DEIS. In perhaps the most comprehensive empirical study of the causal relationship between road projects and traffic congestion, Duranton and Turner (2011) concluded that adding a new road with the characteristics of the South Mountain Freeway is unlikely to relieve congestion. See: Duranton, Gilles, and Matthew A. Turner. "The Fundamental Law of Road Congestion: Evidence from US Cities." *American Economic Review*. 101 (October 2011): 2616-2652.

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Comment #10: There is overwhelming evidence in economics journals and federal regulatory evaluations that freeways produce negative externalities that substantially diminish the quality of life for those living nearby. Some of these effects will likely be reflected in reductions (or slower growth) in property values for residential neighborhoods experiencing diminished quality of life. It is standard practice to use hedonic property value methods and contingent valuation methods to quantify these costs as part of regulatory evaluations. However, no such effort is undertaken in the draft EIS. The following impacts should be quantified and included in the EIS using best practices in methods for economic valuation of environmental impacts of public projects as outlined in EPA's Guidelines for Preparing Economic Analysis: (1) effect of air pollution on property values; (2) effect of noise pollution on property values; (3) cost of water pollution produced from freeway runoff; (4) value of lost recreation benefits to joggers and bicyclists who currently use Pecos road for recreation; (5) value of diminished recreation benefits for people using South Mountain Park due to visual disamenities, noise, dust, odors, and non-visible air pollution created by the freeway; and (6) the impact of building the freeway on crime in Ahwatukee and, in turn, the effect of increased crime on property values. This last point deserves some explanation. At present, weekly statistics from the police blotter indicate that there is virtually no violent crime or property crime in western Ahwatukee. The vast majority of Ahwatukee crimes occur in the eastern part of the town close to the I-10. The lack of crime is western Ahwatukee is likely due to the fact that, as the end of a big cul-de-sac, criminals have no

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500	**General Impacts**	The study used state-of-the-practice, scientific community methods and similarly accepted methods. Methods, assumptions, and data were developed early in the environmental impact statement process and peer reviewed by the Federal Highway Administration, the Arizona Department of Transportation, and other federal, State, and local agencies. Peer reviewers concluded that the methods, assumptions, and data are appropriate. The Draft Environmental Impact Statement has sufficient technical merit, does comply with "fundamental concepts and purpose of an environmental impact statement," and does appropriately and properly inform the public. The Arizona Department of Transportation and Federal Highway Administration, in cooperation with the U.S. Army Corps of Engineers, the U.S. Bureau of Indian Affairs, and the Western Area Power Administration, prepared the Draft and Final Environmental Impact Statements and Section 4(f) Evaluation in accordance with the National Environmental Policy Act of 1969 [42 United States Code § 4332(2)(c)], Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 United States Code § 303, as amended), and Section 404 of the Clean Water Act of 1977 (33 United States Code § 1251). All of these agencies are experienced in the review of National Environmental Policy Act documents and have found the logical sequence of decision making to be sound and in line with National Environmental Policy Act requirements. The Draft Environmental Impact Statement and Section 4(f) Evaluation 1) satisfies Federal Highway Administration and Arizona Department of Transportation's environmental analysis requirements; 2) provides a comparison of the social, economic, and environmental impacts that may result from implementation of the proposed action—construction and operation of a major transportation facility; and 3) identifies measures to avoid, reduce, or otherwise mitigate adverse impacts.
501	**Traffic**	Hazardous Materials Commodity Flow Studies and other information are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing Emergency Response Plans. If the plan were amended, it would be made available to the Arizona Department of Transportation. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The traffic projections for Chandler Boulevard (see Figure 3-12 on page 3-29 of the Draft Environmental Impact Statement) do show a reduction with the proposed freeway when compared with conditions without the proposed freeway.
502	**Health Effects**	A common theme in public comments on the proposed project has been the potential impacts of the project on children's health, primarily through vehicle emissions and noise. Many commenters raised concerns about the proximity of the project to schools or other aspects of the project that may affect children. In addition, the U.S. Environmental Protection Agency requested that the Final Environmental Impact Statement address Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. Throughout the Final Environmental Impact Statement, potential impacts on and subsequent mitigation for human health are disclosed and identified, as inherent in the environmental impact statement process. The Final Environmental Impact Statement incorporates an assessment of the potential impacts of the proposed project on all populations, including children. The Final Environmental Impact

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escape route. Building the freeway will provide such an escape route and increase the attractiveness of the area to criminals as a result. Those who argue in favor of building the freeway often claim that Ahwatukee residents should have known that these effects might eventually occur as a result of the freeway when they first purchased property in the area and that, as a result, the negative externalities are already capitalized into property values. This claim is false. The conventional wisdom of real estate agents and homebuyers in Ahwatukee is that the freeway would never be built and that the original 1985 plan to build the freeway was simply a relic of "pre-Ahwatukee" regional planning. As a result, the freeway will act as a shock to the local housing market and depress property values.

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Comment #11: In the event of heavy traffic, road work, or accidents, drivers on the South Mountain Freeway are likely to use Chandler Blvd. as a bypass. GPS devices will mechanically divert drivers off the freeway and onto Chandler. This is especially true for the Chandler Blvd segment from S. 17th Ave to Desert Foothills Parkway because this segment has 4 lanes, a speed limit of 45mph, and no stop signs or traffic lights. This will create a serious public health hazard because the aforementioned segment of Chandler goes right through the residential neighborhood of "Club West". Joggers, bicyclists, families and children use Chandler Blvd during the morning and evening commute hours for recreation and to walk/bicycle to/from school and parks. Young children on foot or on bicycle and joggers with headphones are often seen crossing the street. The lack of stop signs and crosswalks is not currently a problem because traffic is light. However, with some freeway commuters using the Chandler Blvd corridor as a bypass, there is likely to be a surge in traffic accidents and traffic-related pedestrian deaths in this family-oriented residential neighborhood. These effects are entirely ignored in the DEIS.

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Comment #12: The DEIS violates the spirit of Presidential Executive Order #13045 by failing to identify and assess the environmental health risks and safety risks that may disproportionately affect children as a result of the freeway. An example of the environmental health risk is the increase in ambient ozone concentrations that will affect children living in Ahwatukee, particularly those who use the numerous public schools and public parks located between South

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502 (cont.)		Statement addresses potential impacts of the project on children in the Chapter 4 environmental consequences analyses. The U.S. Environmental Protection Agency's Toxicity and Exposure Assessments for Children's Health report (see page 4-73 of the Final Environmental Impact Statement) indicated that indoor air concentrations of benzene are usually higher than outdoor levels and that indoor air in smokers' homes is a significant contributor to children's exposures. It mentioned children when identifying the effects of acute exposure to naphthalene. The Final Environmental Impact Statement acknowledges and fully discloses public scoping comments that raised the topic of health effects on neighborhoods and adjacent schools (see page 4-31 of the Final Environmental Impact Statement). The Final Environmental Impact Statement evaluates Clean Air Act criteria air pollutant concentrations in Maricopa County and the Phoenix area (see pages 4-75 to 4-77 of the Final Environmental Impact Statement). With regard to air quality impacts, the Final Environmental Impact Statement addresses children's health impacts within the broader discussion regarding health impacts under the National Ambient Air Quality Standards. Clean Air Act Section 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety and are requisite to protect the public health. As noted by the U.S. Environmental Protection Agency in its 2013 rulemaking for particulate matter, Clean Air Act Section 109's legislative history demonstrates that the primary standards are "to be set at the maximum permissible ambient air level... which will protect the health of any [sensitive] group of the population" (78 *Federal Register* 3086 and 3090) (quoting S. Rep. No. 91-1196, 91st Cong., 2 Sess. 10 [1970]) (alterations in original). Accordingly, the Final Environmental Impact Statement National Ambient Air Quality Standards-based evaluation of criteria air pollutants includes a health-based review of sensitive populations, including children, given the National Ambient Air Quality Standards inherent consideration of those factors. Furthermore, the National Ambient Air Quality Standards-based assessment ensures adequate consideration of health-based issues as "[t]he requirement that primary standards provide an adequate margin of safety was intended to address uncertainties associated with inconclusive scientific and technical information ... and to protect against hazards that research has not yet identified" (78 *Federal Register* 3090). Sensitive receivers for air and noise are already included in the air quality and noise analyses in accordance with State and federal guidance. Both sections, *Air Quality* and *Noise*, beginning on Final Environmental Impact Statement pages 4-68 and 4-88, respectively, have addressed requirements under the National Environmental Policy Act. As stated on page 4-89 of the Final Environmental Impact Statement, over 220 sensitive receivers were evaluated at exterior locations from a traffic noise perspective. All of the receivers represent noise-sensitive land uses in proximity to the proposed project, including homes, schools, and parks, and these receivers would have higher noise levels than similar facilities more distant from the proposed action. Each modeled school was reexamined to determine whether noise impacts would result from the proposed freeway and whether appropriate mitigation of these impacts was provided. Of the nine schools modeled in the analysis for the Final Environmental Impact Statement, all were predicted to exceed Federal Highway Administration noise abatement criteria (see Table 4-40, beginning on page 4-93). Mitigation, in the form of noise walls, was proposed for all schools. After applying this mitigation, all schools except one were mitigated according to the Arizona Department of Transportation noise policy. According to Arizona Department of Transportation policy, noise mitigation should achieve a reduction of 5 to 7 A-weighted decibels and result in a noise level of less than 64 A-weighted decibels

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Mountain Park and the proposed Pecos Road alignment of the freeway. The EPA identifies children as a "sensitive group" for ambient ozone. An example of the safety risk is the increase in traffic on arterial streets that wind through residential neighborhoods in Ahwatukee, particular during periods of heavy traffic, road work, or freeway accidents when drivers will naturally use Chandler Blvd as a bypass. The traffic poses a safety risk because children frequently walk / bike / run / play on the streets that will experience increased traffic, such as Chandler Blvd from S. 17th Ave through Desert Foothills Parkway. This will increase the risk of accidental deaths of children.

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502 (cont.)		for residential and similar areas. These criteria were not reached for one school (receiver 67, Santa Maria Elementary School) because the policy limits wall heights to 20 feet. A wall taller than 20 feet would be required to bring levels at this receiver down to 64 A-weighted decibels. However, a 5-A-weighted decibels reduction would be provided by the 20-foot wall proposed in this area. It is important to note that this receiver would be affected only by the W71 Alternative, which is not the Preferred Alternative. The Arizona Department of Transportation noise policy also states that noise abatement shall be considered if "substantial increases" (defined as a 15 A-weighted decibels or greater increase) are predicted. Of the nine schools modeled, substantial increases were predicted at six schools. As discussed above, however, noise walls would reduce noise levels at all schools according to the Arizona Department of Transportation noise policy, with the exception of Santa Maria Elementary School, which would be affected only by the W71 Alternative, which is not the Preferred Alternative. According to the Federal Highway Administration's 1995 Highway Traffic Noise Analysis and Abatement Policy and Guidance, in most cases, if the exterior area can be protected, the interior will also be protected. Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations § 93.123(a). The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Through analysis, the Federal Highway Administration has determined that the proposed project would not produce disproportionate impacts on children. Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe) with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations. Overall, researchers felt that there was "sufficient" evidence for causality for the exacerbation of asthma. Evidence was "suggestive but not sufficient" for health outcomes such as cardiovascular mortality and others.

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502 **(cont.)**		Study authors also noted that past epidemiological studies may not provide an appropriate assessment of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics "hot spots." In general, the authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified. These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work. Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment: *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.* *In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.* *The report also looks at trends in other health conditions, such as Attention-Deficit/ Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.* Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues.

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Additional Comments

Seven

Comments by Hugh S. Mason dated July 21, 2013,
resident of Phoenix and the Ahwatukee are and
Associate Professor at Arizona State University,
School of Life Sciences

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-----Original Message-----
From: Hugh Mason <Hugh.Mason@asu.edu>
To: projects <projects@azdot.gov>
Cc: PARCtheSMF <PARCtheSMF@aol.com>
Sent: Sun, Jul 21, 2013 1:44 pm
Subject: Comments on DEIS for SMF

Dear ADOT:

503 I am a citizen and resident of Phoenix and the Ahwatukee area, and Associate Professor at Arizona State University School of Life Sciences. I am writing to ADOT regarding its draft environmental impact study (DEIS) for the South Mountain freeway (SMF). I would like to register my strong opposition to the building of the SMF. I am a member of Protecting Arizona's Resources and Children (PARC), and fully support its efforts to prevent the building of SMF. I have great concerns about the DEIS, as presented below.

504 One of my main concerns is that the DEIS greatly underestimates the impact of the SMF on the air quality for residents living nearby. The DEIS minimizes the potential pollution that will be caused by trucks burning diesel fuel, especially those coming from Mexico having fuel that is poorly regulated and high in contaminants like sulfur. The DEIS suggests that the "truck bypass" route on I-8 and SH-85 will be preferred by truckers. However, this route is substantially longer than the proposed SMF, and is thus unlikely to be viewed as economically feasible. Due to the geographic features along the E1 Pecos road corridor, concentration of the vehicle emissions is likely to compound toxicity issues in this area. The extreme proximity of several schools to the E1 route puts a huge number of children at risk of health problems due to air pollution.

505 The E1 route would require massive cuts in the ridges of South Mountain on the west side. This action is unfeasible for two main reasons. All of the Native American tribes in the area consider South Mountain to be sacred, and the proposed action would desecrate the land. Although that reason alone is enough to abandon the plan, another factor is more important to most of us: air quality. The blasting required for the SM ridge cuts (and other cuts along the E1 route) would generate huge amounts of airborne particulate matter. The fine dust generated by construction (especially PM10 particles that can be inhaled deeply) will produce respiratory problems for people in the area. Moreover, it will threaten federal funds for transportation that require control of air quality. Maricopa County has had great difficulty maintaining PM10 standards, and the construction of the SMF would certainly make it more difficult, if not impossible.

The DEIS makes dire predictions for adverse effects on the regional economy if the "no action" option is chosen. However, we must remember that the SMF plan was first proposed more than 25 years ago, when fuel was relatively cheap and few people saw any problem with continuation of the freeway transportation paradigm. Data on climate change and greenhouse gases in the atmosphere have steadily accumulated over the years, to the point that it is obvious that we need a transportation paradigm shift in order to address the problems we face. We must reallocate most of our resources away from freeway construction and invest them in technologies that will minimize adverse environmental effects. I strongly advocate light rail expansion throughout the valley. Thus, not building the SMF should not be called "no action", because there are other actions that can be funded with the resources.

I strongly urge the ADOT to abandon the SMF plan and intensify studies of other transportation options that are more environmentally friendly.

Sincerely,
Hugh S. Mason

Code	Issue	Response
503		Responses to specific comments appear below.
504	**Trucks**	The road network in the Maricopa Association of Governments travel demand model includes the Interstate 8 and State Route 85 corridor. So, while the roads are not in the Study Area for the proposed action, traffic and trip distributions along the corridor are included in the traffic analysis for the proposed action. Any traffic that would shift from the Interstate 8 and State Route 85 corridor to the proposed action would be included in the vehicle mix considered in the air quality analysis. A truck driver traveling from Tucson to Los Angeles and choosing to use Interstate 10 and the proposed freeway would travel 15 miles less than one choosing to use the designated truck bypass along Interstate 8 and State Route 85. Choosing to travel on the proposed action versus Interstate 8 and State Route 85 would not translate to any substantial travel time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85. Trucks crossing from Mexico to Arizona are restricted to the commercial zones within 25 miles of the border. The Federal Motor Carrier Safety Administration is administering a United States-Mexico cross-border, long-haul trucking pilot program. The program tests and demonstrates the ability of Mexico-based motor carriers to operate safely in the United States beyond the municipalities and commercial zones along the United States-Mexico border (see <fmcsa.dot.gov/intl-programs/trucking/trucking-program.aspx>). Petróleos Mexicanos (better known as Pemex), the Mexican state-owned petroleum company, has guaranteed 15 parts per million in its sulfur diesel fuel in the border region (see <http://transportpolicy.net/index.php?title=Mexico:_Fuels:_ Diesel_and_Gasoline>). As explained on pages 4-69 and 4-77 of the Draft and Final Environmental Impact Statements, respectively, the emissions analysis conducted for the project shows that future mobile source air toxics emissions will be lower than current levels. This analysis included projected truck traffic.
505	**Air Quality**	A common theme in public comments on the proposed project has been the potential impacts of the project on children's health, primarily through vehicle emissions and noise. Many commenters raised concerns about the proximity of the project to schools or other aspects of the project that may affect children. In addition, the U.S. Environmental Protection Agency requested that the Final Environmental Impact Statement address Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. Throughout the Final Environmental Impact Statement, potential impacts on and subsequent mitigation for human health are disclosed and identified, as inherent in the environmental impact statement process. The Final Environmental Impact Statement incorporates an assessment of the potential impacts of the proposed project on all populations, including children. The Final Environmental Impact Statement addresses potential impacts of the project on children in the Chapter 4 environmental consequences analyses. The U.S. Environmental Protection Agency's Toxicity and Exposure Assessments for Children's Health report (see page 4-73 of the Final Environmental Impact Statement) indicated that indoor air concentrations of benzene are usually higher than outdoor levels and that indoor air in smokers' homes is a significant contributor to children's exposures. It mentioned children when identifying the effects of acute exposure to naphthalene. The Final Environmental Impact Statement acknowledges and fully discloses public scoping comments that raised the topic of health effects on neighborhoods and adjacent schools (see page 4-31 of the Final Environmental Impact Statement). The Final Environmental Impact Statement evaluates Clean Air Act criteria air pollutant concentrations in Maricopa County and the Phoenix area (see pages 4-75 to 4-77 of the

(Response 505 continues on next page)

Code	Comment Document

-----Original Message-----
From: Hugh Mason <Hugh.Mason@asu.edu>
To: projects <projects@azdot.gov>
Cc: PARCtheSMF <PARCtheSMF@aol.com>
Sent: Sun, Jul 21, 2013 1:44 pm
Subject: Comments on DEIS for SMF

Dear ADOT:

I am a citizen and resident of Phoenix and the Ahwatukee area, and Associate Professor at Arizona State University School of Life Sciences. I am writing to ADOT regarding its draft environmental impact study (DEIS) for the South Mountain freeway (SMF). I would like to register my strong opposition to the building of the SMF. I am a member of Protecting Arizona's Resources and Children (PARC), and fully support its efforts to prevent the building of SMF. I have great concerns about the DEIS, as presented below.

One of my main concerns is that the DEIS greatly underestimates the impact of the SMF on the air quality for residents living nearby. The DEIS minimizes the potential pollution that will be caused by trucks burning diesel fuel, especially those coming from Mexico having fuel that is poorly regulated and high in contaminants like sulfur. The DEIS suggests that the "truck bypass" route on I-8 and SH-85 will be preferred by truckers. However, this route is substantially longer than the proposed SMF, and is thus unlikely to be viewed as economically feasible. Due to the geographic features along the E1 Pecos road corridor, concentration of the vehicle emissions is likely to compound toxicity issues in this area. The extreme proximity of several schools to the E1 route puts a huge number of children at risk of health problems due to air pollution.

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The E1 route would require massive cuts in the ridges of South Mountain on the west side. This action is unfeasible for two main reasons. All of the Native American tribes in the area consider South Mountain to be sacred, and the proposed action would desecrate the land. Although that reason alone is enough to abandon the plan, another factor is more important to most of us: air quality. The blasting required for the SM ridge cuts (and other cuts along the E1 route) would generate huge amounts of airborne particulate matter. The fine dust generated by construction (especially PM10 particles that can be inhaled deeply) will produce respiratory problems for people in the area. Moreover, it will threaten federal funds for transportation that require control of air quality. Maricopa County has had great difficulty maintaining PM10 standards, and the construction of the SMF would certainly make it more difficult, if not impossible.

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I strongly urge the ADOT to abandon the SMF plan and intensify studies of other transportation options that are more environmentally friendly.

Sincerely,
Hugh S. Mason

Code	Issue	Response
505 (cont.)		Final Environmental Impact Statement). With regard to air quality impacts, the Final Environmental Impact Statement addresses children's health impacts within the broader discussion regarding health impacts under the National Ambient Air Quality Standards. Clean Air Act Section 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety and are requisite to protect the public health. As noted by the U.S. Environmental Protection Agency in its 2013 rulemaking for particulate matter, Clean Air Act Section 109's legislative history demonstrates that the primary standards are "to be set at the maximum permissible ambient air level... which will protect the health of any [sensitive] group of the population" (78 *Federal Register* 3086 and 3090) (quoting S. Rep. No. 91-1196, 91st Cong., 2 Sess. 10 [1970]) (alterations in original). Accordingly, the Final Environmental Impact Statement National Ambient Air Quality Standards-based evaluation of criteria air pollutants includes a health-based review of sensitive populations, including children, given the National Ambient Air Quality Standards inherent consideration of those factors. Furthermore, the National Ambient Air Quality Standards-based assessment ensures adequate consideration of health-based issues as "[t]he requirement that primary standards provide an adequate margin of safety was intended to address uncertainties associated with inconclusive scientific and technical information ... and to protect against hazards that research has not yet identified" (78 *Federal Register* 3090). Sensitive receivers for air and noise are already included in the air quality and noise analyses in accordance with State and federal guidance. Both sections, *Air Quality* and *Noise*, beginning on Final Environmental Impact Statement pages 4-68 and 4-88, respectively, have addressed requirements under the National Environmental Policy Act. As stated on page 4-89 of the Final Environmental Impact Statement, over 220 sensitive receivers were evaluated at exterior locations from a traffic noise perspective. All of the receivers represent noise-sensitive land uses in proximity to the proposed project, including homes, schools, and parks, and these receivers would have higher noise levels than similar facilities more distant from the proposed action. Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations § 93.123(a). The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Through analysis, the Federal Highway Administration has determined that the proposed project would not produce disproportionate impacts on children.
506	**Cultural Resources**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic

(Response 506 continues on next page)

Code	Comment Document

-----Original Message-----
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To: projects <projects@azdot.gov>
Cc: PARCtheSMF <PARCtheSMF@aol.com>
Sent: Sun, Jul 21, 2013 1:44 pm
Subject: Comments on DEIS for SMF

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One of my main concerns is that the DEIS greatly underestimates the impact of the SMF on the air quality for residents living nearby. The DEIS minimizes the potential pollution that will be caused by trucks burning diesel fuel, especially those coming from Mexico having fuel that is poorly regulated and high in contaminants like sulfur. The DEIS suggests that the "truck bypass" route on I-8 and SH-85 will be preferred by truckers. However, this route is substantially longer than the proposed SMF, and is thus unlikely to be viewed as economically feasible. Due to the geographic features along the E1 Pecos road corridor, concentration of the vehicle emissions is likely to compound toxicity issues in this area. The extreme proximity of several schools to the E1 route puts a huge number of children at risk of health problems due to air pollution.

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508

I strongly urge the ADOT to abandon the SMF plan and intensify studies of other transportation options that are more environmentally friendly.

509

Sincerely,
Hugh S. Mason

Code	Issue	Response
506 (cont.)		Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed.
507	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration have updated the particulate matter (PM_{10}) qualitative analysis performed for the Draft Environmental Impact Statement to a quantitative analysis for the Final Environmental Impact Statement to ensure that a state-of-the-art analysis is completed for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The transportation conformity rule in 40 Code of Federal Regulations § 93.123(c)(5) states that hot-spot analyses are not required to consider construction-related activities that cause temporary increases in emissions. Temporary increases are defined as those that occur only during the construction phase and last 5 years or less at any individual site. The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would expedite the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method, breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years and the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period; therefore, the construction effects described above would be temporary and would not require additional analysis.
508	**Purpose and Need**	At the beginning of the environmental impact statement process, the need for a major transportation facility was reexamined to determine whether such a facility is still needed. Validation of those findings occurred throughout the entire environmental impact statement process. Analysis of the purpose and need for the proposed action followed National Environmental Policy Act and Federal Highway Administration implementing guidance on the subject matter and used state-of-the-practice analytical tools, as pointed out in Table 1-3, "Traffic Analysis Tools," on page 1-13 of the Draft Environmental Impact Statement. The results of the analysis determined that a transportation problem does exist and that problem will continue in the foreseeable future (see section, *Conclusions*, on page 1-21). As noted on page 3-1 in the section, *Reconfirm the Purpose and Need for the Proposed Action*, a continuous validation process was undertaken throughout the environmental impact statement process to ensure past conclusions in the environmental impact statement process remained valid. The reader is referred to Draft Environmental Impact Statement Chapter 3, *Alternatives*, and, specifically, the section, *Alternatives Development and Screening Process Conclusions*, beginning on page 3-26, noting "... a comprehensive set of alternatives including all modes was considered ... assurance that the screening process was an open process ... a logical, sequential, step-by-step process using data and expertise from multiple disciplines ..." to demonstrate all possibilities were considered.
509		Comment noted.

Code	Comment Document

Additional Comments

Eight

Comment by
Phoenix Mountains Preservation Council

Code	Issue	Response

Code	Comment Document
510	PMPC: May 21, 2013 **Phoenix Mountains Preservation Council** Official position on the Arizona Department of Transportation's South Mountain Freeway Draft Environmental Impact Study
511	PMPC is an organization put into place by Arizona visionaries, and for the last 40 years PMPC has continued to monitor and anticipate the impact that rapid population growth would have on our precious Mountain Preserve system.
512	**PMPC is steadfastly opposed to any alignment of the Loop 202 South Mountain Freeway that allows for trespass onto the Mountain Preserve or for any excavation into the South Mountain what so ever. These mountain preserves ensures a lifestyle that 80% of Arizona voters consistently support. The mountain preserves are unique and are for people and wildlife, not for vehicle trespass. PMPC does not agree with** many of the DEIS assumptions finding them objectionable and deficient in the following analysis areas.
513	Unexceptable Pre-Decisional Actions: ADOT has made some pre-decisional actions with the purchase of property before the Draft Environmental Impact Statement (DEIS) was released. Phoenix Mountains Preservation Council (PMPC) questions the legality of this action and the entire DEIS when it appears ADOT has already made considerable financial investment to establish the alignment for the South Mountain Freeway rather than follow the prescribed process. Dismal Wildlife Connectivity: The DEIS does not meet the minimal requirements for coordination and analysis of wildlife resources. The Arizona Game and Fish Department was consulted in 2009 during scoping. The current connection to the Estrella Mountains allows for passage of mule deer, javelina, bobcat, and mountain lion. There is no evidence of further efforts to ascertain wildlife connectivity needs or possible mitigation. The Sonoran desert tortoise provides additional evidence of inadequate cumulative analysis given its status as a U.S. Fish & Wildlife Service's candidate species. The mountain ridge area slated for demolition meets the definition for the tortoise's habitat. Unreasonable Taking of Mountain Preservation Lands: The DEIS states in Figure 5-7 Public Parkland the avoidance of taking over 30 acres of the Preserve is "not prudent and feasible". The taking of this mountainside will destroy important archeological, spiritual, cultural and recreational sites with no realistic or reasonable mitigation possible in the study. The study failed to recognize and address new two trails, Gila and Bursera Trails, created in the southwest end of the Preserve in 2010. Outdated Data Projections Used: The DEIS is based on outdated data projections that are now six to eight years old. The analysis does not acknowledge the impact the major economic downturn had and it brings into question the validity of projected growth levels put forth in the DEIS. In all the alternative studies, the DEIS does not provide one alternative analysis to the demolition of the southwest ridges of South Mountain. Furthermore, nowhere in this study is there an assessment of hazardous material truck traffic nor any mention of managing this truck traffic and the consequences of a serious hazard waste incident. Over 3 million visitors come to South Mountain Park/Preserve annually, according to City of Phoenix statistics. Destroying any part of the mountain to align a high-capacity freeway will only have a negative impact on tourism and the many unique resources the park offers. We urge ADOT to stop providing studies that do not accurately or thoroughly address the impact this freeway has on South Mountain. It's time to stop the $20 million and more in wasted tax payer's money to study the environmental impact and design for an alignment that no longer makes sense.

Code	Issue	Response
510		Responses to specific comments appear below.
511		Comment noted.
512	**Section 4(f) and Section 6(f)**	The information regarding the context and attributes of the South Mountains is described in the Draft Environmental Impact Statement. The acreage of parkland to be converted to a transportation use is reported on page 5-14 in the section, *Direct Use*. It is reported that 31.3 acres or just less than 0.2 percent of the parkland would be converted (this is a reduction in the amount of use planned for in 1988). The text goes on to point out other concerns associated with the direct use reported, and text on page 5-14 in the sidebar, "*The South Mountains in Phoenix's Sonoran Preserve System*," describes the importance of Phoenix South Mountain Park/Preserve in the region. Beginning on page 5-23 in the section, *Measures to Minimize Harm*, measures are presented to be undertaken to address the use impacts, including land replacement, on properties adjacent to the park. The section, *Cultural Resources*, beginning on page 4-128, also discloses the relation of the proposed action to the cultural resource attributes of the South Mountains. City of Phoenix planning efforts since the mid-1980s illustrate an awareness of the potential for the proposed freeway to affect Phoenix South Mountain Park/Preserve. In 1989, the South Mountain Park Master Plan was adopted by the Phoenix City Council. The master plan shows the freeway alignment as adopted by the State Transportation Board in 1988. In 1990, the South Mountain Preserve Act was ratified by the Arizona Legislature. The Act did not apply to roadways through a designated mountain preserve if the roadway was in the State Highway System prior to August 15, 1990. The proposed freeway was in the State Highway System prior to 1990. Records prior to the Act suggest a primary reason for the exception was to allow the proposed freeway to go through Phoenix South Mountain Park/Preserve (see page 5-14 of the Draft Environmental Impact Statement). The project team examined alternatives to avoid the park, but did not identify any feasible and prudent alternatives to avoid impacts. The Arizona Department of Transportation continues to work with park stakeholders to minimize impacts and address concerns. Measures to minimize harm to the park were developed (see Draft Environmental Impact Statement, starting on page 5-23).
513	**Alternatives**	The comment suggests the environmental impact statement process was biased by a history of property acquisitions within the Study Area. More specifically, properties falling within the limits of the Preferred Alternative, as identified in the Final Environmental Impact Statement, were targeted for acquisition. As noted in text on page 3-54 of the Final Environmental Impact Statement, the Arizona Department of Transportation began acquiring land for the original alignment in 1988. Between 1988 and 2001, the Arizona Department of Transportation acquired approximately 293 acres. Most of this land (258 acres) is located in the Eastern Section along Pecos Road. In 2006, the Arizona Department of Transportation began protective and hardship land acquisition in the alignment right-of-way footprint for the W59 and E1 Alternatives. Between 2006 and October 2013, the Arizona Department of Transportation purchased 326 acres (303 in the Western Section and 23 in the Eastern Section). The process for hardship and advanced acquisitions is explained in text on page 4-50 of the Final Environmental Impact Statement.

(Response 513 continues on next page)

Code	Comment Document

PMPC: May 21, 2013

Phoenix Mountains Preservation Council
Official position on the Arizona Department of Transportation's
South Mountain Freeway Draft Environmental Impact Study

PMPC is an organization put into place by Arizona visionaries, and for the last 40 years PMPC has continued to monitor and anticipate the impact that rapid population growth would have on our precious Mountain Preserve system.

PMPC is steadfastly opposed to any alignment of the Loop 202 South Mountain Freeway that allows for trespass onto the Mountain Preserve or for any excavation into the South Mountain what so ever. These mountain preserves ensures a lifestyle that 80% of Arizona voters consistently support. The mountain preserves are unique and are for people and wildlife, not for vehicle trespass. PMPC does not agree with many of the DEIS assumptions finding them objectionable and deficient in the following analysis areas.

Unexceptable Pre-Decisional Actions: ADOT has made some pre-decisional actions with the purchase of property before the Draft Environmental Impact Statement (DEIS) was released. Phoenix Mountains Preservation Council (PMPC) questions the legality of this action and the entire DEIS when it appears ADOT has already made considerable financial investment to establish the alignment for the South Mountain Freeway rather than follow the prescribed process.

514 Dismal Wildlife Connectivity: The DEIS does not meet the minimal requirements for coordination and analysis of wildlife resources. The Arizona Game and Fish Department was consulted in 2009 during scoping. The current connection to the Estrella Mountains allows for passage of mule deer, javelina, bobcat, and mountain lion. There is no evidence of further efforts to ascertain wildlife connectivity needs or possible mitigation. The Sonoran desert tortoise provides additional evidence of inadequate cumulative analysis given its status as a U.S. Fish & Wildlife Service's candidate species. The mountain ridge area slated for demolition meets the definition for the tortoise's habitat.

515 Unreasonable Taking of Mountain Preservation Lands: The DEIS states in Figure 5-7 Public Parkland the avoidance of taking over 30 acres of the Preserve is "not prudent and feasible". The taking of this mountainside will destroy important archeological, spiritual, cultural and recreational sites with no realistic or reasonable mitigation possible in the study. The study failed to recognize and address new two trails, Gila and Bursera Trails, created in the southwest end of the Preserve in 2010.

Outdated Data Projections Used: The DEIS is based on outdated data projections that are now six to eight years old. The analysis does not acknowledge the impact the major economic downturn had and it brings into question the validity of projected growth levels put forth in the DEIS. In all the alternative studies, the DEIS does not provide one alternative analysis to the demolition of the southwest ridges of South Mountain. Furthermore, nowhere in this study is there an assessment of hazardous material truck traffic nor any mention of managing this truck traffic and the consequences of a serious hazard waste incident.

Over 3 million visitors come to South Mountain Park/Preserve annually, according to City of Phoenix statistics. Destroying any part of the mountain to align a high-capacity freeway will only have a negative impact on tourism and the many unique resources the park offers.

We urge ADOT to stop providing studies that do not accurately or thoroughly address the impact this freeway has on South Mountain. It's time to stop the $20 million and more in wasted tax payer's money to study the environmental impact and design for an alignment that no longer makes sense.

Code	Issue	Response
513 (cont.)		The comment infers that by taking such action, the objective equal consideration of the alternatives studied in detail in the Draft and Final Environmental Impact Statements is tainted. Advanced acquisitions in parallel to a National Environmental Policy Act environmental determination process is not unprecedented and is common practice. In this case, property acquisitions by the Arizona Department of Transportation for purposes of implementing the proposed action are done at risk as communicated to the agency by the Federal Highway Administration. If another action alternative were to be ultimately selected, the agency would likely have to place the acquired properties on the market for sale and purchase. The Arizona Department of Transportation attempts to balance the risk against its mission of timely delivery of transportation infrastructure to the driving public. Further, Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
514	**Biology, Plants, and Wildlife**	The section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-125 of the Draft Environmental Impact Statement, discloses by what means the proposed action and its alternatives would affect vegetation, wildlife, and wildlife habitat. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the Sonoran desert tortoise. The information used to prepare the analysis in the Draft Environmental Impact Statement (page 4-122) was based on 2011 information retrieved from the Arizona Game and Fish Department (Gopherus agassizii, draft unpublished abstract compiled and edited by the Heritage Data Management System, Phoenix). Current information on threats and connectivity strategies was included in the Biological Evaluation. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). Connectivity is planned to allow wildlife movement beneath the freeway in multiuse crossings (see page 4-137 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use as well as culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
515	**Section 4(f) and Section 6(f)**	The cultural and religious importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities as noted in the beginning of this response. Consultation has occurred

(Response 515 continues on next page)

Code	Comment Document

PMPC: May 21, 2013

Phoenix Mountains Preservation Council
Official position on the Arizona Department of Transportation's
South Mountain Freeway Draft Environmental Impact Study

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Outdated Data Projections Used: The DEIS is based on outdated data projections that are now six to eight years old. The analysis does not acknowledge the impact the major economic downturn had and it brings into question the validity of projected growth levels put forth in the DEIS. In all the alternative studies, the DEIS does not provide one alternative analysis to the demolition of the southwest ridges of South Mountain. Furthermore, nowhere in this study is there an assessment of hazardous material truck traffic nor any mention of managing this truck traffic and the consequences of a serious hazard waste incident.

Over 3 million visitors come to South Mountain Park/Preserve annually, according to City of Phoenix statistics. Destroying any part of the mountain to align a high-capacity freeway will only have a negative impact on tourism and the many unique resources the park offers.

We urge ADOT to stop providing studies that do not accurately or thoroughly address the impact this freeway has on South Mountain. It's time to stop the $20 million and more in wasted tax payer's money to study the environmental impact and design for an alignment that no longer makes sense.

Code	Issue	Response
515 (cont.)		with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. Mitigation measures were suggested in a letter from the Lieutenant Governor of the Gila River Indian Community to the Administrator, Arizona Division, Federal Highway Administration, dated June 23, 2010 (see page A372 of Appendix 2-1 of the Final Environmental Impact Statement). In this letter, the Gila River Indian Community submitted a proposal to address partial measures for the mitigation of adverse effect from the Pecos Road Alignment of the South Mountain Freeway. The Gila River Indian Community's proposal found the engineering solutions acceptable, but stated that implementation and construction of the proposed freeway would require further consultation. In committing to the evaluation of the South Mountains Traditional Cultural Property, the Arizona Department of Transportation and Federal Highway Administration also committed to the Gila River Indian Community's participation in ongoing engineering design refinements and acknowledged the importance of all plants and animals in the traditional culture of the Akimel O'odham and Pee Posh of the Gila River Indian Community. The newest South Mountains trails, the Bursera and the Pyramid, are more than ¼ mile from the proposed freeway and are analyzed in the Final Environmental Impact Statement on page 5-9. The trails are within ¼ mile of the planned Chandler extension and residential development; however, these trails do not have noise-sensitive activities or viewshed characteristics that contribute to their importance as a Section 4(f) recreational resource. Use of the mountains for the purposes of the proposed freeway represents two-tenths of one percent of the total mountain range. Since 1988, and as part of this environmental impact statement process, several measures have been undertaken and will be undertaken to further reduce effects on the mountains. These measures, including narrowing the design footprint, acquiring replacement land immediately adjacent to the mountains, and the provision of highway crossings, are outlined in text beginning on page 5-23 of the Draft Environmental Impact Statement.
516	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11.

(Response 516 continues on next page)

Code	Comment Document

PMPC: May 21, 2013

Phoenix Mountains Preservation Council
Official position on the Arizona Department of Transportation's
South Mountain Freeway Draft Environmental Impact Study

PMPC is an organization put into place by Arizona visionaries, and for the last 40 years PMPC has continued to monitor and anticipate the impact that rapid population growth would have on our precious Mountain Preserve system.

PMPC is steadfastly opposed to any alignment of the Loop 202 South Mountain Freeway that allows for trespass onto the Mountain Preserve or for any excavation into the South Mountain what so ever. These mountain preserves ensures a lifestyle that 80% of Arizona voters consistently support. The mountain preserves are unique and are for people and wildlife, not for vehicle trespass. PMPC does not agree with many of the DEIS assumptions finding them objectionable and deficient in the following analysis areas.

Unexceptable Pre-Decisional Actions: ADOT has made some pre-decisional actions with the purchase of property before the Draft Environmental Impact Statement (DEIS) was released. Phoenix Mountains Preservation Council (PMPC) questions the legality of this action and the entire DEIS when it appears ADOT has already made considerable financial investment to establish the alignment for the South Mountain Freeway rather than follow the prescribed process.

Dismal Wildlife Connectivity: The DEIS does not meet the minimal requirements for coordination and analysis of wildlife resources. The Arizona Game and Fish Department was consulted in 2009 during scoping. The current connection to the Estrella Mountains allows for passage of mule deer, javelina, bobcat, and mountain lion. There is no evidence of further efforts to ascertain wildlife connectivity needs or possible mitigation. The Sonoran desert tortoise provides additional evidence of inadequate cumulative analysis given its status as a U.S. Fish & Wildlife Service's candidate species. The mountain ridge area slated for demolition meets the definition for the tortoise's habitat.

Unreasonable Taking of Mountain Preservation Lands: The DEIS states in Figure 5-7 Public Parkland the avoidance of taking over 30 acres of the Preserve is "not prudent and feasible". The taking of this mountainside will destroy important archeological, spiritual, cultural and recreational sites with no realistic or reasonable mitigation possible in the study. The study failed to recognize and address new two trails, Gila and Bursera Trails, created in the southwest end of the Preserve in 2010.

Outdated Data Projections Used: The DEIS is based on outdated data projections that are now six to eight years old. The analysis does not acknowledge the impact the major economic downturn had and it brings into question the validity of projected growth levels put forth in the DEIS. In all the alternative studies, the DEIS does not provide one alternative analysis to the demolition of the southwest ridges of South Mountain. Furthermore, nowhere in this study is there an assessment of hazardous material truck traffic nor any mention of managing this truck traffic and the consequences of a serious hazard waste incident.

517 Over 3 million visitors come to South Mountain Park/Preserve annually, according to City of Phoenix statistics. Destroying any part of the mountain to align a high-capacity freeway will only have a negative impact on tourism and the many unique resources the park offers.

We urge ADOT to stop providing studies that do not accurately or thoroughly address the impact this freeway has on South Mountain. It's time to stop the $20 million and more in wasted tax payer's money to study the environmental impact and design for an alignment that no longer makes sense.

Code	Issue	Response
516 (cont.)		While new projections based on the 2010 Census showed a lower anticipated population in 2035 than the previous projections, the need for the freeway has not changed. The traffic analysis demonstrated that the proposed project is needed today. If the proposed action is the Selected Alternative in the record of decision, planning for emergency situations would be initiated. If the plan is amended, it is made available to the Arizona Department of Transportation. A number of alternatives that avoided the South Mountains were considered during the study (see text beginning on page 5-1 of the Draft Environmental Impact Statement). These avoidance alternatives were determined to not be prudent and were eliminated from further consideration. To support this response, here is the comment from the U.S. Department of Interior on the Draft Environmental Impact Statement: "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources." The complete letter can be found in Appendix 7, Volume III, on page B4.
517	**Section 4(f) and Section 6(f)**	The information regarding the context and attributes of the South Mountains is described in the Draft Environmental Impact Statement. The acreage of parkland to be converted to a transportation use is reported on page 5-14 in the section, *Direct Use*. It is reported that 31.3 acres or just less than 0.2 percent of the parkland would be converted (this is a reduction in the amount of use planned for in 1988). The text goes on to point out other concerns associated with the direct use reported, and text on page 5-14 in the sidebar, "*The South Mountains in Phoenix's Sonoran Preserve System*," describes the importance of Phoenix South Mountain Park/Preserve in the region. Beginning on page 5-23 in the section, *Measures to Minimize Harm*, measures are presented to be undertaken to address the use impacts, including land replacement, on properties adjacent to the park. The section, *Cultural Resources*, beginning on page 4-128, also discloses the relation of the proposed action to the cultural resource attributes of the South Mountains. City of Phoenix planning efforts since the mid-1980s illustrate an awareness of the potential for the proposed freeway to affect Phoenix South Mountain Park/Preserve. In 1989, the South Mountain Park Master Plan was adopted by the Phoenix City Council. The master plan shows the freeway alignment as adopted by the State Transportation Board in 1988. In 1990, the South Mountain Preserve Act was ratified by the Arizona Legislature. The Act did not apply to roadways through a designated mountain preserve if the roadway was in the State Highway System prior to August 15, 1990. The proposed freeway was in the State Highway System prior to 1990. Records prior to the Act suggest a primary reason for the exception was to allow the proposed freeway to go through Phoenix South Mountain Park/Preserve (see Draft Environmental Impact Statement page 5-14). The project team examined alternatives to avoid the park, but did not identify any feasible and prudent alternatives to avoid impacts. The Arizona Department of Transportation continues to work with park stakeholders to minimize impacts and address concerns. Measures to minimize harm to the park were developed (see Draft Environmental Impact Statement, starting on page 5-23). The activities that make the park such a highly valued tourist attraction (recreational activities, interaction with the Sonoran Desert) would remain.

Code	Comment Document

Attachments

One

Brown and Caldwell Study dated August 24, 1995

Code	Issue	Response

Code	Comment Document

M. Glotfelty

518

BROWN AND
CALDWELL

August 24, 1995

Mr. Tighue Shields, Director
Golf Course Maintenance Operations
Cobblestone Golf Group
2201 East Clubhouse Drive
Phoenix, Arizona 85048

15/2906-01

Subject: Well Feasibility/Well Siting Investigation
Foothills Golf Club, Phoenix, Arizona

Dear Mr. Shields:

Brown and Caldwell is pleased to provide Cobblestone Golf Group with this hydrogeologic study addressing the feasibility and preferable locations for a water supply well. This investigation was conducted in accordance with our agreement of August 7, 1995. Brown and Caldwell was authorized by Cobblestone Golf Group to conduct the tasks listed in the August 7, 1995 Agreement, including 1) preliminary data collection, and 2) well siting investigation.

519

BACKGROUND

The Foothills Golf Club is currently serviced by an existing well, which is supplemented during the summer months by City of Phoenix fire hydrant water. Use of City of Phoenix water for turf irrigation at the Foothills Golf Club is very expensive and, in addition, the existing well is located in the right-of-way for the proposed expansion of Pecos Road, and will need to be abandoned in the future. Therefore, a new water source is needed immediately to supplement the existing well, and to provide a future water supply for the Foothills Golf Club as a sole source.

520

BASIC DATA

The available hydrogeologic literature relating to the Foothills Golf Club area is limited. Available data were collected from the Arizona Department of Water Resources (ADWR), Cobblestone Golf Group files, and the files of Gilbert Pump Company (the pump maintenance contractor for the Foothills Golf Course well).

Environmental Engineering And Consulting • Analytical Services
cblstone\2906\letter.rpt\082495rhb 2635 N. Central Avenue, Suite 300, Phoenix, AZ 85012-1931
(602) 222-4444 Fax (602) 222-4466

Code	Issue	Response
518		Comment noted.
519	**Water Resources**	Wastewater effluent is not available as a replacement source as noted on page 4-100 of the Draft Environmental Impact Statement; therefore, only two water sources are available for irrigation and lake supply for the Foothills Community Association. The well that would be acquired and potable water from the City of Phoenix. The discussion on page 4-100 of the Draft Environmental Impact Statement has been modified in the Final Environmental Impact Statement to reflect that reclaimed wastewater would not be available; however, the conclusion on page 4-100 is still appropriate. As stated on page 4-100 of the Draft Environmental Impact Statement, "In the event that well replacement were to be impossible, the Arizona Department of Transportation would still replace the water that would be lost through the acquisition." Page 4-100 of the Draft Environmental Impact Statement states that finding a suitable location for a new well in this area may be difficult. Productivity of the well in bedrock formations is primarily based on intercepting fractures, and that can be very difficult to do. The Arizona Department of Transportation is aware of the difficult conditions that exist in replacing wells in this area. The procedure identified on page 4-100 of the Draft Environmental Impact Statement, define the procedure that the Arizona Department of Transportation would use to replace affected wells, and also identifies the general costs that the Arizona Department of Transportation would incur to replace the lost water sources. Depending on whether an action alternative were the Selected Alternative, it may be possible to keep the well in its current location, but move the well controls and associated piping to outside of the right-of-way. Such an analysis would be performed later in the design process.
520		Hydrogeologic report reviewed.

Code	Comment Document

HYDROGEOLOGIC ANALYSIS

The hydrogeologic analysis of the Foothills Golf Club area includes a geologic evaluation, based on review of available literature, and limited geologic mapping by a Brown and Caldwell geologist. The hydrogeologic analysis of the study area also included an evaluation of the groundwater conditions in the study area, based on hydrologic information from ADWR files and regional published reports. Generally, the available data relating to the geology of the Foothills Golf Club area were moderate, but the data relating to the hydrology and groundwater conditions of the Foothills area were quite sparse.

Geologic Setting

The study area is located along the southern flanks of South Mountain, which is a southwest trending mountain range that was formed during the Middle Tertiary Period (20 to 25 million years before present) as a result of low angle normal faulting. The rock types that make up South Mountain, and also occur within the study area include:

Precambrian amphibolite gneiss, which is a fine-grained, dark green rock that is present along the western flank of South Mountain;

Tertiary granite and granodiorite, which is a fine-grained, pink-to-cream-colored rock that comprises the remaining portion of the range; and

dikes, which are veins of rock that result from intrusion of molten rock into older pre-existing rocks. Dikes in South Mountain have various composition, and they cross-cut the Precambrian and Tertiary rocks.

Hydrologic Setting

The data collected from ADWR were insufficient for the preparation of a groundwater elevation contour map. However, available driller's logs for nearby wells were used to construct a generalized geologic cross-section of the area (Figure 1). A video survey obtained from Gilbert Pump Company was used to determine the static water level in the Foothills Golf Club well (Figure 1). Groundwater flow through bedrock aquifers occurs along fractures (broken or cleaved zones in the rock, along which movement has occurred) and joints (closely spaced penetrative cracks in the rock that do not show evidence of movement). The overlying alluvium in this area is relatively thin, and does not appear to significantly contribute water to wells in the Foothills Golf Club area. Therefore, the alluvium was not targeted as a major groundwater resource in this investigation. Rather, the fractured bedrock material within the study area was evaluated to identify preferable locations for installation of a new water well(s) for the facility.

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FRACTURE TRACE ANALYSIS

The most favorable well location in a fractured bedrock aquifer is generally along major fracture systems, or at the intersection of two or more fractures. Groundwater preferentially flows along the fracture systems and thus, a greater volume of groundwater is typically produced from wells along these geologic structures. In order to characterize the fractured bedrock in the Foothills Golf Club area, Brown and Caldwell conducted a fracture trace analysis, utilizing photogeology and field mapping, to determine the orientation (strike and dip) and overall character of the fractures.

Aerial photographs of the Foothills Golf Club area were obtained and evaluated by Brown and Caldwell hydrogeologists to identify the principal geologic lineaments in the study area. Geologic lineaments include such linear features as unusually straight drainages, vegetation alignments, and alignment of discolored or weathered surfaces along outcrops. Lineaments such as these typically occur as a result of underlying geologic structures that control the weathering, vegetation, and outcrop patterns observed at the land surface. The principal geologic lineaments in the study area are presented in Figure 2. Two primary lineament orientations were identified. The dominant (primary) lineament orientation trends to the west-southwest, and the minor (secondary) lineament orientation is nearly perpendicular to the primary lineaments, trending to the southeast. The primary lineaments are more clearly defined on the aerial photographs, and are probably associated with the tectonic event that originally formed South Mountain during the Middle Tertiary Period.

The photogeologic analysis was augmented with limited geologic mapping, and field measurement of selected fracture and joint orientations in the area. The field measurement of geologic structure orientations involves the use of a Brunton compass (a specially designed compass used for measurement of geologic formations and structures) to determine the strike (horizontal direction) and dip (vertical orientation) of dikes, fractures, and joints in the area. The joint, fracture, and dike orientations are presented in Figure 2, and are also listed in Table 1. Joints that occur in the study area frequently occur in sets of two or three intersecting joint planes (Figure 2, Table 1). The orientation of the joint planes parallels the orientation of the primary and secondary lineaments determined in the photogeologic study, and provides confirmation of Brown and Caldwell's photogeologic interpretation of the Foothills Golf Club area.

FINDINGS AND RECOMMENDATIONS

Based on our fracture trace analysis, Brown and Caldwell has identified three locations that appear favorable for the installation of a water well. Each of these locations is at the intersection of at least two fracture systems, as indicated in Figure 2. A more detailed map showing the location of the proposed well sites is presented in Figure 3. The three proposed well locations have been prioritized from the most favorable (indicated as "1" in Figures 2 and 3) to least favorable

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(indicated as "3" in Figures 2 and 3). The prioritization is primarily based on the hydrogeologic setting, but also considers the location of the existing water distribution system.

An additional option would be the installation of a replacement well near the existing well site. The proposed location of a replacement well is designated as "R" in Figures 2 and 3. The Rules and Regulations of the ADWR stipulate that an additional well spacing/well impact analysis is required only if the replacement well is located more than 660 feet from the existing well. Therefore, if a replacement well is to be drilled, it should be located within 660 feet of the existing well, but beyond the right-of-way for the Pecos Road expansion.

Brown and Caldwell appreciates the opportunity to provide this well feasibility/well siting report to the Cobblestone Golf Group. If you have any questions regarding this report, or require additional information, please do not hesitate to call.

Very truly yours,

BROWN AND CALDWELL

REGISTERED GEOLOGIST
CERTIFICATE NO.
22744
MARVIN
GLOTFELTY
Signed 8-24-95
ARIZONA, U.S.A.

Marvin F. Glotfelty, R.G.
Groundwater Resources Manager

MFG:rbb
Attachments (4)

cc: Mr. Brett Marsh, Brown and Caldwell
Mr. Raymond Roessel, Brown and Caldwell

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Table 1. Orientation of Dikes, Joints, and Fractures Foothills Golf Club Area, Phoenix Arizona

Station Number	Approximate Location	Orientation	Type of Feature
1	D(1-3)34dcd	N50E° 39SE°	Dike
2	D(1-3)34cdd	N25W° 44E°	Fracture
		N80E° 30S° N60W° 71N°	Joints
3	D(1-3)28cdb	N27W° 44E°	Fracture
		N34E° 58E°	Joints
4	D(1-3)28dcb	N55W° 39S°	Joints
5	D(1-3)34aac	N10W° 73E° N82E° 71S°	Joints
		N5E° 62S°	Intersection of joints
6	D(1-3)34aaa	N48E° 45S° N5E° 75W° N77W° 29N°	Joints
		N70E° 25E°	Intersection of joints
7	D(1-3)34daa	N48W° 71W°	Dike
8	D(1-3)34dcc	N87W° 42N°	Fracture
		N52W° 39S° N50E° 82E° N26W° 84W°	Joints
		N12E° 81S°	Intersection of joints
9	D(1-3)35cbb	N78W° 8N° N80E° Vertical N28W° 86W°	Joints
		N62W° 87N°	Intersection of joints
10	D(1-3)35cba	N6W° 66W° N86E° 15N° N71E° 75S°	Joints

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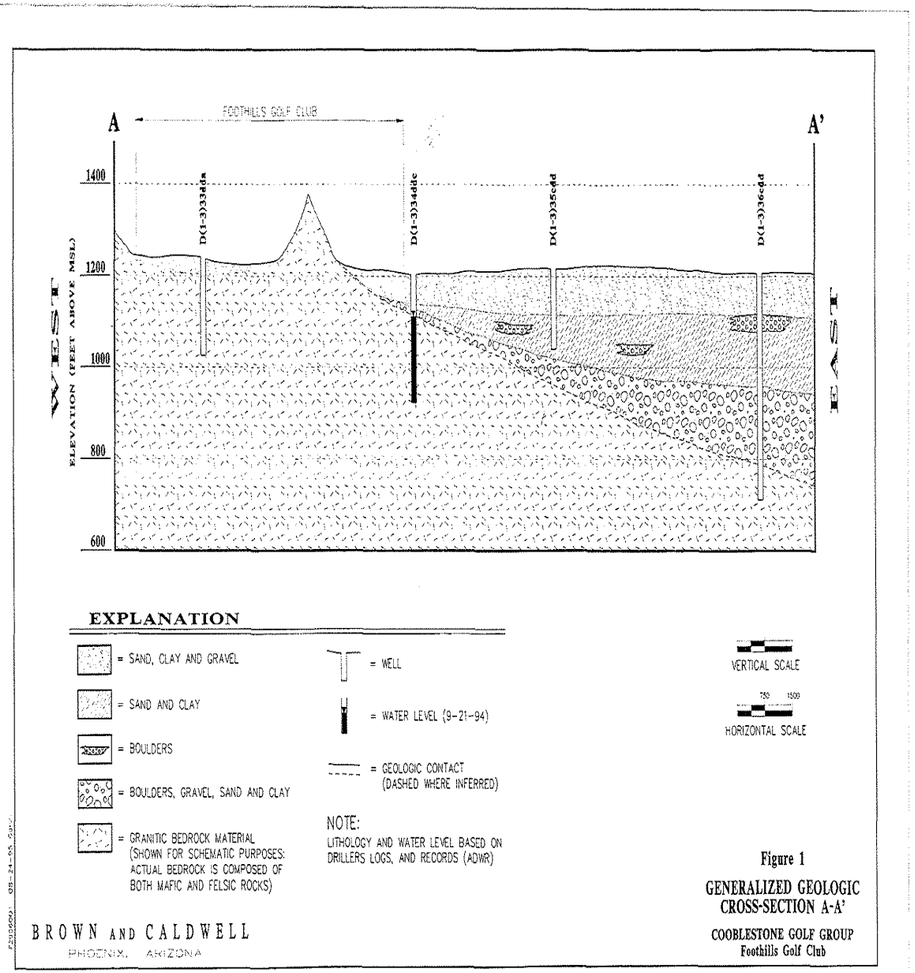

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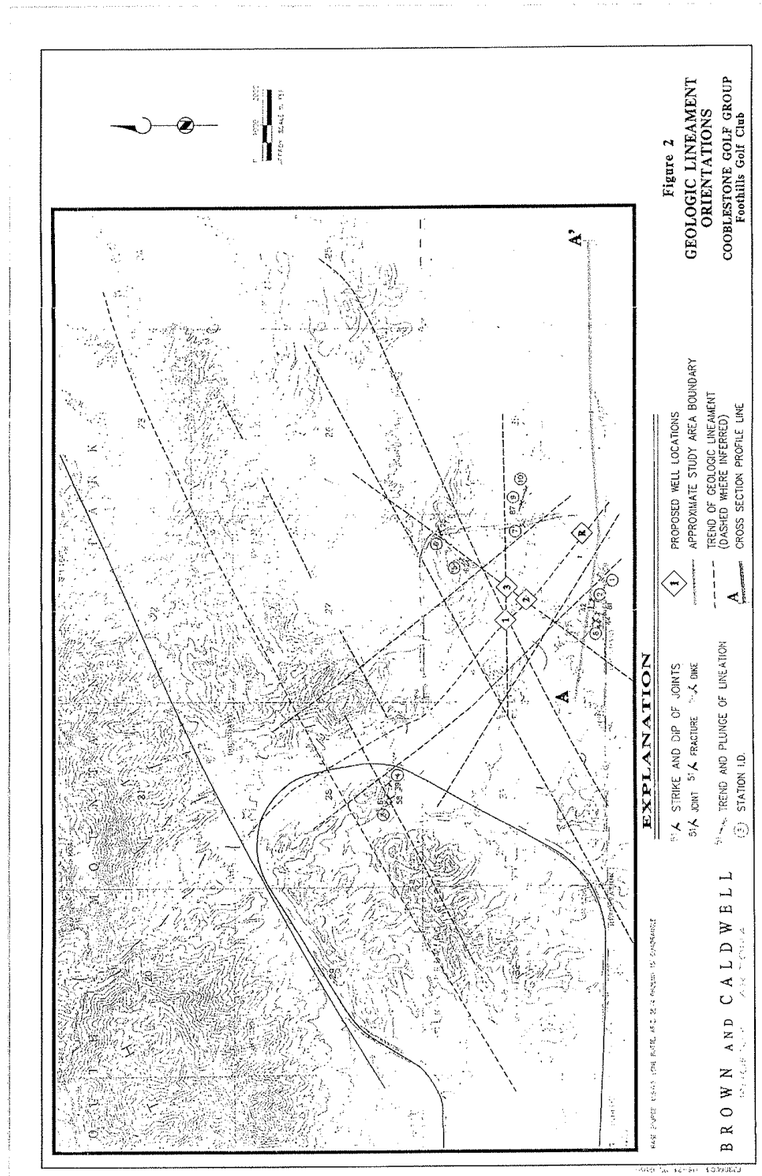

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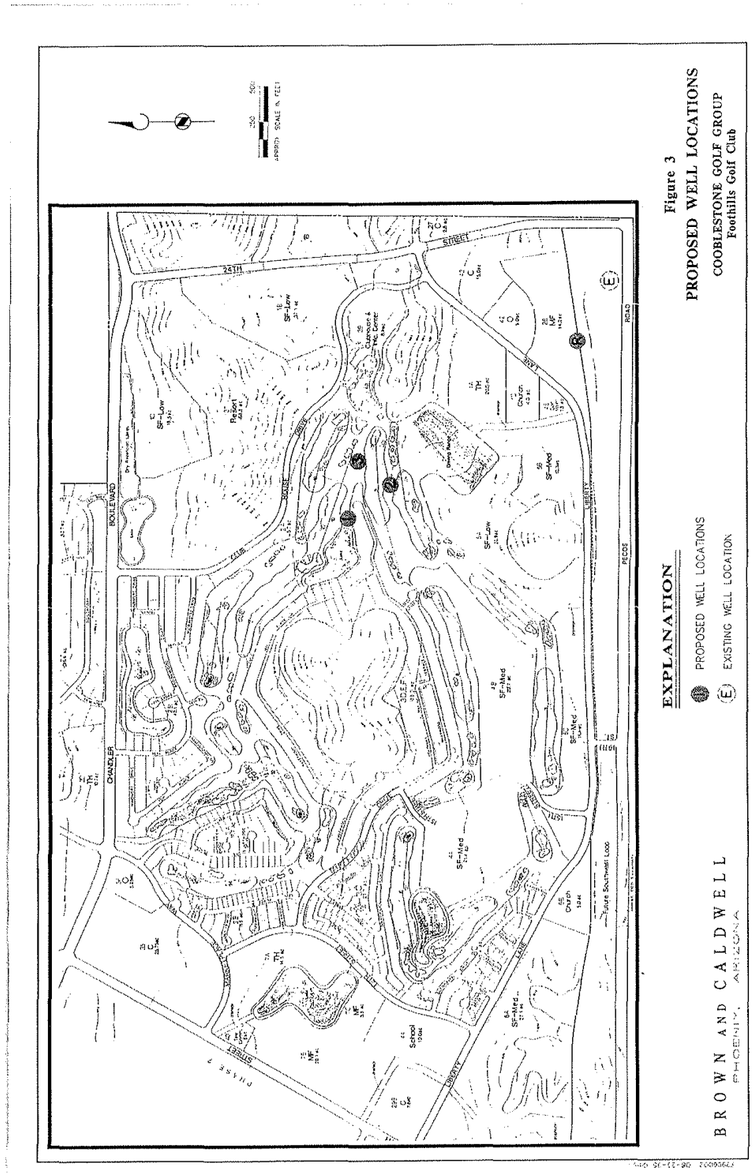

Code	Issue	Response

Code	Comment Document

Attachments

Two

Correspondence Foothills Golf Re: Water

Code	Issue	Response

Code	Comment Document

RE: Re:

Subject: RE: Re:
From: Terry <gm@Ahwatukeegc.com>
Date: 6/3/2013 10:03 AM
To: Chad Blostone <chadblostone@cox.net>

Chad,

We have not and do not plan on doing any test drilling. Suncor did several test drills when they owned it and found nothing.

Terry Duggan
President
Foothills Golf Group
Foothills Golf Club
Ahwatukee Country Club
Club West Golf Club
The Lakes Golf Club
The Duke Golf Club
(O) 480-893-9772
(C) 480-862-2947
(F) 480-699-4490

-----Original Message-----
From: Chad Blostone [mailto:chadblostone@cox.net]
Sent: Friday, May 31, 2013 4:00 PM
To: Terry
Subject: Re:

marvin at clear creek is looking for the old report. will send it to me if he can find it. have you test drilled club west?

521

On 5/30/2013 8:55 AM, Terry wrote:

> Chad,
>
> I am sure that the 55-630348 is the well next to our pump station on hole number 1. The motor was pulled and it is no longer producing any water. It was not good from the inception as it only produced enough water for a drinking fountain.
>
> The main well at Pecos is pulling from 600 to 700 gallons a minute.
>
> If we had to pay for city water the cost would be upwards of 1 million dollars annually which includes the water for the H.O.A. lakes. The Foothills Golf Club would no longer be a viable asset. We are barley breaking even at this point. The Golf Industry is not seeing any turn around yet. We can't close the course but we would probably be looking to sell it if we had to purchase straight city water.
>
> Hope this helps.
>
> Terry Duggan
> President
> Foothills Golf Group
> Foothills Golf Club
> Ahwatukee Country Club
> Club West Golf Club

Code	Issue	Response
521	**Water Resources**	Only two water sources are available for irrigation and lake supply for the Foothills Community Association. The well that would be acquired and potable water from the City of Phoenix. The discussion on page 4-100 of the Draft Environmental Impact Statement has been modified in the Final Environmental Impact Statement to reflect that reclaimed wastewater would not be available; however, the conclusion on page 4-100 is still appropriate. As stated on page 4-100 of the Draft Environmental Impact Statement, "In the event that well replacement were to be impossible, the Arizona Department of Transportation would still replace the water that would be lost through the acquisition." Page 4-100 of the Draft Environmental Impact Statement states that finding a suitable location for a new well in this area may be difficult. Productivity of the well in bedrock formations is primarily based on intercepting fractures, and that can be very difficult to do. The Arizona Department of Transportation is aware of the difficult conditions that exist in replacing wells in this area. The procedure identified on page 4-100 of the Draft Environmental Impact Statement defines the procedure that the Arizona Department of Transportation would use to replace affected wells, and also identifies the general costs that the Arizona Department of Transportation would incur to replace the lost water sources. Depending on whether an action alternative were the Selected Alternative, it may be possible to keep the well in its current location, but move the well controls and associated piping to outside of the right-of-way. Such an analysis would be performed later in the design process.

Code	Comment Document

RE: Re:

> The Lakes Golf Club
> The Duke Golf Club
> (O) 480-893-9772
> (C) 480-862-2947
> (F) 480-699-4490
>
> -----Original Message-----
> From: chadblostone@cox.net [mailto:chadblostone@cox.net]
> Sent: Wednesday, May 29, 2013 6:59 PM
> To: Terry
> Subject: Re: Re:
>
> Do you know of another well the foothills owns in the area - 55 630348? Is it being used? If not, can it be used?
>
> How much water are you pulling from 55 630347 in gallons per day?
>
> I've asked this before but need to ask again - would the foothills gc be unprofitable if you were transitioned from well to city potable water? Could it lead to closure?
>
> Thx
>
> Sent on the Sprint(r) Now Network from my BlackBerry(r)
>
> -----Original Message-----
> From: Terry <gm@Ahwatukeegc.com>
> Date: Wed, 29 May 2013 16:48:07
> To: chadblostone@cox.net<chadblostone@cox.net>
> Subject: RE: Re:
>
> Chad,
>
> Sounds good! I am sure that Clear Creek will be able to give you the most information regarding the area.
>
> Terry Duggan
> President
> Foothills Golf Group
> Foothills Golf Club
> Ahwatukee Country Club
> Club West Golf Club
> The Lakes Golf Club
> The Duke Golf Club
> (O) 480-893-9772
> (C) 480-862-2947
> (F) 480-699-4490
>
> -----Original Message-----
> From: chadblostone@cox.net [mailto:chadblostone@cox.net]
> Sent: Wednesday, May 29, 2013 9:46 AM
> To: Terry
> Subject: Re: Re:
>
> I'm going to call clear creek and southwest water. I'll tell them I got their names from you. Anything they give the hoa that I will be forwarding to adot I'll send to u first. I don't want to get in the way of your objectives. Thx.

Code	Issue	Response

Code	Comment Document

RE: Re:

> Sent on the Sprint(r) Now Network from my BlackBerry(r)
>
> -----Original Message-----
> From: Terry <gm@Ahwatukeegc.com>
> Date: Wed, 29 May 2013 15:49:06
> To: chadblostone@cox.net<chadblostone@cox.net>
> Subject: RE: Re:
>
> Chad,
>
> I think we used Clear Creek & Associates for the geological study. Along with either Beaman Drilling or Webber to drill the wells. We are currently working with Southwest Water Works.
>
> Terry Duggan
> President
> Foothills Golf Group
> Foothills Golf Club
> Ahwatukee Country Club
> Club West Golf Club
> The Lakes Golf Club
> The Duke Golf Club
> (O) 480-893-9772
> (C) 480-862-2947
> (F) 480-699-4490
>
> -----Original Message-----
> From: chadblostone@cox.net [mailto:chadblostone@cox.net]
> Sent: Wednesday, May 29, 2013 8:31 AM
> To: Terry
> Subject: Re:
>
> Do u have any idea who did the work? What type of contractor consults on this type of question?
>
> ------Original Message------
> From: Terry Dugan. Golf course
> To: Chad Blostone
> Subject: RE:
> Sent: May 29, 2013 8:07 AM
>
> Chad,
>
> Unfortunately that was 3 companies ago that did the drilling. I do not have access to those records; however I think the ADWR tracks all wells and what they produce.
> >From my understanding of this area you would need to hit a fracture in order to get water. The current well that we have is in a fracture. Most everything north of Pecos and west of 40th Street is bedrock. The best and highest chance to get water in the sandy areas of the desert; which is everything south of Pecos Road.
> I don't think that the water table moves as it always seeks the lowest point.
>
> I hope this helps.
>
> Terry Duggan
> President
> Foothills Golf Group
> Foothills Golf Club

Code	Issue	Response

Code	Comment Document

RE: Re:

> Ahwatukee Country Club
> Club West Golf Club
> The Lakes Golf Club
> The Duke Golf Club
> (O) 480-893-9772
> (C) 480-862-2947
> (F) 480-699-4490
>
> -----Original Message-----
> From: chadblostone@cox.net [mailto:chadblostone@cox.net]
> Sent: Tuesday, May 28, 2013 11:44 PM
> To: Terry
> Subject:
>
> Terry - can u send me the reports that show the test drilling coming up dry? Adot says they "assume" they can replace the well. They need to know they can't just simply drill anywhere on the course to replace. They need to study replacement sites off the foothills prior to making a decision to take the on site well.
>
> Any chance those areas test drilled 14 yrs ago could now have water? Does the underground water table move?
>
> Thx.
>
> Sent on the Sprint(r) Now Network from my BlackBerry(r)
>
> Sent on the Sprint(r) Now Network from my BlackBerry(r)

Code	Issue	Response

Code	Comment Document

Attachments

Three

Hydrologist Statement

Code	Issue	Response

Code	Comment Document

Foothills GC wells

522

Subject: Foothills GC wells
From: Marvin Glotfelty <MGlotfelty@clearcreekassociates.com>
Date: 6/12/2013 3:22 PM
To: "chadblostone@cox.net" <chadblostone@cox.net>

Chad,

As you requested, copies of the well reports that were done for your group back in 1995 and 1996 are attached. In general, groundwater resources become very sparse and uncertain to the north of Pecos Road, due to the shallow bedrock. It would be technically possible to drill a directional (slanted) well near the Pecos Road alignment that dipped into the region of the alluvial basin to the south. However, I would strongly recommend against that action without first obtaining approval from the Gila River Indian Community to the south, and also the Arizona Department of Water Resources. Otherwise, you may encounter substantial legal challenges to the water rights associated with the directional well. I hope this helps to clarify the situation for you.

Best regards,

Marvin

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This e-mail sent by 100% solar energy

Attachments:

Well Completion Report for the Foothills Golf Club North and South Wells.pdf	1.5 MB
Well Feasibility Well Siting Investigation 08.24.95.pdf	978 KB

Code	Issue	Response
522		Hydrogeologist statement reviewed.

Code	Comment Document

Attachments

Four

Well Completion Report for the Foothills Golf Club
North and South Wells dated April 23, 1996

Code	Issue	Response

Code	Comment Document
523	

WELL COMPLETION REPORT FOR THE
FOOTHILLS GOLF CLUB
NORTH AND SOUTH WELLS

April 23, 1996

Code	Issue	Response
523		Well completion report reviewed.

Code	Comment Document

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WELL COMPLETION REPORT FOR THE
FOOTHILLS GOLF CLUB
NORTH AND SOUTH WELLS

April 23, 1996

Prepared for:

Cobblestone Golf Group
2201 East Clubhouse Drive
Phoenix, Arizona 85048

Prepared by:

Brown and Caldwell
3636 North Central Avenue
Suite 300
Phoenix, Arizona 85012
(602) 222-4444

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SECTION 2.0

DRILLING AND INSTALLATION OF THE NORTH WELL

2.1 BOREHOLE DRILLING

The pilot borehole for the North Well was drilled by Arizona Beeman Drilling Company of Apache Junction, Arizona utilizing an air rotary drilling technique with drilling foam added to the fresh water drilling fluid. A Gardner-Denver 1500 rotary rig was used to perform all work associated with the drilling and installation of the well. Brown and Caldwell personnel performed field inspection and documentation of the key field operations. Drilling and well installation operations were performed during daylight hours only (7:00 a.m. to 6:00 p.m.), Monday through Friday. Sound blankets were used to prevent rig noise from being a nuisance to neighboring residences.

Drilling of the pilot hole commenced on February 6, 1996, and was completed on February 8, 1996. A 14 3/4-inch diameter borehole was drilled to 20 feet below land surface (bls). A temporary surface casing was set to 20 feet bls using 10 3/4-inch outside diameter low-carbon steel casing. After the temporary surface casing was sealed with bentonite chips, the pilot hole was drilled using a 9 7/8-inch button bit from 20 feet bls to a depth of 190 feet bls. In order to increase the drilling rate, an 8-inch downhole hammer bit was used from 190 feet bls to the total depth of 400 feet bls.

Drilled cuttings were collected at 10-foot intervals throughout the pilot borehole. The samples were preserved in 4-inch by 6-inch cloth sample bags for future reference. An additional set of the drilled cutting samples was placed in specially-designed "ice cube tray" plastic containers, and submitted to Cobblestone personnel for archival purposes.

2.2 LITHOLOGIC LOG

A detailed lithologic log of the drilled cuttings from the North Well pilot hole is presented in Appendix A and is summarized below. From the land surface to 17 feet bls, the materials penetrated by the North Well are comprised of light brown felsic sands and fine to medium gravels. From 17 feet to 400 feet bls, bedrock was encountered which was comprised of dark green to black-colored clasts including amphibole, epidote, and biotite, with minor amounts of lighter-colored feldspar and quartz minerals. Pyrite minerals are present in the drill cuttings from about 120 feet bls to 400 feet bls in varying amounts. The bedrock is considered to be an amphibolite gneiss.

2.3 WELL INSTALLATION

The well casing installation at the North Well was conducted on February 16, 1996. A record drawing of the North Well is presented in Figure 1. The temporary casing was removed and the borehole reamed with a 14 3/4-inch mill tooth bit to approximately 60 feet bls. Low-carbon steel 10 3/4-inch outside diameter casing with 0.250-inch wall thickness was installed to 60 feet bls. Below 60 feet bls, the well was completed as an open borehole with no casing or screen. The annulus

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between the casing and the 14 3/4-inch borehole was sealed with cement grout from 60 feet bls to approximately 3 1/2 feet bls.

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SECTION 3.0

POST-CONSTRUCTION NORTH WELL ANALYSIS

3.1 PUMPING TEST

A modified step-rate discharge aquifer test was conducted at the North Well on March 12 and 13, 1996 to evaluate the production capability of the well and the optimum depth to set the permanent submersible pump. The data from the aquifer test were collected by Brown and Caldwell personnel with the pumping equipment supplied by Stewart Brothers Drilling Company of Milan, New Mexico. The pumping test data is presented in Appendix B.

The submersible pump was initially set and pumped at a shallow depth (60 feet bls), then progressively lowered and pumped at various pump-setting depths (100 feet, 200 feet and 300 feet bls) to help determine where the permanent pump can be set. A static water level of 48 feet bls was measured prior to the pumping test. At the various pump depth settings, the discharge rate varied from 45 gallons per minute (gpm) to 90 gpm. The discharge rates were calculated using a flow meter. At the pump settings of 60 feet and 100 feet, the groundwater level drawdown reached the submersible pump intake indicating the pump needed to be set at a lower depth. At a pump setting of 200 feet bls, the groundwater level drawdown in the well was 62 feet after 36 minutes of pumping at approximately 65 gpm. The pump was then lowered to 300 feet bls and pumped at a discharge rate of approximately 65 gpm. The water level drawdown after 44 minutes of pumping was approximately 68 feet.

On March 13, 1996, the pumping test resumed with the pump set at 300 feet bls. The groundwater level drawdown in the well was 66 feet after pumping at an average discharge rate of 61 gpm for 84 minutes. Throughout the test, the specific capacity of the well ranged from 0.8 gpm per foot of drawdown (gpm/ft) to 7.4 gpm/ft. A semi-log plot of the water level drawdown data for the North Well on March 13, 1996 is presented in Figure 2. Using the Cooper-Jacob method of analysis, the transmissivity of the aquifer was calculated to be approximately 380 gallons per day per foot (gpd/ft) as shown in Figure 2. At the conclusion of the pumping test, the water level drawdown recovery was recorded. A semi-log plot of the water level recovery data (Theis Recovery Plot) is presented in Figure 3. Utilizing the Theis Recovery Plot, the transmissivity value was calculated to be approximately 290 gallons per day per foot (gpd/ft) as shown in Figure 3. The calculated transmissivity values are based on a short-term pumping test and the basic assumption that the fractures are interconnected and behave as porous medium. Therefore, these values may vary after long-term pumping due to dewatering of fractures or when other hydrogeologic boundaries are encountered.

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SECTION 4.0

NORTH WELL RECOMMENDATIONS

4.1 PUMP SETTING AND DISCHARGE RATE

Based on the data and analyses presented herein, Brown and Caldwell recommends that the North Well be equipped with a permanent submersible pump capable of producing up to 55 gallons per minute (gpm). The permanent pump equipment should be set at a depth no less than 300 feet bls in order to supply the minimum "net positive suction head" necessary to avoid cavitation in the submersible pump. The pumping water level should not be allowed to drop to within 40 feet above the pump intake. This value is variable and depends upon the pump equipment installed and should be verified at the time of installation. It should also be noted that the pumping test was not a long-term test and continuous long-term pumping of the well may result in greater drawdown than was recorded during the test. As a result, it is also recommended that the well be initially pumped on an 8- to 12-hour cycle to allow for additional well performance evaluation.

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SECTION 5.0

DRILLING AND ABANDONMENT OF THE SOUTH WELL

5.1 BOREHOLE DRILLING

The drilling of the South Well was conducted by Stewart Brothers Drilling Company. The pilot borehole was drilled using a Gardner-Denver 1500 drill rig using the air hammer drilling method. Brown and Caldwell personnel performed field inspection and documentation of the key field operations. Drilling operations were performed during daylight hours (7:00 a.m. to 6:00 p.m.) Monday through Friday.

Drilling of the pilot hole commenced on March 26, 1996, and was completed on March 29, 1996. A 13 3/4-inch diameter pipe was driven to the top of bedrock which was approximately 50 feet bls to help stabilize the hole. A 7-inch diameter liner was installed to 50 feet bls inside the 13 3/4-inch pipe to help facilitate circulation of fluids during the drilling process. The pilot hole was then drilled using a 6 1/4-inch downhole hammer from 50 feet bls to the total depth of 400 feet bls.

Drilled cuttings were collected at 10-foot intervals throughout the pilot borehole. The samples were preserved in 4-inch by 6-inch cloth sample bags for future reference. An additional set of the drilled cutting samples was placed in specially-designed "ice cube tray" plastic containers and submitted to Cobblestone personnel for archival purposes. A detailed lithologic log of the drilled cuttings from the South Well pilot hole is presented in Appendix C. In general, from the surface to 48 feet bls, the materials penetrated by the South Well are comprised of light brown to pink felsic sands and fine gravels. From 48 feet to 400 feet bls, bedrock was encountered which was comprised of dark green to gray colored clasts including epidote, biotite, and amphibole with minor amounts of lighter-colored feldspar and quartz minerals. The bedrock is considered to be an amphibolite gneiss.

5.2 BOREHOLE ABANDONMENT

During the drilling of the pilot hole the water production of the borehole was monitored. No notable fractures yielding significant groundwater were encountered during the drilling process. At 400 feet bls, the well was developed by airlifting for approximately 1 hour with no significant improvement in groundwater production. The borehole was backfilled with drilled cuttings and abandoned per Arizona Department of Water Resources requirements (Arizona Administrative Code R12-15-816).

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FIGURES

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Code	Comment Document

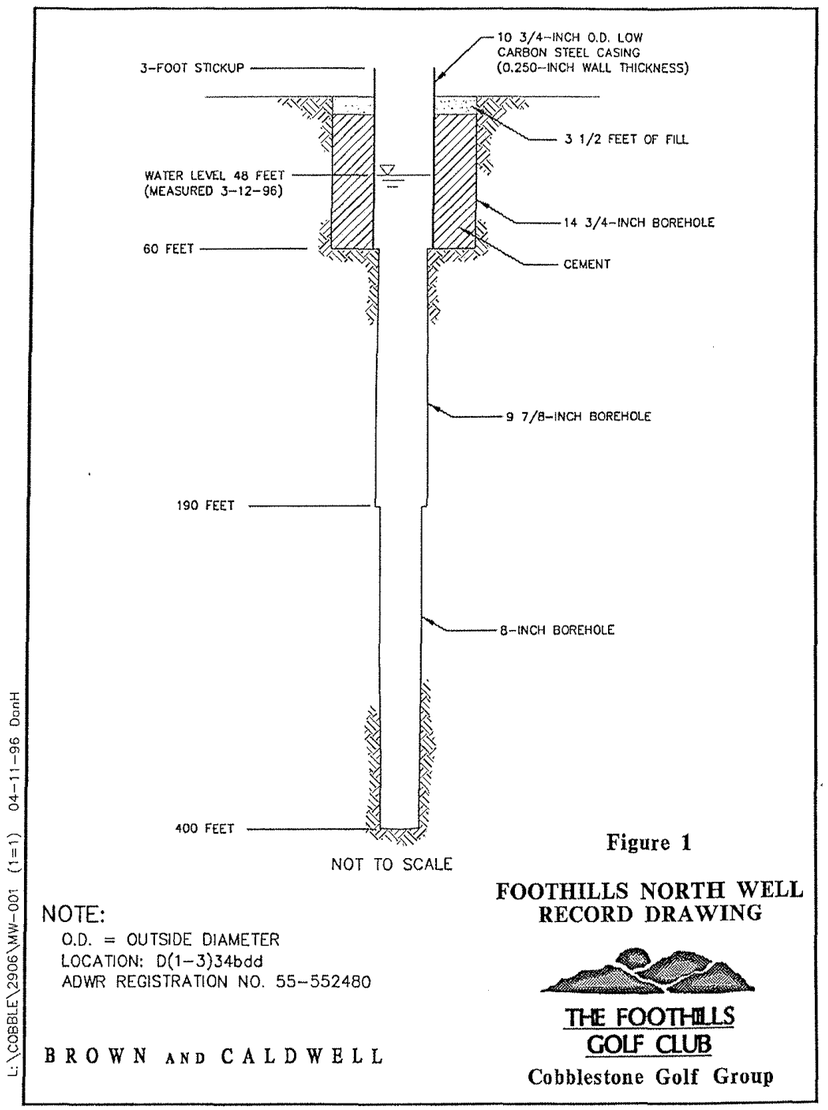

Figure 1

FOOTHILLS NORTH WELL
RECORD DRAWING

NOTE:
O.D. = OUTSIDE DIAMETER
LOCATION: D(1-3)34bdd
ADWR REGISTRATION NO. 55-552480

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GOLF CLUB
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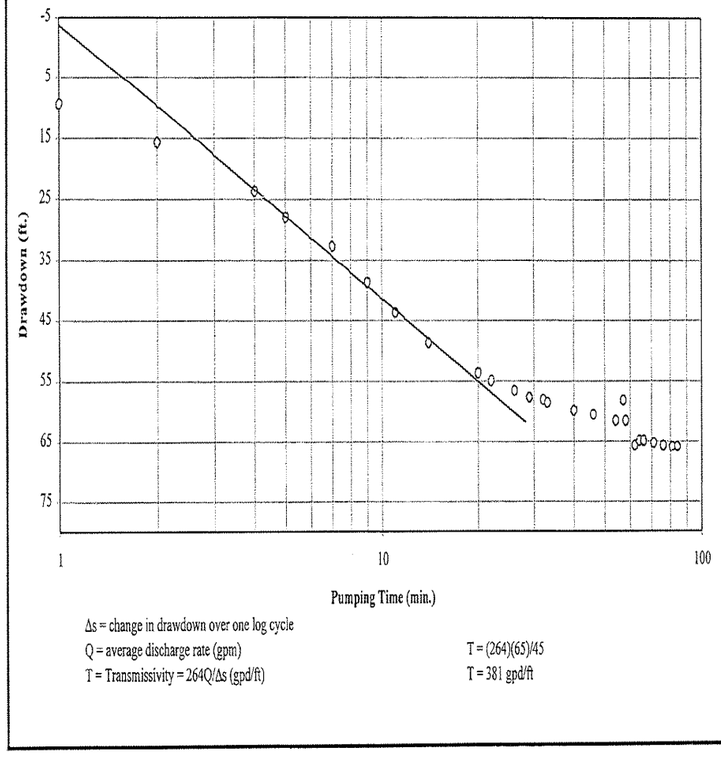
Figure 2. Foothills North Well
Cooper-Jacob Plot
March 13, 1996



Δs = change in drawdown over one log cycle
Q = average discharge rate (gpm)
T = Transmissivity = 264Q/Δs (gpd/ft)

T = (264)(65)/45
T = 381 gpd/ft

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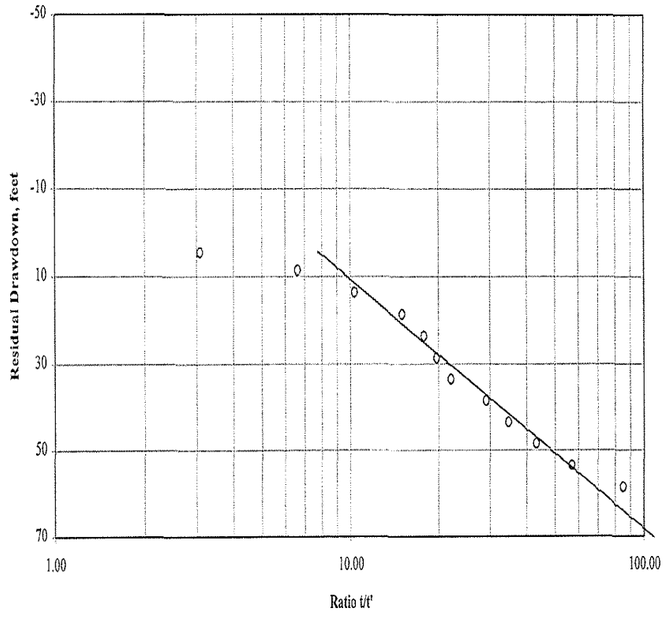
Figure 3. Foothills North Well
Recovery Test Data
March 13, 1996



Δs= change in residual drawdown over one log cycle
Q=weighted average discharge rate (gpm)
T=Transmissivity = 264Q/Δs (gpd/ft)

T=(264)(61)/(56)
T=288 gpd/ft

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APPENDICES

Code	Issue	Response

Code	Comment Document

APPENDIX A

LITHOLOGIC LOG
FOOTHILLS NORTH WELL

Code	Issue	Response

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WELL NO. North Page 1 of 3

Project: Cobblestone Golf Comp	Location: D(1-3)34bdd	Elevation: ~1225 ft MSL	Project No.: 2906
Drilling Co.: Ariz. Beeman Drilling	Drilling Equipment: Gardner-Denver 1500	Date Started: 2/6/96	Date Finished: 2/8/96
Conductor Casing: —	Casing: 10.75" OD LCS 0-60Ft bls	Screen: N/A OPEN HOLE	
Filter Pack: NONE	Logged By: R. Roessel	Drilling Method: Air Rotary	
	Geophysical Logs: —	Drilling Fluid: Air	
Annular Seal: CEMENT GROUT	Development: Air lift	Completion Depth: 400 Ft bls	
		Water Level: 51 Ft bls	

Description	Depth (ft)	Drill Rate	Remarks
GRAVELLY SAND - 60% very coarse to coarse, poorly sorted to well sorted sand, primarily felsic w/ minor mafic components, 30% fine gravel, primarily felsic, 10% fine sand - calcareous (5Y 8/2 1/4) Increase in fine gravels (2-6mm)	0		2/6/96 Begin drilling @ 11AM Drilling w/ 6 5/8" bit, Drilled to 80ft. changed to 14 3/4" mill tooth bit, reamed to 20ft. Set temporary surface casing, changed to 9 7/8" button bit to drill to bottom of hole.
	10		
Green to dark green (5Y 4/1) clasts of opisote, biotite, amphibole (60%) and clasts of feldspar and quartz (40%)	20		
	30		
	40		According to driller - drilling becomes hard + slow @ 40-50 ft. bls
	50		
	60		
	70		
Becomes dark green to black (5Y 3/1)	80		Changed to 9 7/8" button bit - larger chips
	90		
	100		~105 ft. increase in water - fractures
Increase in quartz clasts (30-40%) from 110-120'	110		- measured discharge ~20 gpm - 115 ft. increase in water - fractures
Minor pyrite present	120		~125 ft Drilling becomes hard + slow

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WELL NO. North Page 2 of 3

Description	Depth (ft)	Drill Rate	Remarks
70% dark colored clasts containing biotite, amphibole and epidote with 30% quartz and feldspar iclasts, with minor pyrite	130		2/7/96 Hard slow drilling - rig chatter
	140		Drilling eased up @ 147 ft.
	150		
	160		
	170		
	180		
	190		Changed to 6½" Hammer bit measured discharge @ ~75 gpm
	200		
	210		
	220		
	230		
	240		2/8/96
	250		
	260		
Decrease in quartz from 270-280'	270		
	280		
	290		
	300		

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WELL NO. North Page 3 of 3

Description	Depth (ft)	Drill Rate	Remarks
↓ increase in quartz (~ 40% 60%) from 320 Ft - 340ft.	310		
	320		
↓ same as 130' interval	330		
	340		
	350		
	360		
	370		
	380		measured discharge @ 70 gpm
	390		
↓	400		Total Depth = 400 ft.

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APPENDIX B

AQUIFER TEST DATA
FOOTHILLS NORTH WELL

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AQUIFER TEST DATA

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Project: Cobblestone Golf Group	Project No.: 2906		Static Water Level: 47.74 ft. 10:00 AM 3/12/96
Well Location: D(1-3)34bdd	Well No.: Foothills North Well		Measuring Point: 31.5" Above ground surface
Well Diameter: 0-60' 10"; 60'-190' 9⅞"; 190'-400' 8"	Measured By: MLD		Elevation Measuring Point: Top of casing
Pump Setting: variable	Pump On: Date 3/12/96	Time: 10:10 AM	Available Drawdown:
Screen Interval(s): 60'-400' openhole	Final Pump Off: Date 3/13/96	Time: 11:23 AM	Distance From Pumping Well: NA
How Q Measured: Flow Meter	Duration of Aquifer Test: ~ 10 Hours		

Clock Time	Watch Time (t) (minutes)	Recovery Time (t') (minutes)	t/t'	Sounder Reading (feet)	Corrections (feet)	Water Level (feet)	Drawdown (feet)	Discharge (gpm)	Specific Capacity (gpm/ft)	Remarks
10:11	1			58.1	3.3ft.	54.8	7.1	45	6.4	Pump set @ 60 ft.
10:12	2			59.9		56.6	8.9	45	5.1	
10:13	3			65.7		62.4	14.7	45	3.1	stopped pump drawdown to pump
10:15	5			58.3		55.0	7.3			
10:16	6			56.7		53.4	5.7			
10:17	7			55.6		52.3	4.6			
10:18	8			54.7		51.4	3.7			
10:20	10			53.51		50.2	2.5			
Move pump @ 100 ft.										
10:35	25			51.4		48.1	0.4			Begin Pumping
10:39	29			56.73		53.4	5.7			
10:40	30			64.78		61.5	13.7	10	5.1	
10:41	31			66.9		63.6	15.9	60	3.8	
10:42	32			67.2		63.9	16.2	65	4.0	
10:43	33			68.72		65.4	17.7	65	3.7	
10:44	34			71.33		68.0	20.3	65	3.2	
10:50	40			93.00		89.7	42.0	65	1.5	Water Cloudy White.
10:51	41			96.20		91.9	44.2	65	1.5	
10:52	42			93.90		89.9	42.2	65	1.3	Stop Pumping
10:53	43			91.77		88.5	40.7			
10:54	44			87.00		83.7	36.0			
10:56	45			82.00		78.7	31.0			
10:57	47			62.00		63.7	16.0			

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AQUIFER TEST DATA

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Clock Time	Watch Time (t) (minutes)	Recovery Time (t') (minutes)	t/t'	Sounder Reading (feet)	Corrections (feet)	Water Level (feet)	Drawdown (feet)	Discharge (gpm)	Specific Capacity (gpm/ft)	Remarks
1058	48			69.67	3.3ft	61.4	13.6			
1059	49			60.00		56.7	9.0			
1100	50			55.00		51.7	4.0			
Morning Pump to 200ft										
1131	81			52.32		49.0	1.3			
1133	83			59.9		56.5	8.8	65	7.4	Turn on Pump @ 200'
1134	84			72.35		69.1	21.3	65	3.1	
1135	85			78.71		75.4	27.7	65	2.3	
1136	86			89.30		85.0	37.3	65	1.7	
1137	88			93.54		90.3	42.5	65	1.5	Cond X1000
1140	90			95.90		92.6	44.9	65	1.4	Temp Stand. 77°F
1142	92			100.65		97.4	49.6	65	1.3	pH @ 77°F
1143	93			103.40		100.1	52.4	65	1.2	
1146	96			106.56		103.3	55.5	65	1.2 @ 1%	Cond. 7.27 Cloudy
1149	99			108.50		105.2	57.5	65	1.1	Temp 81.9 White.
1150	100			110.65		107.3	59.5	65	1.1	pH 7.63
1054	104			111		107.7	60.0	65	1.1	cond 7.05 Temp 79.1
1154	108			110.98		107.7	59.9	65	1.1	pH 7.18 H_2O clearing
1202	112			112.96		109.3	61.5	65	1.1	Still cloudy White)
1207	117			113.70		109.4	61.7	65	1.1	cond 6.85 Temp 77.6
Morning to 90 gpm. (Maximum output for this pump)										pH 7.04
1209	119			113.3		110.0	62.3	90	1.4	
1212	122			92.0		88.7	41.0			Pump shut off
1395	205			93.22		49.9	2.2			Cond Clear, H_2O coming into hole.
1404	234			52.85	52.75	49.5	1.7			Pump @ 299'
1405	236			52.75		49.5	1.7			
1409	238			61.90		58.6	10.9	65	6.0	Begin Pumping
1409	239			68.85		65.6	17.8	65	3.6	
1410	240			75.12		71.8	24.1	65	2.7	cond 7.29
1411	241			83.14		79.9	32.1	65	2.0	Temp 82.2
1412	242			87.94		84.7	36.9	65	1.8	pH 7.03

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AQUIFER TEST DATA

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Clock Time	Watch Time (t) (minutes)	Recovery Time (t') (minutes)	t/t'	Sounder Reading (feet)	Corrections (feet)	Water Level (feet)	Drawdown (feet)	Discharge (gpm)	Specific Capacity (gpm/ft)	Remarks
1414	244			96.00	3.3 Ft.	92.7	45.0	65	1.4	
1416	246			98.77		95.5	47.7	65	1.4	
1418	248			103.72		100.4	52.7	65	1.2	
1420	250			106.03		102.7	55.0	65	1.2	
1422	252			107.80		104.5	56.8	65	1.1	
1426	256			111.60		108.3	60.6	65	1.1	
1429	259			112.90		109.6	61.9	65	1.1	Water Milky White
1432	262			114.35		111.1	63.3	65	1.0	Cond. 6.84 Temp 79.7
1437	267			116.22		112.9	65.2	65	1.0	pH 7.24
1442	272			117.60		114.4	66.6	65	1.0	H2O setting for 5 mins
1447	277			119.55		115.3	67.5	65	1.0	Water Turned Clear
1450	280			104.00		105.7	580 pump shut off			Water Milky White
1451	281			107.00		103.7	560	0		Cond 6.7 Temp 78.5 pH 7.09
1455	285			85.00		81.7	34.0	0		
1500	290			80.43		57.1	9.4	0		Can hear water running into hole, alot at first now just a trickling sound.
1533	323			55.02		51.7	4.0	Starter		Well Pumping @ 249'
1536	326			79.47		76.2	28.4	65	2.3	
1539	329			84.20		80.9	43.2	65	1.5	
1542	332			99.10		95.8	48.1	65	1.4	Cond 6.65 Temp 78.9
1548	338			110.7		107.4	59.7	65	1.1	pH 6.96 Milky white
1555	345			114.91		111.5	63.8	65	1.0	Turning clear
1600	350			117 DV		113.7	66.0	65	1.0	pH 6.89 Cond 6.55
1607	357			119.91		115.6	67.9	65	1.0	Temp 78.8
1611	361			119.4		116.1	68.4	65	1.0	Milky White is gone,
1615	365			96.1		92.8	45.1	pump shut off (Sounds like)		air bubbles.
1617	367			82.00		78.7	31.0	0		
1618	368			75.00		71.7	24.0	0		
1619	369			70.00		66.7	19.0	0		

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AQUIFER TEST DATA

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Clock Time	Watch Time (t) (minutes)	Recovery Time (t') (minutes)	t/t'	Sounder Reading (feet)	Corrections (feet)	Water Level (feet)	Drawdown (feet)	Discharge (gpm)	Specific Capacity (gpm/ft)	Remarks
1622	372			65.00	3.3ft	61.7	14.0	0		
1629	379			60.00	/	56.7	9.0	0		
1647	397			56.65	/	53.4	5.6	0		
3-13-96	Test	5								
0706				51.37		48.02		0		Begin New Test
								0		Pump Not Working
0959				51.53		48.23		0		Start Pumping
1000	1			60.78		57.5	9.5	65	6.9	
1001	2			67.00		63.7	15.7	65	4.1	
1003	4			75.00		71.7	23.7	65	2.7	cond 8.13
1004	5			79.25		76.0	27.9	65	2.3	Tem 80.4
1006	7			84.00		80.7	32.7	65	2.0	pH 7.28
1008	9			90.00		86.7	38.7	65	1.7	Slightly Cloudy (white)
1010	11			95.00		91.8	43.8	65	1.5	
1013	14			100.00		96.7	48.7	65	1.3	
1019	20			105.00		101.7	53.7	65	1.2	Cond 7.13
1021	22			106.33		103.0	55.0	65	1.2	Temp 81.3
1025	26			109.00		109.7	56.7	65	1.1	pH 6.97
1026	29			109.00		105.7	57.7	65	1.1	Slightly Cloudy (white) clears
1031	32			109.50		106.2	58.2	65	1.1	after 2 mins.
1032	33			110.00		106.7	58.7	65	1.1	cond 6.66 Temp 78.1
1039	40			111.20		107.9	59.9	65	1.1	pH 6.9. Slightly Cloudy (w).
1045	46			112.00		108.7	60.7	65	1.1	Clear in 2 mins.
1053	54			113.00		109.7	61.7	65	1.1	
1056	57			109.65		106.4	58.3	50	0.9	
1057	58			113.00		109.7	61.7	65	1.1	
1101	62			117.00		113.7	65.7	50	0.8	
1103	64			116.29		113.0	65.0	55	0.8	
1105	66			116.28		113.0	65.0	55	0.8	
1110	71			116.60		113.3	65.3	55	0.8	Temp 77.6 Cond 6.38
1115	76			117.00		113.7	65.7	55	0.8	pH 6.91
1120	81			117.20		113.9	65.9	53	0.8	
1123	84			117.25		114.0	65.9	53	0.8	End Test.

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BROWN AND CALDWELL

Code	Issue	Response

Code	Comment Document

AQUIFER TEST DATA

Page 5 of 5

Clock Time	Watch Time (t) (minutes)	Recovery Time (t') (minutes)	t/t'	Sounder Reading (feet)	Corrections (feet)	Water Level (feet)	Drawdown (feet)	Discharge (gpm)	Specific Capacity (gpm/ft)	Remarks
1124:00	85	1	85	110	3.34	106.7	56.7			Recovery Test
1124:30	85.5	1.5	57	105	/	101.7	53.7			
1125:00	86	2	43	100	/	96.7	48.7			
1125:30	86.5	2.5	34.6	95	/	91.7	43.7			
1126:00	87	3	29	90	/	86.7	38.7			
1127:00	88	4	22	85	/	81.7	33.7			
1127:30	88.5	4.5	19.7	80	/	76.7	28.7			
1128:00	89	5	17.8	75	/	71.7	23.7			
1129:00	90	6	15	70	/	66.7	18.7			
1132:00	93	9	10.3	65	/	61.7	13.7			
1138:00	99	15	6.6	60	/	56.7	8.7			
1205:00	126	41	3.1	56	/	52.7	4.7			End of Recovery Test

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BROWN AND CALDWELL

Code	Issue	Response

Code	Comment Document

APPENDIX C

LITHOLOGIC LOG
FOOTHILLS SOUTH WELL

Code	Issue	Response

Code	Comment Document

WELL NO. South Well Page 1 of 3

Project Cobblestone Golf Group	Location D(1-3)34dca	Elevation ~ 1180 ft msl	Project No. 2906
Drilling Co. Stewart Brothers Drilling	Drilling Equipment Gardner-Denver 1500	Date Started 3/26/96	Date Finished 3/29/96
Conductor Casing NA	Casing NA	Screen NA	
Filter Pack NA	Logged By R. Roesse l	Drilling Method Air Hammer/Rotary	
	Geophysical Logs NA	Drilling Fluid Air	
Annular Seal Abandoned per ADWR A.A.C. R12-15-816.	Development NA	Completion Depth 400 Ft. b/s	
		Water Level 116.1 Ft b/s	

Description	Depth (ft)	Drill Rate	Remarks
GRAVELLY SAND - 70% coarse to very coarse, poorly sorted sand, predominantly felsic with granite, K-spar (5YR 5/4) 30% fine to v.fine sand	0		3/26/96 Begin Drilling - Drive 13 3/8" pipe to 50 ft. Install 7" liner to 50 ft. Begin drilling w/ 6 3/4" downhole hammer. No sample collected
	10		
	20		NO Sample collected, cuttings primarily felsic sand
Increase in dark minerals (5GY 4/1)	30		
	40		
60% dark green to black (5GY 4/1) clasts containing epidote, biotite, amphibole, with 40% clasts of quartz and feldspar	50		Bedrock - Hard drilling @ 48 Ft. 3/27/96
	60		
	70		
	80		
	90		
	100		
	110	50 ft/hr	
	120	120 ft/hr	First Water @ 125 ft.

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BROWN AND CALDWELL

Code	Issue	Response

Code	Comment Document

WELL NO. South Well Page 2 of 3

Description	Depth (ft)	Drill Rate	Remarks
increase in dark green to black clasts of epidote, biotite and amphibole (75%) quarte and feldspar (25%)	130	60 Ft/hr	
	140	30 ft/hr	
	150		
	160	60 ft/hr	
	170		
	180	67 ft/hr	
	190	50 ft/hr	3/28/96
	200		
	210		
	220		
	230		
	240		
	250		
	260		
	270		
	280		
	290		
	300		

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BROWN AND CALDWELL

Code	Issue	Response

Code	Comment Document

WELL NO. South Well Page 3 of 3

Description	Depth (ft)	Drill Rate	Remarks
	310		
			3/29/96
	320	16 Ft/HR	
change in color to light green to green (5G 7/1)	330	24 Ft/HR	
	340	25 Ft/HR	
	350	21 Ft/HR	
	360	20 Ft/HR	measured discharge @ 5 gpm
	370	25 Ft/HR	
increase in dark green to black minerals, with minor quartz	380	22 Ft/HR	
increase in quartz (40%) w/ dark green to black minerals (60%)	390	27 Ft/HR	
	400	21 Ft/HR	Total depth 400 Ft. measured discharge @ 7 gpm

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BROWN AND CALDWELL

Code	Issue	Response

Code	Comment Document

Attachments

Five

South Mountain Land Acquisitions - The spreadsheet was created by ADOT on June 11, 2013.0It has W in the right side if it is a parcel in the western alignment; it has an E in the right side if it is a parcel in the eastern alignment. Parcels 7-11316 and 7-10612 are two parcels in the western alignment that were not included in the spreadsheet. The parcel transmittal sheet for each is also attached.

Code	Issue	Response

Code	Comment Document

South Mountain Acquisitions

Sorted by Acquisition Date

06/11/13

PARCEL	TRACS	OWNER	ACQUISITION DATE	ACQUISITION COST
7-04226	H087201R	ESTATE OF AMCOR INVESTMENTS CORP	09/25/86	$7,371,339.00
7-05060	H543901R	FOOTHILLS JOINT VENTURE	02/29/88	$18,046,663.15
7-05914	H543901R	TOM L MILLS ET UX	06/16/88	$568,713.00
7-05933	H543901R	PHOENIX FIRESTONE TIRE	10/27/88	$412,050.25
7-06376	H543901R	ANNE L LEWIS	07/19/90	$215,213.75
7-05060-A	H543901R	FOOTHILLS JOINT VENTURE	08/02/90	$904.00
7-07169	H543901R	EARL H GOODMAN JR	11/04/93	$52,622.74
7-07577	H087201R	GWENDOLYN E MASON TRUST	01/23/98	$9,751.00
7-09912	H543901R	HIGHLAND RIDGE CONST COMPANY LLC	11/09/01	$2,092,250.08
7-10463	H543901R	PATTERSON BRIAN G ET UX	04/19/06	$1,961,545.00
7-10466	H543901R	PERKOFSKI RYAN	05/25/06	$446,419.95
7-10467	H543901R	DEL E WEBB FOOTHILLS CORPORATION	06/15/06	$8,087.12
7-10465	H543901R	WALKER ROBERT L ET UX	07/28/06	$448,370.55
7-10531	H543901R	SHOTT CHARLES E & SHELLEY L	02/26/07	$424,108.84
7-10544	H543901R	KRAEMER ANTHONY K	04/11/07	$368,192.50
7-10489	H543901R	RENDINA JR VICTOR ET UX	05/24/07	$370,506.17
7-10534	H543901R	GOODMAN MICHAEL S	06/01/07	$338,454.50
7-10537	H543901R	DOUGLAS DALE	06/05/07	$954,653.00
7-10601	H543901R	JTK HOLDINGS, LLC	06/08/07	$384,421.00
7-10538	H543901R	CARDELLENI DENNIS R ET UX	06/14/07	$459,733.50
7-10539	H543901R	HOLLAND PETER M ET UX	06/20/07	$471,833.00
7-10536	H543901R	AUTREY STEPHEN ET UX	06/22/07	$464,886.00
7-10605	H543901R	SCHILKE CODY W	07/03/07	$578,720.00
7-10535	H543901R	DESERT LAKES CUSTOM HOMES LLC	08/28/07	$470,452.74
7-10768	H543901R	NELSON JEFFREY J	08/29/07	$544,968.44
7-10765	H543901R	WHITTY FAMILY TRUST	10/09/07	$1,075,761.29
7-10600	H543901R	JR SKAGGS PROPERTIES LLC	10/19/07	$568,362.42
7-10796	H543901R	SMITH CECIL A ET UX	11/13/07	$345,010.93
7-10607	H543901R	SPEEDCO INC	12/20/07	$3,035,462.72
7-10612	H543901R	FRED AND HELEN J MARTINEZ FAMILY TR	12/21/07	$1,334,504.74
7-10804	H543901R	SMITH RUTH ANN	03/10/08	$322,625.67
7-10806	H543901R	CUNNINGHAM PHILIP S	03/25/08	$355,921.33
7-10805	H543901R	PANDYA MAHENDRAKUMAR S ET UX	04/18/08	$321,568.89
7-10869	H543901R	JENSEN CHARLOTTE C	05/23/08	$322,778.50
7-10870	H543901R	PONGRATZ STEPHEN P ET AL	05/30/08	$470,989.95
7-10802	H543901R	AHWATUKEE LAND INVESTMENTS LLC	06/12/08	$367,158.83

Code	Issue	Response

Code	Comment Document

South Mountain Acquisitions
Sorted by Acquisition Date

06/11/13

PARCEL	TRACS	OWNER	ACQUISITION DATE	ACQUISITION COST	
7-10892	H543901R	THE MCCARRON FAMILY TRUST	09/28/08	$333,245.25	E
7-10868	H543901R	KING TROY	09/30/08	$348,183.63	E
7-10889	H543901R	KRISTENSEN STEWART	10/09/08	$222,641.48	E
7-10890	H543901R	BRENNAR ADAM J	10/16/08	$287,966.75	E
7-10891	H543901R	MARKWELL DAVID R ET UX	10/20/08	$468,812.16	E
7-10906	H543901R	THE JACKSON FAMILY TRUST	10/22/08	$252,197.71	W
7-10940	H543901R	NAGLE CHRISTOPHER S ET AL	12/02/08	$287,756.79	E
7-10671	H543901R	DONAHUE SR EARL R ET UX	12/18/08	$15,038,796.01	W
7-10984	H543901R	CRIDDLE JOHN GARY ET AL	12/23/08	$282,666.37	E
7-10803	H543901R	CRAIG THOMAS C ET UX	02/04/09	$263,682.55	E
7-10986	H543901R	WOODSIDE 20/25 LLC	04/23/09	$999,186.40	E
7-10784	H543901R	BERENDO PROPERTY	05/08/09	$3,003,623.00	W
7-11317	H543901R	DUNNE, KATRINA	07/06/10	$240,361.25	E
7-11316	H543901R	NOLI PETE A ET UX	09/20/10	$292,074.88	E
7-11358	H543901R	DAVID LEE MILLER AND DEBORAH FRANCE	11/30/10	$164,961.27	E
7-11182	H543901R	LASALVIA ANTHONY & PEGGY	04/28/11	$11,643,077.00	W
7-11538	H543901R	INLAND KENWORTH INC	11/26/12	$6,990,047.53	W

NUMBER OF ACQUISITIONS: 53 ACQUISITION COST TOTAL: $87,124,284.58

Code	Issue	Response

Code	Comment Document

RIGHT OF WAY GROUP
205 South 17th Avenue Phoenix, Arizona

PARCEL TRANSMITTAL

Transaction Cutoff Date: Sept. 14, 2010

Processing Unit	Initial	Date	Processing Unit	Initial	Date
Consultant Reviewer/ Acquisition Reviewer	NW	9/13/10	Operations - Accounting	MR	9-14-10
Plans - Delineation	LO	9/13/10	Operations - Manager	PS	9/16/10
Titles	Pcc	9/13/10	Operations - Accounting	DC	3/3/11
Project Mgt - Project Schedule	TC	9/13/10	R/W Record Center		3-31-11

Grantor & Address: ☒ Husband /Wife

Peter A. Noli & Maryann Noli
6130 W. Dobbins, RT 2, Box 955
Laveen, AZ 85339

Project: 202L MA 000 H5439 01R
Highway: SOUTH MOUNTAIN FREEWAY
Section: Jct. I-10W - Jct. I-10S
Parcel: 7-11316
Assessor #: 300-02-021G
☐ Federal Aid Involvement
☐ MAG ☐ PAG ☐ SW ☒ RTP #2468

SETTLEMENT DATA: ☐ Partial ☒ Total

Land	$285,000.00
10.31 Acres, 449,104 Square Feet	
Improvements	$N/A
0 Square Feet	
Severance Damages	$N/A
Cost-to-Cure	$N/A
Temporary Entry	$N/A
Temporary Construction Easement	$N/A
Administrative Settlement	$N/A
Less Salvage	$N/A
Sub Total	$285,000.00
Closing Costs	$7,074.88
TOTAL	$292,074.88

DESCRIPTION:
W2, SE4, SEC 6, T1S, R2E, GSRBM

Maricopa County, Arizona

APPRAISAL DATA:
☐ Appraisal not required
Appraiser: Baltutat ☐ Staff ☒ Fee
Approved Appraisal Amount: $285,000.00
Appraisal Review Amount: $285,000.00

INSTRUMENTS IN FILE:

	Record	Thru Escrow
Warranty Deed	☒	☒
	☐	☐
	☐	☐
	☐	☐

COMMENTS:
Send check to Security Title

Acquisition Code: R301
☐ Acquired by Consultant, Contract #
☐ Escrow Waived
☐ Right of Way Contract
Approved by:
☐ Salvage Sheet Attached
☐ Equal to cost of removal
☐ Offer reduced by salvage amount established
☐ Administrative Settlement
Approved by: on
Amount over approved appraisal $
Excess Land Acquired (If yes, copy to Prop. Mgt.)
Acres, Square Feet
☐ Repurchase Rights Waived
Yes Irrigation Water Right or Well 55 160195 MD
Certificate or Well # 58 (If yes, copy to Titles)
☐ See additional information attached

WARRANT NEEDED BY: September 20, 2010
AGENT PHONE: 602-712-8918)

CERTIFICATION

I hereby certify that, to the best of my knowledge and belief, all statements contained in this parcel file are a full and complete record of all agreements and considerations between the Negotiator and the Grantor, and that such above agreement was reached without coercion, promises other than those shown in the Right of Way Contract, or threats of any kind whatsoever by or to either party.

Further, I have no direct or indirect, present or contemplated future personal interest in such property, nor will I in any way benefit from the acquisition of such property.

Jacki Valinski

Jacki Valinski, Right of Way Agent
ADOT
Parcel Transmittal 12/07/06

APPROVED 11-16-10
DIRECTOR OF ADOT

PARCEL: 7-11316

Code	Issue	Response

Code	Comment Document

ARIZONA DEPARTMENT OF TRANSPORTATION
RIGHT OF WAY GROUP
205 South 17th Avenue Phoenix, Arizona

PARCEL TRANSMITTAL

Transaction Cutoff Date: 12/11/07

Processing Unit	Initial	Date	Processing Unit	Initial	Date
Consultant Reviewer/ Acquisition Reviewer		12-10-07	Operations - Accounting	MJL	12-11-07
Plans - Delineation	CG	12-10-07	Operations - Manager	PB	12/13/07
Titles	See	12/11/07	Operations - Accounting		1/8/08
Project Mgt - Project Schedule		12.11.07	R/W Record Center		1-10-08

Grantor & Address: ☒ Husband /Wife

Mr. Fred Martinez, Trustee
Mrs. Helen J. Martinez, Trustee
5717 West Washington
Phoenix, Arizona 85043

Project: 202 MA 000 H543901R
Highway: SOUTH MOUNTAIN (202L)
Section: Jct. I-10S - Jct. I-10W
Parcel: 7-10612
Assessor #: 104-04-512
☐ Federal Aid Involvement
☐ MAG ☐ PAG ☐ SW ☒ RTP #1605

SETTLEMENT DATA: ☐ Partial ☒ Total

Land 3.415 Acres, 148,777 Square Feet	$1,230,000.00
Improvements	$N/A
Square Feet	
Severance Damages	$N/A
Cost-to-Cure	$N/A
Temporary Entry	$N/A
Temporary Construction Easement	$N/A
Administrative Settlement	$75,000.00
Lost Development Cost	24,591.74
Less Salvage	$N/A
Sub Total	$1,329,591.74
Closing Costs	$4,913.00
TOTAL	$1,334,504.74

DESCRIPTION:
LOT 1, VAN BUREN STREET/57TH DRIVE

Maricopa County, Arizona

APPRAISAL DATA:
☐ Appraisal not required
Appraiser: Baltutat ☐ Staff ☒ Fee
Approved Appraisal Amount: $1,230,000
Appraisal Review Amount: $1,254,591.74

INSTRUMENTS IN FILE:

	Record	Thru Escrow
Warranty Deed	☒	☒
	☐	☐
	☐	☐
	☐	☐

COMMENTS: Please call agent to pick up check.

Acquisition Code: R301
☐ Acquired by Consultant, Contract #
☐ Escrow Waived
☐ Right of Way Contract
Approved by:
☐ Salvage Sheet Attached
☐ Equal to cost of removal
☐ Offer reduced by salvage amount established
☒ Administrative Settlement
Approved by: Brian Rockwell on 11/28/07
Amount over approved appraisal $75,000
No Excess Land Acquired (If yes, copy to Prop. Mgt.)
Acres, Square Feet
☒ Repurchase Rights Waived
No Irrigation Water Right or Well
Certificate or Well # _____ (If yes, copy to Titles)
☐ See additional information attached

WARRANT NEEDED BY: _____
AGENT PHONE: 602-712-7432

CERTIFICATION

I hereby certify that, to the best of my knowledge and belief, all statements contained in this parcel file are a full and complete record of all agreements and considerations between the Negotiator and the Grantor, and that such above agreement was reached without coercion, promises other than those shown in the Right of Way Contract, or threats of any kind whatsoever by or to either party.

Further, I have no direct or indirect, present or contemplated future personal interest in such property, nor will I in any way benefit from the acquisition of such property.

APPROVED 12-18-07
DIRECTOR OF ADOT

Kerry Nygaard, Right of Way Agent

PARCEL: 7-10612

Parcel Transmittal 12/07/06

Code	Issue	Response

Code	Comment Document

From: Howard Shanker
To: Projects
Subject: Additional Comment on the SMF Loop 202 Freeway DEIS - Filed by PARC et al.
Date: Wednesday, July 24, 2013 2:12:06 PM
Importance: High

Addendum to the Comments Filed on July 23, 2013 By:

Protecting Arizona Resources and Children, Inc. (PARC); The Foothills Community Association; The Foothills Club West Community Association; The Lakewood Community Association; The Calabrea Community Association; Don't Waste Arizona, Inc. (DWAZ); Gila River Alliance for a Clean Environment (GRACE); Gila River Environmental Youth (GREY); Patricia Lawlis; Timothy Lank; Chad Blostone; Michael Hinz; Chris Boettcher; Phoenix Mountains Preservation Council (PMPC) - (collectively referred to herein as "Commenters").

1 1. As discussed in Commenters' previous submission, the DEIS failed to adequately consider the health impacts resulting from freeway related air pollution. Given the large number of schools, community areas, and homes within approximately one-half mile of the proposed right-of way (the "Hot Zone" for health impacts), ADOT should also have considered, *inter alia*, future health care costs and impacts on human capital in general as indirect and/or cumulative impacts under NEPA. It is likely that thousands of children living and/or going to school in this Hot Zone will suffer from, in part, inhibited lung growth and development, as well as asthma -- as a direct and proximate result of the freeway. The primary health threat from proposed freeway air pollution to adults will be increased risks of chronic cardiovascular illness, acute myocardial infarctions, and premature mortality. Given the certainty of the science at issue, future health care related costs and health related impacts in general should have been considered in the DEIS.

2. Commenters expressly incorporate herein, by this reference, any comment on the DEIS submitted by: The Sierra Club; PIRG/Arizona PIRG; the Gila River Indian Community; and any member of any of the above identified organizations/associations.

Thank you.

Howard M. Shanker
The Shanker Law Firm, PLC
www.ShankerLaw.net

Offices
700 E. Baseline Rd., Bldg. B
Tempe, Arizona 85283
Phone: (480) 838-9300
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201 E. Birch Avenue, Ste. 10
Flagstaff, Arizona 86001

Indian Law *Environmental & Natural Resources* *Personal Injury* *Civil Litigation* *Adoption*

This e-mail communication, including any attached files, may contain material that is proprietary, privileged,

Code	Issue	Response
1	**Air Quality, Health Risk Assessment**	The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). **The Role of Health Risk Assessment in a National Environmental Policy Act Context** The Federal Highway Administration's National Environmental Policy Act documents are developed under two guiding regulations: the Council on Environmental Quality's National Environmental Policy Act regulations applicable to all federal agencies (40 Code of Federal Regulations Parts 1500–1508) and the Federal Highway Administration's implementing regulations governing Federal Highway Administration National Environmental Policy Act documents (23 Code of Federal Regulations Part 771). In its mobile source air toxics guidance, the Federal Highway Administration discusses 40 Code of Federal Regulations Part 1502.22 and acknowledges that while much work has been done to assess the overall health risk of mobile source air toxics, analytical tools and techniques for assessing project-specific health outcomes as a result of lifetime exposures to mobile source air toxics remain limited. These limitations impede the ability to evaluate the potential health risks attributable to exposure to mobile source air toxics as part of the decision-making process in the National Environmental Policy Act context. However, as with any analysis that the Federal Highway Administration conducts for National Environmental Policy Act purposes, the Federal Highway Administration's approach for mobile source air toxic analysis in National Environmental Policy Act documents is informed not just by 40 Code of Federal Regulations Part 1502.22, but by all applicable Council on Environmental Quality requirements.

(Response 1 continues on next page)

Code	Comment Document
	confidential, or otherwise legally exempt from disclosure. This communication is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the person responsible for delivering this communication to the intended recipient, you are prohibited from retaining, using, disseminating, forwarding, printing or copying this communication. If you have received this communication in error, please immediately notify the sender via return e-mail or telephone. **IRS CIRCULAR 230 DISCLOSURE:** To ensure compliance with requirements imposed by the IRS, we inform you that, to the extent this communication (or any attachment) addresses any tax matter, it was not written to be (and may not be) relied upon to (i) avoid tax-related penalties under the Internal Revenue Code, or (ii) promote, market or recommend to another party any transaction or matter addressed herein (or in any such attachment).

Code	Issue	Response
1 (cont.)		The appropriateness of air toxics health risk assessment as an analysis method for National Environmental Policy Act documents is discussed below, in the context of Council on Environmental Quality requirements for these documents. In addition to the 40 Code of Federal Regulations Part 1502.22 provisions regarding uncertainty and limitations discussed in the Federal Highway Administration's MSAT Interim Guidance Appendix C, three other provisions of the Council on Environmental Quality regulations are particularly relevant to the topic of health risk assessment: *40 Code of Federal Regulations § 1500.1(b): NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.* *40 Code of Federal Regulations § 1502.1: An environmental impact statement is more than a disclosure document. It shall be used by Federal officials in conjunction with other relevant material to plan actions and make decisions.* *40 Code of Federal Regulations § 1502.2: (a) Environmental impact statements shall be analytic rather than encyclopedic. (b) Impacts shall be discussed in proportion to their significance.(c) Environmental impact statements shall be kept concise and shall be no longer than absolutely necessary to comply with NEPA and with these regulations.* Section 1500.1(b) states that information for decision making must be of high quality and based on accurate scientific analysis. Air toxics health risk assessments can involve large uncertainties. The mobile source air toxic health risk assessment uncertainty builds on itself—each step of the analysis involves uncertainties, including modeling traffic and then modeling emissions, and using this estimated output to model dispersion/concentrations, which provide information for estimating or assuming exposures to those concentrations, and finally predicting health outcomes. Major uncertainties are associated with traffic and emissions projections over a 70-year period, and dispersion models are typically held to a "factor of 2" performance standard. Health impacts of mobile source air toxics in the U.S. Environmental Protection Agency Integrated Risk Information System are based on a 70-year lifetime exposure, which introduces significant uncertainty (e.g., on average, people in the United States change residence approximately once every 8 years and change jobs once every 3). Finally, as noted above, the U.S. Environmental Protection Agency's Integrated Risk Information System provides toxicity (risk) values for various pollutants and routes of exposure; in a health risk assessment, the Federal Highway Administration would compare calculated concentrations of mobile source air toxic pollutants to the Integrated Risk Information System values to estimate health risk. In the Integrated Risk Information System, the U.S. Environmental Protection Agency states the toxicity values are believed to be accurate to within an order of magnitude (a factor of 10). The total cumulative uncertainty involved in highway project health risk assessment is much larger than the change in emissions attributable to projects (typically a few percentage points). In this context, the information would not necessarily have a strong nexus to the requirements for high-quality information and accurate scientific analysis.

(Response 1 continues on next page)

Code	Comment Document

Code	Issue	Response
1 (cont.)		Section 1500.1(b) also directs agencies to focus their National Environmental Policy Act analysis and documentation on issues that are truly significant to the action in question. In the context of mobile source air toxics, the Federal Highway Administration must consider whether changes in mobile source air toxic emissions attributable to a project have the potential for significant health risk. Using cancer risk as an example, the U.S. Environmental Protection Agency estimates that the overall risk of cancer in the United States is approximately 330,000 in a million, and that air toxics (from all sources) are responsible for a risk of approximately 50 in a million. In its most recent mobile source air toxics rule-making, the U.S. Environmental Protection Agency estimated mobile source air toxic cancer risk, after implementation of emissions controls, at approximately 5 in a million (or 0.0015 percent of overall cancer risk from any cause). For the Preferred Alternative, the mobile source air toxic emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxic emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxic emissions would decrease by more than 80 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see the discussion beginning on page 4-77 of the Final Environmental Impact Statement). In summary, available information from the U.S. Environmental Protection Agency indicates that mobile source air toxics are a small component of overall cancer risk, and the analysis for the Final Environmental Impact Statement indicates both that the Preferred Alternative would result in a small change in the emissions contributing to this risk and that emissions will decline by a large amount regardless of alternative. As described above and in the air quality technical report, results from the health risk assessment would be influenced more by the uncertainty introduced into the process through assumptions and speculations rather than by genuine insight into the actual health impacts directly attributable to mobile source air toxic exposure associated with a project. Therefore, outcomes of such a health risk assessment do not provide useful information for decision makers, as required by Section 1502.1. The Federal Highway Administration emissions analysis meets the requirement to produce information that is useful for both disclosure and decision making because it allows the public and decision makers to see which alternative has less mobile source air toxic emissions, with much less uncertainty than a health risk assessment.

(Response 1 continues on next page)

Code	Comment Document

Code	Issue	Response
1 (cont.)		Given the uncertainty of a mobile source air toxic health risk assessment, the Federal Highway Administration instead addresses the potential impacts of mobile source air toxics through an emissions assessment in its National Environmental Policy Act documents. For smaller projects with a lower likelihood of a meaningful impact, this discussion is qualitative. For larger projects, emissions analysis is conducted. The Federal Highway Administration approach is consistent with the Council on Environmental Quality's direction in Section 1502.2(b) to discuss impacts in proportion to their significance. The results of an emissions analysis can be summarized concisely in a National Environmental Policy Act document and provide useful information for decision makers (e.g., an alternative that has lower emissions is likely to be "better" from a mobile source air toxics health risk standpoint than one that has higher emissions). While the U.S. Environmental Protection Agency and the Federal Highway Administration both agree on the usefulness of addressing mobile source air toxics in National Environmental Policy Act documents for highway projects, the agencies disagree about the value of health risk assessment as a method for doing so.

(Response 1 continues on next page)

Code	Comment Document

Code	Issue	Response
1 (cont.)		Another consideration with respect to health impacts is that the Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R-07-002, 3-17 [February 2007]). Construction of the Preferred Alternative would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the roadway network. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads. The Federal Highway Administration determined that a supplemental environmental impact statement is not required at this time because there were no changes to the proposed action that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement nor is there new information relevant to environmental concerns and bearings on the proposed action or its impacts that will result in significant environmental impacts not evaluated in the Draft Environmental Impact Statement.

Code	Comment Document

July 16, 2013

Mr. Alan Hansen- Team Leader-PEAR
Federal Highway Administration
4000 N. Central Avenue- Suite 1500
Phoenix, AZ 85012-3500

Dear Mr. Hansen:

RE: South Mountain Freeway Meeting

1

As your schedule permits I would like to meet with you to discuss the proposed South Mountain Freeway Loop 202 and the impacts it will have on my village if it is built on Pecos Road.

My name is Jim Jochim and I am the Treasurer of PARC (Protecting Arizona Resources and Children) we are a 501 C 3 and were incorporated in 2006. I have been actively involved in the public freeway meetings for over a decade and I had the privilege of meeting Mr. Bill Vachon at the SMCAT meetings before he retired .

Enclosed are several copies of the Ahwatukee Republic dated June 14, 2013 in which I am pictured on the front page and on page four. I am also enclosing a number of PARC business cards for your distribution.

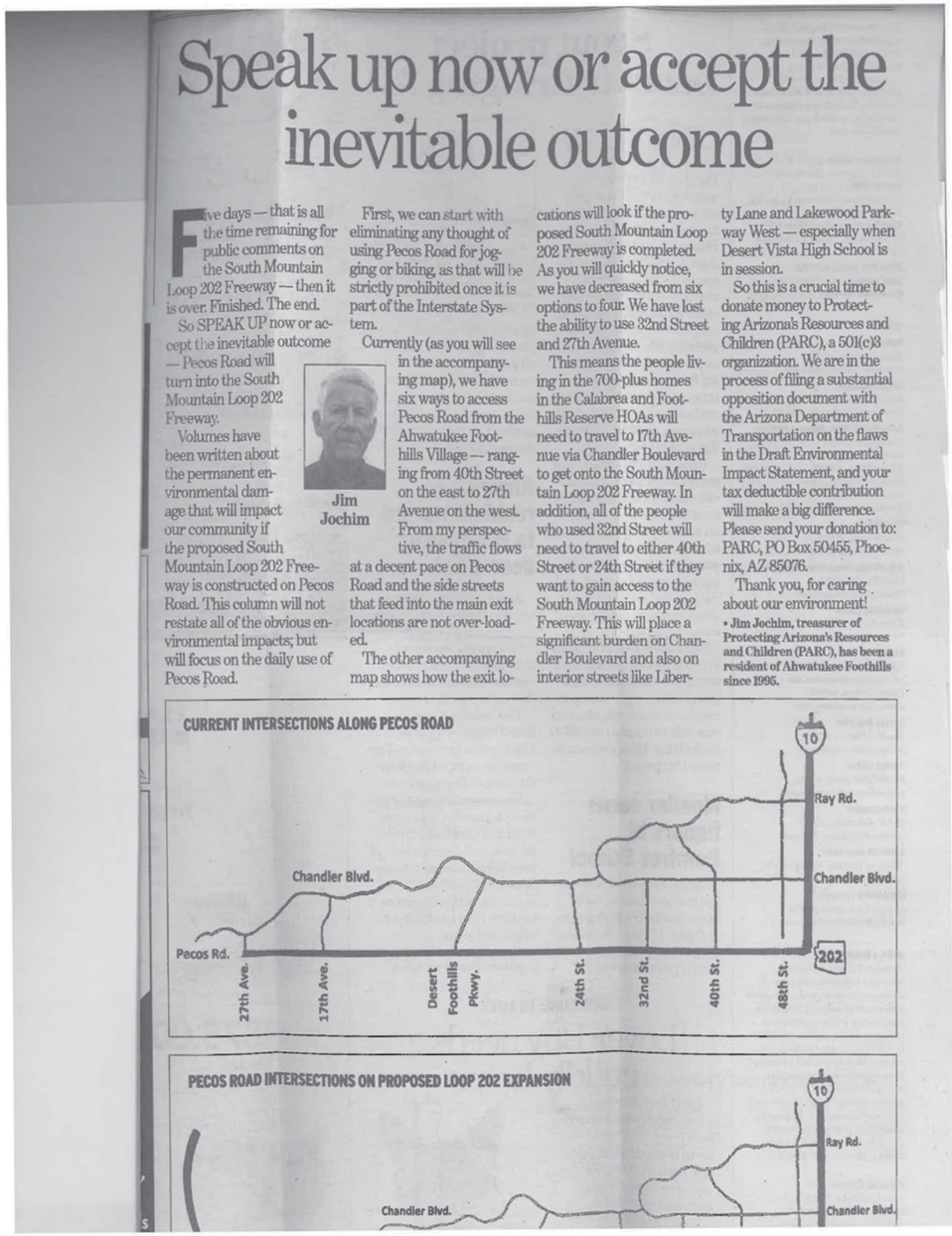
Please advise what date and time works best for your schedule and I will be there because as a retiree from AT&T I have a lot of 'flex' time.

Best regards,

Jim Jochim
1231 E. Desert Flower Lane
Phoenix, AZ 85048
T# 480-460-2535
Fax# 480460-2898
E-mail: Jochim1@cox.net

Enclosures : AFN paper and PARC business cards

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2	

Speak up now or accept the inevitable outcome

Five days — that is all the time remaining for public comments on the South Mountain Loop 202 Freeway — then it is over. Finished. The end.

So SPEAK UP now or accept the inevitable outcome — Pecos Road will turn into the South Mountain Loop 202 Freeway.

Volumes have been written about the permanent environmental damage that will impact our community if the proposed South Mountain Loop 202 Freeway is constructed on Pecos Road. This column will not restate all of the obvious environmental impacts; but will focus on the daily use of Pecos Road.

Jim Jochim

First, we can start with eliminating any thought of using Pecos Road for jogging or biking, as that will be strictly prohibited once it is part of the Interstate System.

Currently (as you will see in the accompanying map), we have six ways to access Pecos Road from the Ahwatukee Foothills Village — ranging from 40th Street on the east to 27th Avenue on the west. From my perspective, the traffic flows at a decent pace on Pecos Road and the side streets that feed into the main exit locations are not over-loaded.

The other accompanying map shows how the exit locations will look if the proposed South Mountain Loop 202 Freeway is completed. As you will quickly notice, we have decreased from six options to four. We have lost the ability to use 32nd Street and 27th Avenue.

This means the people living in the 700-plus homes in the Calabrea and Foothills Reserve HOAs will need to travel to 17th Avenue via Chandler Boulevard to get onto the South Mountain Loop 202 Freeway. In addition, all of the people who used 32nd Street will need to travel to either 40th Street or 24th Street if they want to gain access to the South Mountain Loop 202 Freeway. This will place a significant burden on Chandler Boulevard and also on interior streets like Liberty Lane and Lakewood Parkway West — especially when Desert Vista High School is in session.

So this is a crucial time to donate money to Protecting Arizona's Resources and Children (PARC), a 501(c)3 organization. We are in the process of filing a substantial opposition document with the Arizona Department of Transportation on the flaws in the Draft Environmental Impact Statement, and your tax deductible contribution will make a big difference. Please send your donation to: PARC, PO Box 50455, Phoenix, AZ 85076.

Thank you, for caring about our environment!

• Jim Jochim, treasurer of Protecting Arizona's Resources and Children (PARC), has been a resident of Ahwatukee Foothills since 1995.

Code	Issue	Response
1	**Traffic**	The main line of the E1 Alternative would not have a bicycle route as part of the design. Continuous east–west riding would be possible in the neighborhoods adjoining the alternative and along Chandler Boulevard. Please see Draft Environmental Impact Statement Figure 3-33, on page 3-57.
2	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The 32nd Street interchange would have required the displacement of over 100 homes and would have been located in close proximity to an existing high school. The 27th Avenue interchange was evaluated but ultimately eliminated because of increased residential displacements and cost. The extension of Chandler Boulevard west of 19th Avenue is included in this project because reasonable access must be maintained to the neighborhoods at the west end of Pecos Road. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The traffic information presented in the Draft Environmental Impact Statement in Figure 3-37 on page 3-61 shows that traffic along Chandler Boulevard between 24th Street and Interstate 10 would decrease with the propose freeway in place.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SMF DEIS Comment
Date: Monday, July 22, 2013 8:35:48 AM

FYI

From: Tim Lank [mailto:trlank@hotmail.com]
Sent: Friday, July 19, 2013 9:25 PM
To: Projects
Cc: Tim Lank; Howard Shanker; Pat Lawlis; Jim Jochim; Clsdeer@aol.com; Steve Brittle
Subject: SMF DEIS Comment

Attn: ADOT 202 South Mountain Freeway Project Team

This is a comment on the subject SMF DEIS.

1 I am concerned that the SMF, which has been repeatedly described as a truck
2 bypass, will have an exceptionally high percentage of heavy commercial semi
3 truck traffic on it, with attendent increased noise and air pollution issues, compared to other similar nearby freeways. On any trip out I-10 to the California border, I always observe large numbers of semis, usually running in convoys. While I have no way of knowing for sure, I suspect a high percentage of these trucks are pass-thru long distance overland that have neither originated or stopped in the Phoenix Metro area. I say this because of the number of cargo containers seen; however, I'm sure ADOT / MAG has accurate recent data on commercial cargo for Phoenix on a pass-thru, origination and destination basis, even for intra-regional trucking with origination and destination pairs in the Valley. I was surprised that very little of this specific heavy truck data found its way into the DEIS, with type of traffic vehicles apparently given equal weight, or at least not distinguished between. I would like to see more detailed analysis of the composition of the traffic, with attention to the pass-thru, origination, destination and internal regional components of heavy trucks.

4 I sat through many discussions at the SMCAT meetings where traffic modelling the number of single commuters in passenger cars that would pass through the break point between the east and west sections of the SMF daily was questioned. Since the ultimate goal of the SMF seems to have devolved into regional mobility, I was surprised that this figure of number of daily commuter trips by non-commercial vehicles through the break point between east and west Valley did not

Code	Issue	Response
1	**Traffic**	Creating a truck bypass is not a goal of the proposed action. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary users of the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel model projects that truck traffic will represent approximately 10 percent of the total traffic on the proposed action, similar to what is currently experienced on other regional freeways such as Interstate 10, Loop 101, and U.S. Route 60. Trucking destinations in the Phoenix metropolitan area would still prompt trucks to enter congested areas. Choosing to travel on the proposed freeway versus Interstate 10 would not produce substantial travel time benefits. Therefore, it is expected that "true" through truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85. The CANAMEX and Phoenix truck bypass (Interstate 8/State Route 85) routes are not mandatory for truck traffic; they are recommended. The Arizona Department of Transportation does not enforce these routes. It is not anticipated that these routes would be enforced as mandatory in the future.
2	**Noise**	Noise levels from Pecos Road traffic were measured in 2003 and 2004 and ranged from 44 A-weighted decibels to 56 A-weighted decibels. Without noise mitigation, noise levels from the proposed freeway are predicted to range from 64 A-weighted decibels to 78 A-weighted decibels at the nearest homes, depending on the distance from the freeway. Noise mitigation was estimated to reduce those noise levels to a range of 59 A-weighted decibels to 63 A-weighted decibels for most of the areas (see Draft Environmental Impact Statement page 4-91). Because of topography, local street traffic, or other engineering constraints in a few small areas, estimated noise levels could not be reduced as much and would be as high as 64 A-weighted decibels to 70 A-weighted decibels in those areas. Noise walls would range in height from 8 feet to 20 feet tall in the Ahwatukee Foothills area. Although not recognized by the Federal Highway Administration as mitigation, rubberized asphalt would be used as the top level of paving; it is discussed on Draft Environmental Impact Statement page 4-91 and in the sidebar on page 4-92. The noise analysis was updated for the Final Environmental Impact Statement using most recent Federal Highway Administration and Arizona Department of Transportation policy and traffic projections provided by the Maricopa Association of Governments in August 2013. This updated analysis begins on page 4-88 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted.

(Responses continue on next page)

Code	Comment Document

appear in the DEIS. I'm sure the data is available, since as a long-term employee of a large local company, I had to fill out questionaires regularly from the County on my commuting habits, including home address and destination.

Regarding the pass-thru traffic of heavy semi trucks, I have noticed small signs on I-10E near Buckeye and I-10W near Casa Grande indicating that the AZ85 / I-8 route through Gila Bend is an optional bypass around the Phoenix urban core. Having taken this route a few times, I noticed the number of traffic lights and stop signs, low speed limits, speed traps, lack of amenities, narrow lanes with few passing opportunities, scenic small downtown and difficult access to I-8 were a major disincentive for a commercial trucker to consider this alternate. I have been ensured by ADOT that this is all being remedied and AZ 85 will be an interstate caliber road by the time the SMF is completed, thus providing a much more feasible bypass alternative to the SMF. My question is if ADOT intends replace the current signage with larger, preferably overhead, signs, promoting the AZ85 / I-8 bypass in order to minimize pass-thru truck traffic on the SMF? In addition, are there any plans to require or regulate the use of the Gila Bend bypass for pass thru traffic? If so, will there be enforcement by DPS, since commercial overland drivers all are required to maintain logs and carry bills of laden indicating origin and destination?

5

1

Thank you for considering these numerous concerns and requests for more information regarding the SMF.

Regards,
Timothy R. Lank
Vice President,
Protecting Arizona's Resources and Children (PARC)

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Code	Issue	Response
3	**Air Quality**	The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement).
4	**Traffic**	Information related to the origin and destination, including pass-thru, of vehicles that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Draft Environmental Impact Statement. Details related to heavy trucks in the region is presented on page 3-64 of the Draft Environmental Impact Statement.
5	**Trucks**	There are no current plans to increase the size of the signs for the Phoenix bypass route but the current signs are overhead signs.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SMF DEIS Comment
Date: Monday, July 22, 2013 8:37:08 AM

FYI

From: Tim Lank [mailto:trlank@hotmail.com]
Sent: Friday, July 19, 2013 11:58 PM
To: Projects
Cc: Tim Lank; Howard Shanker; Steve Brittle; Jim Jochim; Clsdeer@aol.com; lawlis@aol.com
Subject: SMF DEIS Comment

Attn: ADOT 202 South Mountain Freeway Project Team

This is a comment on the subject SMF DEIS.

I have been an East Valley resident for 33 years, and as such, I voted on both the sales tax fund raising propositions to implement the regional transportation plan. Realizing there was a possibilty the SMF could be built, I took confidence in the fact that every effort would be made to minimize the aethetic impact, air and noise pollution and the permanent disruption of neighborhoods by cut-thru traffic, which I experienced directly on a temporary basis when Chandler Blvd was widened and again when the Chandler Blvd bridge over I-10 was rebuilt (the signs prohibiting cut-thru traffic and speed bumps in the neighborhoods are still there). I looked at roads like the US60 Superstition Fwy and the more recent Loop 101 Price Fwy and saw that freeways through dense residential neighborhoods could be designed with both the users and the people adjacent to them in mind. Design features such as roadbeds far below the adjacent arterials, frequent intersections, parallel service / access roads and arterial overpasses all combine to minimize the neighborhood impact.

1

So I was shocked and enraged when I discovered that the proposed design of the SMF had none of these features on the high density eastern segment. It is the Walmart of Valley freeways going through an area on the outskirts that prides itself on a more natural, desert suburban village environment. It's not bad enough that this freeway will bring in more congestion, higher crime and eliminate the famous "worlds largest cul-de-sac". Its proposed design will negatively impact the local environment in a huge way, with attempts at mitigation that create unsightly huge walls, and raised freeway overpasses that will propagate traffic noise and pollution at a greater distance. Neighborhood cut-thru routes will become access

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3

Code	Issue	Response
1	**Design**	The design of the proposed freeway would be in accordance with the Arizona Department of Transportation Roadway Design Guidelines (see page 3-54 of the Draft Environmental Impact Statement). All freeways and highways in Arizona are developed these guidelines. Each freeway is evaluated based on surrounding site conditions and the design is optimized based on a number of criteria and considerations. There is not a single design that fits every condition. The proposed freeway would include similar opportunities for aesthetic treatments and enhancements as other freeways in the Phoenix metropolitan area.
2	**General Impacts**	The study used state-of-the-practice, scientific community methods and similarly accepted methods. Methods, assumptions, and data were developed early in the environmental impact statement process and peer reviewed by the Federal Highway Administration, the Arizona Department of Transportation, and other federal, State, and local agencies. Peer reviewers concluded that the methods, assumptions, and data are appropriate. The Draft Environmental Impact Statement has sufficient technical merit, does comply with "fundamental concepts and purpose of an environmental impact statement," and does appropriately and properly inform the public. While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21. The Arizona Department of Transportation and Federal Highway Administration, in cooperation with the U.S. Army Corps of Engineers, the U.S. Bureau of Indian Affairs, and the Western Area Power Administration, prepared the Draft and Final Environmental Impact Statements and Section 4(f) Evaluation in accordance with the National Environmental Policy Act of 1969 [42 United States Code § 4332(2)(c)], Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 United States Code § 303, as amended), and Section 404 of the Clean Water Act of 1977 (33 United States Code § 1251). All of these agencies are experienced in the review of National Environmental Policy Act documents and have found the logical sequence of decision making to be sound and in line with National Environmental Policy Act requirements. The Draft Environmental Impact Statement and Section 4(f) Evaluation 1) satisfies Federal Highway Administration and Arizona Department of Transportation's environmental analysis requirements; 2) provides a comparison of the social, economic, and environmental impacts that may result from implementation of the proposed action—construction and operation of a major transportation facility; and 3) identifies measures to avoid, reduce, or otherwise mitigate adverse impacts.
3	**Air Quality**	The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

(Response 3 continues on next page)

Code	Comment Document
	roads creating traffic on small streets where there was none. Is there some good reason the design of the SMF is so drastically different from its predecessors? Even the most recent adjacent connecting Loop 202 San Tan Fwy has arterial overpasses.
4	Specifically, the design of the SMF in the eastern segment is deficient in that at is an above grade freeway with raised freeway overpasses over arterials, necessitating very high, unsightly noise walls and propagating pollution over an area loaded with nearby schools. This aspect of the design is largely unknown by the general public, who are expecting a design similar to what they see locally.
5	The SMF in the eastern segment is replacing Pecos Rd, which will be completely removed. However, access to the SMF in the form of interchanges will only have four versus the current six. The elimination of 32St and 27Ave access will wreak havoc with local traffic patterns on arterials, collectors and neighborhood streets. It has been stated that the 32St removal was at the request of the City of Phoenix because of concern over the four schools in the immediate area. This is a patently absurd argument. The removal of access to 32St will only cause worse traffic congestion and more dangerous conditions for local schoolchildren. This decision needs to be revisited with the appropriate Phoenix representative so he can reair his concerns and hear the ramifications of his irresponsible request.
6	The elimination of 27Ave access will divert traffic to the 17Ave interchange. Between 17 and 27 Ave is the largest piece of undeveloped land in Ahwatukee. When this area is developed at usual density, the traffic at the 17Ave interchange will increase tremendously, and the development will provide cut-thru traffic routes for vehicles currently using 27Ave. The elimination of an access point to the SMF at 27 Ave is a design deficiency that should be remedied. In addition, since the land between these two access points is undeveloped, an access road would be a helpful amenity.
7	A major safety issue with an above grade freeway is the proximity of approximately 12 miles of SRP 500KV high-tension power lines parallel and immediately adjacent to the roadway. With the expected high percentage of semi trucks on this route, and especially hazmat tankers carrying gasoline from the tank farm at the western end, an accident that involved one of these power poles could cause a cascade failure of the entire 12 mile stretch between dead end towers and cause an extended and expensive outage of weeks since this line carries most of the power to the East Valley. Furthermore, this is a major line from Palo Verde NGS and a sudden dropout could have severe repercussions for this facility. A below grade freeway would greatly reduce the chances of such an accident.
8	The traffic model data by HDR at the SMCAT meetings revealed some doubt about the need for commuter regional mobility between the Southeast Valley and

Code	Issue	Response
3 (cont.)		The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement).
4	**Design**	Depressing the proposed Pecos Road sections would entail installation of pump stations to drain the main line freeway. A depressed freeway would also need a drainage channel to capture the off-site flows to prevent their entering the freeway. Pump stations were not used because of the high cost of construction and maintenance needed for their operation. The recommended freeway configuration would have the E1 Alternative aboveground and the existing culverts extending to pass the drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Depressing the freeway in this area would eliminate the existing culvert crossings and potentially have adverse flooding impacts on adjacent properties. Extending the existing culverts or upsizing the culverts would maintain or improve drainage flows. This would ensure that there would be no adverse flooding impacts on adjacent properties. (See Draft Environmental Impact Statement pages 3-15 and 3-18.) To reduce impacts by depressing the proposed freeway in the Eastern Section, the Arizona Department of Transportation would: · need to spend an additional $400 million for right-of-way acquisition and construction · displace an additional 300 residences · maintain additional pump stations and detention basins for the life of the freeway · would still have noise-related impacts requiring mitigation (i.e., noise barriers and their associated costs and visual impacts) Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study. A depressed freeway option was evaluated in the Draft Environmental Impact Statement and is described on pages 3-15 and 4-91. Although depressing the freeway would reduce noise levels, noise walls would still be needed to further reduce noise to meet the Arizona Department of Transportation noise policy. Whether the freeway is built aboveground with tall walls or belowground with shorter walls, the final mitigated noise levels would be nearly the same at nearby residences. The major disadvantage of building a depressed freeway would be the increased construction cost and the possible acquisition of additional right-of-way for pump stations and retention basins. For most alignments of each of the action alternatives, the proposed freeway would be elevated above the natural grade of the surrounding land. This elevated profile would allow noise to carry farther, creating noise impacts at greater distances from the freeway. Depressing the profile of the freeway below grade might reduce traffic noise levels adjacent to depressed sections. However, it would be necessary to also construct at-grade noise barriers to achieve noise reduction goals at receiver locations adjacent to depressed freeway sections (see page 4-91 in the Draft Environmental Impact Statement). This strategy would reduce visual impacts

(Response 4 continues on next page)

Code	Comment Document
9	the Southwest Valley, especially eight lanes. What was not in doubt however, was the need for improved vehicle transportation between the Village of Laveen and the I-10 Papago Fwy. Throughout the process, many residents of Laveen commented that they didn't need the Ahwatukee segment, they just needed a better route to I-10 Papago. Many felt that future development in their area was being held hostage to a road half of which they didn't need or want. With this in mind, a spur freeway, improved arterials and / or an Arizona Parkway might be a better solution for the people of Laveen. The DEIS did not specifically cite commuter only traffic projections through the break point between the east and west segments of the SMF. This is an important piece of data.
10	Lastly, this SMF freeway is projected to cost out at $2 - 3 billion. This money could more effectively be used improving the existing city core transportation infrastructure, such as widening the Broadway Curve and I-10 Papago Fwy, putting a second level on the Black Canyon Fwy, expanding critical arterials like Baseline Road or technology projects like improving traffic light coordination on arterials all around the Valley for increased flow. However, if the current proposed abominable design for the SMF eastern segment is based on decreased sales tax revenues due to the slow economy, I would like to suggest waiting until the funds are available to built it right.
	Thank you for considering these numerous concerns and requests for more information regarding the SMF.
	Regards, Timothy R. Lank Vice President, Protecting Arizona's Resources and Children (PARC)
	Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
4 (cont.)		associated with high noise barriers on elevated freeways, but would entail ground-level noise barriers and their associated interference with views. Thus, with either approach to noise reduction, views of nearby mountains could be disrupted. The specific impacts would depend on the geometrics of the height of any noise barriers constructed, the intervening topography, and the distance of the barriers from the residences in question.
5	**Alternatives**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
6	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange was evaluated but ultimately eliminated because of increased residential displacements and cost. There are no provisions for frontage roads connecting 17th Avenue to the residential area to the west. Reasonable access is provided from 17th Avenue and the extension of Chandler Boulevard. The daily traffic volume on 17th Street in 2011 was approximately 4,500 vehicles per day just north of Pecos Road (see <http://phoenix.gov/streets/traffic/volumemap>). With the proposed freeway in place, an additional 4,000 vehicles day would use 17th Avenue to gain access to residences west of 17th Avenue. The total daily traffic would be well below the capacity of a two-lane road (approximately 15,000 vehicles per day).
7	**Design**	The clearance distance between the freeway and power lines would be in excess of any regulatory safety requirements for the power lines. There are power lines throughout the region that cross over sections of freeway. The Arizona Department of Transportation and the utility companies work together to ensure the safety of the traveling public as well as ensure reliability of power sources.

(Responses continue on next page)

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8	**Purpose and Need**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Final Environmental Impact Statement page 3-27). The model projects demand for multiple modes of travel, including automobile, bus, and light rail. Key model inputs used to forecast travel demand in the Study Area included socioeconomic data (based on land use plans and population and economic forecasts), the anticipated average number of vehicle trips within the region on a daily basis, the distribution of transportation modes used by travelers in the region, the capacity of the transportation infrastructure to accommodate regional travel, and the future transportation infrastructure. The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. While new projections based on the 2010 Census showed a lower anticipated population in 2035 than the previous projections, the need for the freeway has not changed. The traffic analysis demonstrated that the proposed project is needed today.
9	**Design**	Information related to origins and destinations of motorists that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Final Environmental Impact Statement. The definition of freeway users considers only those motorists who travel through the South Mountains; so, motorists who begin their trips in Ahwatukee Foothills Village and travel east to Interstate 10 (Maricopa Freeway) or motorists who begin in Laveen Village and travel north to Interstate 10 (Papago Freeway) are not counted in the analysis. The analysis of origins and destinations shows that 75 percent of travelers would be involved in trips beginning or ending in the Study Area or areas immediately surrounding it. Nine percent of the trips would begin, end, or begin and end outside of the Maricopa Association of Governments region; seven percent would either begin or end in Pinal County.
10	**Purpose and Need**	The proposed freeway was identified in the 2004 *Regional Transportation Plan* as one of a host of transportation improvements to meet the projected demand for transportation in the Phoenix metropolitan area. Many suggestions such as those made in the comment are being implemented, have been evaluated, or are being considered to address transportation needs in the Phoenix metropolitan area.

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From: Projects
To: ADOT
Subject: FW: SMF DEIS Comment
Date: Monday, July 22, 2013 11:32:16 AM

FYI

From: Tim Lank [mailto:trlank@hotmail.com]
Sent: Monday, July 22, 2013 11:17 AM
To: Projects
Cc: Pat Lawlis; Jim Jochim; Clsdeer@aol.com; Steve Brittle; Howard Shanker; Tim Lank
Subject: SMF DEIS Comment

Attn: ADOT 202 South Mountain Freeway Project Team

This is a comment on the subject SMF DEIS.

I have been an East Valley resident for 33 years, and as such, I voted for the 20 year Proposition 300 sales tax increase to raise funds for the regional transportation plan in 1985. That was supposed to be the complete regional transportation plan, not the miniscule 20% of total miles that ultimately were completed before expiration. I know ADOT likes to point to a weak economy and reduced funds as the reason for the poor performance on this huge and expensive project. Sadly, I have read in numerous articles that a more accurate reason was misuse of funds, poor supervision and poor project management / control. Add to that private citizens making fortunes by swapping land in the right-of-way in order to drive up their selling price. You may recall that in 1985, one could drive from Jacksonville, FL to Los Angeles, CA non-stop on Interstate 10, except that only in Phoenix, one had to exit at the Durango Curve and drive out Lower Buckeye all the way to Dysart Road before I-10 started again. While this was the butt of many jokes, I came to realize that this is a perfectly normal state of affairs for Arizona transportation. I am regularly reminded of it when I drive past the failed iconic horse racing track on the far west Papago. Failed because of poor access from an incomplete I-10. As a commercial delivery driver in the New York City tri-state area previously, it is hard to comprehend the lack of responsiveness to basic transportation needs.

1

Now we are engaged in a fiasco of the opposite sort. There is extensive discussion of a freeway that is basically not needed and an almost unbelievably exorbitant waste of taxpayer dollars. The general public have been starved for decent roads and freeways for many years. They are weary of sitting in traffic jams at rush

Code	Issue	Response
1	**Purpose and Need**	At the beginning of the environmental impact statement process, the need for a major transportation facility was reexamined to determine whether such a facility is still needed. Validation of those findings occurred throughout the entire environmental impact statement process. Analysis of the purpose and need for the proposed action followed National Environmental Policy Act and Federal Highway Administration implementing guidance on the subject matter and used state-of-the-practice analytical tools, as pointed out in Table 1-3, "Traffic Analysis Tools," on page 1-13 of the Final Environmental Impact Statement. The results of the analysis determined that a transportation problem does exist and that problem will continue in the foreseeable future (see section, *Conclusions*, on page 1-21). As noted on page 3-1 in the section, *Reconfirm the Purpose and Need for the Proposed Action*, a continuous validation process was undertaken throughout the environmental impact statement process to ensure past conclusions in the environmental impact statement process remained valid. The reader is referred to Final Environmental Impact Statement Chapter 3, *Alternatives*, and, specifically, the section, *Alternatives Development and Screening Process Conclusions*, beginning on page 3-26, noting "... a comprehensive set of alternatives including all modes was considered ... assurance that the screening process was an open process ... a logical, sequential, step-by-step process using data and expertise from multiple disciplines ..." to demonstrate all possibilities were considered.

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hour. They jump at any chance for any additional roads on the pretext that the new roads might reduce their aggravation and time sitting still in their cars. Well, this South Mountain Freeway is far from the answer to their complaints. But ADOT / MAG have been playing to this need with a false picture of relief based on old data and faulty models. If this involved anything other than a government agency, it would be called a grift. And their basic rationale is that it was put there 35 years ago. It completes a loop. And it's nice and symmetrical looking on a map, just like other large cities.

2

If the SMF was completed even 25 years ago, there would have been little impact and little objection from the neighbors, since there were few people in the area at the time. In fact, our neighbors to the south, the Gila River Indian Community made several overtures expressing an interest in putting this road on their land, only to be spurned by government agencies that obviously had preplanned ideas of what this road needed to look like and where it needed to be. It is telling that of all the highways on the regional plan, the SMF was at the bottom of the list. That and the fact that this DEIS is straining so hard to try and justify it now indicate how ineffective it will be. Think what $2.5 billion dollars would do if directly applied to the Broadway Curve, Papago Freeway, Baseline Road or an Arizona Parkway from Laveen to the Papago, for people who are being held hostage to the SMF under threat of denied development, when all they really want is their half of it. Better traffic controls, like timed coordinated traffic lights on major arterials, or a decent bus system that didn't cater to just downtown workers would a better allocation of transportation resources.

Unresponsiveness to the needs of its citizen customers seems to be systemic at ADOT, the largest government agency in the state. Yet its single minded focus on ramming the misguided SMF through seems to be a dichotomy. It helps to look at some of their recent history for a better understanding of this iconoclast bureacracy.

For practically the entire 1990's, the westbound US 60 left lane merge onto the I-10E was the most hazardous location in the Valley for rear end collisions. In late afternoon, traffic backed up and stopped in the 65mph high-speed lane regularly caused major property damage and injury. An acquantance alerted me to this when her boss, the owner of a large aerospace company, became concerned for his employee's safety and asked her to request information from ADOT on the frequency of collision occurance. After much prodding and expressing fear for his job after looking at the results, an ADOT employee generated the report. The business owner wrote to ADOT asking what was planned to remedy the situation.

Code	Issue	Response
2	**Alternatives**	Tribal sovereignty is based on the inherent authority of Native American tribes to govern themselves. States have very limited authority over activities within tribal land (see Final Environmental Impact Statement page 2-1). The Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make transportation determinations directly affecting tribal land, or condemn tribal land through an eminent domain process. While efforts to study project alternatives on Gila River Indian Community land were attempted (see Final Environmental Impact Statement Chapter 2, *Gila River Indian Community Coordination*), the Gila River Indian Community has long held a position of not allowing the proposed freeway to be located on its land. For example, a coordinated referendum of Gila River Indian Community members to favor or oppose construction of the proposed freeway on Gila River Indian Community land or to support a no-build option occurred in February 2012, and Gila River Indian Community members voted in favor of the no-build option. Moving forward, therefore, the proposed action cannot be located on the Gila River Indian Community (see Final Environmental Impact Statement page 3-25). The Gila River Indian Community's position regarding a "no-build" option was considered in the Draft and Final Environmental Impact Statement. That position is formally known as the No-Action Alternative and was evaluated in depth in assessments of the impacts of the proposed action on each resource. Whether alignments to develop on Gila River Indian Community land are ultimately identified or not, the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments will continue to coordinate with the Gila River Indian Community regarding concerns and potential mitigation for those concerns.

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This local business leader got a very unsatisfying, if not lame response. I wrote to ADOT as well, suggesting flashing signs on the median wall warning of stopped traffic ahead, which I had seen on merging California interstate highways. I was told this was just not done here. This situation went on for over ten years with millions of dollars in damage and numerous injuries before a separate lane was created that fixed the problem. Ironically, all it took was some paint to stripe the new lane, but this hazardous situation had to wait years until a new carpool flyover was built. This is what passes for responsiveness, competence and accountability.

A similar situation happened when the 101 Pima Freeway was opened. Initially, it was only four lanes with a dirt median and a two wire divider. A deadly crash occurred when a car went through the divider into oncoming traffic. This time, a direct order from the governor accelerated the necessary safety improvements. Another characteristic displayed here and on the SanTan 202 is the building of freeways in parts, a lane at a time, so to speak. The addition of another lane in each direction, then the addition of car pool HOV lanes seems designed to spread the pain out as long as possible. As an engineer and project manager, the efficiency and cost effectiveness of this process is questionable. One could also ask why the plans for the SMF call for it to have all eight lanes completed at once? What changed? Why were the previous roads built piecemeal?

3

There are numerous other misfires I'm sure ADOT would just as soon forget about. The AZ51, originally designated the Piestewa (Squaw Peak) Parkway was actually partially built with signalized intersections at Thomas Road before the public realized what they were (not) getting and the outcry forced the immediate conversion to the present freeway. So much for the efficient propagation of highway information, much like the proposed design of the SMF, with its raised overpasses and unsightly huge sound walls.
How much did the Paradise Parkway planning cost before it was quashed by Gov. Fife Symington? This road was also on the 1985 regional plan, had purpose and need, yet was quickly dropped for political reasons.
SR 153 at Sky Harbor Airport was also on the regional plan. A huge expanse of elevated concrete, it was quietly decommissioned and the signs removed after an aborted attempt to transfer responsibility for completion to the City of Phoenix. Literally, a highway to nowhere.
A question on the acquisition of ROW for the SMF. I understand there were very few takings for the 202 SanTan Fwy in Chandler and Gilbert. Yet hundreds of properties are required for the SMF. Why is there such a large difference?

4

Code	Issue	Response
3	**Design**	The determination to build all eight lanes at once was based on a desire to minimize disruption to the traveling public. The other benefit is that there are existing high-occupancy vehicle lanes at each end of the proposed freeway (along State Route 202L [Santan Freeway] and Interstate 10 [Papago Freeway] that can be connected to provide additional services for commuters and regional bus transit). The region's freeways have been implemented in phases based on available funds and traffic demand.
4	**Acquisitions and Relocations**	The number of acquisitions when dealing with a major transportation project such as the proposed freeway is dependent on a number of factors—roadway location, density of development. The Santan Freeway (State Route 202L) was completed in 2006. At that time, the areas of Chandler and Gilbert were not as developed as the Ahwatukee Foothills Village area is today. Also the cities were more successful in preserving the right-of-way by limiting development within the proposed alignments. Conversely, many residences and businesses were acquired in the construction of the Red Mountain Freeway through the city of Mesa. In making decisions about these freeways, the Arizona Department of Transportation, with concurrence from the Federal Highway Administration, attempted to balance agency responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities and environmental conditions. The identification of the W59/E1 Alternative as the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area) seeks to do the same.

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Not all ADOT's misdeeds are so earthshatteringly expensive. Many just require some paint and management direction to fix. I find them interesting because they shed light on the competency of this giant bureaucracy. A running joke almost everywhere in the Valley is the fact that all the new freeways are either called 101 or 202. If I say I'm on the 101, I could be in Glendale or Chandler, miles apart. Rather than continue with the more memorable different names for each segment, or even using different numbers, ADOT has given up on the names. Even the venerable Superstition Freeway has few signs left anymore. We may be calling this highway the South Mountain Freeway, but the chances are good it will just be another 202. This makes it very complicated and confusing to give directions or navigate.

For years, there were daily jams and congestion where the 101 crosses over the Superstition Fwy. The overpass bridge was built wide enough, but the roadway constricted down to just two lanes in each direction, causing massive backups. Apparently, the Governor or some Legislator made a phone call, and someone appeared with a can of paint, added two more lanes and the backups disappeared. This begs the question whether ADOT goes back and audits its projects after completion to compare planned results with reality. The same situation currently exists on I-10E around MP165 where the freeway narrows to two lanes a few hundred meters before the off ramp for Queen Creek Rd. This is the main exit for the entire town of Maricopa and evening traffic regularly backs up to Chandler Blvd on I-10 because of it. The pavement is wide enough to add another lane, so another can of paint would fix this problem also. So much for ADOT concern for travel time and miles of congested highways. With the huge number of employees, does this organization even look for easy and cost effective improvements, or do they all take the bus and light rail?

In a similar vein, I was at an ADOT local public meeting and asked why the I-10 couldn't be easily widened by one lane in each direction between Chandler Blvd and Elliott by using the extended merge/ exit lanes. Only a few yards of new additional pavement under each overpass would be required to complete the lane. Once again, the response was that's just not done here, and besides, it would defeat the purpose of the extended merge lanes. I pointed out that similar short on-ramps were in use on the I-17 downtown, but it was wasted breath. It made me wonder about the actual priority given to commuter travel time and receptiveness to public comments. This in a town where two major arterials have had clocked reversible lanes for years and the Valley is loaded with "suicide" center turn lanes. For comparison, in Honolulu, which has similar congestion problems, major urban core highways use the paved shoulders during peak traffic periods for several hours each day. Their priorities are definitely directed at their "customers" rather than

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their department or jobs.

Lastly, I decided to look at the internal workings and politics of this huge ADOT bureaucracy. This was inspired by an ADOT project engineer during one of the widenings of the Superstition Fwy in Tempe. Apparently, neighbors of the freeway had successfully fought ADOT to a negotiated peace where everyone agreed not to widen the freeway to its full ROW capacity due to noise and pollution concerns. The engineer's comment was in effect- these people won't be here forever and it will get widened to the limit soon enough. He was right. So much for concern for public health of the new neighbors.
On the subject of subcontractor and project management, there were two investigative articles by Sarah Fenske of the Phoenix New Times newspaper in 2006 describing a sucessful lawsuit against ADOT by Tempe engineer Paul Braunstein, an ADOT subcontractor. The articles are quite revealing in a not very flattering way, describing cronyism and nepotism in the department in letting contracts, and organizational gyrations designed to offload accountability onto subcontractors. These articles are on the Internet at:
http://www.phoenixnewtimes.com/2006-06-01/news/friends-at-work/
http://www.phoenixnewtimes.com/2006-06-22/news/roadkill/

Although these articles are dated, there is no clear evidence that ADOT has changed. In fact, the $20 million that ADOT paid HDR Engineering for this grossly deficient SMF DEIS, strongly suggest that things remain exactly the same. In light of all these anecdotes, I question the competency and motives of a department so keen on pushing a questionable $100 million per mile road. This is especially true when the funds could be used so much more effectively practically anywhere else.

Thank you for considering these numerous concerns and requests for more information regarding the SMF.

Regards,
Timothy R. Lank
Vice President,
Protecting Arizona Resources and Children (PARC)

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From: Projects
To: ADOT
Subject: FW: Save Our Mountains Foundation
Date: Wednesday, May 22, 2013 10:56:29 AM
Attachments: SOMF Sth Mt Freeway, 5.20.2013.doc

From: Susanne Rothwell [mailto:sgr@cox.net]
Sent: Monday, May 20, 2013 9:02 PM
To: Projects
Subject: Save Our Mountains Foundation

Dear Sir, Madam,

Please find attached a letter from Save Our Mountains Foundation (SOMF), regarding the location of the South Mountain Freeway, and the alignment across the SMPP in particular. Many thanks for your consideration in the final location of this freeway.

Sincerely,

Susanne Rothwell,
SOMF
(602) 493-1302
susanne@rothwellarch.com

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SAVE OUR MOUNTAINS FOUNDATION (SOMF):
Official position on the Arizona Department of Transportation's South Mountain Freeway Environmental Impact Study: May 20, 2013

SOMF is against the alignment of the South Mountain Freeway and the 202 road that cuts into South Mountain and trespasses into the South Mountain Park/Preserve (SMPP). SOMF is not against the building of the freeway, we are against the encroachment of the freeway into the Preserve and the destruction of the south west ridges of South Mountain.

1 **SOMF anticipate successful negotiations with the Native American Communities to save the scared South Mountain.**

2 • South Mountain is the heart of the Phoenix Preserve system. At 16,600 acres it is the country's largest park, later designated "Preserve" by Mayor Goddard, giving it higher protection. It is sacred to the Native American Communities, and is of significant life style value to the residents of Phoenix with over 3 million visitors each year.

3 • The growth projections both for population and pollution shown in the DEIS are out of date and no longer valid.

4 • The DEIS shows many alternate routes, but no alternative routes that would save cutting into the south west ridges of South Mountain.

5 • The citizens of Phoenix have consistently voted 80% in favour of the Preserves, but ADOT feel able to ignore their vote, under the provision that a similar design was on the books prior to 1990. It is not in fact the same design, and PMPC believes that the 'taking' of 31.5 acres of Preserve land represents a clear conflict of the wishes of 80% of Phoenix voters.

6 • SMPP is on the City of Phoenix "Historic Property Register", and is eligible for protection under the NRHP (National Register of Historic Places). The DEIS says that the CCC buildings will not be destroyed, negating this requirement. However the Sonoran Desert features that make the Preserve unique will be damaged. Cuts of 220' (the height of a 20 storey building) is massive, and the natural experience will be gravely diminished.

7 • Section 6f of the 'U.S. department of Transportation Act' paragraph 1 says "NPS **must** ensure replacement of lands of equal value, location, and usefulness are provided as conditions of approval for land conversions". It is NOT possible to replace pristine south west ridges of South Mountain, and 31.5 acres of Preserve. This provision can **not** be met.

8 • Ch 5-18 of the DEIS states that "measures to minimize harm to the South Mountain resources determined through direct co-ordination with resource owners, stake holders and users..." SOMF as a stake holder has NOT be contacted by ADOT, and in fact there is no way to "minimize harm" when you are making 220' cuts through 3 ridges of the South Mountain. There is no way that any land can compensate for the loss of 31.5 acres and the massive destruction to adjacent land.

9 • Ch 4-1 of the DEIS lists "measurable benefits" of the Freeway Loop. It is notable that the negative impact has NOT been considered.

SOMF would like to list the "Measurable detriments" of cutting 220' into SMPP with 8 lanes of traffic:

10
1. Destruction of the south west ridges of a **sacred mountain** and important tourist destination for over 3 million visitors annually.
2. A massive increase of traffic, pollution, noise and congestion within the Preserve boundary.

Code	Issue	Response
1	**Alternatives**	Tribal sovereignty is based on the inherent authority of Native American tribes to govern themselves. States have very limited authority over activities within tribal land (see Final Environmental Impact Statement page 2-1). The Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make transportation determinations directly affecting tribal land, or condemn tribal land through an eminent domain process. While efforts to study project alternatives on Gila River Indian Community land were attempted (see Final Environmental Impact Statement Chapter 2, *Gila River Indian Community Coordination*), the Gila River Indian Community has long held a position of not allowing the proposed freeway to be located on its land. For example, a coordinated referendum of Gila River Indian Community members to favor or oppose construction of the proposed freeway on Gila River Indian Community land or to support a no-build option occurred in February 2012, and Gila River Indian Community members voted in favor of the no-build option. Moving forward, therefore, the proposed action cannot be located on the Gila River Indian Community (see Final Environmental Impact Statement page 3-25). The Gila River Indian Community's position regarding a "no-build" option was considered in the Draft and Final Environmental Impact Statement. That position is formally known as the No-Action Alternative and was evaluated in depth in assessments of the impacts of the proposed action on each resource. Whether alignments to develop on Gila River Indian Community land are ultimately identified or not, the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments will continue to coordinate with the Gila River Indian Community regarding concerns and potential mitigation for those concerns.
2	**Cultural Resources**	If feasible, avoidance of Section 4(f) resources is always the Federal Highway Administration and Arizona Department of Transportation's first option. As summarized in Figure 5-2 on page 5-4 of the Final Environmental Impact Statement, numerous alignment adjustments were made to avoid use of existing and planned Section 4(f) resources, like the South Mountains Traditional Cultural Property and Park/Preserve. As discussed on page 5-18 of the Final Environmental Impact Statement, many alternatives were examined to avoid the use of the South Mountains Traditional Cultural Property; however, none of these alternatives were deemed to be prudent and feasible by the Federal Highway Administration. The Department of the Interior reviewed the Draft Environmental Impact Statement and commented, "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources. Please note however, that this concurrence is contingent upon successful completion of the Programmatic Agreement among the consulting parties." (See Appendix 1-1 of the Final Environmental Impact Statement.)

(Response 2 continues on next page)

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11	3. The inevitable death of wildlife, and destruction of wildlife corridors that make the Preserve unique.
12	4. South Mountain with a Freeway chopped into a corner of it, will NOT encourage companies to relocate to Phoenix, for its great life style and weather. This will be a negative to economic growth.
13	5. The Maricopa and Sun Circle Trails as a part of a larger County wide trail system, along with site specific trails will be negatively impacted by the freeway. "Having a regional trail system can be a stimulus to economic growth", as "Low impact Heritage Tourism", but not with a freeway cut through.
14	• DEIS "The commitment of resources necessary ($2-3billion) to build and operate....based on the concept that residents ....would benefit from the proposed transportation facility" SOMF proposes that spending $2-3 billion to desecrate a major tourist and recreation attraction at the heart of the Preserve system would NOT be of any benefit to the residents of Phoenix.
	Save Our Mountains Foundation is a Phoenix based non profit formed in 1973 by concerned citizens. SOMF is dedicated to facilitating the improvement of the mountain and desert preserves in Phoenix.
	We anticipate successful negotiations with the Native American Communities to save the sacred South Mountain.

Code	Issue	Response
2 (cont.)		City of Phoenix planning efforts since the mid-1980s illustrate an awareness of the potential for the proposed freeway to affect Phoenix South Mountain Park/ Preserve. In 1989, the South Mountain Park Master Plan was adopted by the Phoenix City Council. The master plan shows the freeway alignment as adopted by the State Transportation Board in 1988. In 1990, the South Mountain Preserve Act was ratified by the Arizona Legislature. The Act did not apply to roadways through a designated mountain preserve if the roadway was in the State Highway System prior to August 15, 1990. The proposed freeway was in the State Highway System prior to 1990. Records prior to the Act suggest a primary reason for the exception was to allow the proposed freeway to go through Phoenix South Mountain Park/ Preserve (see Final Environmental Impact Statement page 5-14).
3	**Traffic**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future. If the proposed action is the Selected Alternative in the record of decision, planning for emergency situations would be initiated.
4	**Alternatives**	Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Gila River Indian Community (Figure 3-6 on page 3-10 of the Final Environmental Impact Statement illustrates a representation of such alternatives). Ultimately the other alternatives were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to study alternatives on its land (see Final Environmental Impact Statement page 3-25). Therefore, the Arizona Department of Transportation, with concurrence from Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.
5	**Section 4(f) and Section 6(f)**	A discussion of the Phoenix Mountain Preserve Act and the proposed freeway is provided on page 5-14 of the Draft Environmental Impact Statement. The total area of impact to the South Mountain Park/Preserve has been reduced from what was proposed in 1988 (see Figure 5-14 on page 5-23 of the Draft Environmental Impact Statement).

(Responses continue on next page)

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6	**Section 4(f) and Section 6(f)**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. Sometimes there is no way for a needed project to proceed without harming Section 4(f) properties (such as the South Mountain Park/Preserve). As described in the Draft Environmental Impact Statement in Chapters 2, 3, and 5, the examination of possible avoidance alternatives was robust and arduous. The Draft Environmental Impact Statement acknowledges that the cuts through the South Mountains would be a substantial impact, but the activities that make the park such a highly valued tourist attraction(recreational activities, interaction with the Sonoran Desert) would remain. If feasible, avoidance of Section 4(f) resources is always the Federal Highway Administration and Arizona Department of Transportation's first option. As summarized in Figure 5-2 on page 5-4 of the Draft Environmental Impact Statement, numerous alignment adjustments were made to avoid use of existing and planned Section 4(f) resources; however, none of these alternatives were deemed to be prudent and feasible by the Federal Highway Administration. The Department of the Interior reviewed the Draft Environmental Impact Statement and commented, "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources. Please note however, that this concurrence is contingent upon successful completion of the Programmatic Agreement among the consulting parties." (See Appendix 1-1 of the Final Environmental Impact Statement.)
7	**Section 4(f) and Section 6(f)**	Section 6(f) of the Land and Water Conservation Fund Act pertains to projects that would impact outdoor recreational property acquired with Land and Water Conservation Fund Act funds. All Section 6(f) protected areas would be avoided and therefore, this requirement would not apply. Other aspects of the South Mountains are afforded protection under Section 4(f) (see page 5-1 of the Final Environmental Impact Statement).
8	**Section 4(f) and Section 6(f)**	It is acknowledged that the Save Our Mountains Foundation was not one of the groups that has historically been solicited for feedback on potential measures to minimize harm. Every reasonable attempt is made to ensure all stakeholders are engaged; Chapter 6 details the comprehensive public and agency outreach undertaken for a project that had more news articles than most other stories in Arizona since 2001 to ensure all stakeholders would be engaged. The Draft Environmental Impact Statement comment period serves as an opportunity for all stakeholders to provide input on potential measures.

(Responses continue on next page)

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9	**Impacts**	Impacts of the proposed freeway are disclosed throughout the Draft Environmental Impact Statement. The *Environmental Consequences* sections in Chapter 4 describe the impacts of each action alternative studied in detail with respect to each environmental elements. In the *Summary* chapter, Table S-3 beginning on page S-10 of the Draft Environmental Impact Statement provides a tabular list of all of the impacts associated with the proposed freeway.
10	**Section 4(f) and Section 6(f)**	If feasible, avoidance of Section 4(f) resources is always the Federal Highway Administration and Arizona Department of Transportation's first option. As summarized in Figure 5-2 on page 5-4 of the Final Environmental Impact Statement, numerous alignment adjustments were made to avoid use of existing and planned Section 4(f) resources, like the South Mountains Traditional Cultural Property and Park/Preserve. The activities that make the park such a highly valued tourist attraction (recreational activities, interaction with the Sonoran Desert) would remain. As discussed on page 5-18 of the Final Environmental Impact Statement, many alternatives were examined to avoid the use of the South Mountains Traditional Cultural Property; however, none of these alternatives were deemed to be prudent and feasible by the Federal Highway Administration. The Department of the Interior reviewed the Draft Environmental Impact Statement and commented, "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources. Please note however, that this concurrence is contingent upon successful completion of the Programmatic Agreement among the consulting parties." (See Appendix 1-1 of the Final Environmental Impact Statement.) City of Phoenix planning efforts since the mid-1980s illustrate an awareness of the potential for the proposed freeway to affect Phoenix South Mountain Park/Preserve. In 1989, the South Mountain Park Master Plan was adopted by the Phoenix City Council. The master plan shows the freeway alignment as adopted by the State Transportation Board in 1988. In 1990, the South Mountain Preserve Act was ratified by the Arizona Legislature. The Act did not apply to roadways through a designated mountain preserve if the roadway was in the State Highway System prior to August 15, 1990. The proposed freeway was in the State Highway System prior to 1990. Records prior to the Act suggest a primary reason for the exception was to allow the proposed freeway to go through Phoenix South Mountain Park/Preserve (see Final Environmental Impact Statement page 5-14).

(Responses continue on next page)

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11	**Biological Resources**	The section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-125 of the Draft Environmental Impact Statement, discloses by what means the proposed action and its alternatives would affect vegetation, wildlife, and wildlife habitat. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species,. The information used to prepare the analysis in the Draft Environmental Impact Statement (page 4-122) was based on 2011 information retrieved from the Arizona Game and Fish Department (Gopherus agassizii, draft unpublished abstract compiled and edited by the Heritage Data Management System, Phoenix). Current information on threats and connectivity strategies was included in the Biological Evaluation. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). Connectivity is planned to allow wildlife movement beneath the freeway in multiuse crossings (see page 4-125 of the Draft Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use as well as culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
12	**Economic Impacts**	Comment noted.
13	**Section 4(f) and Section 6(f)**	The Maricopa County trails that would cross the freeway are noted in Figure 5-5 on page 5-9 of the Final Environmental Impact Statement. As noted in the table, the freeway would cross over each trail and no direct impacts would occur. This condition is not uncommon as there are numerous local and regional trails throughout the Phoenix metropolitan area that cross freeways. The proposed freeway would not incorporate land from the Section 4(f) resource, and would have no proximity impacts so severe that the protected activities, features, or attributes that qualifies the trails for protection under Section 4(f) are substantially impaired.
14	**Purpose and Need**	Providing a new freeway in an area where it would not be fully used would be an unwise expenditure of public funds. Of the projected 51 percent increase in population, 31 percent increase in housing units, and 69 percent increase in jobs between 2010 and 2035, nearly half of these increases are expected in areas that would be immediately served by the proposed freeway (see Final Environmental Impact Statement page 1-21). When the Arizona Department of Transportation determines whether a freeway should be built, the agency must consider numerous factors, including local and regional transportation needs, project costs, and environmental considerations. Decisions regarding freeway projects are based on the transportation needs of the entire Phoenix metropolitan area as part of a comprehensive, multimodal, regional approach. The proposed freeway is a major component in the Regional Freeway and Highway System. Additionally, the proposed freeway is an important component of past and current planning efforts. Maricopa County, Phoenix's villages (Laveen, Estrella, and Ahwatukee Foothills), Tolleson, and Avondale have all made transportation, land use, and economic planning decisions in a context of the proposed freeway operating in the Study Area. Finally, the proposed freeway would function as intended in the *Regional Transportation Plan*.

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Outdated data projections used, based on outdated date projections that are now six to eight years old. In all the studies, the DEIS provides no alternative analysis to the demolition of the southwest ridge. Over 3 million visitors come to South Mountain Park Preserve annually.

THE FACILITATOR: Excuse me, Ms. Lakin.

MS. LAKIN: Destroying any part of the mountain to allaying a high-capacity freeway will only have a negative impact on tourism, and the many unique resources. We are not against this freeway, we are against going through South Mountain Preserve. Thank you.

THE FACILITATOR: Thank you, Ms. Lakin.

We'll now proceed with the non-pre-registered folks.

One more comment before we continue. For those of you who see your name on the screen, if you're in the back parts of the room, if you want to make your way up to get people to either microphone, that will help us through the day. Feel free to move up. At this point Suzanne Rothwell.

Thank you.

MS. ROTHWELL: Good morning. Thank you for the opportunity to speak. Is this working? No.

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Well, don't worry, I have a loud voice.
I represent Save Our Mountains Foundation. And I have an official statement that I've sent to you via your e-mail source. But I wanted to stand here today and say that we are opposed to any cutting through the South Mountain Park Preserve. We are opposed to any taking of the Phoenix Mountain Preserve System.
And I think perhaps the DEIS, which is a long and wordy document, is most deficient in what it doesn't say. Well, it's most obvious by what it doesn't say. And it does say that this is going to be an economic benefit to Phoenix. But what it doesn't say is that Phoenix has companies relocating here, people coming to live here because of our beautiful weather and our outdoor lifestyle. And if you take away the heart of our preserve system by chopping into the southwest reaches of South Mountain Park, we believe that will be a huge negative.
We've got the Maricopa Trail, Sun Circle Trail, and other local trails in that area. In your document you say that within a quarter of a mile it will be impacted, anything more than outside of a quarter of a mile will not be impacted. As a hiker myself, I can tell you that's not true. And who will

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	City of Phoenix planning efforts since the mid-1980s illustrate an awareness of the potential for the proposed freeway to affect Phoenix South Mountain Park/ Preserve. In 1989, the South Mountain Park Master Plan was adopted by the Phoenix City Council. The master plan shows the freeway alignment as adopted by the State Transportation Board in 1988. In 1990, the South Mountain Preserve Act was ratified by the Arizona Legislature. The Act did not apply to roadways through a designated mountain preserve if the roadway was in the State Highway System prior to August 15, 1990. The proposed freeway was in the State Highway System prior to 1990. Records prior to the Act suggest a primary reason for the exception was to allow the proposed freeway to go through Phoenix South Mountain Park/ Preserve (see Final Environmental Impact Statement page 5-14). The project team examined alternatives to avoid the park, but did not identify any feasible and prudent alternatives to avoid impacts. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). The activities that make the park such a highly valued tourist attraction (recreational activities, interaction with the Sonoran Desert) would remain. The Arizona Department of Transportation continues to work with park stakeholders to minimize impacts and address concerns. Measures to minimize harm to the park were developed (see the Final Environmental Impact Statement, starting on page 5-23). Therefore, the proposed freeway is consistent with regional planning efforts.
2	**Section 4(f) and Section 6(f)**	The Maricopa County trails that would cross the freeway are noted in Figure 5-5 on page 5-9 of the Final Environmental Impact Statement. As noted in the table, the freeway would cross over each trail and no direct impacts would occur. This condition is not uncommon as there are numerous local and regional trails throughout the Phoenix metropolitan area that cross freeways. The proposed freeway would not incorporate land from the Section 4(f) resource, and would have no proximity impacts so severe that the protected activities, features, or attributes that qualifies the trails for protection under Section 4(f) are substantially impaired.

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want to go hike in a park where there's a huge eight-lane freeway cut through the southwest region.

So Save Our Mountains Foundation would like to encourage you, and whoever in the state needs to make this happen, to negotiate better with the Gila River Indian community and the Indian community at large, and we hope that they will also come to the table to talk, and that we can make a freeway happen where it doesn't chop into the preserve and part of what forms a crown and glory for the City of Phoenix. We don't have oceans, we don't have beaches, but we do have a beautiful preserve system.

Thank you very, very much.

THE FACILITATOR: Thank you, Ms. Rothwell.

Michael Goodman.

MR. GOODMAN: Thank you. I'm Michael Goodman. I'm also with the Phoenix Mountains Preservation Council, and I am a member of the ADOT Citizens Advisory Team. Pretty much I agree with what has already been said, so I'll be pretty brief. I did finish reading the EIS, and with regards to the E-1 section, I was highly disappointed. I know during the so-called 12 years we've been studying this, we had a number of reports, I guess the E-1 was

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3	**Alternatives**	Tribal sovereignty is based on the inherent authority of Native American tribes to govern themselves. States have very limited authority over activities within tribal land (see Final Environmental Impact Statement page 2-1). The Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make transportation determinations directly affecting tribal land, or condemn tribal land through an eminent domain process. While efforts to study project alternatives on Gila River Indian Community land were attempted (see Final Environmental Impact Statement Chapter 2, *Gila River Indian Community Coordination*), the Gila River Indian Community has long held a position of not allowing the proposed freeway to be located on its land. For example, a coordinated referendum of Gila River Indian Community members to favor or oppose construction of the proposed freeway on Gila River Indian Community land or to support a no-build option occurred in February 2012, and Gila River Indian Community members voted in favor of the no-build option. Moving forward, therefore, the proposed action cannot be located on the Gila River Indian Community (see Final Environmental Impact Statement page 3-25). The Gila River Indian Community's position regarding a "no-build" option was considered in the Draft and Final Environmental Impact Statement. That position is formally known as the No-Action Alternative and was evaluated in depth in assessments of the impacts of the proposed action on each resource. Whether alignments to develop on Gila River Indian Community land are ultimately identified or not, the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments will continue to coordinate with the Gila River Indian Community regarding concerns and potential mitigation for those concerns.

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built unless there is a sidewalk or a trail for pedestrian and bike traffic next to it, so a person should be able to travel any way you can. Now is the time to make that possible.

In closing, I ask that we build the road now. 30 years is long enough and as we all know, costs have gone up substantially and will continue to rise with each day, week, month, year, or, in this case, three decades, we wait.

When first proposed, it was with the future needs in mind. Well, the future has arrived. It is time to act. We cannot wait any longer.

Thank you very much. I appreciate you listening.

THE FACILITATOR: Thank you, Mr. Mockus.

Just one note. For those of you who are, I understand it's very difficult sometimes in working with prepared notes to keep in mind the time here. So if you would, from time to time, if you are working from notes, please take time out to double-check the time. You're doing a great job and we appreciate that. Thank you.

Sandy Bahr.

MS. BAHR: Thank you. My name is Sandy Bahr. I'm the chapter director for the Sierra Club

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1 here in Arizona. And we will be submitting detailed
2 written comments, but I wanted to say a few things
3 this morning.
4 First of all, we are strongly opposed to
5 construction of this freeway and support the no-build
6 option. No-build, as we've said repeatedly for many
7 years, I don't know if it's been 30, but pretty close
8 to it, no-build doesn't mean no action. We should be
9 investing in existing infrastructure, which has been
10 in dire need of it, and in more mass transit options.
11 Phoenix doesn't need another freeway.
12 As proposed, as you have heard, as you
13 know, this project would destroy a portion of South
14 Mountain Park, which is a key component of our
15 community. It would exacerbate air pollution,
16 destroy wildlife and wildlife habitat and exacerbate
17 urban sprawl. It was a bad idea 30 years ago; it's a
18 bad idea today. There are many other issues with
19 construction of this freeway. Increased traffic and
20 traffic congestion. We all know freeways give you
21 just a little bit of respite, and before you know it,
22 they're even more congested. And if it does what
23 some people said it is supposed to do and brings more
24 trucks in instead of taking 85, we'll have even more
25 congestion and more pollution in the Phoenix area,

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Code	Issue	Response
1	**Purpose and Need**	As stated on page 3-40 of the Final Environmental Impact Statement, the No-Action Alternative would not satisfy the purpose and need of the proposed action because it would result in further difficulty in gaining access to adjacent land uses, increased difficulty in gaining access to Interstate and regional freeway systems from the local arterial street network, increased levels of congestion-related impacts, continued degradation in performance of regional freeway-dependent transit services, increased trip times, and higher user costs. Further, the No-Action Alternative would be inconsistent with Maricopa Association of Governments' and local jurisdictions' long-range planning and policies. The No-Action Alternative was included in the Draft and Final Environmental Impact Statements for detailed study to compare impacts of the action alternatives with the consequences of doing nothing (impacts can result from choosing to do nothing).
2	**Section 4(f) and Section 6(f)**	The proposed freeway would pass through the park's southwestern edge. Section 4(f) of the Department of Transportation Act extends protection to significant publicly owned public parks, recreation areas, and wildlife and waterfowl refuges, as well as significant historic sites, whether they are publicly or privately owned. This protection stipulates that those facilities can be used for transportation projects only if there is no prudent and feasible alternative to using the land and the project includes all possible planning to minimize harm to the land [see Final Environmental Impact Statement, Chapter 5, *Section 4(f) Evaluation*].The project team examined alternatives to avoid the Phoenix South Mountain Park/Preserve, but did not identify any feasible and prudent alternatives to avoid impacts on the park. As such, the freeway would go through the park's southwestern limits. The Arizona Department of Transportation continues to work with park stakeholders to minimize impacts and address concerns. Measures to minimize harm to the park were developed (see Final Environmental Impact Statement, starting on page 5-23). The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). Phoenix South Mountain Park/Preserve would remain the largest municipally owned park in the United States. The activities that make the park a highly valued resource (recreational activities, interaction with the Sonoran Desert) would remain. Nine-tenths of a mile of the proposed freeway would pass through the park's southwestern edge (see Final Environmental Impact Statement page 5-13).
3	**Air Quality**	The Final Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency recently determined that Phoenix has attained the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others.

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which already has unhealthy air for particulates and ozone. And transportation is a key component of both of those pollutants.

The other thing that I wanted to mention is that in not looking at some of these alternatives, you really have failed to evaluate the full range of reasonable alternatives. This freeway was something that ADOT has wanted to do, MAG has wanted to do, and no matter how many facts are presented, no matter how much information is presented, that it's a bad idea, that it no longer serves the purpose that it was intended to serve, you just keep pushing forward with it.

We encourage rejecting this freeway, going back to the drawing board, and looking at investing our hard-earned tax dollars in alternatives that will work for our community and for future generations of Arizonans.

So thank you very much. And we'll be presenting more detailed written comments.

THE FACILITATOR: Thank you, Ms. Bahr. David Gironda. Did I pronounce that correctly?

MR. GIRONDA: Gironda. And I do have a written statement which I can give to the recorder to

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3 (cont.)		The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.
4	**Biology, Plants, and Wildlife**	The section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-125 of the Draft Environmental Impact Statement, discloses by what means the proposed action and its alternatives would affect vegetation, wildlife, and wildlife habitat. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species,. The information used to prepare the analysis in the Draft Environmental Impact Statement (page 4-122) was based on 2011 information retrieved from the Arizona Game and Fish Department (Gopherus agassizii, draft unpublished abstract compiled and edited by the Heritage Data Management System, Phoenix). Current information on threats and connectivity strategies was included in the Biological Evaluation. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). Connectivity is planned to allow wildlife movement beneath the freeway in multiuse crossings (see page 4-137 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for wildlife and for limited human use as well as culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

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5	**Urban Sprawl**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although a nationwide recession beginning in 2007 has slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
6	**Purpose and Need**	As noted in the Draft Environmental Impact Statement, when compared with the No-Action Alternative, the Preferred Alternative would result in less energy consumption (page 4-160), regional improvements to air quality (page 4-79) that would be expected to produce health benefits, and economic benefits of reducing regional traffic congestion (page 4-57), and would be consistent with local and regional long-range planning efforts (page 4-18).
7	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

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From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway Study
Date: Monday, May 20, 2013 8:23:42 AM

From: Heidi Cordova [mailto:hcordova@cox.net]
Sent: Sunday, May 19, 2013 1:51 PM
To: Projects
Subject: Loop 202 South Mountain Freeway Study

TO: Arizona Department of Transportation and the Federal Highway Administration

RE: Sun Circle Trail Riders – Opposition to South Mountain Freeway Construction

SCTR is an organization put into place by Arizona visionaries, and for the last 40 years SCTR has continued to ride our horses in the South Mountain Park.

SCTR is steadfastly opposed to any alignment of the Loop 202 South Mountain Freeway that allows for trespass onto the Mountain Preserve or for any excavation into the South Mountain what so ever. These mountain preserves ensures a lifestyle that 80% of Arizona voters consistently support. The mountain preserves are unique and are for people and wildlife, not for vehicle trespass. SCTR does not agree with many of the DEIS assumptions finding them objectionable and deficient in the following analysis areas.

1 Unexceptable Pre-Decisional Actions: ADOT has made some pre-decisional actions with the purchase of property before the Draft Environmental Impact Statement (DEIS) was released. Phoenix Mountains Preservation Council (SCTR) questions the legality of this action and the entire DEIS when it appears ADOT has already made considerable financial investment to establish the alignment for the South Mountain Freeway rather than follow the prescribed process.

2 Dismal Wildlife Connectivity: The DEIS does not meet the minimal requirements for coordination and analysis of wildlife resources. The Arizona Game and Fish Department was consulted in 2009 during scoping. The current connection to the Estrella Mountains allows for passage of mule deer, javelina, bobcat, and mountain lion. There is no evidence of further efforts to ascertain wildlife connectivity needs or possible mitigation. The Sonoran desert tortoise provides additional evidence of inadequate cumulative analysis given its status as a U.S. Fish & Wildlife Service's candidate species. The mountain ridge area slated for demolition meets the definition for the tortoise's habitat.

3 Unreasonable Taking of Mountain Preservation Lands: The DEIS states in Figure 5-7 Public Parkland the avoidance of taking over 30 acres of the Preserve is "not prudent and feasible". The taking of this mountainside will destroy important archeological, spiritual, cultural and recreational sites with no realistic or reasonable mitigation possible in the study. The study failed to recognize and address new two trails, Gila and Bursera Trails, created in the southwest end of the Preserve in 2010.

4

5 Outdated Data Projections Used: The DEIS is based on outdated data projections that are now six to eight years old. The analysis does not acknowledge the impact the major

Code	Issue	Response
1	**Alternatives**	The comment suggests the environmental impact statement process was biased by a history of property acquisitions within the Study Area. More specifically, properties falling within the limits of the Preferred Alternative, as identified in the Final Environmental Impact Statement, were targeted for acquisition. As noted in text on page 3-54 of the Final Environmental Impact Statement, the Arizona Department of Transportation began acquiring land for the original alignment in 1988. Between 1988 and 2001, the Arizona Department of Transportation acquired approximately 293 acres. Most of this land (258 acres) is located in the Eastern Section along Pecos Road. In 2006, the Arizona Department of Transportation began protective and hardship land acquisition in the alignment right-of-way footprint for the W59 and E1 Alternatives. Between 2006 and October 2013, the Arizona Department of Transportation purchased 326 acres (303 in the Western Section and 23 in the Eastern Section). The process for hardship and advanced acquisitions is explained in text on page 4-50 of the Final Environmental Impact Statement. The comment infers that by taking such action, the objective equal consideration of the alternatives studied in detail in the Draft and Final Environmental Impact Statements is tainted. Advanced acquisitions in parallel to a National Environmental Policy Act environmental determination process is not unprecedented and is common practice. In this case, property acquisitions by the Arizona Department of Transportation for purposes of implementing the proposed action are done at risk as communicated to the agency by the Federal Highway Administration. If another action alternative were to be ultimately selected, the agency would likely have to place the acquired properties on the market for sale and purchase. The Arizona Department of Transportation attempts to balance the risk against its mission of timely delivery of transportation infrastructure to the driving public. Further, Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
2	**Biology, Plants, and Wildlife**	The section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-125 of the Draft Environmental Impact Statement, discloses by what means the proposed action and its alternatives would affect vegetation, wildlife, and wildlife habitat. A Biological Evaluation was submitted to the U.S. Fish and Wildlife Service, Arizona Game and Fish Department, and Gila River Indian Community Department of Environmental Quality that addressed threatened, endangered, and candidate species, including the Sonoran desert tortoise. The information used to prepare the analysis in the Draft Environmental Impact Statement (page 4-122) was based on 2011 information retrieved from the Arizona Game and Fish Department (Gopherus agassizii, draft unpublished abstract compiled and edited by the Heritage Data Management System, Phoenix). Current information on threats and connectivity strategies was included in the Biological Evaluation. The U.S. Fish and Wildlife Service concurred with the species determinations in the Biological Evaluation (see Appendix 1-1 of the Final Environmental Impact Statement). Connectivity is planned to allow wildlife movement beneath the freeway in multiuse crossings (see page 4-137 of the Final Environmental Impact Statement). The Federal Highway Administration and Arizona Department of Transportation have committed to providing mitigation by including multifunctional crossing structures designed for

(Response 2 continues on next page)

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6 7 8	economic downturn had and it brings into question the validity of projected growth levels put forth in the DEIS. In all the alternative studies, the DEIS does not provide one alternative analysis to the demolition of the southwest ridges of South Mountain. Furthermore, nowhere in this study is there an assessment of hazardous material truck traffic nor any mention of managing this truck traffic and the consequences of a serious hazard waste incident. Over 3 million visitors come to South Mountain Park/Preserve annually, according to City of Phoenix statistics. Destroying any part of the mountain to align a high-capacity freeway will only have a negative impact on tourism and the many unique resources the park offers. We urge ADOT to stop providing studies that do not accurately or thoroughly address the impact this freeway has on South Mountain. It's time to stop the $20 million and more in wasted tax payer's money to study the environmental impact and design for an alignment that no longer makes sense. Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
2 (cont.		wildlife and for limited human use as well as culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).
3	**Section 4(f) and Section 6(f)**	The religious and cultural importance of the South Mountains (as exemplified in the comment's reference to the Gila River Indian Community resolution) is acknowledged in the Draft Environmental Impact Statement in several locations, notably pages 4-132 and 5-26 as well as in the Summary of the Draft Environmental Impact Statement. The description in the Draft Environmental Impact Statement is based on input received from the Gila River Indian Community and its members and other Indian Nations and their members. The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Gila River Indian Community. The Final Environmental Impact Statement includes discussion on efforts to avoid use of Phoenix South Mountain Park/Preserve, starting on page 5-16. Measures to minimize harm to the park as a result of the proposed freeway start on page 5-23. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). The activities that make the park such a highly valued resource (recreational activities, interaction with the Sonoran Desert) would remain.

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4	**Section 4(f) and Section 6(f)**	South Mountain's newest trails are the Bursera and Pyramid Trails (see Final Environmental Impact Statement page 5-8). The E1 Alternative is approximately 1 mile south of the Pyramid Trail and even farther from the Bursera Trail; thus, it would not affect either trail. The trails have walk-in access from Chandler Boulevard and 19th Avenue, with on-street parking. This walk-in access would be north of and adjacent to the planned extension of Chandler Boulevard and, thus, would not be directly affected. The walk-in access point and the part of the Pyramid Trial at the access point are located adjacent to a residential neighborhood and the City of Phoenix's planned Chandler Boulevard Extension. These trails are typically used for high-intensity recreational activities such as running, hiking, and biking, not noise- or viewshed-sensitive activities. All proposed action alternatives would span existing and proposed trails to avoid impacts. However, during construction (if an action alternative were selected), trails that would be spanned or would be near potential freeway construction would be closed for limited times for safety reasons. Closures would necessitate that trail users detour around construction sites to rejoin the trails farther along their length. According to Phoenix South Mountain Park/Preserve rangers, the Gila Trail—although well-defined—is not a designated trail within the park. That said, the Gila Trail would not be affected by the proposed freeway or by the Chandler Boulevard Extension. The Final Environmental Impact Statement Appendix page A665 contains information directly from the Phoenix General Plan and early coordination with the City of Phoenix Parks Department. The trails in the preserve are exceptions to this statement and were always meant as such. The trails within 1/4 mile of the proposed alternatives were treated separately, as in the case of the Maricopa County Regional Trails System. Should an alternative be selected, the Arizona Department of Transportation and Federal Highway Administration would work closely with the City of Phoenix during final design to ensure the connectivity of trails is maintained, whether they are eligible as Section 4(f) resources or not.
5	**Purpose and Need**	The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.

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6	**Alternatives**	Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Gila River Indian Community (Figure 3-6 on page 3-10 of the Final Environmental Impact Statement illustrates a representation of such alternatives). Ultimately the other alternatives were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to study alternatives on its land (see Final Environmental Impact Statement page 3-25). Therefore, the Arizona Department of Transportation, with concurrence from Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.
7	**Hazardous Materials**	If the proposed action the Selected Alternative in the record of decision, planning for emergency situations would be initiated. If the plan is amended, it is made available to the Arizona Department of Transportation.
8	**Section 4(f) and Section 6(f)**	City of Phoenix planning efforts since the mid-1980s illustrate an awareness of the potential for the proposed freeway to affect Phoenix South Mountain Park/ Preserve. In 1989, the South Mountain Park Master Plan was adopted by the Phoenix City Council. The master plan shows the freeway alignment as adopted by the State Transportation Board in 1988. In 1990, the South Mountain Preserve Act was ratified by the Arizona Legislature. The Act did not apply to roadways through a designated mountain preserve if the roadway was in the State Highway System prior to August 15, 1990. The proposed freeway was in the State Highway System prior to 1990. Records prior to the Act suggest a primary reason for the exception was to allow the proposed freeway to go through Phoenix South Mountain Park/ Preserve (see Final Environmental Impact Statement page 5-14). The project team examined alternatives to avoid the park, but did not identify any feasible and prudent alternatives to avoid impacts. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). The activities that make the park such a highly valued tourist attraction(recreational activities,interaction with the Sonoran Desert) would remain. The Arizona Department of Transportation continues to work with park stakeholders to minimize impacts and address concerns. Measures to minimize harm to the park were developed (see Final Environmental Impact Statement, starting on page 5-23).

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THE FACILITATOR: Thank you.
If you'd like to speak and haven't registered out front, please do so.
THE FACILITATOR: Will Novak.
MR. NOVAK: This one?
THE FACILITATOR: Please.
MR. NOVAK: Hey guys, how are you doing? My name's Will Novak. I'm the president of the Phoenix Historic Neighborhoods Coalition, but I'm also the secretary of a group called the Thunderdome Neighborhood Association for Nonautomotive Mobility. I guess you can probably assume where I'm going to come down on this issue.
And it doesn't really matter what we say, because you guys are in the freeway-building business; you have been for -- since the 1970s. You're going to build this freeway, come hell or high water; it really doesn't matter what the citizens say or what makes good sense.
I just want to say how disappointed I am. You know, most cities, corrective-thinking cities around the country are tearing down freeways, like San Francisco, they got rid of the Embarcadero Freeway, while we're still building more. Phoenix was once a city there was actually a time where we

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1 fought against building freeways. The Arizona
2 Republic came out and said we don't want to build any
3 more freeways; we don't want be another Los Angeles;
4 we don't want to be a sprawl and air pollution and
5 just horrible places. But thanks to, you know,
6 short-sighted planning, what we sort have become is
7 just a mini version of Los Angeles. I see in your
8 paperwork that this project is going to cost
9 $1.23 billion. How many miles of light rail do you
10 think you can build for that? How many miles of
11 commuter rail? How many trees do you think you could
12 plant for $1.23 billion? I'll bet for that much you
13 could fill up the Salt River running over to 19th
14 Avenue and extend the Tempe Town Lake and achieve the
15 original Rio Salado project vision that the city has
16 had for 60 years now. It's just a classic,
17 short-sighted Phoenix thinking, you know; we just are
18 always in a hurry to screw up and do the wrong thing
19 in this town, and it's just devastating.
20 The fact that you might cut through South
21 Mountain, the largest city-owned park in the world,
22 is disgusting. And your study is such a joke anyhow.
23 I mean, the idea that you even looked at alternatives
24 is laughable. The only alternative you really looked
25 into is the no-build scenario, which you're never

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1	**Urban Sprawl**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth).). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Purpose and Need**	The study has considered a variety of transportation modes: transportation system management/transportation demand management, mass transit (commuter rail, light rail, expanded bus service), arterial street improvements, land use controls, new freeways, and a No-Action Alternative. Mass transit modes such as light rail were eliminated from further study because even better-than-planned performance of transit would not adequately address the projected 2035 travel demand (see Final Environmental Impact Statement page 3-4). Two high-capacity transit corridors are being considered near the western and eastern extents of the Study Area, but such extensions would not adequately address the projected 2035 travel demand. A freeway/light rail combination would integrate a freeway and light rail system into a single transportation corridor (see Final Environmental Impact Statement page 3-6). Such a freeway/light rail system is planned at two locations: along Interstate 10 (Papago Freeway) and along State Route 51 (Piestewa Freeway). These two segments would connect to the light rail system currently in operation. With these two freeway/light rail segments already in planning stages, members of the public identified a similar opportunity along the proposed freeway. Most freeway/light rail combinations, however, radiate from a central travel demand generator such as a business district or airport. No such systems are known to follow a circumferential route, as the proposed freeway would. Furthermore, the additional right-of-way needed for light rail (generally, a 50-foot-wide corridor) would have substantial community impacts such as displaced residences and businesses and parkland impacts. Therefore, the light rail alternative was eliminated from further study. The freeway mode was determined to be an appropriate response to the project's purpose and need. The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the

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going to do. I mean, is this freeway even necessary when we have MAG's commuter rail plans come online; what about the West Valley light rail going out that way? You know, it doesn't even talk about induced demand. Anyone who studies transportation and planning, all you get when you build a freeway is you get more traffic. We've known this for 40 years now, that new freeways just induce new demand. All you're going to do is build a freeway, which is going to do what, it's going to create more sprawl. There's going to be a Walmart that pops up and a Kmart, and a KFC, and a Church's chicken, and all that stuff, and they're going to create more and more cars, and more and more air pollution, so you haven't done anything.

But unfortunately, the way we have things set up here is ADOT is in the highway building business, so that's a joke; you're going to build a highway, no matter what. But just -- yeah, I just would hope that you would take a more holistic approach in the future, you know, and look into what's actually good for this city and this area. Because I'm under 30 years, I've got to live here for the next 70 years, and I don't want to choke to death. And I'm just -- just tired of it. Luckily, when my generation grows up and is in charge, this

Code	Issue	Response
2 (cont.)		Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
3	**Section 4(f) and Section 6(f)**	As discussed on page 5-16 of the Final Environmental Impact Statement, many alternatives were examined to avoid the use of the South Mountain Park/Preserve; however, none of these alternatives were deemed to be prudent and feasible by the Federal Highway Administration. The Department of the Interior reviewed the Draft Environmental Impact Statement and commented, "Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources. Please note, however, that this concurrence is contingent upon successful completion of the Programmatic Agreement among the consulting parties." (See Appendix 1-1 of the Final Environmental Impact Statement.) The Arizona Department of Transportation continues to work with park stakeholders to minimize impacts and address concerns. Measures to minimize harm to the park were developed (see Final Environmental Impact Statement, starting on page 5-23). The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). Phoenix South Mountain Park/Preserve would remain the largest municipally owned park in the United States. The activities that make the park a highly valued resource (recreational activities, interaction with the Sonoran Desert) would remain. Nine-tenths of a mile of the proposed freeway would pass through the park's southwestern edge (see Final Environmental Impact Statement page 5-13).
4	**Alternatives**	Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Gila River Indian Community (Figure 3-6 on page 3-10 of the Final Environmental Impact Statement illustrates a representation of such alternatives). Ultimately the other alternatives were eliminated from further study in the screening process and the Gila River Indian Community decided not to give permission to study alternatives on its land (see Final Environmental Impact Statement page 3-25). Therefore, the Arizona Department of Transportation, with concurrence from Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the Western Section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities. The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement were the most appropriate information available. The Maricopa Association of Governments approved new population, employment,

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kind of crap won't be happening anymore.
Thanks.
Thanks for typing.
THE FACILITATOR: Good afternoon. I'd like to introduce the 2:00 to 4:00 p.m. panel, with the Arizona Department of Transportation, Brock Barnhart, with the Federal Highway Administration, Director Moreno, and with the Arizona Department of Transportation, Brent Cain.
Our next speaker is Richard Tracy, Sr.
Mr. Tracy, you now can pick up the microphone.
MR. TRACY: Can I have about five minutes to catch my breath?
THE FACILITATOR: Most certainly.
MR. TRACY: It wasn't always this way, you know. I just lived here 43 years too long.
THE FACILITATOR: Welcome, Mr. Tracy, you have three minutes.
MR. TRACY: All right. Thank you very much. It was quite difficult for me to come here. It's been difficult for me to attend meetings all over the Valley and send letters, and disappointing when nobody pays any attention to it. I hope this is -- okay, as I say, it was difficult to come here.

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Code	Issue	Response
4 (cont.)		housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future
5	**Purpose and Need**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
6	**Air Quality**	The Final Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency recently determined that Phoenix has attained the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.

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The amount of money that we're spending on this freeway, 100 million per, what was it, mile, that's outrageous, not to mention the $20 million to complete this DEIS. People keep talking about cutting down on pollution, but what about the pollution in our community? Do we not matter? The air that we breathe, is our air any less important than the people of Phoenix? When are we going to actually matter? When are those considerations going to happen?

And you're blasting through sacred mountain that is religious and sacred to our people. I can't elaborate on that because my time is out, but I just want to mention that that is significant to our people.

THE FACILITATOR: Thank you, Ms. Riddle.

Our next speaker is David Martin. We welcome David Martin.

Welcome, Mr. Martin.

MR. MARTIN: Thank you.

THE FACILITATOR: You have three minutes.

MR. MARTIN: Thank you. Members of the panel, for the record, my name is David Martin, I sort of have multiple hats here today. I am the president of the Associated General Contractors, I chair an organization called We Build Arizona, and I am an Ahwatukee resident, so I sort of wear three hats.

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But one of the things I want to bring to your attention is a poll that we conducted and submitted into the record, with your permission. Members of the South Mountain study team, thank you very much for the opportunity to speak today. I'm here on behalf of all the memberships that I mentioned before to talk to you about a poll that we conducted and letting you know that Valley commuters have waited in traffic jams too long. The freeway will cut traffic congestion across the metro area, it'll reduce air pollution, and save drivers time and money. Registered voters responding to a poll that our organization conducted a little more than two weeks ago happen to agree; 64.3 percent of likely voters in Maricopa County support construction of the freeway. Just 19.6 percent said they were either opposed or likely to oppose the project.

And in a separate survey, we found that 59 percent of likely voters living in Ahwatukee and Laveen support the freeway as well. As a resident of Ahwatukee for 15-plus years and a third-generation Arizonan, I know that people support the project and support the corridor for the project. Jumping onto I-10 downtown in Phoenix every morning is extraordinarily hectic. If the projections of the study come true, I might as well abandon the area of Ahwatukee and convince someone to

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take my home. Honestly, I don't want to be around if a freeway is not built. This corridor is extraordinarily important to congestion and to the future of Ahwatukee.

Ladies and gentlemen of the committee, the two polls I want to submit to the record today, the voters have spoken three times on this issue: Once in 1985, one in 2004, and again with the poll that we submitted or will be submitting here today. We must bring this EIS to its conclusion; 12 years of study, this corridor flies in the face of the voters who voted this project in. There is no more important project to area commuters and workers in the southbound freeway project. We must build it now. Thank you very much.

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THE FACILITATOR: Thank you, Mr. Martin.

I'd like to invite our next speaker, Joseph Morago.

Welcome, Mr. Morago. You have three minutes.

MR. MORAGO: For the record, it's Joseph Morago. Good afternoon, my name is Joseph Morago. I was born and raised in Arizona, I'm a Native American from Akimel AuAuthm tribe, a member of Gila River Alliance for a Clean Environment, as well as PARC. I'm here today to state my opposition for the proposed South Mountain Loop 202 freeway. After reviewing the DEIS, I was shocked to learn how little information is present in

Code	Issue	Response
1		Comment noted.

RESPONSES TO FREQUENTLY SUBMITTED PUBLIC COMMENTS

The Arizona Department of Transportation and Federal Highway Administration identified several recurring public comments. Comments that provided either support or opposition for the project were reviewed by the project team and responded simply with a "comment noted." Other substantive comments related to a number of topics were received. The nature of these comments is summarized below, immediately followed by a broad response to the issue. Again, the responses address issues that were commented on by multiple reviewers and address the majority of the comments submitted. Many of the responses to individual comments refer the commenter to a specific response (or responses) below for more details.

Below are examples of what the response to a frequently submitted comment looks like in the comment response document. In some instances, multiple "Issues" are combined into a single response that refers to the frequent responses. For each, the Code provides a numbered identifier that corresponds to the comment document, the Issue identifies the topic of the response, and the Response refers the commenter or reviewer to the page where the frequent responses can be located.

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Biology, Plants, and Wildlife**	

ISSUE: ACQUISITIONS AND RELOCATIONS

Frequent comment: *Commenters inquired about the process that would be undertaken by the Arizona Department of Transportation in the acquisition and relocation of their home or business.*

Response: Land acquisition and relocation assistance services for the project shall be available to all individuals without discrimination in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, which provides uniform, fair, and equitable treatment of people whose property is affected or who are displaced as a result of the project, including those with special needs. Advisory assistance services and compensation practices are described in detail in the Arizona Department of Transportation's *Right-of-way Procedures Manual*, located at <azdot.gov/business/RightofWay_Properties/booklets-and-manuals>. For further discussion, see page 4-51 of the Final Environmental Impact Statement and Appendix 4-1. For questions on specific properties, contact the Arizona Department of Transportation Right-of-Way Group at (602) 712-7316.

ISSUE: AIR QUALITY

Frequent comment: *Commenters expressed the belief that the proposed freeway would cause an increase in air pollution and that the proposed freeway would worsen air quality.*

Response: The Final Environmental Impact Statement addresses the history of air quality in the region (see text beginning on page 4-68 of the Final Environmental Impact Statement). The Clean Air Act § 109(b)(1) requires the U.S. Environmental Protection Agency to establish primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety to protect the public health. Air quality in the Phoenix metropolitan area has improved over time; Phoenix was redesignated to attainment/maintenance for carbon monoxide in 2005, and the U.S. Environmental Protection Agency determined on May 30, 2014, that Phoenix is in maintenance for the particulate matter (PM_{10}) standard. These improvements are largely associated with cleaner fuels and lower-emission vehicles along with local controls on fugitive dust. Future emissions would also be reduced by the use of cleaner-burning fuels, technological advances in automotive design (including the greater use of alternative fuel vehicles), reformulated gasoline, gas can standards, stricter enforcement of emission standards during inspections, heavy-duty diesel engine and on-highway diesel sulfur control programs, dust control programs, and others.

As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the Regional Transportation Plan that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014.

The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the updated analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways, arterial streets, and at interchanges, benefiting users of area highways and those living near or using congested roads.

The project-level air quality conformity demonstration for carbon monoxide and particulate matter (PM_{10}) was conducted at the South Mountain Freeway and Interstate 10 (Papago Freeway) interchange. To ensure

that the air quality analyses addressed public comments on the Draft Environmental Impact Statement, two additional interchanges were modeled for discussion in the Final Environmental Impact Statement: the 40th Street and E1 Alternative interchange and the Broadway Road and W59 Alternative interchange. The carbon monoxide and particulate matter (PM_{10}) results for these two interchange locations are shown in Tables 4-32 and 4-33 on pages 4-76 and 4-77, respectively, of the Final Environmental Impact Statement. Modeled carbon monoxide concentrations at all receptor locations in the vicinity of the two interchange locations were well below the 1-hour and 8-hour National Ambient Air Quality Standards of 35 and 9 parts per million, respectively. Likewise, the particulate matter (PM_{10}) design values with the Preferred Alternative did not exceed the 24-hour National Ambient Air Quality Standard of 150 micrograms per cubic meter.

In addition, fugitive dust and mobile source emissions from construction of the proposed freeway would be controlled by requiring the contractor to comply with the dust-control methods in the Arizona Department of Transportation's *Standard Specifications for Road and Bridge Construction* (2008) and Maricopa County Rule 310, Fugitive Dust Ordinance. Disruption to traffic, especially during peak travel periods, would be minimized by a traffic control plan to help reduce impacts of traffic congestion and associated emissions during construction. These methods are discussed on page 4-85 of the Final Environmental Impact Statement.

ISSUE: ALTERNATIVES, W59 ALTERNATIVE VERSUS W101 ALTERNATIVE

Frequent comment: *Commenters expressed that the W101 Alternative would be a better connection point to Interstate 10 in the Western Section and expressed concerns that traffic operations along Interstate 10 would be adversely affected by the connection at 59th Avenue (W59 Alternative).*

Response: In preparing the Final Environmental Impact Statement, the Federal Highway Administration and Arizona Department of Transportation once again compared the W59 Alternative with the W101 Alternative (see Final Environmental Impact Statement beginning on page 3-68). This comparison examined overall transportation needs, consistency with regional and long-range planning goals, environmental and societal impacts, operational differences, estimated costs, and regional support and public input. The W101 Alternative would result in approximately 200 to 600 more displaced residential properties than the W59 Alternative. The W59 Alternative would have a nominal effect on the local tax base in Phoenix. The W101 Alternative would have a severe impact on the City of Tolleson's tax base and would lead to a reduction in City-provided services. Right-of-way for the W101 Alternative would eliminate a substantial portion of the remaining developable land in Tolleson. The W101 Alternative would need the partial or complete reconstruction of the State Route 101L (Agua Fria Freeway) and I-10 (Papago Freeway) interchange and additional widening improvements to State Route 101L (Agua Fria Freeway). The total cost of the W101 Alternative would be $490 million to $640 million greater than the W59 Alternative. Resolutions passed by the City/Town Councils of Avondale, Buckeye, Gila Bend, Goodyear, Litchfield Park, Phoenix, and Tolleson supported an alternative near 55th Avenue (now closely represented by the W59 Alternative) and opposed the W101 Alternative. Following this reanalysis, the Federal Highway Administration and Arizona Department of Transportation identified the W59 Alternative as the Preferred Alternative in the Western Section.

In preparing the Final Environmental Impact Statement, the Federal Highway Administration and Arizona Department of Transportation reanalyzed the Western Section action alternatives' effects on operations along Interstate 10 (see Final Environmental Impact Statement beginning on page 3-62). The analysis determined that the No-Action Alternative would result in the most sections along Interstate 10 operating at level of service E or F, and for the longest duration. The proposed connection to Interstate 10 (Papago Freeway) at 59th Avenue would include substantial improvements (widening) along Interstate 10 to provide adequate operations on Interstate 10 in the area of the junction and to allow traffic moving to and from the South Mountain Freeway to enter and exit the Interstate 10 main line (see page 3-49 of the Final Environmental Impact Statement). The design of the proposed Interstate 10 and South Mountain Freeway system traffic interchange at 59th Avenue has received preliminary acceptance from the Federal Highway Administration, subject to completion of the National Environmental Policy Act process.

ISSUE: ALTERNATIVES, E1 ALTERNATIVE

Frequent comment: *Commenters expressed a belief that other action alternatives, in addition to the E1 Alternative, should have been studied in detail in the Draft Environmental Impact Statement.*

Response: Several action alternatives were subject to the alternatives development and screening process; not just the E1 Alternative and alternatives located on the Community (Figure 3-6 on page 3-10 of the Draft Environmental Impact Statement illustrates a representation of such alternatives). Alternatives that bisected Ahwatukee Foothills Village were eliminated because of their extraordinary community impacts. Alternatives located north of the mountains to avoid the protected resource would not meet the purpose and need of the proposed action and would create impacts of extraordinary magnitude (see Table 3-5 on page 3-12 of the Final Environmental Impact Statement). Alternatives located south of the mountains would pass through Gila River Indian Community land. The Gila River Indian Community has not granted permission to develop alternatives on its land (see Final Environmental Impact Statement page 3-25). Placing an alternative even farther south of the Gila River Indian Community land would not satisfy the purpose and need of the proposed action. Therefore, there is no prudent and feasible alternative to avoid use of the mountains, and the E1 Alternative is the only action alternative available. In June 2013, the Maricopa Association of Governments approved new socioeconomic projections for Maricopa County. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. The conclusions reached in the Draft Environmental Impact Statement were reconfirmed in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). Therefore, the Arizona Department of Transportation, with concurrence from the Federal Highway Administration, identified the E1 Alternative as the eastern section of the Preferred Alternative (which includes the W59 Alternative in the western section of the Study Area). In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.

ISSUE: ALTERNATIVES, NO-ACTION (NO-BUILD) ALTERNATIVE

Frequent comment: *Commenters expressed a desire to select the No-Action (No-Build) Alternative as the Preferred Alternative.*

Response: As stated on page 3-40 of the Final Environmental Impact Statement, the No-Action Alternative would not satisfy the purpose and need of the proposed freeway because it would result in further difficulty in gaining access to adjacent land uses, increased difficulty in gaining access to Interstate and regional freeway systems from the local arterial street network, increased levels of congestion-related impacts,

continued degradation in performance of regional freeway-dependent transit services, increased trip times, and higher user costs. Further, the No-Action Alternative would be inconsistent with Maricopa Association of Governments' and local jurisdictions' long-range planning and policies. The No-Action Alternative was included in the Draft and Final Environmental Impact Statements for detailed study to compare impacts of the action alternatives with the consequences of doing nothing (as impacts can result from choosing to do nothing). The impacts associated with the No-Action Alternative are discussed in each section of Chapter 4, *Affected Environment*, *Environmental Consequences*, and *Mitigation*, in the Final Environmental Impact Statement. These impacts are also summarized in Table S-3 on page S-10 of the *Summary* chapter of the Final Environmental Impact Statement.

ISSUE: ALTERNATIVES, GILA RIVER INDIAN COMMUNITY ALIGNMENT

Frequent comment: *Commenters expressed a desire to locate the proposed freeway on Gila River Indian Community land.*

Response: Tribal sovereignty is based on the inherent authority of Native American tribes to govern themselves. States have very limited authority over activities within tribal land (see Final Environmental Impact Statement page 2-1). The Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make transportation determinations directly affecting tribal land, or condemn tribal land through an eminent domain process.

While efforts to study project alternatives on Gila River Indian Community land were attempted (see Final Environmental Impact Statement Chapter 2, *Gila River Indian Community Coordination*), the Gila River Indian Community has long held a position of not allowing the proposed freeway to be located on its land. For example, a coordinated referendum of Gila River Indian Community members to favor or oppose construction of the proposed freeway on Gila River Indian Community land or to support a no-build option occurred in February 2012, and Gila River Indian Community members voted in favor of the no-build option. Moving forward, therefore, the proposed freeway cannot be located on the Gila River Indian Community (see Final Environmental Impact Statement page 3-25). The Gila River Indian Community's position regarding a "no-build" option was considered in the Draft and Final Environmental Impact Statements. That position is formally known as the No-Action Alternative and was evaluated in depth in assessments of the impacts of the proposed freeway on each resource. Whether alignments to develop on Gila River Indian Community land are ultimately identified or not, the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments will continue to coordinate with the Gila River Indian Community regarding concerns and potential mitigation for those concerns.

ISSUE: ALTERNATIVES, NONFREEWAY ALTERNATIVES

Frequent comment: *Commenters expressed a desire for the Arizona Department of Transportation to invest in nonfreeway travel modes.*

Response: The study has considered a variety of transportation modes: transportation system management/transportation demand management, mass transit (commuter rail, light rail, expanded bus service), arterial street improvements, land use controls, new freeways, and a No-Action Alternative. These alternatives alone or in combination would have limited effectiveness in reducing overall traffic congestion in the Study Area and, therefore, would not meet the purpose and need criteria; specifically, they would not adequately address projected capacity and mobility needs of the region. Mass transit modes such as light rail and an expanded bus system were reexamined in the Final Environmental Impact Statement and were eliminated from further study because even better-than-planned performance of transit would not adequately address the projected 2035 travel demand (see Final Environmental Impact Statement page 3-4). Two high-capacity transit corridors are being considered near the western and eastern extents of the Study Area, but such extensions would not adequately address the projected 2035 travel demand. A freeway/light rail combination would integrate a freeway and light rail system into a single transportation corridor (see Final Environmental Impact Statement page 3-6). Such a freeway/light rail system is planned at two locations: along Interstate 10 (Papago Freeway) and along State Route 51 (Piestewa Freeway). These two segments would connect to the light rail system currently in operation. With these two freeway/light rail segments already in planning stages, members of the public identified a similar opportunity along the proposed freeway. Most freeway/light rail combinations, however, radiate from a central travel demand generator such as a business district or airport. No such systems are known to follow a circumferential route, as the proposed freeway would. Furthermore, the additional right-of-way needed for light rail (generally, a 50-foot-wide corridor) would have substantial community impacts such as displaced residences and businesses and parkland impacts. Therefore, the light rail alternative and light rail and freeway combination would not be prudent and were eliminated from further study. The freeway mode was determined to be an appropriate response to the project's purpose and need.

ISSUE: BIOLOGY, PLANTS, AND WILDLIFE

Frequent comment: *Commenters expressed concerns about the impacts the proposed freeway would have on wildlife within and around the Phoenix South Mountain Park/Preserve area.*

Response: Within the context of overall vegetation, wildlife, and wildlife habitat, all action alternatives and options would result in a decrease in the amount of cover, nesting areas, and food resources for wildlife species caused by construction of the project. See the section, *General Impacts on Vegetation, Wildlife, and Wildlife Habitat*, beginning on page 4-136 of the Final Environmental Impact Statement, for additional details on potential effects on vegetation, wildlife, and wildlife habitat.

The Arizona Department of Transportation and Federal Highway Administration completed a Biological Evaluation containing analysis of the project effects on listed and candidate species under the Endangered Species Act. The Biological Evaluation was completed in May 2014 following identification of the Preferred Alternative in the Draft Environmental Impact Statement. The Biological Evaluation was sent to the U.S. Fish and Wildlife Service, the Arizona Game and Fish Department, and the Gila River Indian Community Department of Environmental Quality for technical assistance with minimizing impacts on listed and candidate species prior to completion of the Final Environmental Impact Statement. In a letter dated July 18, 2014, the Gila River Indian Community provided comments on the Biological Evaluation for the proposed freeway and expressed that the Gila River Indian Community holds all animals in the highest regard and recognizes animals as culturally important. The letter included a list of plant and animal species that are culturally important to the Gila River Indian Community. The Biological Evaluation for the proposed freeway was revised to incorporate an evaluation of the provided species (see page 4-127 of the Final Environmental Impact Statement). The Arizona Department of Transportation and Federal Highway Administration have committed to continue coordination with the Arizona Game and Fish Department, the

Gila River Indian Community Department of Environmental Quality, and U.S. Fish and Wildlife Service regarding wildlife concerns as a result of the freeway's potential implementation. The analysis of biological resources may be found beginning on page 4-125 of the Final Environmental Impact Statement. The informal consultation with the U.S. Fish and Wildlife Service resulted in "no effect" findings for all listed and candidate species except for the Tucson shovel-nosed snake, which received a "may affect, but not likely to adversely affect" finding. Mitigation measures to conduct preconstruction surveys for the Tucson shovel-nosed snake and the Sonoran desert tortoise, where appropriate and after consultation with the Arizona Game and Fish Department, were added to the Final Environmental Impact Statement (see page 4-135).

The 51st Avenue travel corridor and planned development in the area adjacent to Phoenix South Mountain Park/Preserve have and will continue to degrade the ability of wildlife to move through those areas (see the sidebar, "*Existing versus planned land use*," on page 4-3 of the Final Environmental Impact Statement). The Arizona Department of Transportation and Federal Highway Administration have committed to providing mitigation including multifunctional crossing structures designed for wildlife and for limited human use, potential fencing to guide wildlife to the crossing structures, and culverts designed for connectivity for smaller species. Wildlife-friendly design information would be considered during the design of drainage and crossing structures for the freeway (see *Mitigation*, beginning on page 4-138 of the Final Environmental Impact Statement).

ISSUE: CULTURAL RESOURCES

Frequent comment: *Commenters expressed that the South Mountains are sacred to Native American communities and should be protected from impacts from the proposed freeway.*

Response: Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resource studies and engaging in an ongoing, open dialogue with the Gila River Indian Community Tribal Historic Preservation Office to understand the Gila River Indian Community's way of life and to identify and evaluate places of religious, spiritual, and cultural importance to the Gila River Indian Community that may be adversely affected by the proposed freeway. Such places may be referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. The religious, spiritual, and cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. The traditional cultural properties identified are important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28.

Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with State Historic Preservation Officers and tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation regarding all historic properties in the area of potential effects has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments made in a record of decision are completed.

ISSUE: HAZARDOUS MATERIALS

Frequent comment: *Commenters expressed concerns about the transport of hazardous materials on the proposed freeway.*

Response: Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on specific or unique emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; transport of hazardous cargo would be expected to be permissible (see text box on Final Environmental Impact Statement page 4-166).

The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. It also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on Final Environmental Impact Statement page 4-166). The Arizona Department of Environmental Quality maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Arizona Department of Public Safety on incidents within their jurisdiction. Requirements for shippers are maintained by the Arizona Department of Transportation's Enforcement Compliance Division.

In the event of an incident with a hazardous materials issue on a State or federal highway, the emergency responders contact the Arizona Department of Transportation's Traffic Operations Center to report the incident. The Traffic Operations Center then contacts the Arizona Department of Transportation's Safety and Risk Management group, which responds to the accident scene and assesses needs in concert with the Incident Commander from the responding agency with jurisdiction. If requested, the Arizona Department of Environmental Quality can assist cleanup activities by engaging specialty subcontractors with whom the Arizona Department of Environmental Quality has contracts for such support. The Arizona Department of Transportation Safety and Risk Management group's charge is primarily public health protection, with cleanup support being secondary.

ISSUE: HEALTH EFFECTS

Frequent comment: *Commenters expressed concern that the South Mountain Freeway would be located within half a mile of schools and other sensitive locations, and that exposure to emissions from the South Mountain Freeway could lead to asthma, autism, and other adverse health effects.*

Response: Under the Clean Air Act, the U.S. Environmental Protection Agency is responsible for establishing National Ambient Air Quality Standards to protect public health and the environment from adverse effects of air pollutants. Health effects from air pollutants are based on the concentration of the pollutants and the duration of exposure. Concentrations vary with distance from a roadway based on many factors, including background (or ambient) levels of pollution from all sources; the number, speed, and type of vehicles on the roadway; wind speed and direction; topography; and other factors. For the proposed freeway, modeling for carbon monoxide and particulate matter (PM_{10}) was conducted using worst-case (most congested or highest traffic) modeling locations at discrete receptor locations around each analysis location (primarily residences near the interchanges). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones (see discussion beginning on pages 4-75 and 4-76 of the Final Environmental Impact Statement, respectively).

Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement).

Many studies have investigated the prevalence of adverse health effects in the near-road environment. Given concerns about the possibility of air pollution exposure in the near-road environment, the Health Effects Institute has dedicated a number of research efforts toward investigating this issue. In November 2007, the Health Effects Institute published Special Report #16: Mobile-Source Air Toxics: A Critical Review of the Literature on Exposure and Health Effects. This report concluded that the cancer health effects attributable to mobile sources are difficult to discern because the majority of quantitative assessments are derived from occupational cohorts with high concentration exposures and because some cancer potency estimates are derived from animal models. In January 2010, the Health Effects Institute released Special Report #17, investigating the health effects of traffic-related air pollution. The goal of the research was to synthesize available information on the effects of traffic on health. Researchers looked at linkages between: 1) traffic emissions (at the tailpipe) with ambient air pollution in general, 2) concentrations of ambient pollutants with human exposure to pollutants from traffic, 3) exposure to pollutants from traffic with human-health effects and toxicological data, and 4) toxicological data with epidemiological associations. Overall, researchers felt that there was "sufficient" evidence for causality for the exacerbation of asthma (see page 25 of the *Air Quality Technical Report* [2014]). Evidence was "suggestive but not sufficient" for health outcomes such as cardiovascular mortality and others. Study authors also noted that past epidemiological studies may not provide an appropriate assessment of future health associations because vehicle emissions are decreasing over time. Finally, in 2011 three studies were published by the Health Effects Institute evaluating the potential for mobile source air toxics "hot spots." In general, the authors confirmed that while highways are a source of air toxics, they were unable to find that highways were the only source of these pollutants. They determined that near-road exposures were often no different or no higher than background (or ambient) levels of exposure and, hence, no true hot spots were identified. These reports are available from the Health Effects Institute's Web site at <healtheffects.org>. The Federal Highway Administration and U.S. Environmental Protection Agency provide financial support to the Health Effects Institute's research work.

Another source of information is the U.S. Environmental Protection Agency's recently released report on Children's Health and the Environment:

> *The level of knowledge regarding the relationship between environmental exposures and health outcomes varies widely among the topics [presented in this report], and the inclusion of an indicator in the report does not necessarily imply a known relationship between environmental exposure and children's health effects. The report provides data for selected children's health conditions that warrant further research because the causes, including possible contributing environmental factors, are complex and not well understood at this point.*
>
> *In the case of asthma, researchers do not fully understand why children develop the condition. However, substantial evidence shows exposure to certain air pollutants, including particulate matter and ozone, can trigger symptoms in children who already have asthma. Although the report found the percentage of children reported to currently have asthma increased from 8.7 percent in 2001 to 9.4 percent in 2010 and that minority populations are particularly affected by asthma, the severity of children's asthma and respiratory symptoms has declined. The rate of emergency room visits for asthma decreased from 114 visits per 10,000 children in 1996 to 103 visits per 10,000 children in 2008. Between 1996 and 2008, hospitalizations for asthma and for all other respiratory causes decreased from 90 hospitalizations per 10,000 children to 56 hospitalizations per 10,000 children.*
>
> *The report also looks at trends in other health conditions, such as Attention-Deficit/Hyperactivity Disorder (ADHD) and preterm births, for which rates have increased. There is no conclusive information on the role of environmental contaminants in ADHD or preterm births, and additional research is ongoing.*

Finally, the Federal Highway Administration notes that while the incidence of some health effects (such as asthma, autism, and attention deficit/hyperactivity disorder) in the U.S. population appear to have been increasing, motor vehicle emissions have declined. This decline in mobile source air toxics emissions is documented in Figure 4-24 of the Final Environmental Impact Statement and for other pollutants at <epa.gov/ttn/chief/trends/>. This negative correlation between emissions trends and health effects trends illustrates the complexity of the issues.

ISSUE: NOISE

Frequent comment: *Commenters expressed concerns about the increase in noise from the proposed freeway alternatives.*

Response: The noise analysis conducted for and documented in the Draft and Final Environmental Impact Statements complied with the Federal Highway Administration's regulations for conducting noise analyses in 23 Code of Federal Regulations § 772. The noise analysis was updated for the Final Environmental Impact Statement using the most recent Federal Highway Administration and Arizona Department of Transportation policy and traffic projections provided by the Maricopa Association of Governments. Discussion of this updated analysis begins on page 4-88 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted. This report may also be found on the study Web site at <azdot.gov/southmountainfreeway>.

Without noise mitigation, noise levels from the proposed freeway are predicted to range from 61 A-weighted decibels to 78 A-weighted decibels at the nearest homes, depending on the distance from the freeway. Noise mitigation was estimated to reduce those noise levels to a range of 55 A-weighted decibels to 64 A-weighted decibels for most of the areas (see Final Environmental Impact Statement page 4-93). Because of topography, local street traffic, or other engineering constraints in a few areas, estimated noise levels would not be reduced as much and would be as high as 64 A-weighted decibels to 70 A-weighted decibels in those areas. Although not recognized by the Federal Highway Administration as mitigation, rubberized asphalt would be used as the top level of paving; it is discussed beginning on Final Environmental Impact Statement page 4-99.

ISSUE: PURPOSE AND NEED, OLD PLAN OR USE OF OLD DATA

Frequent comment: *Commenters expressed concerns that the project is based on a plan from the mid-1980s and that the study used older data (prior to the economic downturn) to establish the purpose and need for the proposed freeway.*

Response: The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project. Key model inputs used to forecast travel demand included (see Table 3-7 on Final Environmental Impact Statement page 3-27):

- socioeconomic data based on the adopted general plans of Maricopa Association of Governments members, which includes projected growth in population, housing, and employment (including proposed commercial centers), along with economic forecasts and the existing and planned transportation infrastructure as identified by Maricopa Association of Governments members
- the anticipated average number of vehicle trips within the region (including those to and from the region's households) on a daily basis (this number is tracked regularly by the Maricopa Association of Governments)
- the distribution of transportation modes used by travelers in the Maricopa Association of Governments region (also tracked regularly by the Maricopa Association of Governments)
- the capacity of the transportation infrastructure to accommodate regional travel
- the future transportation infrastructure established using Regional Transportation Plan-planned projects and improvements and from known arterial street network improvements assumed to be made by the County, Cities, and private developers

The analyses in the Draft Environmental Impact Statement used socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone levels. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone levels had not been adopted by the Maricopa Association of Governments and were not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement was the most appropriate information available.

In June 2013, the Maricopa Association of Governments approved new socioeconomic projections for Maricopa County. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. The conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*).

ISSUE: PURPOSE AND NEED, TRUCK BYPASS

Frequent comment: *Commenters expressed a belief that the proposed freeway would serve as a truck bypass.*

Response: Creating a truck bypass is not a goal of the proposed freeway. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and allowing traffic—including truck traffic—to access a segment of the "loop" system (see pages 1-21, 1-22, 3-1, and 3-3 of the Final Environmental Impact Statement) in the Phoenix metropolitan area. The proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic. As with all other freeways in the region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary vehicles using the proposed freeway would be automobiles. The Maricopa Association of Governments regional travel demand model projects that truck traffic would represent approximately 10 percent of the total traffic on the proposed freeway, similar to what is currently experienced on other regional freeways such as Interstate 10, State Route 101L, and U.S. Route 60. As disclosed in the Final Environmental Impact Statement, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85 (see page 3-64 of the Final Environmental Impact Statement).

ISSUE: PURPOSE AND NEED, LACK OF SUPPORT

Frequent comment: *Commenters expressed opposition to the proposed freeway based on a lack of need or the belief that it is not supported by local communities or that it would not be used by local travelers or regional commuters.*

Response: Providing a new freeway in an area where it would not be fully used would be an unwise expenditure of public funds. Of the projected 51 percent increase in population, 39 percent increase in housing units, and 69 percent increase in jobs between 2010 and 2035 in the Phoenix metropolitan area, nearly half of these increases are expected in areas that would be immediately served by the proposed freeway

(see Final Environmental Impact Statement page 1-21). When the Arizona Department of Transportation determines whether a freeway should be built, the agency must consider numerous factors, including local and regional transportation needs, project costs, and environmental considerations. Decisions regarding freeway projects are based on the transportation needs of the entire Phoenix metropolitan area as part of a comprehensive, multimodal, regional approach. The proposed freeway is a major component in the Regional Freeway and Highway System. Additionally, the proposed freeway is an important component of past and current planning efforts. Maricopa County, Phoenix's villages (Laveen, Estrella, and Ahwatukee Foothills), Tolleson, and Avondale have all made transportation, land use, and economic planning decisions in a context of the proposed freeway operating in the Study Area. Finally, the proposed freeway would function as intended in the *Regional Transportation Plan*.

ISSUE: SECTION 4(f) AND SECTION 6(f)

Frequent comment: *Commenters expressed concerns about the impacts the proposed freeway would have on the South Mountain Park/Preserve or expressed that the park should be protected.*

Response: City of Phoenix planning efforts since the mid-1980s illustrate an awareness of the potential for the proposed freeway to affect Phoenix South Mountain Park/Preserve. In 1989, the South Mountain Park Master Plan was adopted by the Phoenix City Council. The master plan shows the freeway alignment as adopted by the State Transportation Board in 1988. In 1990, the South Mountain Preserve Act was ratified by the Arizona Legislature. The Act did not apply to roadways through a designated mountain preserve if the roadway was in the State Highway System prior to August 15, 1990. The proposed freeway was in the State Highway System prior to 1990. Records prior to the Act suggest a primary reason for the exception was to allow the proposed freeway to go through Phoenix South Mountain Park/Preserve (see Final Environmental Impact Statement page 5-14).

The proposed freeway would pass through the park's southwestern edge. Section 4(f) of the Department of Transportation Act extends protection to significant publicly owned public parks, recreation areas, and wildlife and waterfowl refuges, as well as significant historic sites, whether they are publicly or privately owned. This protection stipulates that those facilities can be used for transportation projects only if there is no prudent and feasible alternative to using the land and the project includes all possible planning to minimize harm to the land [see Final Environmental Impact Statement, Chapter 5, *Section 4(f) Evaluation*]. The project team examined alternatives to avoid the Phoenix South Mountain Park/Preserve, but did not identify any feasible and prudent alternatives to avoid the use of the park. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). Nine-tenths of a mile of the proposed freeway would pass through the park's southwestern edge (see Final Environmental Impact Statement page 5-13). Phoenix South Mountain Park/Preserve would remain the largest municipally owned park in the United States. The activities that make the park a highly valued resource (recreational activities, interaction with the Sonoran Desert) would remain.

Measures to minimize harm to the park were developed (see Final Environmental Impact Statement, starting on page 5-23). These measures, which were committed to by the Federal Highway Administration and the Arizona Department of Transportation, include securing replacement lands for parkland converted to a transportation use. During the design phase, the Arizona Department of Transportation would consult directly with the Phoenix City Manager's office to identify and implement other additional design measures, including aesthetic treatment of the mountain cuts, landscaping, and structures, to further reduce land needed and impacts from the proposed freeway. The City Manager's office represents its constituents, including the Sonoran Preserve Advisory Committee, Phoenix Mountains Preservation Council, Mountain Bike Association of America, Phoenix Parks and Recreation Board, and Arizona Horsemen's Association.

ISSUE: TRUCKS

Frequent comment: *Commenters expressed a belief that the proposed freeway would be the primary route for heavy trucks originating in Mexico and that this would result in air quality impacts not considered in the study.*

Response: Trucks crossing from Mexico to Arizona are restricted to the commercial zones within 25 miles of the border. The Federal Motor Carrier Safety Administration is administering a United States-Mexico cross-border, long-haul trucking pilot program. The program tests and demonstrates the ability of Mexico-based motor carriers to operate safely in the United States beyond the municipalities and commercial zones along the United States-Mexico border (see <fmcsa.dot.gov/intl-programs/trucking/trucking-program.aspx>).

Petróleos Mexicanos (better known as Pemex), the Mexican state-owned petroleum company that serves all of Mexico, provides 15 parts per million in its sulfur diesel fuel in the border region, which is consistent with the U.S. Environmental Protection Agency requirements for American diesel fuel (see <transportpolicy.net/index.php?title=Mexico:_Fuels:_Diesel_and_Gasoline>).

Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The South Mountain Freeway would operate under the same rules as other similar facilities in the state; truck traffic would be permissible (see text box on Final Environmental Impact Statement page 4-166).

The CANAMEX and Phoenix truck bypass (Interstate 8/State Route 85) routes are not mandatory for truck traffic; they are recommended. The Arizona Department of Transportation does not enforce these routes. It is not anticipated that these routes would be enforced as mandatory in the future.

Because Mexican trucks are currently restricted to the border region, they are not operating in the Study Area and were not included in the air quality analyses, but the analyses included projected truck traffic. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones (see discussions beginning on pages 4-75 and 4-76 of the Final Environmental Impact Statement, respectively). Mobile source air toxics can also have adverse health impacts, but the U.S. Environmental Protection Agency has not established National Ambient Air Quality Standards for these pollutants. As a result, the Federal Highway Administration analyzes these pollutants using emissions analyses. The mobile source air toxics emissions analysis for the Study Area found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement).

BUSINESS COMMENTS AND RESPONSES

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Intel support for Loop 202 South Mountain Freeway
Date: Monday, May 20, 2013 8:46:40 AM
Attachments: Intel Support for SouthMountainFreeway(17May2013).pdf

From: Bagley, Jason [mailto:jason.bagley@intel.com]
Sent: Friday, May 17, 2013 4:13 PM
To: Projects
Cc: Forbis, Jeanne A; Roc Arnett (rarnett@evp-az.org); Ricks, Greg J; Knox Kimberly (Knox@triadvocates.com); John Kelly (John@triadvocates.com); Christine.Mackay@chandleraz.gov
Subject: Intel support for Loop 202 South Mountain Freeway

Please see attached letter of support from Intel concerning the proposed Loop 202 South Mountain Freeway. We would appreciate your consideration of our comments and include them in the public record.
Regards,

Jason Bagley
Government Affairs Manager
Intel Corporate Affairs
Southwestern United States
480.552.6832
jason.bagley@intel.com

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

Intel Corporation
Corporate Affairs Group
CH7-301
5000 West Chandler Blvd.
Chandler, AZ 85226
480-552-6832

May 17, 2013

ADOT Loop 202
South Mountain Freeway Study
1655 West Jackson Street
MD 126F
Phoenix, AZ 85007

Re: Intel Support for Proposed Loop 202 South Mountain Freeway

To Whom It May Concern:

1 I am writing on behalf of Intel Corporation to urge the construction of the proposed Loop 202 South Mountain Freeway. Companies rely on governments to help create the framework within which the business community can invest, create jobs and thrive. A viable transportation system is critical to the economic vitality of the greater Phoenix region. Intel began operations in Chandler in 1980. Now, with more than 11,000 employees, Intel Arizona is the company's second largest site in the U.S., and is the largest employer in Chandler as well as one of the largest in the state.

Over the years, Intel has benefitted from the vision, foresight, and commitment to enabling business growth from our government leaders. A critical factor that enables growth is transportation. Each day, tens of thousands of employees, contract workers, construction workers, suppliers and others transit the valley's roadways in activities directly related to Intel's operations. Ensuring the ability of our stakeholders to conduct their activities in a timely and safe manner is crucial to the success of our business.

Intel is committed to Arizona. Since 1996, we have invested more than $20 billion in manufacturing capacity. This places Intel as the single largest business investor in the state. As our Arizona operations work to make the business case for continued investment from Intel, we rely on our government leaders to ensure that the business climate remains conducive to our growth. We support the proposed Loop 202 South Mountain Freeway and respectfully request that this project move forward as expeditiously as possible. If you have any questions, please feel free to contact me at 480-552-6832 or via email, jason.bagley@intel.com.

Sincerely,

D. Jason Bagley
Government Affairs Manager
U.S. Southwest Region

Code	Issue	Response
1		**Comment noted.**

Code	Comment Document

Miller 160 LLC

5108 N 40th St Ste 3
Phoenix, AZ 85018

To: Arizona Department of Transportation
South Mountain Freeway Study
1655 West Jackson Street MD126F
Phoenix, Arizona 85007

Re: Environmental Impact Statement ("EIS")
Loop 202/South Mountain Freeway

Date: July 8, 2013

The purpose of this letter is to inform you that I am a property owner in the Laveen area of Phoenix. The property I own is located at Northeast corner of Elliott and 59th Ave

1 I am supportive of the Loop 202/South Mountain freeway, with the alignment through Laveen known generally as the 59th Avenue Alignment.

I have many reasons for my support of the Loop 202 Freeway:

- **Access to the Region.** The Laveen area needs improved access to the Metro Phoenix Region. Currently, despite the recent growth in Laveen, there is no Freeway to provide access to the employment, service and entertainment centers in Downtown Phoenix, Sky Harbor Airport, the Loop 101 Corridor (West Valley), and/or the Loop 202 Corridor in the Southeast Valley. The Loop 202/South Mountain Freeway will connect the Laveen area to the Metro Phoenix Region.

- **Congestion/Bottleneck in Downtown Phoenix.** The I-10 Freeway has become a major bottleneck at many locations: in Downtown Phoenix (at the Deck Park Tunnel), on the I-10 West out to the 101 Stack, and certainly at the Broadway Curve and Superstition Freeway Interchange. The Loop 202/South Mountain Freeway will help relieve these major bottlenecks and also support future growth.

- **Long-Range Planning.** The Loop 202/South Mountain Freeway has been on all of the transportation plans from ADOT, MAG and the City of Phoenix dating back to the 1980s (or even earlier). The Loop 202 Freeway has been approved by the voters of Maricopa County on at least two separate occasions. Many long-range planning decisions have been put in place over the years based on the ultimate construction of the Loop 202 Freeway, including zoning and other land-use decisions by the City of Phoenix and property owners to provide commercial, industrial, multifamily and other appropriate land uses directly adjacent to the Loop 202 Freeway. The Loop 202 Freeway supports this approach to long-range planning.

Code	Issue	Response
1		**Comment noted.**

Code	Comment Document

- **Infrastructure/Investment.** The City of Phoenix and the private property owners have continued to work to bring the needed infrastructure to the Laveen area to support and add to the $2 Billion investment in the Loop 202 Freeway. This is a model for public/public/private partnership—again, at all levels of government and with the strong support of private property owners. The Loop 202/South Mountain Freeway will be a major stimulus to significant local government investment and private development investment.

- **Jobs.** The Loop 202/South Mountain Freeway is a fully funded $2 Billion Freeway Infrastructure project that will bring an estimated 30,000 jobs to our region. These are much-needed jobs for our community and our families.

- **Laveen Community/Services.** The Loop 202/South Mountain Freeway will allow the Laveen area to obtain the development and services that are needed to support this growing community, including retail services, healthcare services, additional educational opportunities, and certainly enhanced municipal and other government al services. The Loop 202 Freeway will bring these vital services to Laveen.

- **Air Quality.** The Loop 202/South Mountain Freeway would reduce congestion on I-10, the Broadway Curve and the Deck Park Tunnel, and keep traffic moving. This will actually improve air quality in this region. The EIS has concluded that the No-Build Alternative would not meet the State of Arizona's air quality implementation plan.

Please contact me directly at 602-957-1480 or e-mail at Fretzrealty@gmail.com if you have any questions regarding my property or my support for the Loop 202/South Mountain Freeway.

Thank you,

David Fretz

CC: **Governor Jan Brewer**
ADOT Director John Halikowski
MAG Director Dennis Smith
MAG Chair Marie Lopez Rogers, Mayor of Avondale
FHWA Administrator Victor Mendez
Congressman Ed Pastor
Congresswoman Ann Kirkpatrick
Congressman Raul Grijalva
Representative Ruben Gallego
Representative Catherine Miranda
Senator Leah Landrum-Taylor
Mayor Greg Stanton
Councilman Michael Nowakowski
Councilman Michael Johnson
Phoenix City Manager David Cavazos

Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

5/21/13

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

We own property on S. Side of Lower Buckeye, north of Elwood, west of 59TH AVE, E of 59 AVE 127 Acres. This freeway as proposed will block our ACCESS to 59TH Avenue and divides our property in half, We are opposed as this deteriorates our values, ability to develop and Creates access problems for Circulation. (1) (2)

Optional

Name Newport Group 22nd Foresight Group Email pinapoli11@gmail.

Address

City State Zip

Phone 602.999 3925 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5754 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	

Code	Comment Document

SOUTHERN CROSS, L.L.C.
3131 E. Camelback Road, Suite 310
Phoenix, Arizona 85016
(602) 279-3999 – Office
(602) 230-8065 – Fax

July 16, 2013

Arizona Department of Transportation
South Mountain Freeway Study
1655 West Jackson Street MD126F
Phoenix, Arizona 85007

Re: Environmental Impact Statement ("EIS")
Loop 202/South Mountain

The purpose of this letter is to inform you that I am a property owner in Southwest Phoenix. The property I own is located at 59th Avenue and Van Buren Street.

1

I am supportive of the Loop 202/South Mountain Freeway, with the alignment through South Ahwatukee and Laveen, known generally as the 59th Avenue Alignment.

I have many reasons for my support of the Loop 202 Freeway:

Access to the Region. The Southwest Phoenix and Laveen areas need improved access to the Metro Phoenix Region. Currently, despite the recent growth in Southwest Phoenix and Laveen, there is no freeway to provide access to the employment, service and entertainment centers in Downtown Phoenix, Sky Harbor Airport, the Loop 101 Corridor (West Valley), and/or the Loop 202 Corridor in the Southeast Valley. The Loop 202/South Mountain Freeway will connect the Laveen area to the Metro Phoenix Region.

Congestion/Bottleneck in Downtown Phoenix. The I-10 Freeway has become a major bottleneck at many locations: in Downtown Phoenix (at the Deck Park Tunnel), on the I-10 west out to the 101 Stack, and certainly at the Broadway Curve and Superstition Freeway Interchange. The Loop 202/South Mountain Freeway will help relieve these major bottlenecks and also support future growth.

Long-Range Planning. The Loop 202/South Mountain Freeway has been on all of the transportation plans from ADOT, MAG and the City of Phoenix dating back to the 1980s (or even earlier). The Loop 202 Freeway has been approved by the voters of Maricopa County on at least two separate occasions. Many long-range planning decisions have been put in place over the years based on the ultimate construction of the Loop 202 Freeway, including zoning and other land-use decisions by the City of Phoenix and property owners to provide commercial, industrial, multifamily and other appropriate land uses directly adjacent to the Loop 202 Freeway. The Loop 202 Freeway supports this approach to long-range planning.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Infrastructure/Investment. The City of Phoenix and the private property owners have continued to work to bring the needed infrastructure to the Laveen area to support and add to the $2 billion investment in the Loop 202 Freeway. This is a model for public/private partnership – again, at all levels of government and with the strong support of private property owners. The Loop 202/South Mountain Freeway will be a major stimulus to significant local government investment and private development investment.

Jobs. The Loop 202/South Mountain Freeway is a fully funded $2 billion freeway infrastructure project that will bring an estimated 30,000 jobs to our region. These are much-needed jobs for our community and our families.

Laveen Community/Services. The Loop 202/South Mountain Freeway will allow the Laveen area to obtain the development and services that are needed to support this growing community, including retail services, healthcare services, additional educational opportunities, and certainly enhanced municipal and other governmental services. The Loop 202 Freeway will bring these vital services to Laveen.

Air Quality. The Loop 202/South Mountain Freeway would reduce congestion on I-10, the Broadway Curve and the Deck Park Tunnel, and keep traffic moving. This will actually improve air quality in this region. The EIS has concluded that the No-Build Alternative would not meet the State of Arizona's air quality implementation plan.

Please contact me directly at 602-279-3999 or email at tom@taitdevelopment.com if you have any questions regarding my property or my support for the Loop 202/South Mountain Freeway.

Sincerely,

Tom Tait

Tom Tait

cc: Governor Jan Brewer
ADOT Director John Halikowski
MAG Director Dennis Smith
MAG Chair Marie Lopez Rogers, Mayor of Avondale
FHWA Administrator Victor Mendez
Congressman Ed Pastor
Congresswoman Ann Kirkpatrick
Congressman Raul Grijalva
Representative Ruben Gallego
Representative Catherine Miranda
Senator Leah Landrum-Taylor
Mayer Greg Stanton
Councilman Michael Nowakowski
Councilman Michael Johnson
Phoenix City Manager David Cavazos

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I support building the 202
Date: Monday, May 20, 2013 1:07:42 PM
Attachments: Doug DeClusin.vcf

From: Doug DeClusin [mailto:Doug@sunlandasphalt.com]
Sent: Monday, May 20, 2013 12:31 PM
To: Projects; info@buildthe202.com
Subject: I support building the 202

1 The construction of the South Mountain 202 loop has been approved twice by voters and would be a needed shot in the arm for the construction industry and the Arizona economy in general. Please begin construction as soon as possible.

Regards,
Doug DeClusin
President /CEO

Tel: 602 288 5021
Cell: 602 312 3170
Fax: 602 680 1347
Toll Free: 1 800 540 4413
Email: Doug@sunlandasphalt.com
Web: www.sunlandasphalt.com

775 W Elwood St

Phoenix, AZ 85041

I personally recommend all of these companies for any of your needs:

Executives' Association of Greater Phoenix

Code	Issue	Response
1		**Comment noted.**

Code	Comment Document

http:\\www.eagp.org

This message contains confidential information and is intended only for projects@azdot.gov, info@buildthe202.com. If you are not projects@azdot.gov, info@buildthe202.com you should not disseminate, distribute or copy this e-mail. Please notify Doug@sunlandasphalt.com immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Rick Walz therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.

Sunland Asphalt Office Locations and Contact Info

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Code	Issue	Response

Code	Comment Document

From: Phillip G Ditter
To: Projects
Cc: John P McShane; Jeffrey C Everett; James D Harrison; Wayne R Bulsiewicz
Subject: Loop 202 South Mountain Freeway Study Comments
Date: Wednesday, July 24, 2013 2:52:48 PM
Attachments: South Mountain Freeway Study Comments.pdf

Please find attached comments on the draft EIA regarding the Loop 202 South Mountain Freeway from Veolia ES Technical Solutions.

Phillip Ditter
EH&S Manager, Electronics Recycling
Veolia ES Technical Solutions, L.L.C.
1275 Mineral Springs Drive
Port Washington,WI 53074
tel. 262-243-8908
fax: 262-268-1962
phillip.ditter@veoliaes.com
www.VeoliaES.com

Service First. Safety Always.

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

VEOLIA
ENVIRONMENTAL SERVICES

TECHNICAL SOLUTIONS
NORTH AMERICA

July 24, 2013

ADOT
Loop 202 South Mountain Freeway Study
1655 West Jackson Street
MD 126F
Phoenix, AZ 85007

Dear Sir/Madam:

1

Veolia ES Technical Solutions, L.L.C. (Veolia), formerly known as Onyx Environmental Services, L.L.C., operates a recycling facility on West Jefferson Street that has been identified as lying within the proposed W59 Alternative. As a facility that would be directly impacted by this alternative, Veolia would like to take this opportunity correct the information within the DEIS regarding our facility and to register our opposition to the W59 alternative. The following information is being provided in support of our opposition.

Chapter 4, Affected Environment, Environmental Consequences, and Mitigation includes a section on Hazardous Materials within the affected environment. On page 4-153, Onyx Environmental Services (now Veolia) is identified as a Resource Conservation and Recovery Act (RCRA) large-quantity generator within the W59 Alternative. Although correct, in that the facility is a large-quantity generator, this classification does not fully describe the facility. In addition to being a large quantity generator, the site is also a RCRA permitted hazardous/universal waste storage and recycling facility and an U.S. Environmental Protection Agency approved commercial storage facility for PCB containing equipment and wastes. Each of these permits and approvals are site specific and cannot simply be transferred to a new site. Additionally, the facility also holds a site specific zoning waiver from the City of Phoenix for these operations. Each of these permits places additional restrictions on the relocation of this business that would not be placed on a large-quantity generator.

The following is a summary of the steps that would be involved in the relocation of the Veolia facility.

Veolia ES Technical Solutions, L.L.C.
1275 Mineral Springs, Drive, Port Washington, WI 53074
tel: 262 243 8900 - fax: 262 284 3775
www.VeoliaES.com

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Comment codes continue on next page)

Code	Comment Document

- Identify a suitable site for the relocation of the operations
  As a facility that is permitted for the storage and recycling of hazardous/universal waste, the location of a facility is a bit more complicated than simply finding a building that is of suitable size and has appropriate access. This selection process can be further complicated if any environmental justice issues are associated with the proposed location.

- Arrange for all necessary local approvals and permits.
  This would typically be completed prior to acquiring the property. It would be counterproductive to purchase a property where there may be problems obtaining local approvals or if there is significant public opposition to the siting of a hazardous/universal waste recycling facility. If the location selected would be within the City of Phoenix, the facility would need to obtain a zoning waiver.

- Prepare the permit applications and approval requests.
  While the application process for a City of Phoenix zoning waiver, ADEQ hazardous/universal waste permit and EPA PCB approval are all similar, each application has unique requirements.

- Submit the applications for review and approval.
  The hazardous waste regulations, AAC R18-01, contain licensing time frames for the various types of hazardous/universal waste facilities. As a facility permitted to store hazardous waste in containers, the time frame specified allows for an 84 day Administrative review timeframe and a 293 day Substantive review timeframe once ADEQ receives the permit application. This accounts for a possible public hearing.
  The time frame within the regulations does not include any time spent by Veolia compiling and submitting any response to comments. Under normal circumstances there will be one or more Notices of Deficiency issued by the department requesting additional information.
  The US EPA regulations governing the approval of commercial storage facilities do not contain any set time limits for processing applications for approval. Our facility is currently in the process of renewing an approval that expired in 1999.

Veolia ES Technical Solutions, L.L.C.
1275 Mineral Springs Drive, Port Washington, WI 53074
tel: 262 243 8900 - fax: 262 284 3775
www.VeoliaES.com

Code	Issue	Response

(Comment codes continue on next page)

Code	Comment Document

- Relocate business to new site and close current facility
  Once a new facility is permitted the operations currently on West Jefferson Street could be relocated. Following relocation of the operations the existing facility would need to be closed in accordance with the facility's hazardous waste permit and the US EPA PCB regulations.

Assuming a timeframe of 90 days to prepare the initial permit application and 60 days to respond to any comments, Veolia believes that the ADEQ permitting of a site for the relocation of the hazardous/universal waste storage and recycling portion of the business could be accomplished 527 days following the acquisition of a suitable site and obtaining any required local permits.

As stated above, the US EPA regulations regarding the approval of PCB commercial storage facilities do not contain a specific time frame for review and approval. Combined with our experience trying to obtain a renewal of our current approval, which has been under review for the past 14 years, we cannot provide an estimate for the time frame required to obtain a new approval. If EPA does not issue an approval in a timely manner, the relocation of the facility has the potential to have significant adverse impact on Veolia business.

In addition to the time required to permit a new facility, there is also a cost associated with obtaining new permits. In addition to employing internal resources for the preparation of the permit applications, Veolia would need to contract with environmental consultants to address specific environmental aspects of the application. There would also be the cost assessed by the governing bodies for the issuance of the permits and authorizations. The cost for obtaining the initial waiver for the site on Jefferson Street was in excess of $70,000 and the ADEQ fee schedule, contained in AAC R18-8, lists the fees associated with this type of permit as a minimum of $20,000 and a maximum of $250,000. Based on past experience, Veolia anticipates the actual cost to be in excess of $100,000. The selection of the W59 alternative with the subsequent relocation of Veolia's business from its current location on West Jefferson Street, will have a significant detrimental effect on Veolia's business. This effect includes the cost of permitting and relocating to a new facility and potentially the disruption of service to Veolia's customers. This may eventually result in Veolia no longer being able to perform these activities within the southwestern region of the United States.

Veolia ES Technical Solutions, L.L.C.
1275 Mineral Springs Drive, Port Washington, WI 53074
tel: 262 243 8900 - fax: 262 284 3775
www.VeoliaES.com

Code	Issue	Response

(Comment codes continue on next page)

Code	Comment Document

ADOT
July 24, 2013
Page 4

2

Based on the information presented above, Veolia ES Technical Solutions L.L.C. is opposed to selection of the W59 alternative for the routing of the Loop 202 highway. We are further recommending that Chapter 4 of the DEIS be updated to properly reflect the scope of the regulations that apply to our facility located within the W59 alternative. This includes identifying the facility as a permitted hazardous/universal waste storage and recycling facility and PCB equipment and waste storage facility and that these permits will require the site to undergo closure in accordance with the hazardous waste and PCB rules if relocated.

If you have any questions regarding these comments or the regulatory aspects associated with the relocation of our facility, please contact me at 262-243-8900 or e-mail at phillip.ditter@veoliaes.com.

Sincerely,

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

Phillip Ditter, CHMM
Environmental Health and Safety Manager

Veolia ES Technical Solutions, L.L.C.
1275 Mineral Springs Drive, Port Washington, WI 53074
tel: 262 243 8900 - fax: 262 284 3775
www.VeoliaES.com

Code	Issue	Response
2	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Stephen Williams
To: Projects
Subject: South Mountain Loop 202
Date: Wednesday, July 24, 2013 3:13:21 PM
Attachments: SOUTH MOUNTAIN FREEWAY LOOP 202 PROPERTY OWNER LETTER 6-17-13.doc

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

Stephen H. Williams
4650 W. Dobbins Road
Laveen, Arizona 85339

To: Arizona Department of Transportation
South Mountain Freeway Study
1655 West Jackson Street MD126F
Phoenix, Arizona 85007

Re: Environmental Impact Statement ("EIS")
Loop 202/South Mountain Freeway

Date: June 14, 2010

1

The purpose of this letter is to inform you that I am a property owner in the Laveen area of Phoenix. The property I own is located at 59th Avenue & Dobbins Road, 63rd Avenue & Dobbins Road, 67th Avenue & Dobbins Road approximately 324 Acres. I am supportive of the Loop 202/South Mountain freeway, with the alignment through Laveen known generally as the 59th Avenue Alignment.

I have many reasons for my support of the Loop 202 Freeway:

- **Access to the Region.** The Laveen area needs improved access to the Metro Phoenix Region. Currently, despite the recent growth in Laveen, there is no Freeway to provide access to the employment, service and entertainment centers in Downtown Phoenix, Sky Harbor Airport, the Loop 101 Corridor (West Valley), and/or the Loop 202 Corridor in the Southeast Valley. The Loop 202/South Mountain Freeway will connect the Laveen area to the Metro Phoenix Region.

- **Congestion/Bottleneck in Downtown Phoenix.** The I-10 Freeway has become a major bottleneck at many locations: in Downtown Phoenix (at the Deck Park Tunnel), on the I-10 West out to the 101 Stack, and certainly at the Broadway Curve and Superstition Freeway Interchange. The Loop 202/South Mountain Freeway will help relieve these major bottlenecks and also support future growth.

- **Long-Range Planning.** The Loop 202/South Mountain Freeway has been on all of the transportation plans from ADOT, MAG and the City of Phoenix dating back to the 1980s (or even earlier). The Loop 202 Freeway has been approved by the voters of Maricopa County on at least two separate occasions. Many long-range planning decisions have been put in place over the years based on the ultimate construction of the Loop 202 Freeway, including zoning and other land-use decisions by the City of Phoenix and property owners to provide commercial, industrial, multifamily and other appropriate land uses directly adjacent to the Loop 202 Freeway. The Loop 202 Freeway supports this approach to long-range planning.

Code	Issue	Response
1		**Comment noted.**

Code	Comment Document

- **Infrastructure/Investment.** The City of Phoenix and the private property owners have continued to work to bring the needed infrastructure to the Laveen area to support and add to the $2 Billion investment in the Loop 202 Freeway. This is a model for public/public/private partnership—again, at all levels of government and with the strong support of private property owners. The Loop 202/South Mountain Freeway will be a major stimulus to significant local government investment and private development investment.

- **Jobs.** The Loop 202/South Mountain Freeway is a fully funded $2 Billion Freeway Infrastructure project that will bring an estimated 30,000 jobs to our region. These are much-needed jobs for our community and our families.

- **Laveen Community/Services.** The Loop 202/South Mountain Freeway will allow the Laveen area to obtain the development and services that are needed to support this growing community, including retail services, healthcare services, additional educational opportunities, and certainly enhanced municipal and other government al services. The Loop 202 Freeway will bring these vital services to Laveen.

- **Air Quality.** The Loop 202/South Mountain Freeway would reduce congestion on I-10, the Broadway Curve and the Deck Park Tunnel, and keep traffic moving. This will actually improve air quality in this region. The EIS has concluded that the No-Build Alternative would not meet the State of Arizona's air quality implementation plan.

Please contact me directly at 602-237-4401 or e-mail at carvermountain@gmail.com if you have any questions regarding my property or my support for the Loop 202/South Mountain Freeway.

Thank you.

Stephen H. Williams
Charmian W. Woodson
Byron G. Williams
Property Owners

CC: **Governor Jan Brewer**
ADOT Director John Halikowski
MAG Director Dennis Smith
MAG Chair Marie Lopez Rogers, Mayor of Avondale
FHWA Administrator Victor Mendez
Congressman Ed Pastor
Congresswoman Ann Kirkpatrick
Congressman Raul Grijalva
Representative Ruben Gallego
Representative Catherine Miranda
Senator Leah Landrum-Taylor
Mayor Greg Stanton
Councilman Michael Nowakowski
Councilman Michael Johnson
Phoenix City Manager David Cavazos

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Wednesday, May 22, 2013 10:50:15 AM

From: Wiltsie Enterprises [mailto:wiltent@earthlink.net]
Sent: Wednesday, May 22, 2013 10:47 AM
To: Projects
Subject: South Mountain Freeway

Gentlemen:
We still think the 101 Alternative would be the best route. (1)

Wiltsie Enterprises
6244 S. 75th Avenue
Laveen, Arizona 85339

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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FORM LETTER COMMENTS AND RESPONSES

Code	Comment Document

Name: Stephen U Chasse

Street Address: 16611 S. 30th ST

City, State, Zip Code: Phoenix, AZ 85048

Date: 5/11/13

RECEIVED
MAY 22 2013
By

Arizona Department of Transportation
Communication and Community Partnerships
Room #101 ~ Mail Drop 118A
206 South 17th Avenue
Phoenix, AZ 85007

Dear Arizona Department of Transportation representative:

I am writing to state my opposition for the proposed expansion of Loop 202/South Mountain Freeway (SMF).

(1) (2)

This project has been under consideration since 1983, when oil and fuel prices were inexpensive. At a present time when volatility of the oil industry incurs an ever-rising cost of fuel prices to consumers, the proposed project is outdated in its purpose at a critical time when transportation decisions should address the increasing temperatures of urban cities.

(3) (4) (5)

The two currently proposed routes for the freeway are less than a mile apart. Both will have the same harmful effects on the Gila River Indian Community's (GRIC) air quality, health and traditional cultural properties. The on-reservation alignment will result in a loss of approximately 600 acres of tribal land, and the forced relocation of O'odham families.

(6) (7) (8) (9)

The off-reservation alignment would gouge a 40-story high, 200-yard wide cut into South Mountain, which is sacred to all four O'odham tribes. South Mountain is also significant to the larger Phoenix area due to it being the largest city park in the United States. Laveen and Ahwatukee residents would ultimately be affected by air and noise pollution, as well as the inevitable devastation of numerous local businesses, homes and a church in the line of the proposed route.

(10) (11)

The Sierra Club Report "The Best and Worst in Transportation Investments" listed SMF as one of the worst projects in the United States based on oil, environmental, health, economic, and land use impacts. The freeway would impose on a critical wildlife corridor for various threatened desert animals and fragile ecosystems unique to both the Estrella and South Mountain ranges.

(12)

I want to advocate "No Build" as the only option that preserves the environment, health of GRIC, respects O'odham traditions, and is also beneficial for Laveen and Ahwatukee residents.

Sincerely,

Stephen U Chasse

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
3	**Alternatives**	There is only one action alternative studied in detail in the Eastern Section of the Study Area in the Draft Environmental Impact Statement. While an alignment on Gila River Indian Community land was considered, it was ultimately eliminated from detailed study (see page 3-24 of the Draft Environmental Impact Statement). The Community Alignment, as depicted in Figure 3-11 on page 3-25 of the Draft Environmental Impact Statement would not result in the relocation of any residences on Gila River Indian Community land.
4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Cultural Resources**	
6	**Section 4(f) and Section 6(f)**	
7	**Air Quality**	
8	**Noise**	
9	**Acquisitions and Relocations**	
10	**Sierra Club Report**	The Arizona Department of Transportation and Federal Highway Administration respectfully disagree with the referenced Sierra Club Report. As noted in the Final Environmental Impact Statement, when compared with the No-Action Alternative, the Preferred Alternative would result in less energy consumption (page 4-172), regional improvements to air quality (page 4-74) that would be expected to produce health benefits, and economic benefits of reducing regional traffic congestion (page 4-65), and would be consistent with local and regional long-range planning efforts (page 4-18).
11	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

The previous comment was received 11 times from the following people:

First name	Last name	Address		
Stephen	Chasse	16611 S. 3rd Street	Phoenix, AZ	85048
Nathan	Claussen	1612 E. Glenhaven Drive	Phoenix, AZ	85048
Deborah	Lapierre	16637 S. 27th Lane	Phoenix, AZ	85045
Kenneth	Lapierre	16637 S. 27th Lane	Phoenix, AZ	85045
Peter	Lesio	16723 S. 32nd Lane	Phoenix, AZ	85045
Lyle and Emily	Mazer	2925 W. Glenhaven Drive	Phoenix, AZ	85045
Fernanda	Philbrick	926 W. Mountain Sky Avenue	Phoenix, AZ	85048
Laurence	Stackhouse	805 N. 5th Avenue, 708	Phoenix, AZ	85003
Anonymous				
Anonymous				
Anonymous				
Anonymous				

Code	Issue	Response

Code	Comment Document

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F Phoenix, AZ 85007

Dear ADOT,

Your DEIS did not include concerns I and others raised as there are many deficiencies with this DEIS. I am a member of PARC and I am concerned about the many issues not sufficiently addressed or omitted in the recent DEIS. Please have these items addressed and entered into the public comment section of the process:

1 **A) More Air Quality Issues to Increase in Foothills Reserve Community's**
The Phoenix metro area has had problems for decades meeting the air quality standards for particulate matter (PM) and other criteria pollutants. (Ozone levels are too high in the East Valley and Fountain Hills, for example.) There have been several exceedances of the standards for PM set by EPA under the authorities given the agency by the Clean Air Act (CAA). The problem has been so bad over the years that currently, EPA is examining sanctions that include blocking a billion dollars in highway funds.

2 **B) New Health Findings from Studies in Boston, MA and Los Angeles, CA 2011 – 2013 not incorporated in DEIS**
Documented proof submitted to the EPA in studies found health risks from living within 1 mile of 6 lane highways which create fine and ultrafine particulate matter. Impact of living so close to the highway causes: child hood leukemia, asthma, autism, increase of coronary disease, cancer and lung disease. This impact to thousands of nearby school children, adults and elderly needs to be studied and put in DEIS. Past studies from 2005, 2011, 2012 and 2013 facts have not been included in DEIS as requested. Impacts to the families who will remain after the highway is built in Ahwatukee's Foothills Reserve have clearly not been addressed. In addition sound decibel studies of the SMF's impact to our community and its wild life, including constant compounded sound echo's off the 2 nearby mountain ranges in this unique micro climate have not been addressed in the DEIS as requested. Facts on ultra-fine and fine particulates caused by the project have not been reported nor its health impacts reported with current scientific facts from those experts throughout the United States. All serious health impacts have to take a priority over shorter commutes and business development.

3

4 **C) Traffic Congestion Issues at West I-10 Junction**
The junction of the South Mountain Freeway on its west end with Interstate 10 may have been an idea conceived many years ago, but the traffic congestion that exists at the area between 59th and 51st Avenues on that freeway during morning and evening rush hours in 2013 is more than extreme. Yet there is no mention in the DEIS of the cumulative impacts and effects of traffic congestion at that proposed junction

5 **D) High-Sulfur Diesel and added benzene increase; Truck Bypass Negated due to added Truck Traffic from Mexico**
The modeling of air pollution impacts in the DEIS do not include the additional air pollution from truck traffic from Mexico. The DEIS briefly mentions the issue, but it claims it has no way to know what impact this would be. Patently absurd. This bypass is also now the designated route of the Canamex Highway, and it is Interstate 8 (south of Casa Grande) to State Highway 85, to Interstate 10, west of the Phoenix metro area. Further, trucks originating in Mexico will be fueled with diesel that doesn't meet the CARB diesel standards adopted by Arizona over a decade ago. In Mexico, there is no regulation about the sulfur in diesel fuel. Once this additional pollution is honestly quantified and factored in, there would be a huge net increase in air pollution from the SMF, and associated increases in asthma, heart disease, premature death, and other adverse health impacts. Truck restriction laws need to be written.

6 2 **E) Air Toxics Already a Crisis but Not Mentioned and Local Specific Data not Gathered nor Updated since 2006**
In 2005, there was an extensive air monitoring of certain toxic chemicals (air toxics) conducted by EPA and ADEQ in a joint effort named the Joint Air Toxics Assessment Program (JATAP). The monitoring sites included a site near St. Johns on the GRIC, and some in west Phoenix and South Phoenix. The JATAP monitoring results were reported in 2006, during a time the data for the DEIS was being gathered, and it found levels of certain toxic chemicals associated with vehicular emissions were above the standard of a one in a million chance of cancer in a lifetime of exposure in the west Phoenix, south Phoenix, and GRIC sites. The JATAP monitoring found in the high end of the monitoring levels, formaldehyde at 34 times this standard; benzene at 8 times this standard, 1,3 butadiene at 7.5 times this standard, acetaldehyde at 3.4 times this standard. And, remember, citizens are being subjected to all of these carcinogens, not just one. Some o chemicals are attributed to "mobile sources," or vehicular traffic burning hydrocarbons. Adding more vehicular traffic emissions by building a freeway where there had not been one would add to this toxic burden. The JATAP results are not included in the DEIS, but instead there is a strange missive about the uncertainty of the risk from these air toxics standards, which is not true. The cancer risk standards have been promulgated and published by EPA after extensive research, and are well-known. See Point B)

7 **F) Risks from Hazardous Materials Transportation Incidents Due to the SMF**
There are no industries using and emitting toxic chemicals in Ahwatukee Foothills, and no hazardous materials (hazmat) transportation issues and risks because none of these chemicals, other than gasoline and diesel, are being shipped into the area, other than incidentally adjacent on Interstate 10, which is east of the area. Since the NEPA process started, Ahwatukee Foothills residents and others have consistently raised concerns about the added risks from the transportation of hazmat on the new NEPA requires examination of cultural, social, and economic impacts, and the new hazmat traffic and risks caused by the SMF would affect all of these topic areas.

8 **G) Blasting South Mountain: Religious, Racial Discrimination of Civil Rights Violations in DEIS**
The DEIS clearly discriminates on the basis of religion and race, ADOT plans for blasting *Muhadagi Doog* (South Mountain) are ongoing civil rights violations .Throughout the DEIS, it is acknowledged that the GRIC and other native American tribes hold *Muhadagi Doog* as a sacred site. From the actual language of the DEIS: "The South Mountains are highly valued and considered sacred by some Native American communities. Building SMF will constitute a violation of the 14th Amendment to the Constitution and a violation of the American Indian Religious Freedom Act as any freeway alternative proposed in the DEIS of the South Mountain Freeway requires blasting away part of *Muhadagi Doog*. New wind patterns caused by cutting thru mountains have not been studied and will cause pollution to be trapped.

Sincerely concerned,

Resident of Foothills Reserve

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the U.S. Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).
2	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Operation of the freeway would cause an increase in noise levels that would vary in intensity depending on factors such as amount of traffic, travel speeds, time of day, and day of the week. Nighttime noise levels would be less than daytime noise levels. Some species rely on hearing to avoid predators, communicate, and find food (Noise Pollution Clearinghouse 2004). As noted in the Final Environmental Impact Statement on page 4-136, an increase in traffic noise may affect the ability of some animals to hear at a level necessary for survival when near the proposed action. In addition, hearing loss resulting from vehicle noise has been shown to occur in some desert animals (Bondello and Brattstrom 1979). As discussed in the Noise Analysis Technical Report in support of the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, surrounding topography, and any mitigation measures such as barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.

(Responses continue on next page)

Code	Comment Document

The previous comment was received 45 times from the following people:

First name	Last name	Address		
Mary	Barone			
Gerald	Baumann	1023 E. Derby Drive	Tempe, AZ	85284
Steven	Bennett	2945 Highway 25	Mandan, ND	58554
Susan	Buhles	13833 S. 40th Street	Phoenix, AZ	85044
Tim	Bund			
Lisa and Jeff	Carbutt	2940 W. Glenhaven Drive	Phoenix, AZ	85045
Anita	Choy			
Paula	Deer			
Deb	Frarera			
Ray	Frunt			
Patrice	Hammer			
Lashi	Hapmada			
Bob	Haye			
Robert	Hayes			
Ray	Hinma			
Michael	Hoffner			
Michelle	Hoffner			
Simone	Janssea			
Bruce	Kaehler	16841 S. 30th Avenue	Phoenix, AZ	85045
Robert and Patricia	Laity	16827 S. 30th Drive	Phoenix, AZ	85045
Kennenth John	LaPierne	16637 S. 27th Avenue	Phoenix, AZ	85007
Kent	Laser			
Dave	Luckhal			
Robert	Mavey			
	Mchoss			
Aylan	Meher			
Lisa	Mungier			
Theresa	Niemeyes	2805 W. Silver Fox Way	Phoenix, AZ	85045
Carl	Noble			
Jen	Prant			
Chris	Reef			
Chris	Riply			

Code	Issue	Response
4	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Analysis of impacts in future conditions accounted for cumulative effects of the planned 2035 roadway network including the proposed freeway. 40 Code of Federal Regulations § 1508.7 defines cumulative impacts as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions." The future conditions with and without the proposed freeway are presented in Figure 3-40 on page 3-66 of the Final Environmental Impact Statement. As noted on page 1-13 of the Final Environmental Impact Statement, the 2035 transportation network includes all improvements from the Maricopa Association of Governments *Regional Transportation Plan* except for the proposed freeway in the Study Area. The traffic projections also included Maricopa Association of Governments' projected growth in population, housing, and employment in the Maricopa Association of Governments region, which can result from public or private actions.
5	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause substantial adverse effects. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

(Response 6 continues on next page)

Code	Comment Document

First name	Last name	Address		
Randy	Roben			
Kim	Seever			
Kennenth John	Shrevere			
Elayne	Speilman	3009 W. Silver Fox Way	Phoenix, AZ	85045
John	Speilman	3009 W. Silver Fox Way	Phoenix, AZ	85045
Tracy	Stemple	4096 E. 450N	Rigby, ID	83442
Scott	Thomas			
Paula	Trem			
Anonymous1				
Anonymous2				
Anonymous3				
Anonymous4				
Anonymous5				
Anonymous6				
Anonymous7				
Anonymous8				

Code	Issue	Response
6 (cont.)		As noted above, the carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
7	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Environmental Justice/Lifestyle**	The cultural and religious importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. Air quality depends on several factors such as the area itself (size and topography), the prevailing weather patterns (meteorology and climate), and the pollutants released into the air. Cuts through the South Mountains would be expected to produce microclimate differences similar to those produced by a series of buildings in a large city which produce localized wind tunnel effects. The mountain cuts, however, would not affect regional air quality or cause air to be trapped.

Code	Comment Document

From: Sierra Club on behalf of Ross Mckenzie
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Tuesday, June 18, 2013 1:33:33 PM

Jun 18, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 3 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 5 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6 7 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Ross Mckenzie
3298 E Foothills Dr
Apt C
Sierra Vista, AZ 85635-4289

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

The previous comment was received 704 times from the following people:

First name	Last name	Address	
Lyle	Ackman	3716 E Monterosa St	Phoenix, AZ 85018-4817
Meryebeth	Albert	13682 W Fargo Dr	Surprise, AZ 85374-5376
Dennis	Alcock	38817 N 21st Ave	Phoenix, AZ 85086-9116
Nadine	Alfonso	2909 S Cielo	Mesa, AZ 85212-1439
Donna	Allen	4328 W Desert Cove Ave	Glendale, AZ 85304-4120
Philip	Allsopp	10933 E Sahuaro Dr	Scottsdale, AZ 85259-3940
Charles	Anderson	8030 N 74th Pl	Scottsdale, AZ 85258-2724
Lillian	Anderson	10871 W Santa Fe Dr	Sun City, AZ 85351-2609
Saliane	Anderssen	7140 N Guthrie Rd	Tucson, AZ 85743-9353
Jessica	Andrews	6825 N Chaparral Ave	Tucson, AZ 85718-1207
Christina	Aragon	22093 W Solano Dr	Buckeye, AZ 85326-5931
Jo	Armour	3865 E Valley Ln	Rimrock, AZ 86335-5400
Philippa	Atterbury	185 Topkie Dr	Sedona, AZ 86336-3632
Jana	Austin	1820 N Jade Cir	Prescott, AZ 86301-5905
Jesse	Baade	1022 S Lola Ln	Tempe, AZ 85281-4811
Ti	Bader	1791 Sarafina Dr	Prescott, AZ 86301-7837
Joseph	Bail	446 W Bazille Way	Green Valley, AZ 85614-5273
Elaine	Balgemann	2255 E Balsam Cir	Mesa, AZ 85204-1429
Presley	Banovich	114 N 64th Dr	Phoenix, AZ 85043-3409
Socorro	Banuelos	8403 S 45th Dr	Laveen, AZ 85339-2180
Dieter	Bartels	PO Box 915	Clarkdale, AZ 86324-0915
Kris	Basel	2893 E Sierra Vista Rd	Tucson, AZ 85716-0905
Ernst	Bauer	11581 S 28th Ave	Laveen, AZ 85339-1736
Jessie	Becoates	PO Box 38717	Phoenix, AZ 85069-8717
Christopher	Beeson	5062 Evergreen Dr	Sierra Vista, AZ 85635-2356
Bridget	Bell	819 W Orangewood Ave	Phoenix, AZ 85021-8050
Pat	Bell	601 S Alma School Rd	Mesa, AZ 85210-1061
Peter	Bengtson	1280 E Paseo Pavon	Tucson, AZ 85718-2812
Judy	Bensinger	10657 E Kachina Pl	Dewey, AZ 86327-7091
Catherine	Berger	1717 E Glenn St Unit 5101	Tucson, AZ 85719-2989
Cady	Berkel	148 W Vera Ln	Tempe, AZ 85284-3915
Linda	Bescript	8882 E Maxwell Dr	Tucson, AZ 85747-5187
Ruth	Bescript	8882 E Maxwell Dr	Tucson, AZ 85747-5187

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Comment Document

First name	Last name	Address	
Susan	Betourne	8145 Hollow Ridge Rd	Flagstaff, AZ 86004-6407
Dasi	Bhaktivedanta	122 E McKellips Rd	Tempe, AZ 85281-1118
Bettina	Bickel	9218 N 51st Dr	Glendale, AZ 85302-3401
Jean	Bickel	460 Stonehedge Ranch Rd	Wickenburg, AZ 85390-2645
Patti	Biller	34522 N Scottsdale Rd	Scottsdale, AZ 85266-1224
Edward	Birdman	319 E Kelso St	Tucson, AZ 85705-4744
Peter	Bisschop	9921 E Manassas Pl	Tucson, AZ 85748-3350
Cynthia	Blegen	8219 E Morgan Trl	Scottsdale, AZ 85258-1312
Elizabeth	Boettcher	874 E Waterview Pl	Chandler, AZ 85249-6929
Arielle	Boggess	PO Box 3509	Sedona, AZ 86340-3509
Christy	Bolognani	2008 1/2 N 2nd St	Flagstaff, AZ 86004-4209
Karen	Bond	701 W Grove Pkwy Apt 203	Tempe, AZ 85283-4505
Dennis	Boyle	1180 Deer Run Rd	Prescott, AZ 86303-5361
Barbara	Braden	38497 E Lemon Dr	Wellton, AZ 85356-7247
Georgia	Braithwaite	2145 S Hogan Ln	Cottonwood, AZ 86326-6108
Rebecca	Brandes	1203 E Camino Diestro	Tucson, AZ 85704-7923
Bob & Pam	Breen	240 Craigmont Dr	Sedona, AZ 86336-6213
Kathy	Briggs	4519 E Juarez St	Tucson, AZ 85711-5728
Prudence	Brooks	6238 N 63rd Ave	Glendale, AZ 85301-8300
Duncan	Brown	8122 E Sundew Dr	Tucson, AZ 85710-8572
Sarah	Brown	505 S Roosevelt St	Tempe, AZ 85281-3592
Nathan	Brugnone	2358 S Eastern Dr	Cottonwood, AZ 86326-5829
Shelly	Bruno	2521 S Dragoon Dr	Chandler, AZ 85286-5657
John & Jane	Brunson	4214 E Spring Meadows Cir	Flagstaff, AZ 86004-9207
Brady	Bryant	8923 E Shasta Dr	Gold Canyon, AZ 85118-3324
Valarie	Bryant	1300 N Indian Springs Ln	Flagstaff, AZ 86004-7364
Martha	Brzozowski	11445 E Via Linda	Scottsdale, AZ 85259-2655
Lori	Buhlman	3633 N 3rd Ave Unit 2036	Phoenix, AZ 85013-3930
Julia	Burke	2517 Golf Links Rd	Sierra Vista, AZ 85635-4861
Carolyn	Burns	9861 E Caron St	Scottsdale, AZ 85258-5691
Kate	Buttles	PO Box 3055	Sedona, AZ 86340-3055
Christopher	Byrd	2225 E Windsor Ave	Phoenix, AZ 85006-1331

Comment Document

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Richard	Cady	1412 Natures Way	Prescott, AZ 86305-5143
Latricia	Cagle	1143 N Oleander St Unit 2	Tempe, AZ 85281-1988
Barbara	Cain	3489 N Camino La Jicarrilla	Tucson, AZ 85712-6042
Melissa	Call	4634 E La Puente Ave	Phoenix, AZ 85044-1425
Alfy	Calle	4305 E Mountain Vista Dr	Phoenix, AZ 85048-7436
Nikki	Capetz	8180 E Shea Blvd	Scottsdale, AZ 85260-6568
David	Cardinali	10050 E Rayann Pl	Tucson, AZ 85749-9228
Chris	Carlon	2902 W Curry St	Chandler, AZ 85224-1047
Nicolas	Carreras	29414 N 50th Pl	Cave Creek, AZ 85331-6367
Joyce	Carter	1825 W Placita De Diciembre	Green Valley, AZ 85622-5426
Susan	Carusetta	4210 W Alameda Rd	Glendale, AZ 85310-3206
Louis	Casillas	884 N Cholla St	Chandler, AZ 85224-4292
Joseph	Casper	PO Box 74542	New River, AZ 85087-1010
Sandra	Castagno	8787 N Golden Moon Way	Tucson, AZ 85743-5403
Rosa	Castillo	17790 N 66th Ln	Glendale, AZ 85308-3691
Richard	Causer	511 E David Dr	Flagstaff, AZ 86001-4724
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C.	Chandler	PO Box 7612	Tempe, AZ 85281-0021
Randy	Chandler	714 White Spar Rd Lot 14	Prescott, AZ 86303-4669
Janet	Chase	70 Chavez Ranch Rd	Sedona, AZ 86336-6722
Melanie	Chischilly	420 Tombstone Cyn.	Bisbee, AZ 85603-2285
Gary	Christensen	PO Box 308 5 West Ave	Springerville, AZ 85938-0308
Michael	Clegg	13535 W Sacred Earth Pl	Tucson, AZ 85735-5228
Erin	Clendening	PO Box 1341	Grand Canyon, AZ 86023-1341
John	Cochran	2702 E Charleston Ave	Phoenix, AZ 85032-1633
Melanie	Colavito	4458 E Lester St	Tucson, AZ 85712-3418
Michael	Cooper	516 E Linden St	Tucson, AZ 85705-8936
Eric	Copp	13856 W Waddell Rd	Surprise, AZ 85379-3801
Keridwen	Cornelius	4522 E Arapahoe St	Phoenix, AZ 85044-3204
Daniel	Cortney	8450 N 54th Dr	Glendale, AZ 85302-6107
Diana	Corwin	1209 E 12th St	Tucson, AZ 85719-6105

Comment Document

First name	Last name	Address	
Mark	Coryell	1334 E Chandler Blvd # 5613	Phoenix, AZ 85048-6267
Martin	Cosacco	6582 E 12th St	Tucson, AZ 85710-1009
Elizabeth	Cosgrove	3921 N Smokey Topaz	Tucson, AZ 85749-9711
Robert	Coste	7326 W Moonmist Pl	Tucson, AZ 85757-8733
Michal	Craite	5217 N 24th St Apt 203	Phoenix, AZ 85016-3532
Danny	Cramer	PO Box 57	Grand Canyon, AZ 86023-0057
Chuck	Crosoli	PO Box 667	Camp Verde, AZ 86322-0667
Allen	Crystal	1227 E Griswold Rd	Phoenix, AZ 85020-3838
Shirley	Cupani	10434 E McLellan Rd	Mesa, AZ 85207-3645
Kevin	Dahl	1609 E Spring St	Tucson, AZ 85719-3332
Roger	Daniel	130 Castle Rock Rd Unit 67	Sedona, AZ 86351-8876
Rudy	Dankwort	8121 N 8th Ave	Phoenix, AZ 85021-5634
Loisann	Darby	6207 N 132nd Dr	Litchfield Park, AZ 85340-7303
Carrie	Darling	18032 N 2nd St	Phoenix, AZ 85022-1508
Mara	Davenport	3702 S Twilight Echo Rd	Tucson, AZ 85735-5121
Maureen	Davies	357 E Briarwood Ter	Phoenix, AZ 85048-2057
Kathleen	Davis	1600 E Roger Rd Trlr 13	Tucson, AZ 85719-1102
Vera	Davis	11205 W Bermuda Dr	Avondale, AZ 85392-4224
Stan	De Buse	13500 N Rancho Vistoso Blvd Apt 326	Oro Valley, AZ 85755-5962
Ronald	De Lair	3679 S Desert Echo Rd	Tucson, AZ 85735-5137
Kristopher	Deapen	9314 W Manzanita Dr	Sun City, AZ 85373-1734
Elaine	Decker	3620 E Juarez St	Tucson, AZ 85713-2458
Judy	DeClerck	4120 E Fairmount Ave	Phoenix, AZ 85018-5265
Rachel	Deierling	3140 E Kleindale Rd	Tucson, AZ 85716-1328
Joan	Dejong	1130 E Village Circle Dr N	Phoenix, AZ 85022-4813
Cathy	Della Penta	457 S Sunrise Dr	Gilbert, AZ 85233-6767
John	Deltogno-Armanasco	6950 E Williams Field Rd	Mesa, AZ 85212-6033
Penny	Deluca	1659 W Prospector Way	Queen Creek, AZ 85142-4445
Margrit	Deman	8041 S 15th Ave	Phoenix, AZ 85041-7803

Comment Document

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David	Divine	1761 W Placita Del Helecho	Green Valley, AZ 85622-4678
Max	Dobles	PO Box 1399	Grand Canyon, AZ 86023-1399
George	Dodds	3661 N Campbell Ave # 111 Pmb	Tucson, AZ 85719-1527
Phyllis	Dodge	12445 N Derringer Rd	Marana, AZ 85653-9451
Eva	Dong	658 W Calle Garcia	Tucson, AZ 85706-5204
Elisa	Donnadieu	7249 E Coronado Rd	Scottsdale, AZ 85257-1405
John	Dooley	PO Box 4105	Prescott, AZ 86302-4105
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Gregory	Du Bois	150 Disney Ln	Sedona, AZ 86336-9751
Valentina	Dubasik	8303 E Vista Dr	Scottsdale, AZ 85250-7321
Marilyn	Duerbeck	1747 E Northern Ave Unit 113	Phoenix, AZ 85020-3984
Meg	Dugan	731 N Colette Pl	Tucson, AZ 85748-1910
Lois	Dunn	2253 S Harper	Mesa, AZ 85209-2423
Susan	Dunn	1440 S Val Vista Dr Apt 1090 M	Mesa, AZ 85204-6443
Joel	Dworin	4031 E Calle Chica	Tucson, AZ 85711-4127
Honeygirl	E	PO Box 1750	Dolan Springs, AZ 86441-1750
Trish	Egger	435 Foothills South Dr	Sedona, AZ 86336-5025
Nancy	Eisner	7308 E Montebello Ave	Scottsdale, AZ 85250-6024
Brian	Eller	3022 E Lester St	Tucson, AZ 85716-3126
Jay	Elliott	8715 N Valley Oak Dr	Prescott, AZ 86305-7719
Paulette	English	1730 Bluff Dr	Cottonwood, AZ 86326-8941
John & Juanita	Enkoji	26804 N 79th St	Scottsdale, AZ 85266-9059
Elizabeth	Enright	6222 E Avalon Dr	Scottsdale, AZ 85251-7006
Leslie Ann	Epperson	4275 N River Grove Cir Apt 131	Tucson, AZ 85719-1273
Andrea	Estrella	4817 E 18th St	Tucson, AZ 85711-4360
Edward	Estrella	4817 E 18th St	Tucson, AZ 85711-4360

Comment Document

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Elizabeth	Farkas	2514 E Drachman St	Tucson, AZ 85716-3507
Elizabeth	Farnell	3625 E Ray Rd	Phoenix, AZ 85044-7118
Kirby	Faulkner	Rt 1 Box 421	Maricopa, AZ 85139-5846
John	Ferner	2966 E Placita Santa Lucia	Tucson, AZ 85716-0817
Roy	Ferry	9220 E Fairway Blvd Apt 233	Sun Lakes, AZ 85248-6582
Suzann	Fildes	7644 E Fay Ave	Mesa, AZ 85208-5652
Randy	Filipic	5650 S Kyrene Rd 1247	Tempe, AZ 85283-1732
Rob & Linda	Findlay	2167 E Greasewood Dr	Kingman, AZ 86409-9222
Margaret	Finnerty	6116 N 17th Ave	Phoenix, AZ 85015-2021
James	Fishgold	2446 E Pierson St	Phoenix, AZ 85016-4817
Robin	Flack	21630 N 44th Pl	Phoenix, AZ 85050-6936
Christopher	Fleischman	4225 E Buena Terra Way	Phoenix, AZ 85018-1104
Rich	Flood	PO Box 67002	Phoenix, AZ 85082-7002
Margaret	Flyntz	1611 E Mitchell St	Tucson, AZ 85719-3133
Sherry	Fox	PO Box 193	Elfrida, AZ 85610-0193
David	Fraser	9037 S 16th St	Phoenix, AZ 85042
Gregory	Freeman	6333 E Apache Dr	Pearce, AZ 85625-6028
Sarah	Freshley	4727 E Virginia Ave	Phoenix, AZ 85008-1515
Corinna	Fritsch	8639 S 49th St Unit 2	Phoenix, AZ 85044
Robert	Frost	3223 E Larkspur Dr	Phoenix, AZ 85032-7244
Ursula	Fuchs	9500 N 68th Ln	Peoria, AZ 85345-8827
David	Fura	2536 W Tanya Rd	Phoenix, AZ 85086-8304
Yolanda	Gales	14312 E Thoroughbred Trl	Scottsdale, AZ 85259-5509
Juan	Gallardo	3223 E Lee St	Tucson, AZ 85716-3214
Donna	Gamblin	829 E Ironwood Dr	Phoenix, AZ 85020-1738
Vicki	Gannon	3225 W Daphne Ln	Tucson, AZ 85742-8839
Jeannette	Garcia	2913 E Lester St	Tucson, AZ 85716-3043
Rosemary	Garcia	3480 E Millennium Way	Rimrock, AZ 86335-6133
Vickie	Garcia	725 N Dobson Rd Apt 211	Chandler, AZ 85224-9108
Eric	Gebhard	6361 W Corona Dr	Chandler, AZ 85226-1102
Sheila	Gebhard	PO Box 11871	Tempe, AZ 85284-0032

Comment Document

First name	Last name	Address	
Joseph	Gebler	2291 N Avenida Del Polen	Green Valley, AZ 85614-4165
Paul	Gee	3352 E Hawthorne St	Tucson, AZ 85716-4225
Cochise	Genet	1014 E Blacklidge Dr	Tucson, AZ 85719-2578
Marvin	George	1233 Katherine Dr	Sierra Vista, AZ 85635-4975
Beverly	Gibbons	1716 W Frontier St	Apache Junction, AZ 85120-9085
Sara	Gibson	2100 N Fremont Blvd	Flagstaff, AZ 86001-0955
Bill	Gilchrist	33834 N 52nd St	Cave Creek, AZ 85331-5125
Tom	Gilmore	2211 W Tonto Ridge Rd	Prescott, AZ 86305-3939
Brian	Glauser	1040 E Seminole Dr	Phoenix, AZ 85022-6401
Nanette	Glover	4119 S 14th Ave	Tucson, AZ 85714-1347
Nancy	Godwin	2202 S Calle Mesa Del Oso	Tucson, AZ 85748-8223
Emily	Goffman	2608 W Curry St	Chandler, AZ 85224-1042
Denielle	Gongaware	320 N 3rd St	Avondale, AZ 85323-1918
Felina	Gonzales	173 E Calle Puente Lindo	Sahuarita, AZ 85629-8703
Cody	Goodell	3823 N 41st Pl	Phoenix, AZ 85018-5311
Tyler	Goodman	8537 W Riley Rd	Tolleson, AZ 85353-3688
Bon	Gordon	6837 E Lincoln Dr	Scottsdale, AZ 85253-4411
Ashley	Grace	1414 N 5th Ave Apt 2	Phoenix, AZ 85003-1268
Aradia	Green	16040 N 27th St Apt 109	Phoenix, AZ 85032-3540
Kelly	Green	325 N 47th St	Phoenix, AZ 85008-6539
Melvin	Greer	4916 W Cholla St	Glendale, AZ 85304-2810
Betty	Gregg	PO Box 40208	Mesa, AZ 85274-0208
Carl	Gregory	1402 E Guadalupe Rd Unit 138	Tempe, AZ 85283-3975
Mark	Grenard	12810 N Cave Creek Rd Apt 105	Phoenix, AZ 85022-5880
Kathy	Grieves	7709 W Via Del Sol	Peoria, AZ 85383-3160
Linda	Griffith	10020 E Moccasin Pl	Tucson, AZ 85749-8148
Jaime	Grimwood	1616 W Clarendon Ave	Phoenix, AZ 85015-5517
Carmen	Guerrero	12501 W Monroe St	Avondale, AZ 85323-8005
Robert	Guignard	407 E Del Rio Dr	Tempe, AZ 85282-3762
Rachel	Gullett	1300 E Chula Vista Rd	Tucson, AZ 85718-1109
Rhoda	Guth	1715 S Jones Blvd Apt G110	Tucson, AZ 85713-2381

Comment Document

First name	Last name	Address	
Sara	Gutierres	1290 S Maple Ave	Tempe, AZ 85281-8667
B	Hall	9950 E 24th	Yuma, AZ 85365
Raymond	Hall	PO Box 5138 210 Morgan Dr	Page, AZ 86040-5138
Rose	Hall	20402 W Morning Star Ln	Wittmann, AZ 85361-9780
Mary Jane	Halloran	17018 E Cascade Dr	Fountain Hills, AZ 85268-2545
Renee	Hamill	8051 N 14th Ave	Phoenix, AZ 85021-5631
Michael	Hammermeister	1941 S Pierpont Apt 1023	Mesa, AZ 85206-4647
Eileen	Hampton	1733 E Wildflower Ln	Casa Grande, AZ 85122-6386
Johnathan	Hampton	1733 E Wildflower Ln	Casa Grande, AZ 85122-6386
Scott	Handrick	11526 E Mendoza Ave	Mesa, AZ 85209-1436
Jennifer	Hannan	4402 E Glenrosa Ave	Phoenix, AZ 85018-4321
Michael	Hansen	3601 N 5th Ave Apt 102	Phoenix, AZ 85013-3732
Miranda	Hansen	450 W Cool Dr	Tucson, AZ 85704-6462
Jeanine	Hanson	16675 W Woodlands Ave	Goodyear, AZ 85338-2724
Norman	Hanson	75 Cimarron Ridge Dr	Sedona, AZ 86336-9199
Thomas	Hanson	16675 W Woodlands Ave	Goodyear, AZ 85338-2724
Henry	Harding	304 W Coolidge St	Phoenix, AZ 85013-2713
Kathy	Harding	6825 W Drexel Rd	Tucson, AZ 85757-9561
J	Hargrove	PO Box 1788	Sedona, AZ 86339-1788
W B	Harrington	7077 E Bobwhite Way	Scottsdale, AZ 85266-8538
Melissa	Harris	1060 W Emerine Dr	Tucson, AZ 85704-3426
Colleen	Harrison	15871 S 11th Pl	Phoenix, AZ 85048-8407
Jenneva	Haskins	7818 E Ebola Ave	Mesa, AZ 85208-6084
Theresa	Headrick	9945 W Thunderbird Blvd	Sun City, AZ 85351-2838
Wendy	Heald	285 El Camino Grande	Sedona, AZ 86336-5042
Memi	Heeder	3629 N 5th Ave Apt F1	Phoenix, AZ 85013-3706
Gary	Henderson	530 E Linda Ave	Apache Junction, AZ 85119-7632
Michael K.	Henderson	849 S 2nd Ave	Tucson, AZ 85701-3214
Walter	Henderson	210 N Maguire Ave Apt 409	Tucson, AZ 85710-9050
Virginia	Hensler	7300 N Spur Rd	Prescott, AZ 86305-8933
Donald	Hensley	11572 W Mountain View Rd	Youngtown, AZ 85363-1753

Comment Document

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Tara	Hetzer	9749 S Darrow Dr	Tempe, AZ 85284-3797
James	Hewitt	7634 E Lerma Pl	Tucson, AZ 85710-6322
Steve	Hibbeler	904 W Willow Ave	Phoenix, AZ 85029-1847
Judith	Hicks	511 E Mohave Rd	Tucson, AZ 85705-3629
Joseph	Highley	515 W Orchard Way	Gilbert, AZ 85233-5326
Joseph	Hill	1500 S San Francisco St 610-D	Flagstaff, AZ 86001-0493
Larry	Hill	16014 S 13th Way	Phoenix, AZ 85048-8668
Alissa	Hinckley	7352 E Monte Ave	Mesa, AZ 85209-4973
Christine	Hiner Kasten	10229 E Essex Village Dr	Tucson, AZ 85748-2103
Katherine	Hinson	1411 S Nielson St	Gilbert, AZ 85296-9712
Korey	Hjelmeir	2350 W Kathleen Rd	Phoenix, AZ 85023-4119
Sue	Holmes	157 W Paradise Ln	Peoria, AZ 85382-3567
Wendy	Hood	9750 N 96th St	Scottsdale, AZ 85258-5293
Jay	Hotchkiss	1251 E Granite View Dr	Phoenix, AZ 85048-4445
Natalie	Houghton	Woods Trail	Prescott, AZ 86305-5186
Chris	Houseman	1715 E Grant Rd # 2	Tucson, AZ 85719-3318
Holly	Hovious	3225 W Melinda Ln	Phoenix, AZ 85027-2203
Ron	Hubert	6800 Virgil Way	Flagstaff, AZ 86001-8148
Valaryee	Huffman	8851 N Oracle Rd Apt 85	Tucson, AZ 85704-7451
Elizabeth	Hunter	1125 W Willetta St	Phoenix, AZ 85007-1900
Ann	Hurst	4795 Spud Dr	Flagstaff, AZ 86004-8599
Carmen	Ibarra	615 W Taylor Ave	Coolidge, AZ 85128-6120
Barbara	Illingworth	1673 W Petunia Pl	Oro Valley, AZ 85737-7253
Norma	Itule	5215 E Alberta Dr	Tucson, AZ 85711-3120
L	Jackson		
Sarah	Jacobson	4250 E 29th St Apt 8	Tucson, AZ 85711-6117
Ellan	Jagger	63 Juniper Trl	Sedona, AZ 86336-6506

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First name	Last name	Address	
Lisa	James	20320 N 98th St	Scottsdale, AZ 85255-6213
Beverly	Janowitz-Price	3020 N 14th St	Phoenix, AZ 85014-5620
Gwendolyn	Jarick	4530 E Juana Ct	Cave Creek, AZ 85331-3294
Paul	Jehle	PO Box 87456	Tucson, AZ 85754-7456
Corliss	Jenkins-Sherry	8024 W Greensleeves Way	Tucson, AZ 85743-5503
Josephine	Jennings	8701 S Kolb Rd # 5 -221	Tucson, AZ 85756-9607
Christine	Johnson	5237 Chula Vista Pl	Sierra Vista, AZ 85635-8277
Clay	Johnson	2041 W Hazelwood Pkwy	Phoenix, AZ 85015-4142
Crysten	Johnson	8482 E Verbena Ln	Hereford, AZ 85615-8952
Mansur	Johnson	6056 N Oracle Jaynes Station Rd	Tucson, AZ 85741-3470
Martha	Johnson	4671 S Greythorne Way	Chandler, AZ 85248-5470
Tanja	Jokovic	6305 W Riva Rd	Phoenix, AZ 85043-1943
Cherie	Jones	10801 E Happy Valley Rd # 140	Scottsdale, AZ 85255-8171
Debra	Jones	PO Box 994	Scottsdale, AZ 85252-0994
Jacki	Jones	1815 S Torre Molinos Cir	Tempe, AZ 85281-6130
Lois	Jordan	9161 E Walnut Tree Dr	Tucson, AZ 85749-9639
Stella	Kahn	6861 N Skyway Dr	Tucson, AZ 85718-1121
Matt	Kalina	8342 E Weldon Ave	Scottsdale, AZ 85251-5934
Linda	Kane	56 S 75th Pl	Mesa, AZ 85208-1250
Carl	Kanun	7496 N Camino Sin Vacas	Tucson, AZ 85718-1277
Edeltraud	Kapl-Blume	7660 E Canon De La Vis	Tucson, AZ 85750-1371
Judy	Karnia	6057 N 79th St	Scottsdale, AZ 85250-4737
DC	Katten	41667 N 51st St	Cave Creek, AZ 85331-8436
Francis	Kazakwic	3402 W Languid Ln	Phoenix, AZ 85086-2276
Mary	Kearney	44111 N 48th Dr	New River, AZ 85087-3043
James-Garrett	Kelley	PO Box 303	Pearce, AZ 85625-0303
Elise	Kelsheimer	4009 E Hearn Rd	Phoenix, AZ 85032-5427
Benjamin	Kendall	329 N McLane Rd Apt B	Payson, AZ 85541-4366
Peggy	Kennon	17737 W Stella Ln	Waddell, AZ 85355-9641
Diane	Kent	4123 E Blanche Dr	Phoenix, AZ 85032-4710
Peeyush	Khanna	9609 W Ross Ave	Peoria, AZ 85382-5150
Laqura	Kiholm	1541 N 107th Pl	Mesa, AZ 85207-4539

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First name	Last name	Address	
Laura	Kiholm	1541 N 107th Pl	Mesa, AZ 85207-4539
Jerry	Kilgore	6420 S Y Lightning Ranch Rd	Hereford, AZ 85615-9482
James	Kimes	8045 E Donna Rd	Prescott Valley, AZ 86314-8450
Scott	Kipp	120 S Val Vista Dr	Gilbert, AZ 85296-1370
Joani	Kirchgessner	10432 W Monterosa St	Phoenix, AZ 85037-5830
Irene	Kitzman	E Forgeus Pl	Tucson, AZ 85716-4752
Sallie	Kladnik	3530 N Monte Vista Dr	Flagstaff, AZ 86004-1771
Carol	Klamerus	5445 W De Green Ln	Tucson, AZ 85743-9797
Keith	Kleber	8935 N Scenic Dr	Tucson, AZ 85743-8787
Isabelle	Kler	123 Faek Street	Detroit, AZ 85324
Evan and Louise	Kligman	2950 E River Rd	Tucson, AZ 85718-6573
Renate	Kloppinger	PO Box 268	Sonoita, AZ 85637-0268
Yuri	Kondo	10049 E Dynamite Blvd Ste 115	Scottsdale, AZ 85262-3694
Rebecca	Koo	124 N California St Unit 29	Chandler, AZ 85225-6989
Sean	Koudelka	11807 N Cherry Hills Dr E	Sun City, AZ 85351-3818
Maryellen	Kovatch	2756 N Forgeus Ave	Tucson, AZ 85716-2110
Klaus	Kracht	190 N Abrego Dr	Green Valley, AZ 85614-2928
Karen	Kravcov Malcolm	30821 N 138th St	Scottsdale, AZ 85262-7932
Erika Anne	Kreider	1239 N 1st Ave	Tucson, AZ 85719-4002
Timothy	Krone	PO Box 30424	Tucson, AZ 85751-0424
Dean	Krupa	5213 W Boston Way N	Chandler, AZ 85226-3633
Barbara	Kuelbs	2920 E 18th St	Tucson, AZ 85716-5637
Lenore	Kuipers	PO Box 396	Sanders, AZ 86512-0396
Chetan	Kumar	4600 S Verbenia Ct	Chandler, AZ 85248-4856
Heather	Kutch	4095 S Hohokam Dr	Sierra Vista, AZ 85650-8551
Ron	Kuykendall	372 E Rudasill Rd	Tucson, AZ 85704-6027 887-8142
Stephen	La Falce	9185 Starfield Rd	Flagstaff, AZ 86004-1323
David	Labiner	6282 E Placita Chiripa	Tucson, AZ 85750-1221
Magali	Lachot	8150 N 112th Ave	Peoria, AZ 85345-2912

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First name	Last name	Address	
Larry	Lacterman	909 Tombstone Canyon	Bisbee, AZ 85603
Caleb	Laieski	4140 N Central Ave Apt 1110	Phoenix, AZ 85012-7804
Jim	Landua	3440 E Southern Ave Unit 1158	Mesa, AZ 85204-5662
Donna	Langlois	5641 E Windstone Trl	Cave Creek, AZ 85331-6095
Joan	Lansberry	PO Box 2965	Yuma, AZ 85366-2403
Drena	LaPointe	7839 E Keim Dr	Scottsdale, AZ 85250-4799
Drena	Lapointe-Meyer	338 E Vaughn Ave	Gilbert, AZ 85234-9300
Janet	Larkin	7409 E Bonita Dr	Scottsdale, AZ 85250-7105
Dona	Laschiava	4511 W Rockwood Dr	Tucson, AZ 85741-3929
Shell	Lavender	370 Snowflake Heights Blvd	Snowflake, AZ 85937-5701
Geoffrey	Lawrence	940 S 12th St	Cottonwood, AZ 86326-4517
Jim	Lawrence	14881 W Larkspur Dr	Surprise, AZ 85379-5956
Michael	Lee	3829 E Poinsettia Dr	Phoenix, AZ 85028-1435
Richard & Sara	Leibold	4696 N So Hi Blvd	Golden Valley, AZ 86413-9667
Linda	Leonard	12646 W Fort Lowell Rd	Tucson, AZ 85743-9527
Sarah	Letnes	2705 E Longhorn Pl	Chandler, AZ 85286-1379
Ally	Lewis	4427 E Redwood Ln	Phoenix, AZ 85048-7032
Diane	Lewis	1927 E Hampton Ave Unit 162	Mesa, AZ 85204-6065
Pat	Lewis	1552 W Vuelta Salvatierra	Green Valley, AZ 85622-5078
David	Lewton	8161 N 1st Ave	Phoenix, AZ 85021-5668
Lisa	Lockett	9785 Pioneer Valley Rd	Flagstaff, AZ 86004-9562
Robert	Lorenzo	1100 E Osborn Rd Apt 146	Phoenix, AZ 85014-5246
Bonnie	Loughridge	PO Box 76	Laveen, AZ 85339-0076
Dorothy	Love	17 Whitetail Ln	Sedona, AZ 86336-4501
Kirsten	Lovette	1884 E Calle Muleta	Tucson, AZ 85714-1721
Rob	Lowe	752 N Recker Rd	Mesa, AZ 85205-6652
Steve	Lowen	11108 E Jimson Loco Ln	Scottsdale, AZ 85262-3412
Karen	Lowery	6021 S Hopdown Ln	Tucson, AZ 85746-3745
Russell	Lowes	3339 E Seneca St	Tucson, AZ 85716-3255
Bill	Luke	115 W Marlette Ave	Phoenix, AZ 85013-1523
Pat	Lukensmeyer	3849 E Broadway Blvd	Tucson, AZ 85716-5407

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First name	Last name	Address	
Harry	Lumley	5936 E Leisure Ln	Cave Creek, AZ 85331-9104
John	Lynch	PO Box 15016	Flagstaff, AZ 86011-0540
Sb	Macintyre	PO Box 20443	Sedona, AZ 86341-0443
Steve	Maclear	6647 E Rollins St	Mesa, AZ 85215-4341
Paul	Madarasz	2662 N Alvernon Way Apt D205	Tucson, AZ 85712-1719
Kim	Maddox	4288 N Rillito Creek Pl	Tucson, AZ 85719-1163
Sherri	Maley	21178 E Alyssa Rd	Queen Creek, AZ 85142-6557
MJ	Mallory	471 W Main	Payson, AZ 85541-4717
Kellie	Malone	13422 W Hyacinth Dr	Sun City West, AZ 85375-4955
Candy	Mancuso	2621 W Sunrise Dr	Phoenix, AZ 85041-9616
Melanie	Manera	1717 E Union Hls Dr	Phoenix, AZ 85024-3035
Judith	Manocchia	3583 E Mission Ln	Cottonwood, AZ 86326-5375
Geoff	Manoil	29 E Papago Dr	Tempe, AZ 85281-1120
Ziporah	Marcus	PO Box 236 Second	Mesa, AZ 86043-0236
Robert	Mark	3644 N Stone Crest St	Flagstaff, AZ 86004-6811
Eileen	Marshall	6225 E Delcoa Ave	Scottsdale, AZ 85254-3824
Glen	Martin	14126 W Summerstar Dr	Sun City West, AZ 85375-5244
P A	Martin	5780 W Rocking Circle St	Tucson, AZ 85713-6320
Brenda	Mason	5430 N 25th St	Phoenix, AZ 85016-3645
Kirti	Mathura	5614 W Buffalo St	Chandler, AZ 85226-3520
Catherine & John	Matthews	4718 E Mulberry Dr	Phoenix, AZ 85018-6536
Jill	Maxwell	PO Box 1331	Bisbee, AZ 85603-2331
Sandra	Maxwell	2816 Jamaica Blvd S	Lake Havasu City, AZ 86406-7710
Nasrin	Mazuji	3498 Little Hill Ln	Sierra Vista, AZ 85635-8101
Ed	Mazur	6304 S De Mello St	Hereford, AZ 85615-5602
Martha	Mcbroom	13859 N 109th Ave	Sun City, AZ 85351-2577
C Gene	Mccormick	7473 N Paseo Ronceval	Tucson, AZ 85704-1365
William	Mccoy	2721 N Essel Dr	
Norma	Mcculloch	18650 N 91st Ave Unit 3501	Peoria, AZ 85382-7779
K	McDevitt	13383 W Watson Ln	Surprise, AZ 85379-6450
Beth	Mceldowney	1637 E Montoya Ln	Phoenix, AZ 85024-4325

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First name	Last name	Address	
Jackie	McFarland	15255 N Wright Blvd Apt 2077	Scottsdale, AZ 85260-2810
Robert	Mcfarren	12625 W Windsor Ave	Avondale, AZ 85392-5547
Cheryl	Mcgregor	710 W Moreland St	Phoenix, AZ 85007-2119
Janice	McKee	PO Box 55326	Phoenix, AZ 85078-5326
Ross	Mckenzie	3298 E Foothills Dr Apt C	Sierra Vista, AZ 85635-4289
Peter	Mckinney	20640 E Squaw Valley Rd	Black Canyon City, AZ 85324-8818
Sarah	Mclean	PO Box 1178	Sedona, AZ 86339-1178
Annie	McMahon	421 Geary Hgts, Dr	Clarkdale, AZ 86324-3127
Debbie	Mcnally	440 W Illinois St	Tucson, AZ 85714-2919
David	Melcer	5811 E Paseo Busanic	Tucson, AZ 85750-1704
Kenneth	Meoni	532 S Eloy Rd	Golden Valley, AZ 86413-4840
Luci	Messing	2450 N Tierra Verde Pl	Tucson, AZ 85749-9315
Brigitte	Metzger	15217 S 14th Dr	Phoenix, AZ 85045-1938
Karen	Michael	7040 W Voltaire Ave	Peoria, AZ 85381-5061
Linda	Middaugh	1598 N Paseo La Tinaja	Green Valley, AZ 85614-3988
Jon	Miller	801 E Becker Ln	Phoenix, AZ 85020-1528
Nichasie	Miller	Post Mail Box (PMB) 6595	Chandler, AZ 85246
Susan	Miller	3834 N Borg Ln	Tucson, AZ 85716-0828
David	Milligan	14402 E Ranch Creek Pl	Vail, AZ 85641-9097
Melayne	Mills	3922 N 125th Dr	Avondale, AZ 85392-6314
Jay	Miner	28425 N Blck Cyn Hwy	Phoenix, AZ 85085-7601
Jennifer	Minish	931 S Baylor Dr	Tucson, AZ 85710-8708
Scott	Mittelsteadt	14602 N 19th Ave Unit 112	Phoenix, AZ 85023-7104
Robert	Modica	833 N Sicily Dr	Chandler, AZ 85226-6308
Julie	Mohr	4339 E Contessa St	Mesa, AZ 85205-7076
Mary	Monell	1813 E Beautiful Ln	Phoenix, AZ 85042-6866
Linda	Mooney	7730 N Rain Valley Rd	Flagstaff, AZ 86004-1411
David	Moore	5201 E 2nd St Apt G4	Tucson, AZ 85711-1301
Jamie	Moore	4707 E Cypress St	Phoenix, AZ 85008-3209
Richard M	Moore	10990 E Oakwood Dr	Tucson, AZ 85749-9463
James	Moran	8331 W Marlette Ave	Glendale, AZ 85305-2547
Liana	Moran	8331 W Marlette Ave	Glendale, AZ 85305-2547
Liana	Moran	8331 W Marlette Ave	Glendale, AZ 85305-2547

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First name	Last name	Address	
Liana	Moran	8331 W Marlette Ave	Glendale, AZ 85305-2547
Claire	Morgan	19450 E Silver Creek Ln	Queen Creek, AZ 85142-9066
Joanne	Moses	7400 E Golf Links Rd Apt 179	Tucson, AZ 85730-1151
Matt	Mueller	700 E Mesquite Cir	Tempe, AZ 85281-1939
Susan	Mulcahy	6838 E Osborn Rd	Scottsdale, AZ 85251-6204
Carroll	Munz	4820 E Caida Del Sol Dr	Paradise Valley, AZ 85253-2013
Dacia	Murphy	4255 E Pecos Rd Apt 3077	Gilbert, AZ 85295-7849
Jim	Myers	1200 N Sunspot Pl	Tucson, AZ 85715-5835
Christine	Nagasawa	5800 W Park Ave	Chandler, AZ 85226-1242
Stephen	Nally	1933 E Palo Verde Dr	Phoenix, AZ 85016-2627
Gerri & Rudy	Natalini	1961 N Laguna Oaks Dr	Green Valley, AZ 85614-6341
Jolyn	Nebeker	8294 Praire Dr	Winslow, AZ 86047-5104
Brett	Nelson	476 S Sawmill Gardens Dr	Cottonwood, AZ 86326-5336
JoAnn	Nelson	1642 E Pinchot Ave	Phoenix, AZ 85016-7622
Nanci	Nelson	1919 W Lester St	Tucson, AZ 85745-1938
Suzanne	Nelson	7401 W Arrowhead Clubhouse Dr	Glendale, AZ 85308-8808
Andrew	Nemecek	36550 N 97th St	Scottsdale, AZ 85262-3158
Annie	Neroda	7352 N 7th Pl	Phoenix, AZ 85020-5041
Lynda	Nesbitt	34950 W Miller Rd	Stanfield, AZ 85172-8663
Peter	Newton	901 E Van Buren St Apt 2039	Phoenix, AZ 85006-4031
Colby	Nez	PO Box 2377	Tuba City, AZ 86045-2377
Thuong	Nguyen	5229 W Boston Way S	Chandler, AZ 85226-3637
Elizabeth	Nichols	1714 Hill Rd Apt 5	Holbrook, AZ 86025-3217
Carmen	Nichols McQueen		Chandler, AZ 85225-1307
Marita	Nickerson	406 E Fillmore St	Tempe, AZ 85281-1116
Dennis	Nolan	13226 W Flagstone Ct	Sun City West, AZ 85375-3206
Kate	Nolan	4540 N 44th St Unit 16	Phoenix, AZ 85018-4265
James	Notestine	6432 E Brian Kent	Tucson, AZ 85710-1108
John	Nowlin	18231 N 49th Pl	Scottsdale, AZ 85254-7506
Bette	O'Connor	214 W Sullivan Ave	Flagstaff, AZ 86001-3050

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First name	Last name	Address	
Michael	O'Connor	2617 S Palm Dr	Tempe, AZ 85282-2340
John	Oehler	1126 W Redhead Rd	Cochise, AZ 85606-8603
William A.	Ohman II	232 S 12th Ave	Phoenix, AZ 85007-3101
Bonnie	Oliver	45 W Fort Lowell Rd Unit 22	Tucson, AZ 85705-5927
Katharine	Olmstead	2949 N Sunrock Ln	Tucson, AZ 85745-9626
Scott	Olsen	750 E Devon Dr	Gilbert, AZ 85296-3578
Bonnie	O'Neil	PO Box 671	Arivaca, AZ 85601-0671
Colleen	O'Neil	17009 E Duffers Dr	Mayer, AZ 86333-4113
Molly	Osborne	3805 N Nash Creek Ct	Tucson, AZ 85745-4154
Ruth	Osborne	9555 E Shirley Ln	Dewey, AZ 86327-6949
Simone	Ossipov	609 E Tulane Dr	Tempe, AZ 85283-1973
Tom	Oviatt	6391 W Angela Dr	Glendale, AZ 85308-3685
Lori	Paar	6429 W Mohave St	Phoenix, AZ 85043-5736
Karen	Palmer	7611 E Linden St	Tucson, AZ 85715-4526
Deborah	Papaleo	13044 S 46th Way	Phoenix, AZ 85044-4023
Gayle	Parent	1331 E Winter Dr	Phoenix, AZ 85020-4215
Monica	Parker	244 W Kelso St	Tucson, AZ 85705-4439
Hansi	Patience	348 S Paseo Madera Unit B	Green Valley, AZ 85614-0744
Skywalker	Payne, Rn	PO Box 947	Polacca, AZ 86042-0947
Alexander	Perme	6703 N 10th St	Phoenix, AZ 85014-1022
Erinn	Peters	1149 N Norton Ave	Tucson, AZ 85719-4714
Nancy	Peterson	17640 W Fiddler Dr	Tucson, AZ 85735-2514
Tracey	Peterson	2725 E Mine Creek Rd Unit 1222	Phoenix, AZ 85024-6270
Wendy	Petkus	25114 S Golfview Dr	Sun Lakes, AZ 85248-7372
Adrienne	Petraitis	16655 S 14th St	Phoenix, AZ 85048-4719
Kevin	Petty	4600 S Fair Ln	Tempe, AZ 85282-6207
Dennis	Phelan	9680 W Northern Ave Unit 1329	Peoria, AZ 85345-4651
Gene	Polis	2151 E Southern Ave	Mesa, AZ 85204-5355
Jeanne	Pollard	5920 N Placita Del Conde	Tucson, AZ 85718-4314
Karrie	Porter Brace	1819 S Torre Molinos Cir	Tempe, AZ 85281-6130
Steven	Prchal	733 S Kenyon Dr	Tucson, AZ 85710-4606
Eric	Preiss	9041 E Chickamauga St	Tucson, AZ 85710-4434

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First name	Last name	Address	
Mallory	Quigg	421 E Ironwood Dr	Phoenix, AZ 85020-1043
Michael	Quinlan	1341 E Bayview Dr	Tempe, AZ 85283-2156
Patti	Racina	2541 W Anklam Rd	Tucson, AZ 85745-1730
Robert	Racine	1643 W 5th St	Mesa, AZ 85201-5304
Darla	Ramirez	412 3rd Ave E	Buckeye, AZ 85326-1308
Karina	Ramirez	3424 W Rancho Dr	Phoenix, AZ 85017-1924
Gary	Raney	4136 N Robin Dr	Prescott Vly, AZ 86314-6398
Bruce	Raymond	DoNotMail	Tucson, AZ 85745-3124
Crystal	Rector	1348 E Clarendon Ave	Phoenix, AZ 85014-5119
Fritzi	Redgrave	5600 S Cntry Clb Rd Trlr 209	Tucson, AZ 85706-2748
Debbie	Reichow	7664 E Clinton St	Scottsdale, AZ 85260-5580
Joseph	Reilly	PO Box 20336	Mesa, AZ 85277-0336
Richard	Resnick	2461 Hano Trl	Flagstaff, AZ 86001-3622
William	Resseguie	805 N 4th Ave Unit 206	Phoenix, AZ 85003-1353
Stephanie	Reynolds	1330 W Butler Dr	Chandler, AZ 85224-6194
Minnie (Mini)	Richards	1882 W. Lantana Dr.	Chandler, AZ 85248-2170
Hedy	Richardson	2212 W Alta Vista Rd	Phoenix, AZ 85041-5424
Kristine	Richter	5700 E 24th St	Tucson, AZ 85711-5909
Lisa	Ricker	333 E McKinley St	Tempe, AZ 85281-1024
Pam	Riehm	10072 E Bryonwood Ln	Tucson, AZ 85730-4492
Vincent	Riggs	2940 W Camino Perritos	Tucson, AZ 85745-1602
Allison	Rindge	1550 N Fort Valley Rd Apt 29	Flagstaff, AZ 86001-1277
Robert	Robertson	4900 N Judy Cir Apt 1	Prescott Valley, AZ 86314-6179
Jean	Rodine	PO Box 37465	Phoenix, AZ 85069-7465
Elane	Rodriguez	1410 E Diamond St	Phoenix, AZ 85006-2925
Rose	Rodriguez	PO Box 14565	Scottsdale, AZ 85267-4565
Celeste	Rogers	6219 E Hawthorne St	Tucson, AZ 85711-1628
Charlene	Rogers	875 W Miracle Mile Apt 3103	Tucson, AZ 85705-6228
Chris	Rollins	1730 W Village Way	Tempe, AZ 85282-4443
Margarita	Romero-Durazzi	227 E 20th St	Tucson, AZ 85701-3142

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First name	Last name	Address	
Denise	Romesburg	7326 N 21st Ave	Phoenix, AZ 85021-7812
Pat	Ross	10589 E Ralph Alvarez Pl	Tucson, AZ 85747-5886
Brit	Rosso	8629 S Triangle K Ranch Pl	Vail, AZ 85641-8932
Jerome	Roth	1912 S River Dr	Tempe, AZ 85281-6118
Leilani	Rothrock	4421 E Fort Lowell Rd	Tucson, AZ 85712-1106
Rose Ann	Rowlett	PO Box 16412	Portal, AZ 85632-0412
Laurie	Rubin	3901 E Pinnacle Pk Rd Lot 367	Phoenix, AZ 85050-8127
Amy	Rukstales	533 W Mariposa St	Phoenix, AZ 85013-2527
Celia	Rumann	2617 S Palm Dr	Tempe, AZ 85282-2340
Pamela & Philip	Rupprecht	8201 S Pecan Grove Cir T	empe, AZ 85284-2311
Jean	Rusen	1513 E Cedar St	Tempe, AZ 85281-5903
Jonathan	Russo	5040 E Larkspur Dr	Scottsdale, AZ 85254-4144
Penelope	Ryan	11075 W Picture Rocks Rd	Tucson, AZ 85743-8692
Madeline	Ryder	6425 N Placita Tranquila	Tucson, AZ 85704-1103
Judy	Saeger	5457 S Arabian Dr	Sierra Vista, AZ 85650-9140
Jeanne	Saint-Amour	PO Box 37465	Phoenix, AZ 85069-7465
Claudia	Salmoni	13375 N Atalaya Way	Oro Valley, AZ 85755-8547
Carol	Salvati	4847 W Cheryl Dr	Glendale, AZ 85302-1816
Rosa	Sanchez	10314 W Pioneer St	Tolleson, AZ 85353-8406
Cheryl	Sarno	202 E McDowell Rd Ste 277	Phoenix, AZ 85004-4536
Dennis	Sassarini	31238 N 40th Pl	Cave Creek, AZ 85331-7881
Steve	Savitch	3255 W Calle Cereza	Tucson, AZ 85741-2969
Phillip	Schaffer	770 Gordon Dr	Kingman, AZ 86409-2917
Anita	Scheelings	PO Box 214	Skull Valley, AZ 86338-0214
Linda	Schermer	500 Mountain Lilac Dr	Sedona, AZ 86336-7416
Dean	Schlarbaum	5201 W Iron Springs Rd	Prescott, AZ 86305-7034
Justin & Li	Schmidt	1961 W Brichta Dr	Tucson, AZ 85745-1812
Kyle	Schmierer	220 W Behrend Dr	Phoenix, AZ 85027-4445
Tracy	Schneider	314 E Piute Ave	Phoenix, AZ 85024-1663
Rosann	Schott	1101 E Villa Maria Dr	Phoenix, AZ 85022-6018
Donna	Schreck	2217 E Linda Ct	Phoenix, AZ 85022-3445

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First name	Last name	Address	
Richard	Schreck	2217 E Linda Ct	Phoenix, AZ 85022-3445
Lisa	Schrempp	854 W Alameda St	Tucson, AZ 85745-2935
Gail	Schuessler	2025 E 3rd St	Tucson, AZ 85719-5104
Dorothy	Schultz	12722 W Soledad St	El Mirage, AZ 85335-8231
Mark	Schultz	4505 S Hardy Dr Apt 1141	Tempe, AZ 85282-6567
Michael	Schumm	1219 W Crystal Palace Pl	Oro Valley, AZ 85737-9051
Ashley	Schutt	15461 W Maui Ln	Surprise, AZ 85379-6066
Dorothy	Schutte	208 E Palmcroft Dr	Tempe, AZ 85282-2126
Jerry	Schutte	208 E Palmcroft Dr	Tempe, AZ 85282-2126
Harlan	Scott	805 W Glenn Dr	Phoenix, AZ 85021-8638
Teresita	Scully	14510 N Swan Rd	Tucson, AZ 85739-9128
Francine	Shacter	4301 N Camino Del Obispo	Tucson, AZ 85718-6601
Alexandra	Shelley	231 W Ashby Apple Dr	Payson, AZ 85541-2185
Sharons	Siesel	PO Box 7502	Tempe, AZ 85281-0017
Kristina	Sigrid Solheim	2222 E Seneca St	Tucson, AZ 85719-3834
Gail	Sikes	6507 E Hubbell St	Scottsdale, AZ 85257-2560
Rev. Ronald L.	Sims	1552 W Miracle Mile Unit 4	Tucson, AZ 85705-9355
Shannon	Sklut	16308 W Marconi Ave	Surprise, AZ 85388-1170
Brian	Skow	7663 E Thunderhawk Rd	Scottsdale, AZ 85255-4680
Patrick	Sloan, CPA	6702 E Cholla St	Scottsdale, AZ 85254-5113
Kevin	Small	4352 N Parkway Ave	Scottsdale, AZ 85251-4009
Barbara	Smith	7845 Country Club Dr	Pinetop, AZ 85935-8709
Jennifer	Smith	15039 S 28th St	Phoenix, AZ 85048-8942
Kenneth	Smith	7845 Country Club Dr	Pinetop, AZ 85935-8709
Phyllis	Smith	914 Paso Dr	Lake Havasu City, AZ 86406-8216
Pricilla	Smith	4662 E Linden St	Tucson, AZ 85712-3279
Linda	Snelson	1051 E Jensen St	Mesa, AZ 85203-2691
Donna	Snow	6806 W Desert Ln	Laveen, AZ 85339-2731
Peter	Sockness	5133 E Lower Stump Rd	Hereford, AZ 85615-9454
Carolyn	Sol	14401 N 27th Pl	Phoenix, AZ 85032-4976
Michael	Sorum	28150 N Alma School Pkwy	Scottsdale, AZ 85262-8048

Comment Document

First name	Last name	Address	
Lilvia	Soto	536 W Riverdale Ct	Green Valley, AZ 85614-3524
Ashley	Spencer	PO Box 7778	Mesa, AZ 85216-7778
Eric & Cedra	Spragett	4035 E Bloomfield Rd	Phoenix, AZ 85032-7411
Terri	Spurr	PO Box 85142	Tucson, AZ 85754-5142
Michael	Stabile	358 Pennsylvania Ave	Patagonia, AZ 85624
Alice & Karl	Stambaugh	8537 E Osborn Rd	Scottsdale, AZ 85251-5931
Thomas	Stander	5020 S 32nd St	Show Low, AZ 85901-7939
Alicia	Stapleton	2309 N 83rd Pl	Scottsdale, AZ 85257-2316
Donna	Stebbins	3401 W Diana Ave	Phoenix, AZ 85051-3857
Laura	Steckman	5484 N Bramble Brook Ln	Tucson, AZ 85704-1737
Donna Lee	Steele	1524 N Sunset Dr	Flagstaff, AZ 86001-1440
Bo	Stevens	5 E Cottage Ave Apt 1	Flagstaff, AZ 86001-5786
Mitch	Stevens	7661 S Avenida De Pina	Tucson, AZ 85747-9709
Sebastian	Stevenson	208 E Baseline Rd	Tempe, AZ 85283-1241
E Ann	Stewart	1205 E Camino Diestro	Tucson, AZ 85704-7923
Michelle	Stewart	2142 E La Jolla Dr	Tempe, AZ 85282-5934
Patsy	Stewart	5641 N Mina Vista	Tucson, AZ 85718-4121
Elizabeth	Stillman	3439 W Altadena Ave	Phoenix, AZ 85029-3241
Sonja	Stimmer	28248 N Tatum Blvd	Cave Creek, AZ 85331-6343
Rob	Stonecipher	3601 N 5th Ave Apt 102	Phoenix, AZ 85013-3732
Robert	Stonecipher	3601 N 5th Ave 102	Phoenix, AZ 85013-3732
Sandra	Stover	3779 N Morenci Rd	Golden Valley, AZ 86413-8124
John	Stuckey	117 W Rosa Dr	Green Valley, AZ 85614-4222
Sonja	Stupel	923 W Wanda Vista Pl	Tucson, AZ 85704-4431
Pam	Sutton	7740 E Glenrosa Ave Apt 225	Scottsdale, AZ 85251-4050
Loren	Swanson	14467 S Cholla Canyon Dr	Phoenix, AZ 85044-6176
Christina	Sweeney	17717 W Manso St	Goodyear, AZ 85338-5849
Jane	Swicegood	5050 N Campbell Ave	Tucson, AZ 85718-5934
Lindy	Swinney	914 E Palm Ln	Phoenix, AZ 85006-2115
Winnie	Taney	1909 N Talkington Dr	Flagstaff, AZ 86001-1213
Jeff	Tanner	65 Meander Way	Sedona, AZ 86336-3116
Linda	Taylor	2521 W Vereda De Las Flores	Tucson, AZ 85746-8050
Tom	Taylor	1640 N Lindsay Rd	Mesa, AZ 85213-3006

Comment Document

First name	Last name	Address	
Terry	Tedesco-Kerrick	3042 E Squaw Peak Cir	Phoenix, AZ 85016-8924
Carol	Tepper	392 N Silverbell Rd	Tucson, AZ 85745-2652
Tobey	Thatcher	3266 S Lakeside Ridge Loop	Tucson, AZ 85730-2700
Meggie	Theisen	8332 S 47th Ave	Laveen, AZ 85339-2386
Susan	Thing	2025 W Spring St	Tucson, AZ 85745-1109
Paul	Thompson	2609 W Southern Ave Lot 275	Tempe, AZ 85282-4226
Susan	Thompson	640 E Bow Maker Trl	Cottonwood, AZ 86326-4990
William	Thornton	2955 E Chula Vista Dr	Tucson, AZ 85716-2403
Janet	Tillotson	9304 E Calle De Valle Dr	Scottsdale, AZ 85255-4304
Muriel	Timmins	8081 S Carbury Way	Tucson, AZ 85747-9223
Angel	Torres	PO Box 67623	Phoenix, AZ 85082-7623
Salina	Tovar	1655 W. Jackson St. MD 126F, Room 170	Phoenix, AZ 85007
Anthony	Tripp	HC 1 Box 1378	Strawberry, AZ 85544-9750
Leon	Tsai	5480 W Sharpshooter Ct	Tucson, AZ 85743-7604
Jack & Joy	Tuber	9139 N 64th Pl	Paradise Valley, AZ 85253-1843
Michele	Tucker	8702 E Palo Verde Dr	Scottsdale, AZ 85250-6315
Jake	Turner	1630 N Euclid Ave	Tucson, AZ 85719-3918
Myrna	Uditsky	3319 E University Dr Apt 305	Mesa, AZ 85213-8715
Anita	Valdez	800 N Country Club Rd	Tucson, AZ 85716-4507
Scott	Valenti	1619 W Blaylock Dr	Phoenix, AZ 85085-6323
Patrick	Van Wormer	4701 W Thunderbird Rd	Glendale, AZ 85306-4900
Bobbie	Vandegriff	11750 E Calle Del Valle	Tucson, AZ 85749-8869
Carol	Vanprice	309 W Gilmore St	Winslow, AZ 86047-2613
Deborah	Vath	4421 N Paseo De Los Cerritos	Tucson, AZ 85745-9553
Melissa	Velazquez	2429 W Ian Pl	Tucson, AZ 85741-3739
Kent	Vella	11762 N Pyramid Point Dr	Tucson, AZ 85737-3723
Anthony	Ventriere	2711 W Cottonwood Ln	Phoenix, AZ 85045-2228
William	Venuti	9168 E Calle Luna	Gold Canyon, AZ 85118-4688
Tom	Vetter	PO Box 4390	Kayenta, AZ 86033-4390
Jennifer	Vigil	839 W Moore Rd	Oro Valley, AZ 85755-9119

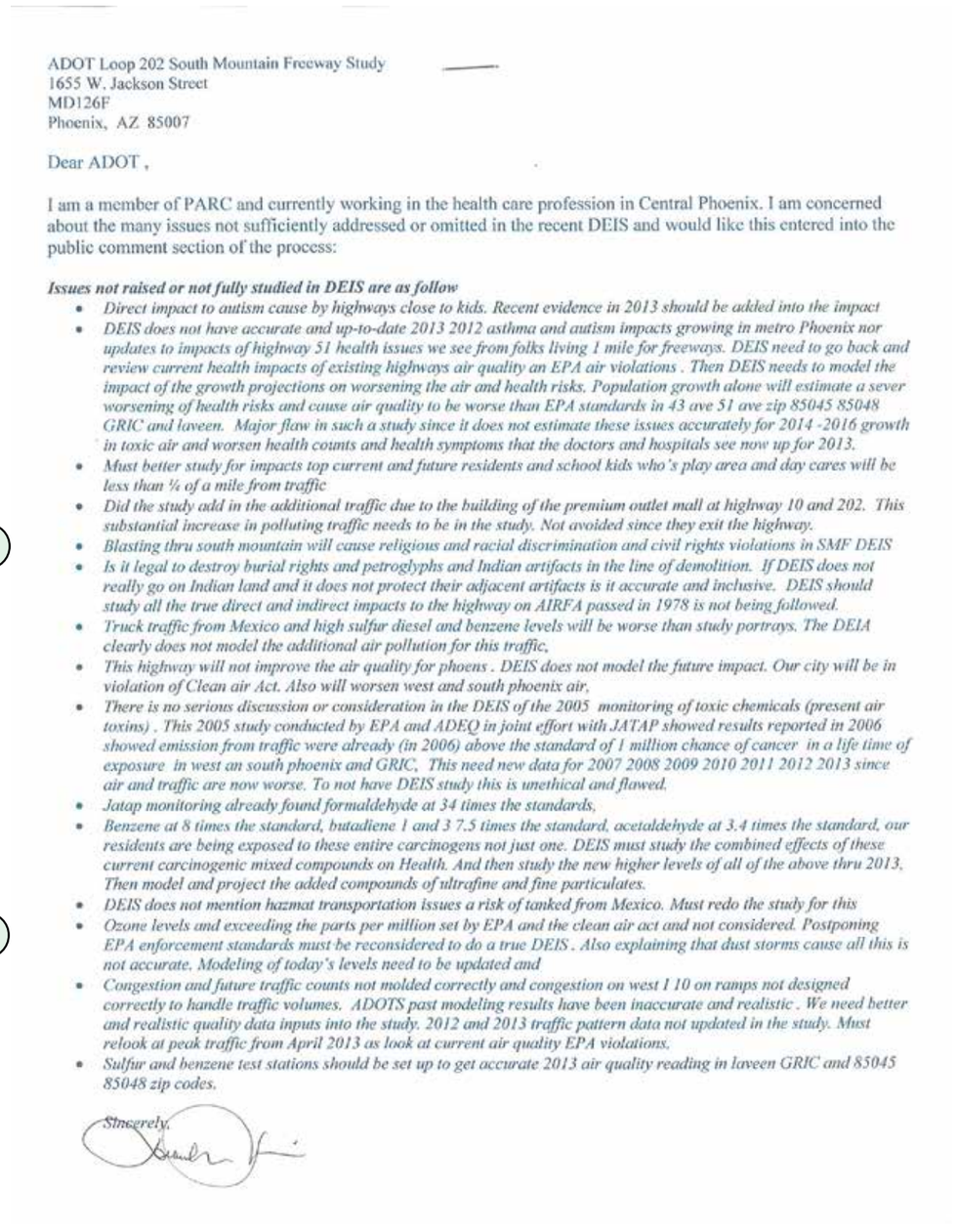
Comment Document

First name	Last name	Address	
Margie	Villaire	528 S O Leary St Apt A	Flagstaff, AZ 86001-5871
Abigail	Villodas	30610 N 63rd St	Cave Creek, AZ 85331-6000
Michele	von Kampen	6348 N 7th Ave Unit 19	Phoenix, AZ 85013-1368
Elizabeth	Wagner	4140 N 44th St	Phoenix, AZ 85018-4235
Elizabeth	Wagner	2 Northridge Cir	Wickenburg, AZ 85390-3576
George	Wagner	5627 W Chicago St	Chandler, AZ 85226-3533
Jason Michael	Walker	6920 S 74th Ln	Laveen, AZ 85339-5093
Nancy	Wall	3547 E Elida St	Tucson, AZ 85716-3208
Arthur	Walters	2510 S Hillert Dr	Cornville, AZ 86325-5031
Janice	Warnke	975 N Javalina Pl	Tucson, AZ 85748-2084
Barb	Warren	3653 N Prince Village Pl	Tucson, AZ 85719-2028
Seth	Warren	7857 W Crocus Dr	Peoria, AZ 85381-8526
Carson	Watkinson	4133 N 34th Pl	Phoenix, AZ 85018-4771
Amy	Weaver	20240 N 33rd Ave	Phoenix, AZ 85027-3060
Nancy	Weaver	PO Box 769	Bisbee, AZ 85603-0769
Nanette	Weaver	PO Box 1871	Oracle, AZ 85623-1871
Cindy	Webb	1414 S 76th Pl	Mesa, AZ 85209-3466
Jane	Webb	211 W Calle De Las Profetas	Green Valley, AZ 85614-3115
Brooke	Weber	4770 Paintbrush Ln	Flagstaff, AZ 86004-1010
Sonja	Webster	PO Box 17613	Fountain Hills, AZ 85269-7613
Charles	Weeks	4882 E Fernwood Ct	Cave Creek, AZ 85331-6374
Michael	Weinand	215 W Portland St Unit 157c	Phoenix, AZ 85003-5421
Carol	Weiss	26 Pinnacle Rd	Prescott, AZ 86305-5239
Melinda	Weisser-Lee	3864 W Kimball St	Thatcher, AZ 85552-5112
Diane	Welles	95 Horse Canyon Dr	Sedona, AZ 86351-8967
Dyane	Welt	201 W Wood Dr	Phoenix, AZ 85029-1852
Tom	Wenzel	2063 Meadowbrook Rd	Prescott, AZ 86303-5696
Celeste	Wernz	902 S Erin Ave	Tucson, AZ 85711-4864
Jane	Whitaker	7810 E Ocotillo Rd	Scottsdale, AZ 85250-4746
D.E.	Whitcomb	255 E Jacinto St	Tucson, AZ 85705-4732
Elaine	White	507 E Mitchell Dr	Phoenix, AZ 85012-2305
Ted	White	84 Neptune Ave	Bisbee, AZ 85603-1134
James	Wilkey	3544 W Grovers Ave	Glendale, AZ 85308-3217

Comment Document

First name	Last name	Address	
Cliff	Wilkinson	942 W Emerald Cir	Mesa, AZ 85210-3457
Donna	Williams	7216 E Camino Vecino	Tucson, AZ 85715-3416
Elizabeth	Williams	207 W Mountain Sage Dr	Phoenix, AZ 85045-0430
James	Willoby	3700 N 1st Ave Apt 1006	Tucson, AZ 85719-1649
Elodie	Winger	9131 N Overlook Dr	Tucson, AZ 85704-6722
Marika	Witenko	2628 N 8th St	Phoenix, AZ 85006-1007
Roslynn	Witte	26006 N. 107th Way	Scottsdale, AZ 85255
Mary & Jack	Wolter	668 Shadow Mountain Dr	Prescott, AZ 86301-5720
Haridev	Woodworth	2121 W Main St Apt 1113	Mesa, AZ 85201-9065
Alexandra	Wymetal	4960 W Calle Don Antonio	Tucson, AZ 85757-1409
Donald	Yeager	7412 E Cozy Camp Dr	Prescott Valley, AZ 86314-1971
Peggy	Yeargain-Williams	16418 E Bradford Dr	Fountain Hills, AZ 85268-2229
Kathleen & James	Yontz		
Lisa	Yorgason	523 E Osborn Rd	Phoenix, AZ 85012-2313
Roy	Zarow	2807 N Castro Ave	Tucson, AZ 85705-4465
Ed	Zimmermann	1767 N Rio Yaqui	Green Valley, AZ 85614-4043
Peter	Zurcher	4514 E Hopi St	Phoenix, AZ 85044-2454
Anonymous1			Queen Creek, AZ 85142-4919

Code	Comment Document



ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F
Phoenix, AZ 85007

Dear ADOT ,

I am a member of PARC and currently working in the health care profession in Central Phoenix. I am concerned about the many issues not sufficiently addressed or omitted in the recent DEIS and would like this entered into the public comment section of the process:

Issues not raised or not fully studied in DEIS are as follow

- *Direct impact to autism cause by highways close to kids. Recent evidence in 2013 should be added into the impact*
- *DEIS does not have accurate and up-to-date 2013 2012 asthma and autism impacts growing in metro Phoenix nor updates to impacts of highway 51 health issues we see from folks living 1 mile for freeways. DEIS need to go back and review current health impacts of existing highways air quality an EPA air violations . Then DEIS needs to model the impact of the growth projections on worsening the air and health risks. Population growth alone will estimate a sever worsening of health risks and cause air quality to be worse than EPA standards in 43 ave 51 ave zip 85045 85048 GRIC and laveen. Major flaw in such a study since it does not estimate these issues accurately for 2014 -2016 growth in toxic air and worsen health counts and health symptoms that the doctors and hospitals see now up for 2013.*
- *Must better study for impacts top current and future residents and school kids who's play area and day cares will be less than ¼ of a mile from traffic*
- *Did the study add in the additional traffic due to the building of the premium outlet mall at highway 10 and 202. This substantial increase in polluting traffic needs to be in the study. Not avoided since they exit the highway.*
- *Blasting thru south mountain will cause religious and racial discrimination and civil rights violations in SMF DEIS*
- *Is it legal to destroy burial rights and petroglyphs and Indian artifacts in the line of demolition. If DEIS does not really go on Indian land and it does not protect their adjacent artifacts is it accurate and inclusive. DEIS should study all the true direct and indirect impacts to the highway on AIRFA passed in 1978 is not being followed.*
- *Truck traffic from Mexico and high sulfur diesel and benzene levels will be worse than study portrays. The DEIA clearly does not model the additional air pollution for this traffic,*
- *This highway will not improve the air quality for phoens . DEIS does not model the future impact. Our city will be in violation of Clean air Act. Also will worsen west and south phoenix air,*
- *There is no serious discussion or consideration in the DEIS of the 2005 monitoring of toxic chemicals (present air toxins) . This 2005 study conducted by EPA and ADEQ in joint effort with JATAP showed results reported in 2006 showed emission from traffic were already (in 2006) above the standard of 1 million chance of cancer in a life time of exposure in west an south phoenix and GRIC, This need new data for 2007 2008 2009 2010 2011 2012 2013 since air and traffic are now worse. To not have DEIS study this is unethical and flawed.*
- *Jatap monitoring already found formaldehyde at 34 times the standards,*
- *Benzene at 8 times the standard, butadiene 1 and 3 7.5 times the standard, acetaldehyde at 3.4 times the standard, our residents are being exposed to these entire carcinogens not just one. DEIS must study the combined effects of these current carcinogenic mixed compounds on Health. And then study the new higher levels of all of the above thru 2013, Then model and project the added compounds of ultrafine and fine particulates.*
- *DEIS does not mention hazmat transportation issues a risk of tanked from Mexico. Must redo the study for this*
- *Ozone levels and exceeding the parts per million set by EPA and the clean air act and not considered. Postponing EPA enforcement standards must be reconsidered to do a true DEIS . Also explaining that dust storms cause all this is not accurate. Modeling of today's levels need to be updated and*
- *Congestion and future traffic counts not molded correctly and congestion on west I 10 on ramps not designed correctly to handle traffic volumes. ADOTS past modeling results have been inaccurate and realistic . We need better and realistic quality data inputs into the study. 2012 and 2013 traffic pattern data not updated in the study. Must relook at peak traffic from April 2013 as look at current air quality EPA violations.*
- *Sulfur and benzene test stations should be set up to get accurate 2013 air quality reading in laveen GRIC and 85045 85048 zip codes.*

Sincerely,

Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Draft Environmental Impact Statement page 3-27). Traffic projections are regularly updated by the Maricopa Association of Governments. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011. When the Maricopa Association of Governments adopts new socioeconomic projections and traffic projections, it will be reflected in the study documents. Key model inputs used to forecast travel demand included (see Table 3-7 on Draft Environmental Impact Statement page 3-27): · socioeconomic data based on the adopted general plans of Maricopa Association of Governments members, which includes projected growth in population, housing, and employment (including proposed commercial centers), along with economic forecasts and the existing and planned transportation infrastructure as identified by Maricopa Association of Governments members · the anticipated average number of vehicle trips within the region (including those to and from the region's households) on a daily basis (this number is tracked regularly by the Maricopa Association of Governments) · the distribution of transportation modes used by travelers in the Maricopa Association of Governments region (also tracked regularly by the Maricopa Association of Governments) · the capacity of the transportation infrastructure to accommodate regional travel · the future transportation infrastructure established using *Regional Transportation Plan*-planned projects and improvements and from known arterial street network improvements assumed to be made by the County, Cities, and private developers The Maricopa Association of Governments approved new socioeconomic projections in June 2013. The new data are presented in the Final Environmental Impact Statement (see page 1-11). Although slower growth in total vehicle miles traveled was noted, the need for the freeway did not change. The revised traffic analysis validated that the proposed project is needed today.

(Responses continue on next page)

Code	Comment Document

The previous comment was received 7 times from the following people:

First name	Last name	Address		
C	B	17012 S. 27th Lane	Phoenix, AZ	85045
Analin	Fran			
Rick	Jansing			
Ken	Lapierre			
Roger	Lapierre			
Christine	Spencer	2708 W. Cedarwood Lane	Phoenix, AZ	85045
Anonymous1				

Code	Issue	Response
3	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed on page 4-147 of the Draft Environmental Impact Statement, a programmatic agreement was developed for the project to establish a process for consultation, review, and compliance with federal and State preservation laws as the effects of the project on historic properties become known. The programmatic agreement states that any data recovery on federal lands necessitated by the project must be permitted under the Archaeological Resources Protection Act in accordance with the federal land-holding agency and that, in the event any data recovery for the project should take place on tribal lands, all applicable permits would be obtained. Because the project is proposed, a programmatic agreement is in place to address data recovery on federal and tribal lands, and no excavations have yet occurred. The proposed freeway is and will continue to be in compliance with the Archaeological Resources Protection Act.
4	**Environmental Justice/Lifestyle**	The cultural and religious importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
5	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	
7	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics.The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause substantial adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. As noted above, the carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the *Regional Transportation Plan* that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014.
10	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Alternatives, W59 Alternative Versus W101 Alternative**	
12	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analyses. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement. According to U.S. Environmental Protection Agency guidance, new monitors are not necessary to analyze air quality impacts.

Code	Comment Document

May 22, 2013
ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F
Phoenix, AZ 85045

Dear ADOT ,

I am a member of PARC and currently working in the health care profession in Central Phoenix. I am concerned about the many issues not sufficiently addressed or omitted in the recent DEIS and would like this entered into the public comment section of the process:

Issues in DEIS I learned since the May 21 meeting

1
- *Seems to me several groups for 202 freeway were bused in to the meeting to voice opinions and were backed by trucking industry. This should be investigated as to if swift transportation in Levine area is backing these folks and or paying them to speak. Can you please investigate that since they are of record in public comments?*

2
3
- *I have also learned additional facts after my statement made that day that concern me.*
- *A longtime resident on Phoenix mentioned the study done on environmental impact after 1982 (and the one in 2005) showed that there was a negative impact due to air toxins and the study found it was not environmentally safe to proceed with the highway yet no know seems to have entered these old findings up for public review. If already decide a bad outcome why is it now a revised study with a different conclusion. Please find these studied and add to the DEIS with a section on the 2005 /2006 EPA / JATAP finding from monitoring stations. Also redo that portion again to insure the current toxin level impacting our citizens. We should have a right for this to be added in the DEIS and FEIS.*

4
- *If you do major cut thru and removal of 3 to 5 ridges of South Mountain I assume the wind tunnel and wind patterns will be dramatically different and in the future will cause the wind , dust and pollution flows to be different. May cause more sulfur diesel and benzene to flow into the air and be trapped in zip codes 85045 85048 and on GRIC. The study does not seriously look at this impact with quality findings. I also am not certain that the studied the air quality and violations of EPA standards in and on GRIC and in 85045 85048 areas in 2013. Air quality on May 20, 21 ,22 23 2013 seem to be extremely bad and may have exceeded EPA. Levels also what levels above EPA standard were exceeded in 2013 at the 43 ave EPA test monitor site.*

5
- *Detail the EPA sensor air violations thru May 2013 so we all publically know what levels and issues we have before the freeway.*

2 6
- *Dust particulate impact should be study at today's levels the construction levels and post construction levels since the natural wind tunnel with be changed due to cut thru mountain ridges and opening up air toxin portal..*
- *It has been very difficult to breathe the air in 2013 in awhatukee and south leaven due to increase pollution and benzene and certainly worse that 2012 levels.*

4
- *Updated data and study still needed and more air sampling must be done and study to wind patter changes due to cutting thru mountains*

7
- *Also the DEIS needs to study the commercial development planned on the highway route. As of 5/21 several plans and public information on development are public including local politicians and business owners intended use of land leases on GRIC and truck stops and truck depots already planned. Also swift transportation truck routs and use of this highway have not been studied since there are no laws to restrict truck traffic on this freeway. Must require that camex trucks use highway 8 bypasses but no enforcement nor acknowledgment in the study to add the new camex or other illegal truck traffic can publically use this.*

8
- *Study must calculate and consider increased truck traffic from Mexico where trucks do not meet the CARB diesel standards adopted by AZ. Ignoring and assuming they won't take this faster route is seriously flawed part of DEIS study*

Issues not raised or not fully studied in DEIS are as follow

- *Direct impact to autism cause by highways close to kids. Recent evidence in 2013 should be added into the impact*

2
- *DEIS does not have accurate and up-to-date 2013 2012 asthma and autism impacts growing in metro Phoenix nor updates to impacts of highway 51 health issues we see from folks living 1 mile for freeways. DEIS need to go back and review current health impacts of existing highways air quality an EPA air violations . Then DEIS needs to model the impact of the growth projections on worsening the air and health risks. Population growth alone will estimate a sever*

Code	Issue	Response
1	**Public Involvement**	These claims were not substantiated and no unlawful acts were identified during the public comment period.
2	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause substantial adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. As noted above, the carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement).

(Response 3 continues on next page)

Code	Comment Document
2	*worsening of health risks and cause air quality to be worse than EPA standards in 43 ave 51 ave zip 85045 85048 GRIC and laveen. Major flaw in such a study since it does not estimate these issues accurately for 2014 -2016 growth in toxic air and worsen health counts and health symptoms that the doctors and hospitals see now up for 2008 20010 etc..*
7 9 10	• *Must better study for impacts top current and future residents and school kids who's play area and day cares will be less than ¼ of a mile from traffic* • *Did the study add in the additional traffic due to the building of the premium outlet mall at highway 10 and 202. This substantial increase in polluting traffic needs to be in the study. Not avoided since they exit the highway.* • *Blasting thru south mountain will cause religious and racial discrimination and civil rights violations in SMF DEIS* • *Is it legal to destroy burial rights and petroglyphs and Indian artifacts in the line of demolition. If DEIS does not really go on Indian land and it does not protect their adjacent artifacts is it accurate and inclusive. DEIS should study all the true direct and indirect impacts to the highway after its built.AIRFA passed in 1978 is not being followed nor respected.*
8 11	• *Truck traffic from Mexico and high sulfur diesel and benzene levels will be worse than study portrays. The DEIA clearly does not model the additional air pollution for this traffic,* • *This highway will not improve the air quality for phoens . DEIS does not model the future impact. Our city will be in violation of Clean air Act. Also will worsen west and south phoenix air,*
2 3	• *There is no serious discussion or consideration in the DEIS of the 2005 monitoring of toxic chemicals (present air toxins) . This 2005 study conducted by EPA and ADEQ in joint effort with JATAP showed results reported in 2006 showed emission from traffic were already (in 2006) above the standard of 1 million chance of cancer in a life time of exposure in west an south phoenix and GRIC, This need new data for 2007 2008 2009 2010 2011 2012 2013 since air and traffic are now worse. To not have DEIS study this is unethical and flawed.* • *Jatap monitoring already found formaldehyde at 34 times the standards,*
2 3	• *Benzene at 8 times the standard, butadiene 1 and 3 7.5 times the standard, acetaldehyde at 3.4 times the standard, our residents are being exposed to these entire carcinogens not just one. DEIS must study the combined effects of these current carcinogenic mixed compounds on Health. And then study the new higher levels of all of the above thru 2013, Then model and project the added compound and impacts caused by the study which will make all the toxin levels higher* • *Health risks of JATAP have been studied and need to be updated and cancer risks have been extensively published by the EPA and are well known carcenogins hurting health. The DEIS states it's uncertain of the risk proving the DEIS study is a cover-up and inaccurate denial of the facts.*
12	• *DEIS does not mention hazmat transportation issues a risk of tanked from Mexico. Must redo the study for this*
13	• *The sharp curve designed in the highway south of 85045 zip code should be reviewed for the addition risk fo truck and car crashed since it's a steep banked curve, It is fully known that the pitch slop and angles of this curve will contribute to a truck safety issue and will increase the ricks of track accidents and hazardous material spills. This extra detail is all missing from DEIS which is designed to protect and inform the public about impacts. A study of why the flaws in the DEIS need to be independently looked at as well and the influence the trucking industry is having and adot on rushing to poor judgment in this study. Independent review must be done to answer why the above points we omitted or played down and Environmental impacts since prior and current facts differ from the DEIS.*
14	• *Ozone levels and exceeding the parts per million set by EPA and the clean air act and not considered. Postponing EPA enforcement standards must be reconsidered to do a true DEIS . Also explaining that dust storms cause all this is not accurate. Modeling of today's levels need to be updated and*
15	• *Congestion and future traffic counts not molded correctly and congestion on west I 10 on ramps not designed correctly to handle traffic volumes. ADOTS past modeling results have been inaccurate and realistic . We need better and realistic quality data inputs into the study. 2012 and 2013 traffic pattern data not updated in the study. Must relook at peak traffic from April 2013 as look at current air quality EPA violations.*
16	• *Sulfur and benzene test stations should be set up to get accurate 2013 air quality reading in laveen GRIC and 85045 85048 zip codes.*
17	• *These are just some of the concerns I have after being involved in this issue for 30days.* I am a home owner and have *Working in the AZ Health care industry for the past 5 years. Please put correct facts into the study about the children's true health impacts seen today and with the new project added in.*

Ken Lapierre
Resident Phoenix AZ
Working in the AZ Health care industry for the past 5 years

Code	Issue	Response
3 (cont.)		The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
4	**Air Quality**	Air quality depends on several factors such as the area itself (size and topography), the prevailing weather patterns (meteorology and climate) and the pollutants released into the air. Cuts through the South Mountains would be expected to produce microclimate differences similar to those produced by a series of buildings in a large city which produce localized wind tunnel effects. The mountain cuts, however, would not affect regional air quality.
5	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analysis. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project, which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement. According to U.S. Environmental Protection Agency guidance, new monitors are not necessary to analyze air quality impacts.
6	**Air Quality**	Emissions from road dust and additional sources were considered in the quantitative project-level particulate matter (PM_{10}) hot-spot analysis prepared for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (beginning on page xiii) and more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
7	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Draft Environmental Impact Statement page 3-27). Traffic projections are regularly updated by the Maricopa Association of Governments. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011. When the Maricopa Association of Governments adopts new socioeconomic projections and traffic projections, it will be reflected in the study documents. Key model inputs used to forecast travel demand included (see Table 3-7 on Draft Environmental Impact Statement page 3-27):

(Response 7 continues on next page)

Code	Comment Document

The previous comment was received 6 times from the following people:

First name	Last name	Address
Ken	Lapierre	Phoenix, AZ
Ken	Lapierre	Phoenix, AZ
Ken	Lapierre	Phoenix, AZ
Ken	Lapierre	Phoenix, AZ
Ken	Lapierre	Phoenix, AZ
Ken	Lapierre	Phoenix, AZ

Code	Issue	Response
7 (cont.)		· socioeconomic data based on the adopted general plans of Maricopa Association of Governments members, which includes projected growth in population, housing, and employment (including proposed commercial centers), along with economic forecasts and the existing and planned transportation infrastructure as identified by Maricopa Association of Governments members · the anticipated average number of vehicle trips within the region (including those to and from the region's households) on a daily basis (this number is tracked regularly by the Maricopa Association of Governments) · the distribution of transportation modes used by travelers in the Maricopa Association of Governments region (also tracked regularly by the Maricopa Association of Governments · the capacity of the transportation infrastructure to accommodate regional travel · the future transportation infrastructure established using *Regional Transportation Plan*-planned projects and improvements and from known arterial street network improvements assumed to be made by the County, Cities, and private developers The Maricopa Association of Governments approved new socioeconomic projections in June 2013. The new data are presented in the Final Environmental Impact Statement (see page 1-11). Although slower growth in total vehicle miles traveled was noted, the need for the freeway did not change. The revised traffic analysis validated that the proposed project is needed today.
8	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed on page 4-147 of the Draft Environmental Impact Statement, a programmatic agreement was developed for the project to establish a process for consultation, review, and compliance with federal and State preservation laws as the effects of the project on historic properties become known. The programmatic agreement states that any data recovery on federal lands necessitated by the project must be permitted under the Archaeological Resources Protection Act in accordance with the federal land-holding agency and that, in the event any data recovery for the project should take place on tribal lands, all applicable permits would be obtained. Because the project is proposed, a programmatic agreement is in place to address data recovery on federal and tribal lands, and no excavations have yet occurred. The proposed freeway is and will continue to be in compliance with the Archaeological Resources Protection Act.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
10	**Environmental Justice/Lifestyle**	The cultural and religious importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
11	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Hazardous Materials**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
13	**Design**	All elements of the proposed freeway design are in accordance with the Arizona Department of Transportation *Roadway Design Guidelines* and the American Association of State Highway Officials, *A Policy on Geometric Design of Highways and Streets*. Emergency responders would address the construction of the proposed freeway by amending the local emergency response plan to include the facility. This would include emergency response on the road and alternative routes for diversion of traffic in the event that an incident occurred along the roadway. Information related to transport of hazardous materials is presented on Final Environmental Impact Statement page 4-166. The environmental impact statement process is an objective, interdisciplinary study of the proposed action and its potential impacts. The public hearing process of the environmental impact statement allows all interested members of the public or agencies to review, research, and comment on any and all aspects of the study process. All comments will be considered in the environmental impact statement process.
14	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the *Regional Transportation Plan* that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014.
15	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
16	**Alternatives, W59 Alternative Versus W101 Alternative**	
17	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analyses. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement. According to U.S. Environmental Protection Agency guidance, new monitors are not necessary to analyze air quality impacts.

Code	Comment Document

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F
Phoenix, AZ 85007

Dear ADOT ,

I am a member of PARC and feel many issues not addressed or omitted in the recent DEIS. I would like the following issues entered into the public comment section:

- *This highway will not improve the air quality for phoenix . DEIS does not model the future impact accurately. Our city will be in violation of Clean air Act. Also will worsen west and south phoenix air.* (1)
- *Ozone levels today are exceeding the standard parts per million set by EPA and the clean air act and not considered to get worse in this study. Postponing EPA enforcement standards must be reconsidered to do a true DEIS . Also explaining that dust storms cause all this is not accurate.* (2)
- *Study must consider increased truck traffic from Mexico where trucks do not meet the CARB diesel standards adopted by AZ. Ignoring and assuming they won't take this faster route is seriously flawed part of DEIS study* (3)
- *There is a need to study the Swift transportation truck routes and use of this highway have not been studied since there are no laws to restrict truck traffic on this freeway. No enforcement nor acknowledgment in the study reviews the new camex traffic or other illegal truck traffic will now drive on this faster new highway. .* (1)
- *Population growth alone will estimate a severe worsening of health risks and cause air quality to be worse than EPA standards in 43 ave 51 ave zip 85045 85048 GRIC and laveen.* (4)
- *Address impacts to school kids whose play area and day cares will be less than ¼ of a mile from traffic* (5)
- *Did the study add in the new additional traffic due to the building of the premium outlet mall at 10 and 202. .* (6)
- *Blasting thru south mountain will cause religious and racial discrimination and civil rights violations in SMF DEIS Is it legal to destroy burial rights and petroglyphs and Indian artifacts in the line of demolition. DEIS should have to study all the true direct and indirect impacts to the highway after its built.AIRFA passed in 1978 is not being followed nor respected.* (7)
- *Truck traffic from Mexico and high sulfur diesel and benzene levels will be worse than study portrays. The DEIA clearly does not model the additional air pollution for this traffic,* (3)
- *There is no serious consideration in the DEIS of the 2005 monitoring of toxic chemicals (present air toxins) . This 2005 study conducted by EPA and ADEQ in joint effort with JATAP showed results reported in 2006 showed emission from traffic were already (in 2006) above the standard of 1 million chance of cancer in a lifetime of exposure in west an south phoenix and GRIC, This need new data for 2007 2008 2009 2010 2011 2012 2013 since air and traffic are now worse. To not have DEIS study this is unethical and flawed.* (8)
- *Jatap monitoring already found formaldehyde at 34 times the standards,*
- *Benzene at 8 times the standard, butadiene 1 and 3 7.5 times the standard, acetaldehyde at 3.4 times the standard, our residents are being exposed to these entire carcinogens not just one. DEIS must study the combined effects of these current carcinogenic mixed compounds on Health. And then study the new higher levels of all of the above thru 2013, Then model and project the added issue when compounds are mixed.*
- *Health risks of JATAP have been studied and need to be updated and cancer risks have been extensively published by the EPA and are well known carcinogens hurting health.*
- *DEIS does not mention hazmat transportation issues a risk of tanked from Mexico. Must redo the study for this* (9)
- *The designed sharp curve in the highway south of 85045 zip code should be reviewed for the addition risks It is fully known that the pitch slope and angles of this curve will contribute to a truck safety issue and will increase the risks of track accidents and hazardous material spills. This extra detail is all missing from DEIS.* (10)
- *Ozone, Sulfur and benzene test stations should be set up to get accurate 2013 air quality sample readings in Laveen GRIC, Ahwatukee and Chandler.* (11)

Thank you,

Frank J. Kobylecki

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for particulate matter (PM_{10}) for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the U.S. Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).
2	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the *Regional Transportation Plan* that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014.
3	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Health Effects**	

(Responses continue on next page)

Code	Comment Document

The previous comment was received 7 times from the following people:

First name	Last name	Address		
Susan	Emanuel	16814 S. Coleman Street	Phoenix, AZ	85045
Perry	Jan			
Frank	Kobyleski	16839 S. Coleman Street	Phoenix, AZ	85045
Ken	Lapierre	16637 S. 27th Lane	Phoenix, AZ	85045
Deborah	Lapierre	16637 S. 27th Lane	Phoenix, AZ	85045
	Luper			
Rafeal	Olary			

Code	Issue	Response
5	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Draft Environmental Impact Statement page 3-27). Traffic projections are regularly updated by the Maricopa Association of Governments. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011. When the Maricopa Association of Governments adopts new socioeconomic projections and traffic projections, it will be reflected in the study documents. Key model inputs used to forecast travel demand included (see Table 3-7 on Draft Environmental Impact Statement page 3-27): · socioeconomic data based on the adopted general plans of Maricopa Association of Governments members, which includes projected growth in population, housing, and employment (including proposed commercial centers), along with economic forecasts and the existing and planned transportation infrastructure as identified by Maricopa Association of Governments members · the anticipated average number of vehicle trips within the region (including those to and from the region's households) on a daily basis (this number is tracked regularly by the Maricopa Association of Governments) · the distribution of transportation modes used by travelers in the Maricopa Association of Governments region (also tracked regularly by the Maricopa Association of Governments · the capacity of the transportation infrastructure to accommodate regional travel · the future transportation infrastructure established using *Regional Transportation Plan*-planned projects and improvements and from known arterial street network improvements assumed to be made by the County, Cities, and private developers The Maricopa Association of Governments approved new socioeconomic projections in June 2013. The new data are presented in the Final Environmental Impact Statement (see page 1-11). Although slower growth in total vehicle miles traveled was noted, the need for the freeway did not change. The revised traffic analysis validated that the proposed project is needed today.
6	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed on page 4-147 of the Draft Environmental Impact Statement, a programmatic agreement was developed for the project to establish a process for consultation, review, and compliance with federal and State preservation laws as the effects of the project on historic properties become known. The programmatic agreement states that any data recovery on federal lands necessitated by the project must be permitted under the Archaeological Resources Protection Act in accordance with the federal land-holding agency and that, in the event any data recovery for the project should take place on tribal lands, all applicable permits would be obtained. Because the project is proposed, a programmatic agreement is in place to address data recovery on federal and tribal lands, and no excavations have yet occurred. The proposed freeway is and will continue to be in compliance with the Archaeological Resources Protection Act.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Environmental Justice/Lifestyle**	The cultural and religious importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause substantial adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. As noted above, the carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
9	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Design**	All elements of the proposed freeway design are in accordance with the Arizona Department of Transportation's *Roadway Design Guidelines* and the American Association of State Highway and Transportation Officials' *A Policy on Geometric Design of Highways and Streets*. Emergency responders would address the construction of the proposed freeway by amending the local emergency response plan to include the facility. This would include emergency response on the road and alternative routes for diversion of traffic in the event that an incident occurred along the road. Information related to transport of hazardous materials is presented on Final Environmental Impact Statement page 4-166.
11	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analysis. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project, which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement. According to U.S. Environmental Protection Agency guidance, new monitors are not necessary to analyze air quality impacts.

Code	Comment Document

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F
Phoenix, AZ 85007

Dear ADOT ,

I am a member of PARC and feel many issues not addressed or omitted in the recent DEIS. I would like the following issues entered into the public comment section:

Issues in DEIS

1. *Ozone levels today are exceeding the standard parts per million set by EPA and the clean air act and not considered to get worse in this study. Postponing EPA enforcement standards must be reconsidered to do a true DEIS . Also explaining that dust storms cause all this is not accurate. Modeling of today's air levels needs to be updated and relooked at accurately.* (1)
2. *Study must calculate and consider increased truck traffic from Mexico where trucks do not meet the CARB diesel standards adopted by AZ. Ignoring and assuming they won't take this faster route is seriously flawed part of DEIS study* (2)
3. *Also the DEIS needs to study the commercial development planned on the highway route. As of 5/21 several plans and public information on development are public including local business owners intended use of land leases on GRIC and truck stops and truck depots already planned. Also swift transportation truck routes and use of this highway have not been studied since there are no laws to restrict truck traffic on this freeway. Must require that camex trucks use highway 8 bypasses only but no enforcement nor acknowledgment in the study reviews the new camex traffic or other illegal truck traffic will now drive on this faster new highway. .* (3) (2)
4. *Direct impact to autism cause by highways built close to kids. Recent evidence already exists in 2013/2012 should be added into the impact and not avoided. DEIS does not have accurate and up-to-date 2013 2012 asthma and autism impacts growing in metro Phoenix nor updates to impacts of highway 51 health issues we see from folks living 1 mile for freeways.*
5. *DEIS need to go back and review current health impacts of existing highways air quality an EPA air violations. Then DEIS needs to model the impact of the growth projections on worsening the air and health risks.* (4)
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7. *Must better study for impacts to current and future residents and school kids whose play area and day cares will be less than ¼ of a mile from traffic*
8. *Did the study add in the additional traffic due to the building of the premium outlet mall at highway 10 and 202. This substantial increase in polluting traffic needs to be in the study. Not avoided since they exit the highway.* (3)
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4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

air toxins) . This 2005 study conducted by EPA and ADEQ in joint effort with JATAP showed results reported in 2006 showed emission from traffic were already (in 2006) above the standard of 1 million chance of cancer in a life time of exposure in west an south phoenix and GRIC, This need new data for 2007 2008 2009 2010 2011 2012 2013 since air and traffic are now worse. To not have DEIS study this is unethical and flawed.

8 4

13. *Jatap monitoring already found formaldehyde at 34 times the standards,*
14. *Benzene at 8 times the standard, butadiene 1 and 3 7.5 times the standard, acetaldehyde at 3.4 times the standard, our residents are being exposed to these entire carcinogens not just one. DEIS must study the combined effects of these current carcinogenic mixed compounds on Health. And then study the new higher levels of all of the above thru 2013, Then model and project the added compound and impacts caused by the study which will make all the toxin levels higher*
15. *Health risks of JATAP have been studied and need to be updated and cancer risks have been extensively published by the EPA and are well known carcinogens hurting health. The DEIS states it's uncertain of the risk proving the DEIS study is a cover-up and inaccurate denial of the facts.*

9 2 10

16. *DEIS does not mention hazmat transportation issues a risk of tanked from Mexico. Must redo the study for this*
17. *The sharp curve designed in the highway south of 85045 zip code should be reviewed for the addition risk for truck and car crashed since it's a steep banked curve, It is fully known that the pitch slope and angles of this curve will contribute to a truck safety issue and will increase the risks of track accidents and hazardous material spills. This extra detail is all missing from DEIS which is designed to protect and inform the public about impacts. A study of why the flaws in the DEIS need to be independently looked at as well and the influence the trucking industry is having and adot on rushing to poor judgment in this study. Independent review must be done to answer why the above points we omitted or played down and Environmental impacts since prior and current facts differ from the DEIS.*

11 3

18. *Congestion and future traffic counts not molded correctly and congestion on west I 10 on ramps not designed correctly to handle traffic volumes. ADOTS past modeling results have been inaccurate and realistic . We need better and realistic quality data inputs into the study. 2012 and 2013 traffic pattern data not updated in the study. Must relook at peak traffic from April 2013 as look at current air quality EPA violations.*

12

19. *Sulfur and benzene test stations should be set up to get accurate 2013 air quality reading in laveen GRIC and Ahwatukee and Chandler who are directly going to be impacted by this as well.*

13

20. *If you do major cut thru and removal of 3 to 5 ridges of South Mountain I assume the wind tunnel and wind patterns will be dramatically different and in the future will cause the wind , dust and pollution flows to be different. May cause more sulfur diesel and benzene to flow into the air and be trapped in zip codes 85045 85048 and on GRIC. The study does not seriously look at this impact with quality findings. I also am not certain that the studied the air quality and violations of EPA standards 2013 and may have exceeded EPA. Detail the EPA sensor air violations thru May 2013 so we all publically know what levels and issues we have before the freeway.*

12

8 14

21. *Dust particulate impact should be study at today's levels the construction levels and post construction levels since the natural wind tunnel with be changed due to cut thru mountain ridges and opening up air toxin portal.. What levels above EPA standard were exceeded in 2013 at the 43 ave EPA test monitor site.*
22. *It has been very difficult to breathe the air in 2013 in awhatukee and south leaven due to increase pollution and benzene and certainly worse than 2012 levels and worse thaqn what was identified inthe DEIS.*

12

23. *Updated data and study still needed and more air sampling must be done and study to wind pattern changes due to cutting thru mountains*

Sincerely concerned,

YUWEI QI

2810 W. WINDSONG DR.
PHOENIX, AZ 85045

Code	Issue	Response
5	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed on page 4-147 of the Draft Environmental Impact Statement, a programmatic agreement was developed for the project to establish a process for consultation, review, and compliance with federal and State preservation laws as the effects of the project on historic properties become known. The programmatic agreement states that any data recovery on federal lands necessitated by the project must be permitted under the Archaeological Resources Protection Act in accordance with the federal land-holding agency and that, in the event any data recovery for the project should take place on tribal lands, all applicable permits would be obtained. Because the project is proposed, a programmatic agreement is in place to address data recovery on federal and tribal lands, and no excavations have yet occurred. The proposed freeway is and will continue to be in compliance with the Archaeological Resources Protection Act.
6	**Environmental Justice/Lifestyle**	The cultural and religious importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based upon the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

The previous comment was received 8 times from the following people:

First name	Last name	Address		
Lon	Edgar		Phoenix, AZ	85050
Ron	Fortre		Phoenix, AZ	85051
Daniel	Jeffries	16835 S. Coleman Street	Phoenix, AZ	85047
Ralph	Kentele		Phoenix, AZ	85052
Alex	Laper		Phoenix, AZ	85049
Yuwzi	Qi	2810 W. Windsong Drive	Phoenix, AZ	85045
Moraci	Ranganathan	16633 S. 27th Lane	Phoenix, AZ	85046
Daniel	Senly		Phoenix, AZ	85053

Code	Issue	Response
7	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause substantial adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. As noted above, the carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
9	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Design**	All elements of the proposed freeway design are in accordance with the Arizona Department of Transportation's *Roadway Design Guidelines* and the American Association of State Highway and Transportation Officials' *A Policy on Geometric Design of Highways and Streets*. Emergency responders would address the construction of the proposed freeway by amending the local emergency response plan to include the facility. This would include emergency response on the road and alternative routes for diversion of traffic in the event that an incident occurred along the road. Information related to transport of hazardous materials is presented on Final Environmental Impact Statement page 4-166.
11	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analyses. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project, which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement. According to U.S. Environmental Protection Agency guidance, new monitors are not necessary to analyze air quality impacts.
13	**Air Quality**	Air quality depends on several factors such as the area itself (size and topography), the prevailing weather patterns (meteorology and climate) and the pollutants released into the air. Cuts through the South Mountains would be expected to produce microclimate differences similar to those produced by a series of buildings in a large city which produce localized wind tunnel effects. The mountain cuts, however, would not affect regional air quality.
14	**Air Quality**	Emissions from road dust and additional sources were considered in the quantitative project-level particulate matter (PM_{10}) hot-spot analysis prepared for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

Code	Comment Document

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F
Phoenix, AZ 85007

Dear ADOT ,

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Issues in DEIS

- *DEIS panel needs to go back and review total current health impacts of existing highways air quality an EPA air violations. Then DEIS needs to model the impact of the growth projections on worsening the air and health risks. Assumptions made in study are understating the impacts and are unrealistic.* (1)
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	Thank you, ,

Code	Issue	Response
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(Responses continue on next page)

Code	Comment Document

The previous comment was received 4 times from the following people:

First name	Last name	Address
Gene	Marc	4631 E. Thomas Road Phoenix, AZ 85018
Alice	Marc	
Midmuller Family		
Anonymous		

Code	Issue	Response
8	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause substantial adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. As noted above, the carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
9	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Design**	All elements of the proposed freeway design are in accordance with the Arizona Department of Transportation's *Roadway Design Guidelines* and the American Association of State Highway and Transportation Officials' *A Policy on Geometric Design of Highways and Streets*. Emergency responders would address the construction of the proposed freeway by amending the local emergency response plan to include the facility. This would include emergency response on the road and alternative routes for diversion of traffic in the event that an incident occurred along the road. Information related to transport of hazardous materials is presented on Final Environmental Impact Statement page 4-166.
11	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analyses. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project, which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement. According to U.S. Environmental Protection Agency guidance, new monitors are not necessary to analyze air quality impacts.

Code	Comment Document
1	Dear Arizona Department of Transportation: I support building the South Mountain Freeway. The freeway expansion would help in reducing traffic congestion on our existing freeways and streets, plus create thousands of jobs and pump millions of dollars into our economy. Please build the South Mountain Freeway. Sincerely, THE KASLER FAMILY 4064 E CLUBVIEW DR GILBERT, AZ 85298 4802846424

Code	Issue	Response
1		**Comment noted.**

Comment Document

The previous comment was received 4,678 times from the following people:

Last Name	Address			
ABBOTT	200 W HERMOSA DR 2N101	TEMPE	AZ	85283
ABBOTT	1246 E EL PARQUE DR	TEMPE	AZ	85282
ABBOTT	16725 W TAYLOR ST	GOODYEAR	AZ	85338
ABDO	8812 N 105TH AVE	PEORIA	AZ	85345
ABERNATHY	13211 W JADESTONE DR	SUN CITY WEST	AZ	85375
ABRAHAM	14419 W CORONADO RD	GOODYEAR	AZ	85395
ABRAHAM	25801 S FLAME TREE DRIVE	CHANDLER	AZ	85248
ACOSTA	1836 W BURGESS LN	PHOENIX	AZ	85041
ACOSTA	8231 S CALLE SAHUARO	TEMPE	AZ	85283
ADAMACHE	7726 W JENAN DR	PEORIA	AZ	85345
ADAMS	4369 E HUBBELL ST	PHOENIX	AZ	85008
ADAMS	44 S GREENFIELD RD 22	MESA	AZ	85206
ADAMS	4537 W GUMINA AVENUE	LAVEEN	AZ	85339
ADAMS	4857 S SUMMIT CT	GILBERT	AZ	85298
ADAMS	7220 W HEARN RD	PEORIA	AZ	85381
ADAMS	13507 W ROBIN LN	SUN CITY WEST	AZ	85375
ADAMS	2106 E LOMA VISTA DR	TEMPE	AZ	85282
ADAMS	809 E CARSON RD	PHOENIX	AZ	85042
ADAMSEN	1852 E AUBURN DRIVE	TEMPE	AZ	85283
ADDISON	13810 W VIA TERCERO	SUN CITY WEST	AZ	85375
ADEE	6271 W LONE CACTUS DR	GLENDALE	AZ	85308
ADETOKUNBO	3103 S VINEYARD	MESA	AZ	85210
ADEYEMO	17763 W BLOOMFI	SURPRISE	AZ	85388
ADINDU	1422 W JOAN DE ARC	PHOENIX	AZ	85029
AGANON	2642 E BROOKWOOD CT	PHOENIX	AZ	85048
AGRAWAL	1631 W MUSKET WAY	CHANDLER	AZ	85286
AGUILAR	1557 E FLOSSMOOR CIR	MESA	AZ	85204
AGUIRRE	1918 W COLTER ST	PHOENIX	AZ	85015
AGUIRRE	25 W WHYMAN AVE	AVONDALE	AZ	85323
AHRENSMEYER	1262 W MENDOZA AVE	MESA	AZ	85202
AIROLA	3107 W SAN MIGUEL AVE	PHOENIX	AZ	85017
ALBANO	19929 N PALO BREA CT	SURPRISE	AZ	85374
ALBIN	11206 W CAMBRIDGE AVE	AVONDALE	AZ	85392

Comment Document

Last Name	Address			
ALBOLIRAS	2211 E CAMELBACK RD 403	PHOENIX	AZ	85016
ALCOCER	13628 W MEDLOCK DR	LITCHFIELD PARK	AZ	85340
ALCORN	2123 E CANYON PL	CHANDLER	AZ	85249
ALDAY	1734 W TONTO ST	PHOENIX	AZ	85007
ALDINI	9343 S HAZELTON LANE	TEMPE	AZ	85284
ALDREDGE	1730 E JACOB STREET	PHOENIX	AZ	85034
ALDRICH	6322 E PINCHOT AVE	SCOTTSDALE	AZ	85251
ALDRICH	2811 E AZALEA DR	CHANDLER	AZ	85286
ALEJANDRO-MIRANDA	2626 S 85TH DR	TOLLESON	AZ	85353
ALETOR	12922 W PALM LN	AVONDALE	AZ	85392
ALEXANDER	15522 W FAIRMOUNT AVE	GOODYEAR	AZ	85395
ALEXANDER	15870 W CENTRAL ST	SURPRISE	AZ	85374
ALEXANDER	6342 N 47TH AVE	GLENDALE	AZ	85301
ALEXANDER	801 W DIAMOND DR	TEMPE	AZ	85283
ALEXANDER	15112 N 73RD AVE	PEORIA	AZ	85381
ALFARO	3206 S 99TH DRIVE	TOLLESON	AZ	85353
ALFONSO	20979 E DESERT HILLS BLVD	QUEEN CREEK	AZ	85142
ALFONSO	12529 W BAJADA RD	PEORIA	AZ	85383
ALKEMA	15810 S 27TH PL	PHOENIX	AZ	85048
ALKIRE	1325 N 24TH ST	MESA	AZ	85213
ALL	3860 E PINON CT	GILBERT	AZ	85234
ALLEN	14669 N 174TH DR	SURPRISE	AZ	85388
ALLEN	16739 W YAVAPAI ST	GOODYEAR	AZ	85338
ALLEN	26448 N 84TH AV	PEORIA	AZ	85383
ALLEN	514 W HARRISON ST	CHANDLER	AZ	85225
ALLEN	8136 E SUGARLOAF CIR	MESA	AZ	85207
ALLEN	10253 W DESERT HILLS DR	SUN CITY	AZ	85351
ALLEN	5830 S CLARK DR	TEMPE	AZ	85283
ALLEN	2017 E MARSHALL	PHOENIX	AZ	85016
ALLISON	9338 S DATELAND DR	TEMPE	AZ	85284
ALMADA	1351 N PLEASANT DR 2040	CHANDLER	AZ	85225
AL-NAKIB	2340 N 123RD DR	AVONDALE	AZ	85392
ALONZO	14732 W PICCADILLY RD	GOODYEAR	AZ	85395

Comment Document				
Last Name	**Address**			
ALPER	6319 S ROCKFORD DRIVE	TEMPE	AZ	85283
ALTIERI JURKOVIC	10425 E CHAMPAGNE DR	CHANDLER	AZ	85248
ALTRINGER	11066 W TONTO LN	SUN CITY	AZ	85373
ALVARADO	4337 N 58TH DR	PHOENIX	AZ	85031
ALVARADO	6432 W SOPHIE LN	LAVEEN	AZ	85339
ALVAREZ	3240 E MCKINLEY ST	PHOENIX	AZ	85008
AMADEO	12600 W ROANOKE AVE	AVONDALE	AZ	85392
AMADOR	7643 W MESCAL ST	PEORIA	AZ	85345
AMARO	4523 W PALM LN	PHOENIX	AZ	85035
AMARO	409 S 123RD LN	AVONDALE	AZ	85323
AMATO	1943 E BELLERIVE DRIVE	CHANDLER	AZ	85249
AMES	8818 E MARYLAND AVENUE	CHANDLER	AZ	85248
AMOLS	3629 E INDIGO CIR	MESA	AZ	85205
AMPUERO	16104 W WOODLANDS AVE	GOODYEAR	AZ	85338
ANASTASION	4202 E BROADWAY RD 78	MESA	AZ	85206
ANAYA	17633 N LOST MINE LN	SURPRISE	AZ	85374
ANAYA	5716 S 21ST AVENUE	PHOENIX	AZ	85041
ANCHONDO	5621 N 46TH AVE	GLENDALE	AZ	85301
ANDERSON	10202 W AVENIDA CORDONIZ	PHOENIX	AZ	85037
ANDERSON	1077 E CAROB DR	CHANDLER	AZ	85286
ANDERSON	1361 W ESCARPA ST	MESA	AZ	85201
ANDERSON	13783 W CARIBBEAN LN	SURPRISE	AZ	85379
ANDERSON	1819 W ROVEY AVE	PHOENIX	AZ	85015
ANDERSON	2305 E CAIRO DR	TEMPE	AZ	85282
ANDERSON	3425 E CHEROKEE ST	PHOENIX	AZ	85044
ANDERSON	500 N ROOSEVELT AVENUE #3	CHANDLER	AZ	85226
ANDERSON	6119 W MEGAN STREET	CHANDLER	AZ	85226
ANDERSON	11060 W OAK RIDGE RD	SUN CITY	AZ	85351
ANDERSON	15134 W BOCA RATON RD	SURPRISE	AZ	85379
ANDERSON	2228 LEISURE WORLD	MESA	AZ	85206
ANDERSON	35 W BROWN RD 373	MESA	AZ	85201
ANDERSON	3579 E KESLER LN	GILBERT	AZ	85295
ANDERSON	8331 N 105TH DR	PEORIA	AZ	85345
ANDRADE	10421 W MIAMI STREET	TOLLESON	AZ	85353
ANDRADE	2004 N 103RD DRIVE	AVONDALE	AZ	85392

Comment Document				
Last Name	**Address**			
ANDRADE	4008 N 79TH LN	PHOENIX	AZ	85033
ANDRES	6131 E QUARTZ CIR	MESA	AZ	85215
ANDREW	2015 S LAS PALMAS	MESA	AZ	85202
ANDREWS	11617 S 46TH STREET	PHOENIX	AZ	85044
ANDREWS	5930 E FOUNTAIN ST	MESA	AZ	85205
ANDRUSS	26201 S NOTTINGHAM DR	CHANDLER	AZ	85248
ANGEL	4829 E BRILL ST	PHOENIX	AZ	85008
ANGER	6268 S PINALENO PLACE	CHANDLER	AZ	85249
ANGUIANO	4632 N 85TH DR	PHOENIX	AZ	85037
ANGUIANO	61 W 10TH AVE	MESA	AZ	85210
ANTONLADES	14388 W CAMERON DR	SURPRISE	AZ	85379
APPLEBY	7012 N 80TH DR	GLENDALE	AZ	85303
APPLETON	8038 S 25TH ST	PHOENIX	AZ	85042
APPLETON-SHAPIRO	19748 N JOJOBA CT	SURPRISE	AZ	85374
AQUINO	17401 W HOLLAND LN	SURPRISE	AZ	85388
AQUINO	1712 W TAMARISK ST	PHOENIX	AZ	85041
ARANA	4834 S 4TH STREET	PHOENIX	AZ	85040
ARANDA	5820 N 70TH AVE	GLENDALE	AZ	85303
ARBUCKLE	702 W GREENTREE DRIVE	CHANDLER	AZ	85225
ARBUCKLE-WASHINGTON	4802 N 19TH AVE B106	PHOENIX	AZ	85015
ARCHER	8811 W GIBSON LN	TOLLESON	AZ	85353
ARCHER	9205 E OMEGA ST 1551	MESA	AZ	85207
AREVALO	11002 W GRANADA ROAD	AVONDALE	AZ	85392
ARGUETA-HARO	5132 E SALINAS ST	PHOENIX	AZ	85044
ARMENTA	6970 W PIERSON ST	PHOENIX	AZ	85033
ARMENTA	728 S DALEY	MESA	AZ	85204
ARMSTRONG	5736 E EDGEMONT AVE	SCOTTSDALE	AZ	85257
ARMSTRONG	14331 W COLT LN	SUN CITY WEST	AZ	85375
ARNDT	7559 W SUNNYSIDE DR	PEORIA	AZ	85345
ARNIERI	3452 N SAPPHIRE CIR	MESA	AZ	85215
ARONSON	2121 W MAIN STREET #2028	MESA	AZ	85201
AROZ	3309 N 87TH DRIVE	PHOENIX	AZ	85037
ARREDONDO	4229 N 73RD AVE	PHOENIX	AZ	85033
ARROWSMITH	3155 E BACKUS RD	MESA	AZ	85213

Comment Document				
Last Name	**Address**			
ARTHUR	3823 W GARDENIA AVE	PHOENIX	AZ	85051
ASAD	3625 E BLUEBIRD PLACE	CHANDLER	AZ	85286
ASCHENDORF	20206 N 126TH AVE	SUN CITY WEST	AZ	85375
ASHLEY	5333 E DELTA AVE	MESA	AZ	85206
ATCHLEY	3239 S LEBANON LANE	TEMPE	AZ	85282
ATIENZA-ALFEREZ	2114 E OSBORN RD	PHOENIX	AZ	85016
ATKINS	18070 W SAMMY WAY	SURPRISE	AZ	85374
ATKINSON	1527 W LAWRENCE RD	PHOENIX	AZ	85015
ATZ	2401 W SOUTHERN AVENUE #6	TEMPE	AZ	85282
AULT	9955 W DEVONSHIRE AVE	PHOENIX	AZ	85037
AULT	3829 E CAMBRIDGE AVE	PHOENIX	AZ	85008
AUSTIN	14416 W POWDERHORN DR	SURPRISE	AZ	85374
AUSTIN	1940 E SHARON DR	PHOENIX	AZ	85022
AUSTIN	2639 N 28TH PL	PHOENIX	AZ	85008
AUSTIN	3820 E MULBERRY DR	PHOENIX	AZ	85018
AVALOS	2040 N 40TH DR	PHOENIX	AZ	85009
AVENDANO	6509 W PAPAGO COURT	PHOENIX	AZ	85043
AVERY	1821 E JULIE DR	TEMPE	AZ	85283
AVERY	2116 W CATALINA DR	PHOENIX	AZ	85015
AVILA	6514 N MARYLAND CIR	PHOENIX	AZ	85013
AVILA	110S E YUMA ST	PHOENIX	AZ	85034
AVILLA	1604 E WILLETA ST	PHOENIX	AZ	85006
AYALA	8374 W MARYLAND AVE	GLENDALE	AZ	85305
BACA	15381 W WINDSOR	GOODYEAR	AZ	85395
BACA	46 W IVY GLEN ST	MESA	AZ	85201
BACH	10342 W TALISMAN RD	SUN CITY	AZ	85351
BACH AGHA	3625 E RAY ROAD #2004	PHOENIX	AZ	85044
BACKS	2425 N 83RD LN	PHOENIX	AZ	85037
BADGLEY	4520 W GUMINA AVE	LAVEEN	AZ	85339
BADRICK	345 W WILSHIRE DR	PHOENIX	AZ	85003
BAGGETT	165 W IRONWOOD DR	CHANDLER	AZ	85225
BAIER	5 E GREENTREE DR	TEMPE	AZ	85284
BAILEY	1817 N 38TH PL	PHOENIX	AZ	85008
BAILEY	3246 E IRWIN AVE	MESA	AZ	85204
BAILEY	4721 E ESCONDIDO AVE	MESA	AZ	85206

Comment Document				
Last Name	**Address**			
BAILEY	7524 S 31ST PLACE	PHOENIX	AZ	85042
BAILEY	12422 S POTOMAC ST	PHOENIX	AZ	85044
BAINES	16636 N 174TH AVE	SURPRISE	AZ	85388
BAIRD	125 E RIVIERA OR	TEMPE	AZ	85282
BAIRD	264 N 54TH ST	MESA	AZ	85205
BAISLEY	1626 E GARNET AVE	MESA	AZ	85204
BAKER	2120 E IVY ST	MESA	AZ	85213
BAKER	21716 N 92ND AVE	PEORIA	AZ	85385
BAKER	317 S 58TH PL	MESA	AZ	85206
BAKER	7450 E MCKELLIPS RD	SCOTTSDALE	AZ	85257
BAKER	759 E JOSEPH CT	GILBERT	AZ	85295
BAKER	3925 E FRYE RD	PHOENIX	AZ	85048
BAKER	4538 E CAVALRY DR	GILBERT	AZ	85297
BAKKEN	2345 E INVERNESS AVE	MESA	AZ	85204
BALL	8929 W CUSTER LN	PEORIA	AZ	85381
BALLA	13721 W ROBERTSON DR	SUN CITY WEST	AZ	85375
BALLANCE	7402 W ALEXANDRIA WAY	PEORIA	AZ	85381
BALLEJOS	2355 S WESTWOOD	MESA	AZ	85210
BALLENTINE	1650 N 87TH TER 28A	SCOTTSDALE	AZ	85257
BALLING	3213 W LAURIE LN	PHOENIX	AZ	85051
BALLOU	2929 E MAIN ST 275	MESA	AZ	85213
BALSLEY	16007 W KINO DR	SURPRISE	AZ	85374
BANDA	1401 E WINSTON DR	PHOENIX	AZ	85042
BANERJEE	2043 E CLUBHOUSE DRIVE	PHOENIX	AZ	85048
BANERJEE	4432 E SAGITTARIUS PL	CHANDLER	AZ	85249
BANES	2102 E FAIRMOUNT AVE	PHOENIX	AZ	85016
BANKS	5222 S 5TH ST	PHOENIX	AZ	85040
BANNOCHIE	15915 W MULBERRY DR	GOODYEAR	AZ	85395
BARAJAS ESTRADA	1127 W PEORIA AVE	PEORIA	AZ	85029
BARANY	8427 W ESCUDA DR	PEORIA	AZ	85382
BARCUS	11275 N 99TH AVE	PEORIA	AZ	85345
BARGMAN	1442 W KEY HARBOR DR	GILBERT	AZ	85233
BARKER	5435 N 102ND AV	GLENDALE	AZ	85307
BARKER	8505 W WELDON AVENUE	PHOENIX	AZ	85037
BARKER	915 W WILLOW AVE	PHOENIX	AZ	85029

Comment Document				
Last Name	**Address**			
BARNARD	14203 W WHITE ROCK DR	SUN CITY WEST	AZ	85375
BARNARD	4036 N 155TH DR	GOODYEAR	AZ	85395
BARNES	10210 W DENTON LN	GLENDALE	AZ	85307
BARNES	3009 W DEVONSHIRE AVE	PHOENIX	AZ	85017
BARNES	1752 E PALOMINO DR	GILBERT	AZ	85296
BARNES	19279 E SPYGLASS BOULEVARD	QUEEN CREEK	AZ	85142
BARNETT	321 S LOS FELIZ DRIVE	CHANDLER	AZ	85226
BARNETT	3327 N 109TH AVE	AVONDALE	AZ	85392
BARNWELL	8213 W WETHERSFIELD RD	PEORIA	AZ	85381
BAROTT	8613 W BAJADA RD	PEORIA	AZ	85383
BARR	921 S PIONEER	MESA	AZ	85204
BARRAZA	118 W PUEBLO AVE	PHOENIX	AZ	85041
BARRAZA	3525 W LINCOLN STREET	PHOENIX	AZ	85009
BARRAZA	1130 S GRAND	MESA	AZ	85210
BARRETT	802 N 78TH ST	SCOTTSDALE	AZ	85257
BARRETT	10015 W ROYAL OAK RD 238	SUN CITY	AZ	85351
BARRETTE	1409 W BERRIDGE LN	PHOENIX	AZ	85013
BARRIGA	6815 S HARDY DR	TEMPE	AZ	85283
BARTEL	20641 N 102ND LN	PEORIA	AZ	85382
BARTELS	2670 E WISTERIA DR	CHANDLER	AZ	85286
BARTER	13309 N 126TH DR	EL MIRAGE	AZ	85335
BARTLES	9622 W WILLOWBROOK DR	SUN CITY	AZ	85373
BARTLETT	11033 W PALMERAS DR	SUN CITY	AZ	85373
BARTOLETTI	5616 N 132ND DR	LITCHFIELD PARK	AZ	85340
BARTSCH	9617 S 43RD PLACE	PHOENIX	AZ	85044
BARTZ	14948 W ALPACA DR	SUN CITY WEST	AZ	85375
BARYLA	6492 W BEHREND DR	GLENDALE	AZ	85308
BASELICE	20974 E NIGHTINGALE ROAD	QUEEN CREEK	AZ	85142
BASS	1707 E WIER AVE	PHOENIX	AZ	85040
BASSETT	29050 N 130TH DR	PEORIA	AZ	85383
BASTION	13805 N 98TH AVE	SUN CITY	AZ	85351
BATDORF	6871 W EL CORTEZ PL	PEORIA	AZ	85383
BATE	6441 S OAKMONT DRIVE	CHANDLER	AZ	85249
BATEMAN	6316 S 45TH DRIVE	LAVEEN	AZ	85339

Comment Document				
Last Name	**Address**			
BATES	4751 S BUTTERNUT CT	GILBERT	AZ	85297
BATES	16445 W YUCATAN DR	SURPRISE	AZ	85388
BATES	5120 E HAMPTON AVE 1228	MESA	AZ	85206
BAUER	12926 W BENT TREE DR	PEORIA	AZ	85383
BAUER	19715 N 64TH LN	GLENDALE	AZ	85308
BAUER	2901 W FLEETWOOD LN	PHOENIX	AZ	85017
BAUER	6613 S 68TH AVE	LAVEEN	AZ	85338
BAUMAN	10713 W WILLOWBROOK DR	SUN CITY	AZ	85373
BAUMGARTEN	13637 N 108TH DR	SUN CITY	AZ	85351
BAUMHOFER	16660 S 37TH PLACE	PHOENIX	AZ	85048
BAUTISTA	3646 N 69TH AVE 24	PHOENIX	AZ	85033
BAXA	7401 W GREER AVE	PEORIA	AZ	85345
BAXTER	11248 S PEWAUKEE STREET	PHOENIX	AZ	85044
BAXTER	7390 W KERRY WAY	GLENDALE	AZ	85308
BAY	20013 N RAWHIDE WAY	SURPRISE	AZ	85387
BAYATI	4322 W FREMONT RD	LAVEEN	AZ	85339
BEABOUT	11007 S TOMAH ST	PHOENIX	AZ	85044
BEADY	3756 E ROLLING GREEN WAY	CHANDLER	AZ	85249
BEATTY	7308 W GRIFFIN	GLENDALE	AZ	85303
BEAUCHAMP	10330 W THUNDERBIRD BLVD C212	SUN CITY	AZ	85351
BECK	373 E CORONADO RD 8	PHOENIX	AZ	85004
BECK	6432 E DALLAS ST	MESA	AZ	85205
BECK	6210 E ARBOR AVE 203	MESA	AZ	85206
BECK	714 N 56TH ST	MESA	AZ	85205
BECKER	3783 N 162ND LN	GOODYEAR	AZ	85395
BECKER	945 N PASADENA 25	MESA	AZ	85201
BECKETT	5208 N 40TH DR	PHOENIX	AZ	85019
BECKMAN	15324 W SKY HAWK DR	SUN CITY WEST	AZ	85375
BECKMAN	20986 N 81ST LN	PEORIA	AZ	85382
BECKSTEAD	1434 E PIEDMONT RD	PHOENIX	AZ	85042
BECKWITH	6929 E OSBORN RD B	SCOTTSDALE	AZ	85251
BEDARD	3641 W SUNLAND AVENUE	PHOENIX	AZ	85041
BEEBE	5505 E MCLELLAN RD 45	MESA	AZ	85205
BEEMAN	4731 E CAROL AVE	MESA	AZ	85206

Comment Document				
Last Name	**Address**			
BEESLEY	16828 W PALISADE TRAIL LN	SURPRISE	AZ	85387
BEESON	2124 W WOOD DR	PHOENIX	AZ	85029
BEEVERS	16858 W SAGUARO	SURPRISE	AZ	85388
BEGAY	5422 S 23RD WAY	PHOENIX	AZ	85040
BEHM	3026 N 37TH DR	PHOENIX	AZ	85019
BEHMER	18010 N HYACINTH DR	SUN CITY WEST	AZ	85375
BEIROW	3767 E FRUITVALE AVENUE	GILBERT	AZ	85297
BEJAR	7052 N 41ST LN	PHOENIX	AZ	85051
BELL	207 E DESERT LANE	GILBERT	AZ	85234
BELL	520 E CARTER DRIVE	TEMPE	AZ	85282
BELL	8546 W FULLAM ST	PEORIA	AZ	85382
BELL	2212 E REDWOOD DR	CHANDLER	AZ	85286
BELLER	1557 E JUNIPER ST	MESA	AZ	85203
BELLIN	24718 S STONEY PATH DR	CHANDLER	AZ	85248
BELLOWS	1109 E JENSEN ST	MESA	AZ	85203
BELOTE	19219 N JOY LN	SUN CITY	AZ	85373
BELSER	10101 W PALMERAS DR 201	SUN CITY	AZ	85373
BELTRAN	10943 W 4TH ST	AVONDALE	AZ	85323
BENCHOFF	3904 N 162ND AVE	GOODYEAR	AZ	85395
BENDER	15367 W SKYVIEW WAY	SURPRISE	AZ	85374
BENDER	2306 W NIDO AVE	MESA	AZ	85202
BENEFIEL	925 S SAILFISH DRIVE	GILBERT	AZ	85233
BENN	7724 S 20TH LANE	PHOENIX	AZ	85041
BENNETT	1140 S EUCALYPTUS PL	CHANDLER	AZ	85286
BENNETT	17612 N LINDGREN AVE	SUN CITY	AZ	85373
BENSON	5552 E EVERGREEN ST	MESA	AZ	85205
BENSON	1521 E SOLANO DR	PHOENIX	AZ	85014
BENTLEY	16259 W WINDCREST DR	SURPRISE	AZ	85374
BENTLEY	3308 N SUNRIDGE LN	CHANDLER	AZ	85225
BENTLEY	194 W SUNBURST LN	TEMPE	AZ	85284
BENZIES	4835 E WINNEBAGO ST	PHOENIX	AZ	85044
BERCY	21912 E ESTRELLA RD	QUEEN CREEK	AZ	85142
BERG	2126 S VENTURA DR	TEMPE	AZ	85282
BERG	60 W MELODY DR	GILBERT	AZ	85233
BERG	2918 E HIGHLAND	PHOENIX	AZ	85016

Comment Document				
Last Name	**Address**			
BERKOSKI	6336 E COCHISE	PARADISE VALLEY	AZ	85253
BERKOWITZ	11662 W FLYCATCHER CT	SURPRISE	AZ	85378
BERNA	6609 W CHEERY LYNN RD	PHOENIX	AZ	85033
BERNAL	915 W ALTA VISTA ROAD #1032	PHOENIX	AZ	85041
BERNARD	7212 W ELLIS STREET	LAVEEN	AZ	85339
BERRY	10761 W TONOPAH DR	SUN CITY	AZ	85373
BERTHLETT	15364 W INDIANOLA AVE	GOODYEAR	AZ	85395
BERTHOLD	842 N SPUR CIR	MESA	AZ	85203
BERVE	15233 N AGUA FRIA DR	SUN CITY	AZ	85351
BESTENLEHNER	1432 E GERONIMO STREET	CHANDLER	AZ	85225
BESWICK	3500 S HOLGUIN CT	CHANDLER	AZ	85248
BETANCOURT	1018 N 25TH PLACE	PHOENIX	AZ	85008
BETANCOURT	7323 W CORDES ROAD	PHOENIX	AZ	85043
BETHELL	4141 N 31ST ST 209	PHOENIX	AZ	85016
BICKETT	6345 N 23RD AVE	PHOENIX	AZ	85015
BIDDLE	16410 S 12TH STREET #104	PHOENIX	AZ	85048
BIERNZ	1239 E ELTON AVENUE	MESA	AZ	85204
BIESK	17836 W EUGENE TER	SURPRISE	AZ	85388
BIGELOW	17618 W SPRING LN	SURPRISE	AZ	85388
BILLIET	1627 W PIERSON ST 1	PHOENIX	AZ	85015
BILLS	19405 N 77TH DR	GLENDALE	AZ	85308
BILSE	7023 W EVANS DR	PEORIA	AZ	85381
BIONDO	10214 E STONEY VISTA DR	CHANDLER	AZ	85248
BIORN	11725 W SHAW BUTTE DR	EL MIRAGE	AZ	85335
BIRD	1613 W LATHAM ST	PHOENIX	AZ	85007
BIRO	30252 N 123RD DR	PEORIA	AZ	85383
BIRSCHBACH	2901 E NORWOOD ST	MESA	AZ	85213
BISSET	2671 E DESERT INN DR	CHANDLER	AZ	85249
BISSON	5244 N 102ND AVE	GLENDALE	AZ	85307
BIVIN	19667 N STAR RIDGE DR	SUN CITY WEST	AZ	85375
BLACK	2323 E TURNEY AVE	PHOENIX	AZ	85016
BLACKBURN	10019 E ARROWVALE DR	CHANDLER	AZ	85248
BLACKMAN	101 E PALM LN C	PHOENIX	AZ	85004
BLAIR	18425 N DEER GRASS CT	SURPRISE	AZ	85374

Comment Document				
Last Name	**Address**			
BLAKE	321 W ELLIS ST	PHOENIX	AZ	85041
BLAKSLEY	4814 E BELLERIVE DRIVE	CHANDLER	AZ	85249
BLAND	3321 N 116TH DR	AVONDALE	AZ	85392
BLANDFORD	3763 N AVOCA	MESA	AZ	85207
BLANTON	61 W 11TH DR	MESA	AZ	85210
BLATTEL	5902 E INGLEWOOD ST	MESA	AZ	85205
BLAUVELT	7065 W ELECTRA LN	PEORIA	AZ	85383
BLAZEK	12402 W ALVARADO RD	AVONDALE	AZ	85392
BLEVINS	7109 S 68TH AVE	LAVEEN	AZ	85339
BLOCK	21087 E EXCELSIOR AVENUE	QUEEN CREEK	AZ	85142
BLODGETT	1280 W LAREDO ST	CHANDLER	AZ	85224
BLOUGH	18143 N WINDFALL DR	SURPRISE	AZ	85374
BLOUGH	1318 W LYNWOOD ST	PHOENIX	AZ	85007
BLUE	14036 N PALM RIDGE DR	SUN CITY	AZ	85351
BLUM	1015 S VAL VISTA DR 20	MESA	AZ	85204
BLUVAS	3827 E BRIDGEPORT PKY	GILBERT	AZ	85295
BOBIS	393 W CAROB DR	CHANDLER	AZ	85248
BOCK	837 N GREGORY PLACE	CHANDLER	AZ	85226
BOE	629 E CALLE BOLO LN	GOODYEAR	AZ	85338
BOGAN	3002 S STANDAGE	MESA	AZ	85202
BOHM	10245 W FLORENCE AVE	TOLLESON	AZ	85353
BOHM	440 S VAL VISTA DR 5	MESA	AZ	85204
BOJORQUEZ	1130 W GOLDFINCH WAY	CHANDLER	AZ	85286
BOLDUC	12817 N 26TH PL	PHOENIX	AZ	85032
BOLEY	7124 W CHERYL D	PEORIA	AZ	85345
BOLOGNINI	108 N GREENFIELD RD 1188	MESA	AZ	85205
BOLTON	1970 E DEL SUR DR	TEMPE	AZ	85283
BOLTON	2606 S SHANNON DR	TEMPE	AZ	85282
BOND BREEN	6625 E PRESIDIO ST	MESA	AZ	85215
BONNERT	11017 W CANYON CREEK	SUN CITY	AZ	85351
BOOKER	10233 N 106TH AVE	SUN CITY	AZ	85351
BOOKS	4632 E CATALINA	PHOENIX	AZ	85018
BOON	6123 S HUACHUCA WAY	CHANDLER	AZ	85249
BOONE	2111 E FAWN DR	PHOENIX	AZ	85042
BOONE	4402 E KIOWA ST	PHOENIX	AZ	85044

Comment Document				
Last Name	**Address**			
BOOTH	3121 N 23RD ST	PHOENIX	AZ	85016
BOOTH	502 S QUINN 6	MESA	AZ	85206
BOOTHROYD	4125 W MISSOURI AVE	PHOENIX	AZ	85019
BORA	7918 W EMORY LN	PEORIA	AZ	85383
BORDNER-LIND	22145 E CALLE DE FLORES	QUEEN CREEK	AZ	85142
BORDONARO	3498 E FAIRVIEW ST	GILBERT	AZ	85295
BORGE	18243 W BUENA VISTA DR	SURPRISE	AZ	85374
BORN	3015 N 52ND DR	PHOENIX	AZ	85031
BORNN	10362 W HUTTON DR	SUN CITY	AZ	85351
BOROWSKI	3117 E LIBERTY LANE	PHOENIX	AZ	85048
BORRUD	1654 E HARRISON ST	CHANDLER	AZ	85225
BORWICK	2236 N 90TH DR	PHOENIX	AZ	85037
BOSCO	6301 N 42ND ST	PARADISE VALLEY	AZ	85253
BOSFIELD	715 W MOUNTAIN SKY AVENUE	PHOENIX	AZ	85045
BOSWELL	17256 W RIMROCK ST	SURPRISE	AZ	85388
BOSWORTH	1134 W DUBLIN ST	CHANDLER	AZ	85224
BOTHAM	13817 S 32ND PL	PHOENIX	AZ	85044
BOTHWELL	17213 W HERMOSA DR	SURPRISE	AZ	85387
BOTTCHER	8527 W RUTH AVE	PEORIA	AZ	85345
BOUDREAU	4571 E MIA LN	GILBERT	AZ	85298
BOUSE	5306 W HUNTINGTON DR	LAVEEN	AZ	85339
BOVINE	225 N GILBERT RD 166	MESA	AZ	85203
BOWEN	3628 N 49TH PL	PHOENIX	AZ	85018
BOWER	5030 W MELODY LN	LAVEEN	AZ	85339
BOWERS	5802 N 61ST DR	GLENDALE	AZ	85301
BOWERS	8728 W VILLA RITA DR	PEORIA	AZ	85382
BOWLES	16033 N 99TH DR	SUN CITY	AZ	85351
BOWLING	2470 E DESERT WILLOW DR	PHOENIX	AZ	85048
BOWLUS	26625 S NOTIINGHAM CT	CHANDLER	AZ	85248
BOWMAN	2002 W SUNNYSID	PHOENIX	AZ	85029
BOWMAN	7424 S 43RD STREET	PHOENIX	AZ	85042
BOWMAN	3718 N 154TH DR	GOODYEAR	AZ	85395
BOYCE	3425 E FLOWER ST	PHOENIX	AZ	85018
BOYD	5049 N 11TH AVE F100	PHOENIX	AZ	85013

Comment Document				
Last Name	**Address**			
BOYLE	325 W HOLLY ST	PHOENIX	AZ	85003
BOYLE	4712 E APPLEBY CT	GILBERT	AZ	85298
BOYNE	10324 E NACOMA DRIVE	CHANDLER	AZ	85248
BOZACK	4434 S KENNETH PLACE	TEMPE	AZ	85282
BRAATEN	1381 W CARDINAL WAY	CHANDLER	AZ	85286
BRACAMONTE	605 E AUBURN DRIVE	TEMPE	AZ	85283
BRADDOCK	17251 W IMPERIAL LN	SURPRISE	AZ	85387
BRADFORD	1632 E STREET CHARLES AVENUE	PHOENIX	AZ	85042
BRADLEY	17025 N ERIN LN	SURPRISE	AZ	85374
BRADSHAW	1854 S BEVERLY	MESA	AZ	85210
BRADY	14680 W MORNING STAR TRL	SURPRISE	AZ	85374
BRADY	1748 N FRASER DR	MESA	AZ	85203
BRADY	7413 E THOMAS RD	SCOTTSDALE	AZ	85251
BRAGG	8967 W ADAM AVE	PEORIA	AZ	85382
BRAHAM	10739 W CANTERBURY DR	SUN CITY	AZ	85351
BRAIS	14562 W MOCCASIN TRL	SURPRISE	AZ	85374
BRAMBILA	14121 W DESERT HILLS DR	SURPRISE	AZ	85379
BRANSON	77 W COOLIDGE ST 320	PHOENIX	AZ	85013
BRASCH	2551 E DESERT WILLOW DRIVE	PHOENIX	AZ	85048
BRASSFIELD	10980 W CUMBERLAND DR	SUN CITY	AZ	85351
BRATCHER	9429 S 33RD AVENUE	LAVEEN	AZ	85339
BRAUER	2206 E SHERIDAN ST	PHOENIX	AZ	85006
BRAUN	15131 W COOPERSTOWN WAY	SURPRISE	AZ	85374
BRAY	1139 S 53RD PL	MESA	AZ	85206
BRECHT	635 W NAVARRO AVENUE	MESA	AZ	85210
BREHMER	18011 N 129TH DR	SUN CITY WEST	AZ	85375
BREITHAUPT	26226 S FLAME TREE DR	CHANDLER	AZ	85248
BRENEMAN	14673 W YOSEMITE DR	SUN CITY WEST	AZ	85375
BRENING	4914 W BUFFALO ST	CHANDLER	AZ	85226
BRENNAN	3342 E TONTO DR	PHOENIX	AZ	85044
BRENNER	11021 E TWILIGHT COURT	CHANDLER	AZ	85248
BRENNER	1242 E SANDCASTLE CT	GILBERT	AZ	85234
BRENZA	3110 N BENTRUP CIRCLE	CHANDLER	AZ	85224
BRESSLER	6127 W LAREDO STREET	CHANDLER	AZ	85226

Comment Document				
Last Name	**Address**			
BREWER	12503 W ALEGRE DR	LITCHFIELD PARK	AZ	85340
BREWER	1540 N 26TH ST	MESA	AZ	85213
BREWER	440 S PARKCREST 118	MESA	AZ	85206
BREWSTER	1798 W YOSEMITE PLACE	CHANDLER	AZ	85248
BREWSTER	3803 E BRONCO TRL	PHOENIX	AZ	85044
BRIDGES	16279 W MISSION COVE LN	SURPRISE	AZ	85374
BRIDGES	6823 S 18TH PL	PHOENIX	AZ	85042
BRIERLEY	5728 E MONTEROS	PHOENIX	AZ	85018
BRIGHAM	1914 E MONTEREY STREET	CHANDLER	AZ	85225
BRISENOGALVEZ	6046 W ENCINAS LN	PHOENIX	AZ	85043
BRISSON	14222 W VIA TERCERO	SUN CITY WEST	AZ	85375
BRITTAIN	10424 S 43RD ST	PHOENIX	AZ	85044
BRITTAIN	13063 W BALLAD DR	SUN CITY WEST	AZ	85375
BROCKMAN	6710 S CORAL GABLE DR	CHANDLER	AZ	85249
BROCKMEYER	1471 E DORAL DR	CHANDLER	AZ	85249
BRODERICK	17812 W MARIPOSA DR	SURPRISE	AZ	85374
BRONERSKY	17748 W CANTO BONITO LN	SURPRISE	AZ	85387
BRONSTEIN	9434 W MORROW DR	PEORIA	AZ	85382
BROOK	1952 E 8TH ST	MESA	AZ	85203
BROOKMAN	4022 N 79TH DR	PHOENIX	AZ	85033
BROOKS	5830 E NANCE ST	MESA	AZ	85215
BROOKS	6161 W MCDOWELL ROAD #2069	PHOENIX	AZ	85035
BROOKS	8409 W MOHAVE STREET	TOLLESON	AZ	85353
BROOKS	2730 W HAZELWOOD ST	PHOENIX	AZ	85017
BROSEMANN	4326 N 113TH DR	PHOENIX	AZ	85037
BROTHERS	12542 W PARKWOOD DR	SUN CITY WEST	AZ	85375
BROTSCHI	1126 E ELI COURT	GILBERT	AZ	85295
BROWN	10025 N 107TH AV	SUN CITY	AZ	85351
BROWN	1350 N VILLA NUEVA DR	LITCHFIELD PARK	AZ	85340
BROWN	15012 W GEORGIA DR	SURPRISE	AZ	85379
BROWN	17018 W ARTESIA DR	SURPRISE	AZ	85387
BROWN	20034 N 106TH DR	SUN CITY	AZ	85373
BROWN	4532 W MONTEBELLO AVE	GLENDALE	AZ	85301

Comment Document				
Last Name	**Address**			
BROWN	4802 S 6TH STREET	PHOENIX	AZ	85040
BROWN	507 E BARBARITA AVENUE	GILBERT	AZ	85234
BROWN	7424 S 26TH DR	PHOENIX	AZ	85041
BROWN	931 E EVENING STAR LN	TEMPE	AZ	85283
BROWN	12539 W PAINTBRUSH DR	SUN CITY WEST	AZ	85375
BROWN	15056 W ROUNDERS DR	SURPRISE	AZ	85374
BROWN	2019 W SAN JUAN AVE	PHOENIX	AZ	85015
BROWN	5328 S 29TH LN	PHOENIX	AZ	85041
BROWN	7043 W COCHISE DR	PEORIA	AZ	85345
BROWNELL	2124 E CHANUTE PASS	PHOENIX	AZ	85040
BROWN-FLEITZ	11226 N BALBOA DR	SUN CITY	AZ	85351
BROWN-LASCONIA	71 N SOHO PL	CHANDLER	AZ	85225
BROYLES	2564 N ELLIS ST	CHANDLER	AZ	85224
BROZ	2725 S RURAL ROAD #28	TEMPE	AZ	85282
BRUCHIS	1320 S VAL VISTA DR 1088	MESA	AZ	85204
BRULL	17194 N FLOWING RIVER TRL	SURPRISE	AZ	85374
BRUMSEY	15299 W MORNING GLORY ST	GOODYEAR	AZ	85338
BRUNDAGE	16124 W DESERT COVE WAY	SURPRISE	AZ	85374
BRUSO	1735 W VERDE LN	PHOENIX	AZ	85015
BRUSS	1699 SASH ST	GILBERT	AZ	85233
BRYAN	18509 E LARK DR	QUEEN CREEK	AZ	85142
BRYAN	5618 N 32ND DR	PHOENIX	AZ	85017
BRYAN	214 W HARMONT DR	PHOENIX	AZ	85021
BRYANT	3820 E FORGE AVE	MESA	AZ	85206
BRYANT	7230 W CAMBRIDGE AVE	PHOENIX	AZ	85035
BRYANT	1024 W FREMONT AVE	MESA	AZ	85210
BRYNER	4844 N 87TH DR	PHOENIX	AZ	85037
BRYSON	12436 W ORANGE	LITCHFIELD	AZ	85340
BUCHANAN	14064 N 132ND LN	SURPRISE	AZ	85379
BUCKNER	7791 E OSBORN RD 37E	SCOTTSDALE	AZ	85251
BUELNA	12474 W GRANADA RD	AVONDALE	AZ	85392
BUITENDORP	4065 E UNIVERSITY DR 527	MESA	AZ	85205
BULGRIN	20839 N GRAND STAIRCASE DR	SURPRISE	AZ	85387
BULLOCH	748 N WINDSOR	MESA	AZ	85213
BULLOCK	11000 N 91ST AVE 83	PEORIA	AZ	85345

Comment Document				
Last Name	**Address**			
BULLOCK	1728 E TAMARISK AVE	PHOENIX	AZ	85040
BULTINCK	5553 E GABLE AVE	MESA	AZ	85206
BUNDY	7056 W MORROW DR	GLENDALE	AZ	85308
BUNKER	2435 E JENSEN ST	MESA	AZ	85213
BUNTING	3502 S AMBUSH PASS ROAD	GILBERT	AZ	85296
BUNTS	10901 W LOMA BLANCA DR	SUN CITY	AZ	85351
BUONO	909 S SCALLOP DRIVE	GILBERT	AZ	85233
BURBANK	431 E HALIFAX ST	MESA	AZ	85203
BURCIAGA	170 S CALIFORNIA STREET	CHANDLER	AZ	85225
BURDICK	2745 E CANYON PL	CHANDLER	AZ	85249
BURGAN	2139 E KNOX ROAD	TEMPE	AZ	85284
BURGER	13154 W SEVILLE DR	SUN CITY WEST	AZ	85375
BURGESS	5814 E CAMBRIDGE AVE	SCOTTSDALE	AZ	85257
BURKE	10211 E NACOMA DRIVE	CHANDLER	AZ	85248
BURKE	3450 E MENLO ST	MESA	AZ	85213
BURKE	4401 N 35TH ST	PHOENIX	AZ	85018
BURKHART	15543 W CLEAR CANYON DR	SURPRISE	AZ	85374
BURKS	10563 W OAKMONT DR	SUN CTIY	AZ	85351
BURLESON	6302 W WAGONER RD	GLENDALE	AZ	85308
BURNELL	3104 E BROADWAY RD 189	MESA	AZ	85204
BURNETT	401 E HARMONT D	PHOENIX	AZ	85020
BURNETTE	7545 W COUNTRY GABLES DR	PEORIA	AZ	85381
BURNS	6419 W CORDIA	PHOENIX	AZ	85083
BURNS	5150 N 99TH AVE 3046	GLENDALE	AZ	85305
BURNS	5824 W IVANHOE ST	CHANDLER	AZ	85226
BURRELL	15854 W EDGEMONT AVE	GOODYEAR	AZ	85395
BURRIS	1148 N JULY CIR	MESA	AZ	85203
BURROUGHS	6340 E STAR VALLEY CIR	MESA	AZ	85215
BURTNER	10027 E CEDAR WAXWING DR	CHANDLER	AZ	85248
BUSCH	547 N SANTA BARBARA	MESA,	AZ	85201
BUSH	3970 E PAGE	GILBERT	AZ	85234
BUSS	900 W DETROIT ST	CHANDLER	AZ	85225
BUSSELBERG	1328 E INDIGO CIR	MESA	AZ	85203
BUSTAMANTE	7849 W WETHERSFIELD RD	PEORIA	AZ	85381
BUTCHER	18617 E CANARY WAY	QUEEN CREEK	AZ	85142

Comment Document				
Last Name	**Address**			
BUTLER	5716 N 62ND DR	GLENDALE	AZ	85301
BUTORAC	5808 E BROWN RD 147	MESA	AZ	85205
BUTTLER	4658 W KRALL ST	GLENDALE	AZ	85301
BUTTON	901 E CANYON WAY	CHANDLER	AZ	85249
BUXTON	3410 N 35TH ST	PHOENIX	AZ	85018
BYE	13021 S 42ND PL	PHOENIX	AZ	85044
BYERLY	6605 S 18TH STREET	PHOENIX	AZ	85042
BYERS	2509 E MITCHELL DR	PHOENIX	AZ	85016
BYINGTON	13350 W LA REATA AVE	GOODYEAR	AZ	85395
BYLINSKY	11410 N 103RD AVE	SUN CITY	AZ	85351
BYRD	1792 LEISURE WORLD	MESA	AZ	85206
BYRD	3830 E LAKEWOOD PARKWAY #1025	PHOENIX	AZ	85048
CABAL	5508 W DARROW DRIVE	LAVEEN	AZ	85339
CABELLERO	19221 N 59TH DR	GLENDALE	AZ	85308
CABIBO	1668 W GLENDALE AVE 407	PHOENIX	AZ	85021
CABRAL	6907 W WAGONER RD	GLENDALE	AZ	85308
CADRIEL	804 W MAGNOLIA ST	PHOENIX	AZ	85007
CAFOUREK	5311 N 8TH PL	PHOENIX	AZ	85014
CAGE	1240 W BRECKENRIDGE AVE	GILBERT	AZ	85233
CAHILL	1638 N 26TH ST	MESA	AZ	85213
CALL	4251 E DOWNING ST	MESA	AZ	85205
CALLAHAN	15845 N NICKLAUS LN	SUN CITY	AZ	85351
CALLAHAN	13825 W PAVILLION DR	SUN CITY WEST	AZ	85375
CALLEJA	741 W HARVARD DRIVE	TEMPE	AZ	85283
CAMARENA	1443 E SILVER CREEK RD	GILBERT	AZ	85296
CAMPANARO	14510 W RAVENSWOOD DR	SUN CITY WEST	AZ	85375
CAMPBELL	1120 W WAGNER DRIVE	GILBERT	AZ	85233
CAMPBELL	1128 E SILVERWOOD DR	PHOENIX	AZ	85048
CAMPBELL	2618 N 124TH DRIVE	AVONDALE	AZ	85392
CAMPBELL	7240 N DREAMY DRAW DR 108	PHOENIX	AZ	85020
CAMPBELL	1154 E BUFFALO ST	CHANDLER	AZ	85225
CAMPBELL	13036 S 43RD ST	PHOENIX	AZ	85044
CAMPBELL	3426 N 32ND ST 5	PHOENIX	AZ	85018
CAMPBELL	8502 W PINCHOT AVE	PHOENIX	AZ	85037

Comment Document				
Last Name	**Address**			
CAMPIN	11016 W CHERRY HILLS DR	SUN CITY	AZ	85351
CAMPOS	1215 E MOUNTAIN	PHOENIX	AZ	85020
CAMPOS	4226 W MULBERRY DR	PHOENIX	AZ	85019
CANALES	8316 W CATALINA DR	PHOENIX	AZ	85037
CANDELL	18423 N 94TH AVE	SUN CITY	AZ	85373
CANEZ	1028 E DESERT LN	PHOENIX	AZ	85042
CANISALES	11020 S 35TH AVE	LAVEEN	AZ	85339
CANNON	3532 W OAKLAND ST	CHANDLER	AZ	85226
CANNON	10428 N 105TH AVE	SUN CITY	AZ	85351
CANZONERI	3913 E NAMBE STREET	PHOENIX	AZ	85044
CAPPELLA	2950 N 46TH ST	PHOENIX	AZ	85018
CARBONE	910 S 118TH LN	AVONDALE	AZ	85323
CARCHEDI	7557 N DREAMY DRAW DR 277	PHOENIX	AZ	85020
CARD	221 W MAIN ST 17	AVONDALE	AZ	85323
CARDENAS	10364 W PRIMROSE DR	AVONDALE	AZ	85392
CARDONA	9236 S 7TH AVE	PHOENIX	AZ	85041
CARLSON	1705 N QUEENSBURY	MESA	AZ	85201
CARLSON	720 E DOBBINS RD	PHOENIX	AZ	85042
CARLSON	10616 W CAMDEN AVE	SUN CITY	AZ	85351
CARMAN	12423 W EVENINGSIDE DR	SUN CITY WEST	AZ	85375
CARMERON	2634 N 118TH LANE	AVONDALE	AZ	85392
CARNEY	745 W ESTRELLA DRIVE	GILBERT	AZ	85233
CARPENITO	607 N PIONEER CIR	MESA	AZ	85203
CARPENTER	684 W CARLA VISTA DR	CHANDLER	AZ	85225
CARPENTER	10731 W THUNDERBIRD BLVD	SUN CITY	AZ	85351
CARPIO	6506 E CALLE WOI	TEMPE	AZ	85283
CARR	10160 E ISLET	MESA	AZ	85209
CARR	2438 E GLASS LANE	PHOENIX	AZ	85042
CARRASCO	1041 E MESQUITE ST	GILBERT	AZ	85296
CARRILLO	5023 N 61ST DR	GLENDALE	AZ	85301
CARRILLO	715 N 28TH PLACE	PHOENIX	AZ	85008
CARRILLO	3016 W KOWALSKY LN	PHOENIX	AZ	85041
CARROLL	2521 N 82ND ST	MESA	AZ	85207
CARROLL	7304 S 29TH LANE	PHOENIX	AZ	85041
CARROLL	7120 W COLUMBINE DR	PEORIA	AZ	85381

Comment Document				
Last Name	**Address**			
CARRON	1313 E GLADE CIR	MESA	AZ	85204
CARSON	6054 E AKRON ST	MESA	AZ	85205
CARTER	3045 W PALMAIRE AVE	PHOENIX	AZ	85051
CARTER	1715 E JENSEN ST	MESA	AZ	85203
CARTER	7132 W ZAK RD	PHOENIX	AZ	85043
CARTWRIGHT	8611 W MINNEZONA AVE	PHOENIX	AZ	85037
CASBOURNE	10202 W PINEAIRE DR	SUN CITY	AZ	85351
CASE	10830 W APACHE ST 302	AVONDALE	AZ	85323
CASEY	7713 E WILSHIRE DR	SCOTTSDALE	AZ	85257
CASHMAN	915 W ALTA VISTA ROAD #2034	PHOENIX	AZ	85041
CASSADY	13054 W CHEERY LYNN ROAD	AVONDALE	AZ	85392
CASSAVANT	14521 W JENAN DR	SURPRISE	AZ	85379
CASSELBURY	2625 W OAKLAND 5T	CHANDLER	AZ	85224
CASSUTT	3329 E LONG LAKE ROAD	PHOENIX	AZ	85048
CASTANEDA	3289 E BRIDGEPORT PKY	GILBERT	AZ	85295
CASTILLO	3015 S KENNETH PL	TEMPE	AZ	85282
CASTILLO	6969 W MONTEREY STREET	CHANDLER	AZ	85226
CASTILLO	1326 W BECKER LN	PHOENIX	AZ	85029
CASTLE	7181 W CIELO GRANDE	PEORIA	AZ	85383
CASTRO	229 E ILLINI ST	PHOENIX	AZ	85040
CASTRO	6233 W THOMAS ROAD #1019	PHOENIX	AZ	85033
CASULLO	9511 W COUNTRY CLUB DR	SUN CITY	AZ	85373
CATES	829 W ORION STREET	TEMPE	AZ	85283
CATLIN	14154 DENNY BLVD 103	LITCHFIELD PARK	AZ	85340
CAVALIER	10101 W PALMERA	SUN CITY	AZ	85373
CAWLEY	6380 W VIA MONTOYA DR	GLENDALE	AZ	85310
CAZARES	8822 W INDIANOLA AVE	PHOENIX	AZ	85037
CAZARES-MARTINEZ	9205 W BADEN ST	TOLLESON	AZ	85353
CEBALLOS	11783 W HOPI ST	AVONDALE	AZ	85323
CELAYA	2029 N 39TH AVE	PHOENIX	AZ	85009
CELAYA	2568 N 131ST LN	GOODYEAR	AZ	85395
CELAYA	9251 W TAYLOR ST	TOLLESON	AZ	85353
CELAYA-LIZARRAGA	602 N 95TH AVE	TOLLESON	AZ	85353

Comment Document				
Last Name	**Address**			
CELESTINO	13197 W CORONADO RD	GOODYEAR	AZ	85395
CENTER	8119 W HAZELWOOD ST	PHOENIX	AZ	85033
CESTA	3516 E MERRILL AVENUE	GILBERT	AZ	85234
CETTA	2006 S 84TH AVENUE	TOLLESON	AZ	85353
CHACON	5823 W FAIRMOUNT AVE	PHOENIX	AZ	85031
CHACON	8424 S 9TH ST	PHOENIX	AZ	85042
CHAFFIN	15835 W MADISON	GOODYEAR	AZ	85338
CHAKOS	4627 N 11TH PLACE	PHOENIX	AZ	85014
CHALOUPKA	443 W NAVARRO AVENUE	MESA	AZ	85210
CHAMBERLIN	1318 E SUNBURST LN	TEMPE	AZ	85284
CHAMBERS	2817 E DESERT COVE	PHOENIX	AZ	85028
CHAMBERS	4209 W DIANA AVE	PHOENIX	AZ	85051
CHAMBERS	3631 E MONTEROS	PHOENIX	AZ	85018
CHAMPAGNE	5270 W MORTEN AVE	GLENDALE	AZ	85301
CHAMPAGNE	2131 N 124TH DR	AVONDALE	AZ	85392
CHANDUSZKO	311 N CARRIAGE LANE	CHANDLER	AZ	85224
CHANG	4701 N 31ST DR	PHOENIX	AZ	85017
CHAPMAN	507 S 97TH PL	MESA	AZ	85208
CHAPMAN	840 N PAJARO LN	LITCHFIELD	AZ	85340
CHAPMAN	10520 W HUTION DR	SUN CTIY	AZ	85351
CHAPMAN MADDEN	20670 N GLEN CANYON DR	SURPRISE	AZ	85387
CHAPPELL	4221 E RAY ROAD	PHOENIX	AZ	85044
CHARBONNEAU	10202 S 48TH PL	PHOENIX	AZ	85044
CHARLES	21749 W 218TH STREET	QUEEN CREEK	AZ	85142
CHARLSON	4949 W NORTHERN	GLENDALE	AZ	85301
CHASE	19602 N KEYSTONE DR	SUN CITY WEST	AZ	85375
CHATMAN	2132 W GLEN ROSA AVE	PHOENIX	AZ	85015
CHAUDHRY	3527 E COCONINO ST	PHOENIX	AZ	85044
CHAVARRIA	4609 S 8TH STREET	PHOENIX	AZ	85040
CHAVES	9422 W CINNABAR AVE	PEORIA	AZ	85345
CHAVEZ	2013 E VALENCIA DR	PHOENIX	AZ	85042
CHAVEZ	6248 S 16TH PLACE	PHOENIX	AZ	85042
CHAVEZ	7107 W OSBORN RD	PHOENIX	AZ	85033
CHAVEZ	8632 N 106TH LN	PEORIA	AZ	85345
CHAVEZ	10830 W APACHE ST 506	AVONDALE	AZ	85323

Comment Document				
Last Name	**Address**			
CHAVEZ	1516 E VIRGINIA AVE	PHOENIX	AZ	85006
CHAVEZ	2111 E MELROSE ST	GILBERT	AZ	85297
CHAVEZ	9045 S CALLE VAUO NAWI	TEMPE	AZ	85283
CHEATHAM	5406 W WINSTON DRIVE	LAVEEN	AZ	85339
CHEKE	13365 W ALMERIA RD	GOODYEAR	AZ	85395
CHELUS	1129 W MARIA LN	TEMPE	AZ	85284
CHESTNUT	12141 W VILLA HERMOSA CT	SUN CITY	AZ	85373
CHESWICK	513 S CATALINA ST	GILBERT	AZ	85233
CHIDESTER	10822 E CHESTNUT DRIVE	CHANDLER	AZ	85248
CHIMENTO	1033 N 59TH ST	MESA	AZ	85205
CHISHOLM	6186 S CYPRESS POINT DR	CHANDLER	AZ	85249
CHRISCADEN	1436 E DOWNING ST	MESA	AZ	85203
CHRISTENSEN	14242 W FRANCISCAN DR	SUN CITY WEST	AZ	85375
CHRISTENSEN	6255 E AVALON DR	SCOTTSDALE	AZ	85251
CHRISTENSON	444S HIGLEY RD 156	MESA	AZ	85206
CHRISTIAN	6507 S HARDY DR 239	TEMPE	AZ	85283
CHRISTOPHER	6270 E AVALON DR	SCOTTSDALE	AZ	85251
CHRISTOPHER	7820 E LEWIS AVE	SCOTTSDALE	AZ	85257
CHUCHLA	4237 W STATE AVE	PHOENIX	AZ	85051
CHUN	5923 W WHITTON AVE	PHOENIX	AZ	85033
CHURCH	5230 E BROWN RD 112	MESA	AZ	85205
CHURCH	21375 N 107TH DR	SUN CITY	AZ	85373
CICIONI	17942 W SKYLINE DR	SURPRISE	AZ	85374
CICORIA	946 S PARKCREST STREET	GILBERT	AZ	85296
CIGOY	3601 N 5TH AVE 206	PHOENIX	AZ	85013
CIRANDO	1505 N CENTER ST 129	MESA	AZ	85201
CIULLA	14145 W COUNTRY	SURPRISE	AZ	85379
CLAIR	12045 S PAIUTE ST	PHOENIX	AZ	85044
CLARE	802 N 22ND PL 143	PHOENIX	AZ	85006
CLARK	12926 W OYER LN	PEORIA	AZ	85383
CLARK	1330 E GEORGIA AVE	PHOENIX	AZ	85014
CLARK	14292 W CORONADO RD	GOODYEAR	AZ	85395
CLARK	2155 N GRACE BLVD 103	CHANDLER	AZ	85225
CLARK	327 W VIRGINIA AVE	PHOENIX	AZ	85003
CLARK	3546 W GARDENIA AVE	PHOENIX	AZ	85051

Comment Document				
Last Name	**Address**			
CLARK	540 N MAY 1085	MESA	AZ	85201
CLARK	5523 W GARY DRIVE	CHANDLER	AZ	85226
CLARK	14709 N 137TH LN	SURPRISE	AZ	85379
CLARK	150 S DEBRA DR	GILBERT	AZ	85296
CLARK	15123 W HORSEMAN LN	SUN CITY WEST	AZ	85375
CLARK	1902 E HAWKEN PLACE	CHANDLER	AZ	85286
CLARK	2223 E HALE ST	MESA	AZ	85213
CLARK	44 W MONROE ST 1509	PHOENIX	AZ	85003
CLARK	16503 W MCKINLEY ST	GOODYEAR	AZ	85338
CLARKE	11353 E SPAUL	MESA	AZ	85212
CLARKE	9236 E ROCKY LAKE DRIVE	CHANDLER	AZ	85248
CLARKE	2555 N PRICE RD	CHANDLER	AZ	85224
CLARKE	7826 W BROWN ST	PEORIA	AZ	85345
CLAWSON	2716 W ECHO LN	PHOENIX	AZ	85051
CLEGG	4448 E DEL RIO ST	GILBERT	AZ	85295
CLEMENS	14417 W HURON DR	SUN CITY WEST	AZ	85375
CLEMENTS	19420 N WESTBROOK PKY 506	PEORIA	AZ	85282
CLEMENTS	2028 E GREENWAY	PHOENIX	AZ	85022
CLEMONS	6220 S 12TH PLACE	PHOENIX	AZ	85042
CLEVELAND	1808 E CONCORDA DRIVE	TEMPE	AZ	85282
CLICK	5113 W HARRISON ST	CHANDLER	AZ	85226
CLUNIE	9717 E HOLIDAY WAY	CHANDLER	AZ	85248
COAK	17830 N 30TH ST	PHOENIX	AZ	85032
COATTA	1542 E DORAL DRIVE	CHANDLER	AZ	85249
COBB	4202 E PALM BEACH DR	CHANDLER	AZ	85249
COBER	4773 W MEDITERRANEAN DR	GLENDALE	AZ	85301
COCHRAN	10529 E SPRING CREEK ROAD	CHANDLER	AZ	85248
COCHRAN	1422 W PASADENA AVE	PHOENIX	AZ	85013
COCKERILL	11561 W OLIVE DR	AVONDALE	AZ	85392
COCKERILL	9037 W PLUM RD	PEORIA	AZ	85383
COCREHAM	2210 E AMELIA AVE	PHOENIX	AZ	85016
COFFEY	6209 E MCKELLIPS RD 84	MESA	AZ	85215
COFFMAN	2106 E BROWNING PL	CHANDLER	AZ	85286
COGGIN	12825 S 40TH PL	PHOENIX	AZ	85044
COGLIANESE	6514 S ROOSEVELT STREET	TEMPE	AZ	85283

Comment Document				
Last Name	**Address**			
COGSWELL	6512 E MCLELLAN RD	MESA	AZ	85205
COHEN	4324 E STRAWBERRY DR	GILBERT	AZ	85298
COHEN	7260 W LONE CACTUS DR	GLENDALE	AZ	85308
COKER	4311 E ELLIS ST	PHOENIX	AZ	85042
COLASANTI-LEA	3831 N KINGS PEAK	MESA	AZ	85215
COLBERT	1741 E VINEYARD RD	PHOENIX	AZ	85042
COLBERT	20229 N 105TH AVE	PEORIA	AZ	85382
COLCLASURE	57S3 E ARBOR AVE	MESA	AZ	85206
COLE	16437 W MONROE ST	GOODYEAR	AZ	85338
COLE	2172 W HARRISON STREET	CHANDLER	AZ	85224
COLE-GRAY	20347 N 110TH L	SUN CITY	AZ	85373
COLLA	2691 S MCCLELLAND PL	CHANDLER	AZ	85286
COLLETTE	1111 S PHEASANT	GILBERT	AZ	85296
COLLIER	11101 W AMELIA AVE	AVONDALE	AZ	85392
COLLINS	1536 N 103RD	MESA	AZ	85207
COLTER	5806 S 21ST DR	PHOENIX	AZ	85041
COMER	17700 N 54TH LN	GLENDALE	AZ	85308
CONANT	463 E FAIRFIELD ST	MESA	AZ	85203
CONDE	14530 N 90TH LN	PEORIA	AZ	85381
CONDO	1643 E CONSTITUTION DR	CHANDLER	AZ	85225
CONDOS	11020 S 44TH ST	PHOENIX	AZ	85044
CONFER	10350 W MCDOWELL RD 2161	AVONDALE	AZ	85392
CONKLIN	10363 W CLAIR DR	SUN CITY	AZ	85351
CONKLIN	15583 W WHITTON AVE	GOODYEAR	AZ	85395
CONNELL	8315 N 61ST DR	GLENDALE	AZ	85302
CONNELLY	2151 E LADONNA DRIVE	TEMPE	AZ	85283
CONNELLY	14329 W LISBON LN	SURPRISE	AZ	85379
CONNERS	112 W ALMERIA RD	PHOENIX	AZ	85003
CONNOLLY	280 E BARBARITA AVENUE	GILBERT	AZ	85234
CONNOR	13606 N 21ST PL 9	PHOENIX	AZ	85022
CONNOR	15309 W JACKSON ST	GOODYEAR	AZ	85338
CONRAD	401 S 125TH AVE	AVONDALE	AZ	85323
CONROY	2804 W ROSEWOOD DR	CHANDLER	AZ	85224
CONTENTO	9017 W WHYMAN AVE	TOLLESON	AZ	85353
CONTRATA	27685 N HIGUERA DR	PEORIA	AZ	85383

Comment Document				
Last Name	**Address**			
CONTRERAS	12542 W LOWER BUCKEYE ROAD	AVONDALE	AZ	85323
CONTRERAS	5420 S 38TH DR	PHOENIX	AZ	85041
CONTRERAS	13321 W WINDSOR AVE	GOODYEAR	AZ	85395
CONWAY	3199 N DESOTO ST	CHANDLER	AZ	85224
CONWAY	4813 W ROYAL PALM	GLENDALE	AZ	85302
CONWAY	12913 W SHERIDAN ST	AVONDALE	AZ	85392
COOGAN	15447 W MONTEREY WAY	GOODYEAR	AZ	85395
COOK	16771 W ROMERO LN	SURPRISE	AZ	85387
COOK	23628 S ILLINOIS AVENUE	CHANDLER	AZ	85248
COOKE	1128 E BAYLOR LANE	GILBERT	AZ	85296
COOLEY	1226 W 16TH STREET	TEMPE	AZ	85281
COONEY	14979 W VERDE LN	GOODYEAR	AZ	85395
COOPER	4435 W EUCLID AVENUE	LAVEEN	AZ	85339
COOPER	4849 S DARROW DRIVE #161	TEMPE	AZ	85282
COOPER	6828 S 8TH DR	PHOENIX	AZ	85041
COOPER	12383 W SHERMAN ST	AVONDALE	AZ	85323
COOPEY	1725 N SUNDIAL	MESA	AZ	85205
COOR	14221 W VIA TERCERO	SUN CITY WEST	AZ	85375
COPELAND	3828 W NORTHVIEW AVE	PHOENIX	AZ	85051
COPLEN	822 E VIRGINIA AVE	PHOENIX	AZ	85006
COPPINGER	6327 W CLARENDON AVE	PHOENIX	AZ	85033
COPRICH	10017 W WILLIAMS ST	TOLLESON	AZ	85353
CORBIN	4307 S SUMMIT STREET	GILBERT	AZ	85297
CORDOVA	3523 W COOLIDGE ST	PHOENIX	AZ	85019
CORIO	1149 N 92ND STREET #196	SCOTTSDALE	AZ	85256
CORNE	101 S YUCCA ST 168	CHANDLER	AZ	85224
CORNELISSENS	1600 E SAN TAN ST	CHANDLER	AZ	85225
CORNWELL	16986 W LIMESTONE DR	SURPRISE	AZ	85374
CORNWELL	17639 S 144TH ST	GILBERT	AZ	85297
CORRALES	901 E VAN BUREN ST 3030	PHOENIX	AZ	85006
CORRALES SOTO	2528 E ROESER RD	PHOENIX	AZ	85040
CORREA	860 S PUEBLO ST	GILBERT	AZ	85233
CORRELL	3228 W GLENDALE AVE 109	PHOENIX	AZ	85051
CORY	18510 N PARKVIEW PL 208	SURPRISE	AZ	85374
COSENTINO	19499 N MARBLE CANYON CT	SURPRISE	AZ	85374

Comment Document				
Last Name	**Address**			
COSGROVE	5900 E THOMAS RD D104	SCOTTSDALE	AZ	85251
COSTACHE	1382 W THOMPSON WAY	CHANDLER	AZ	85286
COSTAL	7031 N 26TH DR	PHOENIX	AZ	85051
COTTER	4009 W HAYWARD AVE	PHOENIX	AZ	85051
COUCH	2562 E LYNWOOD ST	MESA	AZ	85213
COUTNOYER	3067 E PALMDALE LANE	GILBERT	AZ	85298
COVARRUBIAS	930 W SUN COAST DRIVE	GILBERT	AZ	85233
COWGER	1760 W PARK AVE	CHANDLER	AZ	85224
COX	2416 E MANHATION DR	TEMPE	AZ	85282
COYLE	10330 W THUNDERBIRD BLVD A120	SUN CITY	AZ	85351
CRAIG	5124 W MAGDALENA LANE	LAVEEN	AZ	85339
CRAIG	8812 W AMELIA AVE	PHOENIX	AZ	85037
CRANDELL	223 E 2ND ST	MESA	AZ	85201
CRANE	1228 N 67TH ST	MESA	AZ	85205
CRANE	931 E 10TH PL	MESA	AZ	85203
CRANEY	7733 W WAHALLA LN	GLENDALE	AZ	85308
CRAUSE	12402 W MISSOUR	LITCHFIELD	AZ	85340
CRAVER	7352 E MELROSE ST	MESA	AZ	85207
CRAWFORD	21411 N 157TH DR	SUN CITY WEST	AZ	85375
CRAWFORD	2244 N EDGEMERE ST	PHOENIX	AZ	85006
CRAWFORD	406 E PALM ST	LITCHFIELD PARK	AZ	85340
CRAWFORD	937 W MESETO AVENUE	MESA	AZ	85210
CRESPO	3406 W GLEN ROSA AVE	PHOENIX	AZ	85017
CRESPO	7543 W PASADENA	GLENDALE	AZ	85303
CREWDSON	11461 W AUSTIN THOMAS DR	SURPRISE	AZ	85378
CRIDDLE	7215 S 15TH PL	PHOENIX	AZ	85042
CROCKER	43 W BEALL AVENUE	MESA	AZ	85210
CROFF	10835 W SACK DR	SUN CITY	AZ	85373
CRONIN	409 E LAGUNA DR	TEMPE	AZ	85282
CROOK	12501 E CLOUD ROAD	CHANDLER	AZ	85249
CROSBY	5442 W EL CAMIN	GLENDALE	AZ	85302
CROSTHWAITH	1501 S KAY CIR	MESA	AZ	85204
CROTTS	15599 W RIO VISTA LN	GOODYEAR	AZ	85338

Comment Document				
Last Name	**Address**			
CROUCH	725 S MONTEREY STREET	GILBERT	AZ	85233
CROWE	1753 W SPRINGFIELD WAY	CHANDLER	AZ	85286
CROWLEY	4482 E SYCAMORE DRIVE	GILBERT	AZ	85298
CRUMLY	13801 N 98TH AVE	SUN CITY	AZ	85351
CRUMMEY	306 W VERNON AVE	PHOENIX	AZ	85003
CRUMP	15051 N 73RD DR	PEORIA	AZ	85381
CRUZ	21107 E DUNCAN ST	QUEEN CREEK	AZ	85142
CRUZ	2203 W MUSKET PL	CHANDLER	AZ	85286
CRUZ	2873 E WINGED FOOT DR	CHANDLER	AZ	85249
CRUZ	331 N KENNETH PLACE	CHANDLER	AZ	85226
CRUZ	6618 N 52ND AVE	GLENDALE	AZ	85301
CRUZ	6902 E MONTEREY WAY	SCOTTSDALE	AZ	85251
CRUZ	8234 W PIMA STREET	PHOENIX	AZ	85043
CSADER	102 W 9TH ST	MESA	AZ	85201
CUDNEY	5001 E MAIN ST 48	MESA	AZ	85205
CULLEN	4604 E PIEDMONT RD	PHOENIX	AZ	85044
CULPEPPER	5619 W MARIPOSA ST	PHOENIX	AZ	85031
CUMPTON	7519 N 17TH AVE	PHOENIX	AZ	85021
CUNNINGHAM	24710 S CEDARCREST DRIVE	CHANDLER	AZ	85248
CUNNINGHAM	8719 W CATALINA DRIVE	PHOENIX	AZ	85037
CURIEL	9153 W PIERCE STREET	TOLLESON	AZ	85353
CURRAN	7556 E TASMAN CIR	MESA	AZ	85207
CURRY	2639 E FOX ST	MESA	AZ	85213
CURTIS	10909 W CHINO DR	SUN CITY	AZ	85373
CURTIS	2839 E HERMOSA VISTA DR	MESA	AZ	85213
CURTIS	6210 S 4TH AVE	PHOENIX	AZ	85041
CURTIS	13868 N 79TH AVE 131	PEORIA	AZ	85381
CYGA	7401 W BRILES RD	PEORIA	AZ	85383
CZERNISKI	145 E GALVESTON STREET	GILBERT	AZ	85295
DAD	1850 W SUNNYSLO	PHOENIX	AZ	85021
DAHL	15483 N 88TH AVE	PEORIA	AZ	85382
DAHL	578 S ROANOKE STREET	GILBERT	AZ	85296
DAILY	8775 W NICOLET AVE	GLENDALE	AZ	85305
DALBIK	2992 E BEECHNUT PLACE	CHANDLER	AZ	85249
DALEY	14608 W VIA MONTOYA	SUN CITY WEST	AZ	85375

Comment Document				
Last Name	**Address**			
DALLAS	10111 N 75TH DR	PEORIA	AZ	85345
DALLAS	8132 E KRAMER ST	MESA	AZ	85207
DAMES	3105 E DESERT FLOWER LN	PHOENIX	AZ	85048
DANAHER	1330 S ILLLINOIS COURT	CHANDLER	AZ	85286
DANDY	25 N COTTONWOOD ST	CHANDLER	AZ	85225
DANIEL	1168 W TREMAINE AVENUE	GILBERT	AZ	85233
DANIEL	2518 W ROESER RD	PHOENIX	AZ	85041
DANIEL	3925 W STELLA LN	PHOENIX	AZ	85019
DANIEL	850 E CANYON WAY	CHANDLER	AZ	85249
DANIELS	11205 W CITRUS GROVE WAY	AVONDALE	AZ	85392
DANIELS	2006 W NANCY LN	PHOENIX	AZ	85041
DANIELS	395 N WILLIAMS STREET	CHANDLER	AZ	85225
DANIELS	10556 W FLOWER ST	AVONDALE	AZ	85392
DANIELSEN	2107 E MEAD PL	CHANDLER	AZ	85249
DANIELSON	18635 E HAPPY ROAD	QUEEN CREEK	AZ	85142
DANISH	6313 E DODGE ST	MESA	AZ	85205
DARLING	5448 W MILKY WAY	CHANDLER	AZ	85226
DARRINGTON	1123 E MONROE ST 121	PHOENIX	AZ	85034
DATWYLER	3720 N GRANITE DR	GOODYEAR	AZ	85395
DAVENPORT	3351 S HORIZON PL	CHANDLER	AZ	85248
DAVENPORT	6805 W WINDSOR BLVD	GLENDALE	AZ	85303
DAVIDSON	6445 S MAPLE AVENUE #1117	TEMPE	AZ	85283
DAVIDSON	9172 W QUAIL AVE	PEORIA	AZ	85382
DAVILA	1708 W 6TH AVENUE	MESA	AZ	85202
DAVILA	19065 E VIA PARK STREET	QUEEN CREEK	AZ	85142
DAVIS	10359 W BURNETT RD	PEORIA	AZ	85382
DAVIS	10618 E HERCULES DRIVE	CHANDLER	AZ	85248
DAVIS	10628 W GRISWOLD RD	PEORIA	AZ	85345
DAVIS	13015 W RANCHO SANTA FE BOULEVARD #2103	AVONDALE	AZ	85392
DAVIS	14502 W ANTELOPE DR	SUN CITY WEST	AZ	85375
DAVIS	1731 E DORAL DRIVE	CHANDLER	AZ	85249
DAVIS	17641 W VOLTAIRE ST	SURPRISE	AZ	85388
DAVIS	1816 W VERDE LN	PHOENIX	AZ	85015
DAVIS	1905 E MOBILE LANE	PHOENIX	AZ	85040

Comment Document				
Last Name	**Address**			
DAVIS	2830 W CAVALIER DR	PHOENIX	AZ	85017
DAVIS	4402 W PALMAIRE AVE	GLENDALE	AZ	85301
DAVIS	6223 E COLBY ST	MESA	AZ	85205
DAVIS	6529 N 74TH DR	GLENDALE	AZ	85303
DAVIS	8552 W RUE DE LAMOUR	PEORIA	AZ	85381
DAVIS	1160 N CENTER ST	MESA	AZ	85201
DAVIS	12614 W CASTLE ROCK DR	SUN CITY WEST	AZ	85375
DAVIS	13605 W COLTER ST	LITCHFIELD PARK	AZ	85340
DAVIS	1835 EST CHARLES AVE	PHOENIX	AZ	85042
DAVIS	4509 E DESERT TRUMPET RD	PHOENIX	AZ	85044
DAVIS	5601 W MCDOWELL RD 1066	PHOENIX	AZ	85035
DAVIS	8010 W RUE DE LAMOUR	PEORIA	AZ	85381
DAVIS	7412 W CREST LN	GLENDALE	AZ	85310
DAVIS-ROBINSON	2443 E DETROIT CT	CHANDLER	AZ	85225
DAWSON	241 S COMANCHE DR	CHANDLER	AZ	85224
DAY	2012 E BURGESS LANE	PHOENIX	AZ	85042
DAY	4601 W SAN JUAN AVE	GLENDALE	AZ	85301
DE BONDT	11006 W CRIMSON LN	AVONDALE	AZ	85392
DE CIANCIO	262 E BROWN RD 122	MESA	AZ	85201
DE LA CRUZ	6408 E DUNCAN ST	MESA	AZ	85205
DE LA CRUZ	15220 N EL FRIO CT	EL MIRAGE	AZ	85335
DE LA VEGA	4311 E GROVE ST	PHOENIX	AZ	85040
DE LEON	15031 W DESERT HILLS DR	SURPRISE	AZ	85379
DE MENDOZA	1507 W CARSON RD	PHOENIX	AZ	85041
DE PRIEST	2022 N NEVADA STREET #1222	CHANDLER	AZ	85225
DEACON	3056 N 160TH AVE	GOODYEAR	AZ	85395
DEAL	2743 W MONTEBELLO AVE	PHOENIX	AZ	85017
DEAMBRA	260 N STANLEY PL	CHANDLER	AZ	85226
DEAN	1253 W SAN CARLOS PLACE	CHANDLER	AZ	85248
DEAN	434 E STOTTLER DRIVE	GILBERT	AZ	85296
DEAN	11S96 W SIERRA DAWN BLVD 269	SURPRISE	AZ	85378
DEAN	301 W SPARROW DR	CHANDLER	AZ	85286
DEATON	17903 E SAN TAN BOULEVARD	QUEEN CREEK	AZ	85142
DEBACHER	16239 W EVANS DR	SURPRISE	AZ	85379

Comment Document				
Last Name	**Address**			
DEBOER	13801 W VIA MANANA	SUN CITY WEST	AZ	85375
DECLAUDIO	1602 S KAREN DRIVE	CHANDLER	AZ	85286
DEFILIPPI	5548 E ASPEN AVE	MESA	AZ	85206
DEFUSCO	1601 E EDGEWATER DR	TEMPE	AZ	85283
DEGONZALEZ	4353 S SOUTHERN AVENUE	PHOENIX	AZ	85042
DEGRAFF	14635 S 4TH AVE	PHOENIX	AZ	85045
DEGUILIO	564 W CANDLEWOOD LANE	GILBERT	AZ	85233
DEL LLANO	412 E GEMINI DRIVE	TEMPE	AZ	85283
DEL TREDICI	4804 W PEDRO LN	LAVEEN	AZ	85339
DELACRUZ	3801 W MARSHALL AVE	PHOENIX	AZ	85019
DELACRUZ	10615 S 27TH AVE	LAVEEN	AZ	85339
DELACRUZ	3505 N HEATHER LN	AVONDALE	AZ	85392
DELAGARZA	889 W DUBLIN STREET	CHANDLER	AZ	85225
DELAND	725 S PUEBLO STREET	GILBERT	AZ	85233
DELATORRERUIZ	21335 S 185TH WAY	QUEEN CREEK	AZ	85142
DELGADO	11210 W ALVARADO RD	AVONDALE	AZ	85392
DELONG	2042 E CORNELL DRIVE	TEMPE	AZ	85283
DEMALINE	17131 N JOSHUA PATH	SURPRISE	AZ	85374
DEMARBIEUX	16156 W LATHAM ST	GOODYEAR	AZ	85338
DEMICHAEL	26202 S BUTTONWOOD DRIVE	CHANDLER	AZ	85248
DEMING	4431 N 9TH AVE	PHOENIX	AZ	85013
DEMORY	12206 N RIO VISTA DR	SUN CITY	AZ	85351
DENHAM	130 W BROWN RD B302	MESA	AZ	85201
DENNIS	12746 W MERRELL ST	AVONDALE	AZ	85392
DENNY	4027 W TOWNLEY	PHOENIX	AZ	85051
DEPAUL	6258 S COLONIAL WAY	TEMPE	AZ	85283
DEPEITRO	898 E ELGIN STREET	CHANDLER	AZ	85225
DEPRENGER	9923 W GULF HILLS DR	SUN CITY	AZ	85351
DERBIS	9238 W KERRY LN	PEORIA	AZ	85382
DEROSA FAMILY	923 E WATERVIEW PL	CHANDLER	AZ	85249
DERRIG	17229 N ZUNI TRL	SURPRISE	AZ	85374
DERRYBERRY	5818 E OAK ST	SCOTTSDALE	AZ	85257
DERY	109 S NEELY ST	GILBERT	AZ	85233
DESHONG	2421 E INVERNESS AVE	MESA	AZ	85204
DESHONG	2758 N ESTRADA	MESA	AZ	85207

Comment Document				
Last Name	**Address**			
DESROSIERS	4233 E LEWIS AVE	PHOENIX	AZ	85008
DEVERMANN	2810 E HACKAMORE CIR	MESA	AZ	85213
DEVINE	613 N 4TH AVE 715	PHOENIX	AZ	85003
DEVORE	14819 S 20TH STREET	PHOENIX	AZ	85048
DEWALD	1643 N OLD COLONY	MESA	AZ	85201
DEWITT	2526 E HIGHLAND	PHOENIX	AZ	85016
DEWITTE	4633 W PARK AVE	CHANDLER	AZ	85226
DEXTER	2754 E MOUNTAIN SKY AVENUE	PHOENIX	AZ	85048
DEYDEN	3060 N RIDGECREST 61	MESA	AZ	85207
DEZOTELL	35 W BROWN RD 313	MESA	AZ	85201
DIAZ	12512 W LOWER BUCKEYE RD	AVONDALE	AZ	85323
DIAZ	1826 E PECAN ROAD	PHOENIX	AZ	85040
DIAZ	6986 S KIMBERLEE WAY	CHANDLER	AZ	85249
DICHIARA	3052 E DESERT COVE AVE	PHOENIX	AZ	85028
DICK	10421 E REGAL DRIVE	CHANDLER	AZ	85248
DICKENS	501 E BISHOP DRIVE	TEMPE	AZ	85282
DICKERSON	17500 N 67TH AV	GLENDALE	AZ	85308
DICKSON	3060 N RIDGECREST 75	MESA	AZ	85207
DICKSTEIN	16525 W FLORA LN	SURPRISE	AZ	85387
DIDONE	26406 S EASTLAKE DR	CHANDLER	AZ	85248
DIEHL	19785 E VIA DEL RANCHO	QUEEN CREEK	AZ	85142
DIEHL-BRENITS	21264 E PUMMELOS RD	QUEEN CREEK	AZ	85142
DIEL	3336 N CARRIAGE LN	CHANDLER	AZ	85224
DIETRICH	137 E PASEO WAY	PHOENIX	AZ	85042
DIETZ	2140 N YUCCA COURT	CHANDLER	AZ	85224
DIETZ	329 E LA DIOSA DRIVE	TEMPE	AZ	85282
DIGHT	9735 W WRANGLER DR	SUN CITY	AZ	85373
DIGIOVINE	1818 E GLENROSA AVE	PHOENIX	AZ	85016
DINGMAN	16602 N 168TH AVE	SURPRISE	AZ	85388
DINSDALE	2020 E HACKAMORE ST	MESA	AZ	85213
DIPPEL	17665 W VALENTINE ST	SURPRISE	AZ	85388
DIRKS	1717 E WIER AVENUE	PHOENIX	AZ	85040
DISMUKES	12047 N 149TH DR	SURPRISE	AZ	85379
DITTBERNER	19670 N COYOTE LAKES PKY	SURPRISE	AZ	85378
DIVONA	10709 E COOPERS HAWK DRIVE	CHANDLER	AZ	85248

Comment Document				
Last Name	**Address**			
DIXON	3536 N ARABELLA	MESA	AZ	85215
DIXON	807 N 47TH PL	PHOENIX	AZ	85008
DIXON	818 E TODD DR	TEMPE	AZ	85283
DLUGOS	3033 W MARYLAND AVE	PHOENIX	AZ	85017
DOAK	15521 W VENTURA ST	SURPRISE	AZ	85379
DOANE	11232 N BALBOA DR	SUN CITY	AZ	85351
DOBBS	3044 N 37TH DR	PHOENIX	AZ	85019
DOBBS	1529 W ALAMO DR	CHANDLER	AZ	85224
DOBRIN	3680 N 149TH AVE	GOODYEAR	AZ	85395
DODGE	1154 W EDGEWATER DR	GILBERT	AZ	85233
DODT	3101 W MARIPOSA ST	PHOENIX	AZ	85017
DOEING	941 W OSAGE AVENUE	MESA	AZ	85210
DOELY	1908 S 85TH LANE	TOLLESON	AZ	85353
DOERING	2940 E BROADWAY RD 15O	MESA	AZ	85204
DOIDGE	1451 S WESTERN SKIES DRIVE	GILBERT	AZ	85296
DOLGAN	12567 N 176TH LN	SURPRISE	AZ	85388
DOLIN	10545 E HERCULES DRIVE	CHANDLER	AZ	85248
DOMINGUEZ	1337 E WILLETTA ST	PHOENIX	AZ	85006
DOMINGUEZ	14505 N 1ST AVE	EL MIRAGE	AZ	85335
DOMINI	1836 W MARLETTE AVE	PHOENIX	AZ	85015
DOMSKY	340 E SOLANA DR	TEMPE	AZ	85281
DONALD	3524 N 35TH PL	PHOENIX	AZ	85018
DONNER	13251 N 25TH DR	PHOENIX	AZ	85029
DONOVAN	9629 W ALICE AVE	PEORIA	AZ	85345
DORA	167 W PIERSON ST	PHOENIX	AZ	85013
DORCHEUS	346 E EMBASSY ST	TEMPE	AZ	85281
DORRIS	1696 W BLUEBIRD DRIVE	CHANDLER	AZ	85286
DORSTEN	2530 N 14TH ST	PHOENIX	AZ	85006
DOSS	2327 E SHERATON LN	PHOENIX	AZ	85040
DOUGHERTY	1144 W MACKENZIE DR	PHOENIX	AZ	85013
DOUGHERTY	1044 E DENTON LN	PHOENIX	AZ	85014
DOUGHERTY	337 E OCOTILLO	PHOENIX	AZ	85012
DOUGHTY	18806 N 95TH AVE	PEORIA	AZ	85382
DOUGLAS	1750 S ALMA SCHOOL ROAD #114	MESA	AZ	85210
DOUGLAS	4131 E FREMONT STREET	PHOENIX	AZ	85042

Comment Document				
Last Name	**Address**			
DOUGLAS	3639 W LAWRENCE LN	PHOENIX	AZ	85051
DOVER	8540 E MCDOWELL RD 119	MESA	AZ	85207
DOWDLE	1121 W LONGHORN DR	CHANDLER	AZ	85286
DOWELL	3509 E PICCADILLY RD	PHOENIX	AZ	85018
DOWLING	13621 W DENTON ST	LITCHFIELD PARK	AZ	85340
DOWNER	5402 E MCKELLIPS RD 241	MESA	AZ	85215
DOWNEY	3441 S CAMELLIA PLACE	CHANDLER	AZ	85248
DOWNEY	949 S LONGMORE 141	MESA	AZ	85202
DOWNING	14353 W WOODBRIDGE AVE	GOODYEAR	AZ	85395
DOWNS	10412 N 105TH AVE	SUN CITY	AZ	85351
DOWNS	9015 E COOPERS HAWK DR	CHANDLER	AZ	85248
DOXEY	19537 N 69TH AVE	GLENDALE	AZ	85308
DOYLE	628 S CRISS STREET	CHANDLER	AZ	85226
DOYLE	9608 W PINERIDGE DR	SUN CITY	AZ	85351
DRAKE	15820 W HERITAGE DR	SUN CITY WEST	AZ	85375
DRAPER	1045 W MARYLAND AVE	PHOENIX	AZ	85013
DRAPER	1947 E LAGUNA DR	TEMPE	AZ	85282
DREGALLA	19202 N PALERMO ST	SURPRISE	AZ	85374
DREVO	4633 E FLOWER AVE	MESA	AZ	85206
DREW	16287 W WASHINGTON ST	GOODYEAR	AZ	85338
DREYER	3128 E ORIOLE DR	GILBERT	AZ	85297
DREYFUS	14836 W DOMINGO LN	SUN CITY WEST	AZ	85375
DRIEVOLD	9508 W BROKENSTONE DR	SUN CITY	AZ	85351
DRISCOLL	137 W LEAH CT	GILBERT	AZ	85233
DRISKELL	4252 W TOWNLEY	PHOENIX	AZ	85051
DRIVER	3935 W ELM ST	PHOENIX	AZ	85019
DRIZIGACKER	1635 N REVERE	MESA	AZ	85201
DSOUZA	5392 W ELGIN ST	CHANDLER	AZ	85226
DUARTE	11726 S 40TH AVENUE	LAVEEN	AZ	85339
DUARTE	2833 W POLK ST	PHOENIX	AZ	85009
DUBASH	3247 E PIRO STREET	PHOENIX	AZ	85044
DUBOIS	9859 E SUNBURST DR	CHANDLER	AZ	85248
DUBOIS	7810 W PEORIA AVE 104	PEORIA	AZ	85345
DUDDING	2041 W GALVESTON STREET	CHANDLER	AZ	85224

Comment Document				
Last Name	**Address**			
DUENAS	13831 W SOLANO DR	LITCHFIELD PARK	AZ	85340
DUGAN	3413 N 129TH DR	AVONDALE	AZ	85392
DUGUID	13435 W BALLAD DR	SUN CITY WEST	AZ	85375
DUNAGAN	7136 W IRWIN AVE	LAVEEN	AZ	85339
DUNBAR	17300 N 88TH AVE 216	PEORIA	AZ	85382
DUNBAR	8780 E MCKELLIPS ROAD #132	SCOTTSDALE	AZ	85257
DUNCAN	2031 W BLOOMFIELD RD 3	PHOENIX	AZ	85029
DUNCAN	17415 N JAVELINA DR	SURPRISE	AZ	85374
DUNN	1318 W BETHANY HOME RD	PHOENIX	AZ	85013
DUNN	1521 W ST ANNE AVE	PHOENIX	AZ	85041
DUNN	4009 N SAN GABRIEL CIR	MESA	AZ	85215
DUNN	7116 W WATKINS STREET	PHOENIX	AZ	85043
DUNNIGAN	1734 W TUCKEY LN 12	PHOENIX	AZ	85015
DURAN	11739 W MARIPOSA GRANDE	SUN CITY	AZ	85373
DURAN	2933 W CLAREMONT ST	PHOENIX	AZ	85017
DURAN	6223 W WINDSOR BLVD	GLENDALE	AZ	85301
DURAN	625 E JULIE DR	TEMPE	AZ	85283
DURANOVIC	5038 S HARDY DRIVE #1086	TEMPE	AZ	85282
DURANTI	2329 N RECKER RD 32	MESA	AZ	85215
DUTCH	3838 N 157TH AVE	GOODYEAR	AZ	85395
DUVALL	7130 E SADDLEBACK ST 49	MESA	AZ	85207
DYER	6035 E SIERRA BLANCA ST	MESA	AZ	85215
DYKE	1402 W EL ALBA WAY	CHANDLER	AZ	85224
DZBANKO	2810 E FOLLEY PLACE	CHANDLER	AZ	85225
EAGAN	11507 W ORANGE BLOSSOM LN	AVONDALE	AZ	85392
EAKINS	3040 S COUNTRY CLUB WAY	TEMPE	AZ	85282
EARLY	2927 E FAIRMOUNT AVE	PHOENIX	AZ	85016
EATON	11426 W MOHAVE ST	AVONDALE	AZ	85323
EATON	6535 E BARSTOW ST	MESA	AZ	85205
EBEL	15468 W MESCAL ST	SURPRISE	AZ	85379
EBER	18358 N LINKLETTER LN	SURPRISE	AZ	85374
ECCLESTON	808 W JUANITA CIRCLE	MESA	AZ	85210
ECHEVERRIA	6083 W DUBLIN LN	CHANDLER	AZ	85226
EDDY	4390 E OLNEY DR	PHOENIX	AZ	85044

Comment Document				
Last Name	**Address**			
EDMONDS	24511 S SADDLETREE DR	CHANDLER	AZ	85248
EDMUND	2112 W SILVERGATE DR	CHANDLER	AZ	85225
EDWARDS	1008 N PLYMOUTH CT	GILBERT	AZ	85234
EDWARDS	1450 S YUCCA PLACE	CHANDLER	AZ	85286
EDWARDS	1495 LEISURE WORLD	MESA	AZ	85206
EDWARDS	15720 W SKINNER RD	SURPRISE	AZ	85387
EDWARDS	25850 S ILLINOIS AVENUE	CHANDLER	AZ	85248
EDWARDS	6250 N 19TH AVE 276	PHOENIX	AZ	85015
EDWARDS	6752 W SADDLEHORN RD	PEORIA	AZ	85383
EDWARDS	22130 N 89TH AVE	PEORIA	AZ	85383
EDWARDS	922 S LONGMORE 236	MESA	AZ	85202
EEDS	6601 S 123RD AVENUE	TOLLESON	AZ	85353
EGGEN	2910 E YUCCA ST	PHOENIX	AZ	85028
EHRHARDT	7934 E TETON CIR	MESA	AZ	85207
EICHLIN	1367 E WASHINGTON AVENUE	GILBERT	AZ	85234
EICK	15304 W VIA MONTOYA	SUN CITY WEST	AZ	85375
EICKMEIER	10450 W OAKMONT DR	SUN CITY	AZ	85351
EIGELL	1474 E TULSA STREET	GILBERT	AZ	85295
EIMAR	27420 N CARDINAL LN	PEORIA	AZ	85383
EISENBRISE	2263 E CORTEZ DRIVE	GILBERT	AZ	85234
EISENHART	9044 E COOPERS HAWK DR	CHANDLER	AZ	85248
EITNER	4032 W GLENN DR	PHOENIX	AZ	85051
EKLOFE	1939 E MERLOT STREET	GILBERT	AZ	85298
EKLUND	5735 E MCDOWELL RD 127	MESA	AZ	85215
ELCHLINGER	13080 N 99TH DR D	SUN CITY	AZ	85351
ELIAS	925 N COLLEGE AVE 1135	TEMPE	AZ	85281
ELIAS	11428 S MANDAN ST	PHOENIX	AZ	85044
ELINE	12602 W BUTTERFIELD DR	SUN CITY WEST	AZ	85375
ELLIOTT	235 E CERCADO LN	LITCHFIELD PARK	AZ	85340
ELLIOTT	2676 W GILA LN	CHANDLER	AZ	85224
ELLIS	14331 N 145TH D	SURPRISE	AZ	85379
ELLIS	23726 S ILLINOIS AVE	CHANDLER	AZ	85248
ELLIS	5514 S 12TH WAY	PHOENIX	AZ	85040
ELLIS	11206 W GARFIELD ST	AVONDALE	AZ	85323

Comment Document				
Last Name	**Address**			
ELLIS	1449 E STANFORD AVE	GILBERT	AZ	85234
ELLIS	15749 W EUCALYPTUS CT	SURPRISE	AZ	85374
ELLISON	7152 W LEWIS AVE	PHOENIX	AZ	85035
ELMORE	15S42 W SUPAI CIR	GOODYEAR	AZ	85338
EL-SHARKAWY	2510 E GRANITE VIEW DR	PHOENIX	AZ	85048
ELY	9342 W ESCUDA DR	PEORIA	AZ	85382
EMERSON	15021 W HERITAGE OAK WAY	SURPRISE	AZ	85374
EMLER	5114 E DOVER ST	MESA	AZ	85205
EMMETT	3236 N 26TH PL	PHOENIX	AZ	85016
ENDERS	9149 E OHIO AVE	CHANDLER	AZ	85248
ENGEL	14132 W CIRCLE RIDGE DR	SUN CITY WEST	AZ	85375
ENGELBRETSON	9942 W MOHAWK LN	PEORIA	AZ	85382
ENGELMAN	19618 N WILLOWCREEK CIR	SUN CITY	AZ	85373
ENGLAND	3946 W LAS PALMARITAS DR	PHOENIX	AZ	85051
ENGLISH	25623 S 189TH STREET	QUEEN CREEK	AZ	85142
ENGLISH	26605 S SADDLETREE DR	CHANDLER	AZ	85248
ENKE	S632 W GLEN ROSA AVE	PHOENIX	AZ	85031
ENOCH	15783 W DESERT	SURPRISE	AZ	85379
ENRIQUEZ	10541 W ECHO LN	PEORIA	AZ	85345
EPHRAIM	405 W LA JOLLA DR	TEMPE	AZ	85282
ERGER	910 W ST KATERI DR	PHOENIX	AZ	85041
ERICKSON	4283 E ARGYLE DR	GILBERT	AZ	85298
ERICKSON	7133 W TUCKEY LN	GLENDALE	AZ	85303
ERIVES	2740 W WAYLAND DR	PHOENIX	AZ	85041
ERNE	2625 N 158TH AVE	GOODYEAR	AZ	85395
ERTELT	11456 S PAWNEE CIR	PHOENIX	AZ	85044
ERWIN	15418 W MOONLIGHT WAY	SURPRISE	AZ	85374
ERWIN	2025 N 47TH PL	PHOENIX	AZ	85008
ERWIN	6320 W ORCHID LN	CHANDLER	AZ	85226
ESCALANTE	6517 S HAZELTON LANE	TEMPE	AZ	85283
ESCARCEGA	10820 W MIAMI AVENUE	TOLLESON	AZ	85353
ESCOBAR	10720 W ASHLAND WAY	AVONDALE	AZ	85392
ESCORCIA	104 S 66TH ST	MESA	AZ	85206
ESKRA	3218 E MALDONADO DR	PHOENIX	AZ	85042
ESKRIDGE	9305 S 35TH DR	LAVEEN	AZ	85339

Comment Document				
Last Name	**Address**			
ESPARZA	4444 S 5TH STREET	PHOENIX	AZ	85040
ESPINOSA	3377 E BARTLETI PL	CHANDLER	AZ	85249
ESQUIVEL	4027 N 47TH DR	PHOENIX	AZ	85031
ESTABROOK	3006 N 78TH ST	MESA	AZ	85207
ESTLUND	6634 N 60TH AVE	GLENDALE	AZ	85301
ESTRADA	1621 W AUBURN STREET	MESA	AZ	85201
ESTRADA	3861 E DEWBERRY AVE	MESA	AZ	85206
ESTRADA	4901 W OCOTILLO RD	GLENDALE	AZ	85301
ESTRADA	6341 W DEVONSHIRE	PHOENIX	AZ	85033
ESTRADA	13835 N CAMEO DR	SUN CITY	AZ	85351
ESTRELLA	4420 E FREMONT ST	PHOENIX	AZ	85042
ETHEREDGE	1535 N HORNE 13	MESA	AZ	85203
ETHINGTON	4857 E ELMWOOD CIR	MESA	AZ	85205
ETINGER	15582 W FAIRMOUNT AVE	GOODYEAR	AZ	85395
EVANCHO	1705 N APACHE DRIVE	CHANDLER	AZ	85224
EVANS	10010 E WILLOWCREST COURT	CHANDLER	AZ	85248
EVANS	6534 N MARYLAND CIR	PHOENIX	AZ	85013
EVANS	9311 E SUN LAKES BOULEVARD	CHANDLER	AZ	85248
EVANS	1019 W VERMONT AVE	PHOENIX	AZ	85013
EVERS	128 E PIERCE STREET	TEMPE	AZ	85281
EVERS	15312 W VERDE LN	GOODYEAR	AZ	85395
EVITTS	25643 S WYOMING AVENUE	CHANDLER	AZ	85248
EVITTS	425 E MCKELLIPS RD 41B	MESA	AZ	85203
EWEN	1121 W EDGEMONT AVE	PHOENIX	AZ	85007
EWERT	1053 E JADE DR	CHANDLER	AZ	85286
EYRICH	1613 W VIRGINIA AVE	PHOENIX	AZ	85007
FAGRELIUS	9210 N 7TH AVE	PHOENIX	AZ	85021
FAHEY	905 W MONTE WAY	PHOENIX	AZ	85041
FAJARDO	2545 N 83RD AVENUE #1061	PHOENIX	AZ	85035
FAJARDO	5735 E MCDOWELL RD 329	MESA	AZ	85215
FALCO	17686 W ARCADIA DR	SURPRISE	AZ	85374
FANNING	1339 W LOS LAGOS VISTA	MESA	AZ	85202
FANO	14742 W DOMINGO LN	SUN CITY WEST	AZ	85375
FARMER	3040 N 36TH ST N402	PHOENIX	AZ	85018
FARMER	6812 W BURGESS LN	LAVEEN	AZ	85339

Comment Document				
Last Name	**Address**			
FARNHAM	24622 S STONEY PATH DR	CHANDLER	AZ	85248
FARRAR	4236 E ZIA ST	PHOENIX	AZ	85044
FAUBION	63S1 SGRANITE DR	CHANDLER	AZ	85249
FAUGHT	943 N MILLER ST	MESA	AZ	85203
FAUSS	19362 E CARRIAGE WAY	QUEEN CREEK	AZ	85142
FAVELA	5404 S 3RD AVE	PHOENIX	AZ	85041
FAYERWEATHER	12740 W INDIAN SCHOOL RD U108	LITCHFIELD PARK	AZ	85340
FAYNIK	7036 W MELODY DRIVE	LAVEEN	AZ	85339
FECHTER	1328 E WOODMAN DR	TEMPE	AZ	85283
FEDERICO	5322 W ALLEN STREET	LAVEEN	AZ	85339
FEELEY	15796 W CARIBBEAN LN	SURPRISE	AZ	85379
FEENEY	801 N FEDERAL ST 1129	CHANDLER	AZ	85226
FEETHAM	8644 W DIANA AVE	PEORIA	AZ	85345
FEHER	9438 E ROCKY LAKE DRIVE	CHANDLER	AZ	85248
FELDER	7217 S 56TH LN	LAVEEN	AZ	85339
FENNER	18421 N 96TH AVE	SUN CITY	AZ	85373
FENSTER	15294 W DOLLIN	SURPRISE	AZ	85374
FENWICK	8402 W MARY ANN DR	PEORIA	AZ	85382
FEORE	2204 E DETROIT STREET	CHANDLER	AZ	85225
FEREBEE	10014 W HESS STREET	TOLLESON	AZ	85353
FERGUSON	1357 N PASADENA	MESA	AZ	85201
FERNANDEZ	608 N FREESTONE CIR	MESA	AZ	85203
FERRARO	9540 E PINTO PLACE	CHANDLER	AZ	85248
FIALA	1834 E LADONNA DRIVE	TEMPE	AZ	85283
FICKER	1376 S COLT DR	GILBERT	AZ	85296
FIELDS	2549 E MEGAN STREET	GILBERT	AZ	85295
FIELDS	22251 S 214TH ST	QUEEN CREEK	AZ	85142
FIELDS	7817 S 46TH LN	LAVEEN	AZ	85339
FIERKE	862 N CROSSBOW CT	CHANDLER	AZ	85225
FIERROS	3828 N 9TH ST	PHOENIX	AZ	85014
FIFE	6455 E PRESIDIO ST	MESA	AZ	85215
FIKE	25309 S 187TH PLACE	QUEEN CREEK	AZ	85142
FIL	1028 W 19TH ST	TEMPE	AZ	85281
FINDLAY	4057 E JUDE LANE	GILBERT	AZ	85298

Comment Document				
Last Name	**Address**			
FINK	16457 W CENTURY PLANT DR	SURPRISE	AZ	85387
FINK	19029 N SIGNAL BUTTE CIR	SUN CITY	AZ	85373
FINK	525 E DEL RIO DRIVE	TEMPE	AZ	85282
FINKBEINER	205 S HIGLEY RD 231	MESA	AZ	85206
FINKEMEIER	77 E LOUIS WAY	TEMPE	AZ	85284
FINNELL	3947 S SOHO LN	CHANDLER	AZ	85286
FIRRIELLO	1715 N PARSELL CIR	MESA	AZ	85203
FISCHER	16211 W MARCONI AVE	SURPRISE	AZ	85374
FISCHER	959 W PERALTA AVENUE	MESA	AZ	85210
FISCHER	1110 N 85TH PL	SCOTTSDALE	AZ	85257
FISCHER	5459 E FLORIAN AVE	MESA 85206	AZ	85257
FISCHER	10960 N 67TH AVE 79	GLENDALE	AZ	85304
FISHBACK	9015 E CACTUS LN	CHANDLER	AZ	85248
FISHER	2722 E BOSTON CIR	MESA	AZ	85213
FISHER	3242 E BRIARWOOD TER	PHOENIX	AZ	85048
FISHER	660 S OAK CIRCLE	CHANDLER	AZ	85226
FISHER	9703 W LINDGREN AVE	SUN CITY	AZ	85373
FISHER	1105 N DYSART RD 16	AVONDALE	AZ	85323
FISHER	15368 W EARLL CT	GOODYEAR	AZ	85395
FISHER	22729 W PATTON RD	WIDMANN	AZ	85361
FISHER	2519 W WASHINGTON ST	PHOENIX	AZ	85009
FISHER	2946 N 14TH ST 27	PHOENIX	AZ	85014
FISHER	7819 E CORONADO RD	SCOTTSDALE 85257	AZ	85257
FISHER	9019 E EMERALD DR	CHANDLER	AZ	85248
FISHER	1220 S WAGON WHEEL DR	CHANDLER	AZ	85286
FISHLER	6924 W LONE CACTUS DR	GLENDALE	AZ	85308
FITCH	11002 N 64TH ST	SCOTTSDALE	AZ	85254
FITZGERALD	6735 S 35TH DR	PHOENIX	AZ	85041
FITZHUGH	8327 W ROSE LN	GLENDALE	AZ	85305
FITZHUGH	3512 W TYSON ST	CHANDLER	AZ	85226
FLADELAND	11441 N BALBOA DR	SUN CITY	AZ	85351
FLAGG	12825 W CLARENDON AVENUE	AVONDALE	AZ	85392
FLANDERS	3933 W EDGEMONT AVE	PHOENIX	AZ	85009
FLANNERY	13235 N 108TH AVE	SUN CITY	AZ	85351

Comment Document				
Last Name	**Address**			
FLEMING	5632 S JOLLY ROGER ROAD	TEMPE	AZ	85283
FLEMING	9648 E COCHISE PLACE	CHANDLER	AZ	85248
FLETCHER	8658 W GREEN BRIAN DR	PEORIA	AZ	85382
FLETCHER	1626 E WILLIAMS ST	TEMPE	AZ	85281
FLETCHER	5039 W OLNEY AVE	LAVEEN	AZ	85339
FLODIN	8044 S 54TH DRIVE	LAVEEN	AZ	85339
FLORES	2925 E LIBRA STREET	GILBERT	AZ	85234
FLORES	401 S LAGUNA DR	GILBERT	AZ	85233
FLORES	5533 N 31ST DR	PHOENIX	AZ	85017
FLORES	1331 W CANARY WAY	CHANDLER	AZ	85286
FLORES	6837 S 58TH AVE	LAVEEN	AZ	85339
FLORES VILLALOBOS	2330 E SPRUCE DR	CHANDLER	AZ	85286
FLOREZ	4226 W PECAN ROAD	PHOENIX	AZ	85041
FLORY	2110 W FLINT ST	CHANDLER	AZ	85224
FLOWERS	4608 W OLNEY AVENUE	LAVEEN	AZ	85339
FLURETT	13627 W CABALLERO DR	SUN CITY WEST	AZ	85375
FLYNN	25856 N 47TH	PHOENIX	AZ	85050
FOLEY	6728 S TAMARRON WAY	CHANDLER	AZ	85249
FOLEY	8027 W TURNEY AVE	PHOENIX	AZ	85033
FOLEY	16121 N 91ST DR	PEORIA	AZ	85382
FOLLIS	14300 W BELL RD 331	SURPRISE	AZ	85374
FONTAINE	10418 E EAST DR	CHANDLER	AZ	85248
FOOTE	6958 S OAKMONT DRIVE	CHANDLER	AZ	85249
FORD	18821 N CACTUS FLOWER WAY	SURPRISE	AZ	85387
FORD	2201 N CENTRAL AVE 3E	PHOENIX	AZ	85004
FORD	2725 N 40TH DR	PHOENIX	AZ	85009
FORD	1818 E WOOD ST	PHOENIX	AZ	85040
FORD	9601 N 88TH DR	PEORIA	AZ	85345
FOREMNY	361 S BANDERA CIR	LITCHFIELD PARK	AZ	85340
FORQUER	17578 W IRONWOOD ST S	SURPRISE	AZ	85388
FORREST	13373 N PLAZA DEL RIO BLVD 6604	PEORIA	AZ	85381
FORSBERG	10035 W ROYAL OAK RD GH1001	SUN CITY	AZ	85351

Comment Document				
Last Name	**Address**			
FORTE	1511 E FLINT ST 121	CHANDLER	AZ	85225
FOSHIE	2097 E ALOE P	CHANDLER	AZ	85286
FOSNIGHT	2309 N CABOT CIR	MESA	AZ	85207
FOSS	4107 E PARK ST	PHOENIX	AZ	85042
FOSTER	11609 S IROQUOIS DR	PHOENIX	AZ	85044
FOSTER	7556 E SIERRA MORENA CIR	MESA	AZ	85207
FOSTER	113 E INDIGO ST	MESA	AZ	85201
FOSTER	18635 N SPANISH GARDEN DR	SUN CITY WEST	AZ	85375
FOSTER	355 W HONEYSUCKLE DRIVE	CHANDLER	AZ	85248
FOSTER	4644 N 10TH ST	PHOENIX	AZ	85014
FOSTER	500 N ROOSEVELT AVE 122	CHANDLER	AZ	85226
FOULK	4929 W AVALON DR	PHOENIX	AZ	85031
FOULK	7218 W ALTA VISTA RD	LAVEEN	AZ	85339
FOULKS	4139 W AUGUSTA AVE	PHOENIX	AZ	85051
FOUMBERT	19477 E REINS ROAD	QUEEN CREEK	AZ	85142
FOWLER	1509 E EARLL DR	PHOENIX	AZ	85014
FOX	3736 N 154TH DR	GOODYEAR	AZ	85395
FOX	16607 5 27TH AVE	PHOENIX	AZ	85045
FRANCIS	16932 W BARWICK DR	SURPRISE	AZ	85387
FRANCO	1309 N CAMBRIDGE STREET	CHANDLER	AZ	85225
FRANCO	606 E WHYMAN AVE	AVONDALE	AZ	85323
FRANK	4830 E ELMWOOD ST	MESA	AZ	85205
FRANKLIN	2154 E CORONA AVENUE	PHOENIX	AZ	85040
FRANKS	15409 N RIDGEVIEW RD	SUN CITY	AZ	85351
FRANSEN	10910 E CHESTNUT DRIVE	CHANDLER	AZ	85248
FRAUSTO	6226 S 2ND AVENUE	PHOENIX	AZ	85041
FRAZEE	563 N CHIPPEWA DR	CHANDLER	AZ	85224
FRAZIER	7561 E CULVER ST 926	SCOTTSDALE	AZ	85257
FREEMAN	15214 S 44TH PL	PHOENIX	AZ	85044
FREEMAN-WILSON	2135 E EBONY DRIVE	CHANDLER	AZ	85286
FREEMOLE	3033 E DESERT BROOM WAY	PHOENIX	AZ	85048
FREITAG	1100 N DATE PALM DRIVE	GILBERT	AZ	85234
FRENCH	11647 W CINNABAR AVE	YOUNGTOWN	AZ	85363
FRENCH SALCIDO	2730 E YELLOWSTONE PLACE	CHANDLER	AZ	85249
FRESQUEZ	3110 N 127TH LANE	AVONDALE	AZ	85392

Comment Document				
Last Name	**Address**			
FRIDLUND	3284 E THORNTON AVE	GILBERT	AZ	85297
FRIESEN	9542 W SHASTA DR	SUN CITY	AZ	85351
FRIESS	19443 N 83RD DR	PEORIA	AZ	85382
FRISON	12709 W CANTENIA RD	AVONDALE	AZ	85392
FRITZ	269 S 54TH ST	MESA	AZ	85206
FRITZ	8224 S 18TH PL	PHOENIX	AZ	85042
FROLA	4468 E DESERT LN	GILBERT	AZ	85234
FRUIN	667 S PENROSE CIR	MESA	AZ	85206
FUENTES	2903 S 73RD DR	PHOENIX	AZ	85043
FULTON	507 E KINDERMAN DRIVE	AVONDALE	AZ	85323
FULTON	3428 N 17TH AVE	PHOENIX	AZ	85015
FUNK	4253 N 161ST AVE	GOODYEAR	AZ	85395
FURMAN	8442 N 54TH DR	GLENDALE	AZ	85302
FURPHY	2111 N PACEY RD	PHOENIX	AZ	85037
GABALSKI	12388 W DEVONSHIRE AVENUE	AVONDALE	AZ	85392
GABBARD	10332 W TUMBLEWOOD DR	SUN CITY	AZ	85351
GABLE	18567 N 60TH DR	GLENDALE	AZ	85308
GADE	14417 N SARABANDE WAY	SUN CITY	AZ	85351
GADZIK	1107 W SALTSAGE DR	PHOENIX	AZ	85045
GAITHER	4114 E NIGHTHAWK WAY	PHOENIX	AZ	85048
GALAN	6605 N 93RD AVE 1028	GLENDALE	AZ	85305
GALE	2621 N 73RD PL	SCOTTSDALE 85257	AZ	85257
GALE	509 N WILLIAMS C	MESA	AZ	85203
GALLACINAO	29320 N 130TH LN	PEORIA	AZ	85383
GALLAGHER	7625 W EUGIE AVE	PEORIA	AZ	85381
GALLO	1561 W PRESCOTT DR	CHANDLER	AZ	85248
GALLUCCI	5713 E ENCANTO ST	MESA	AZ	85205
GALVAN	1325 S SABINO DR	GILBERT	AZ	85296
GALVIN	25848 S DARTFORD DRIVE	CHANDLER	AZ	85248
GAM BOLD	1887 E AUGUSTA AVE	CHANDLER	AZ	85249
GAMBLE	12515 N 77TH DR	PEORIA	AZ	85381
GAMBOA	921 S VAL VISTA DR 183	MESA	AZ	85204
GAMMAGE	7204 W DARROW ST	LAVEEN	AZ	85339
GAMMONS	443 W PRINCETON AVENUE	GILBERT	AZ	85233

Comment Document				
Last Name	**Address**			
GANGLE	2705 E HARTFORD	PHOENIX	AZ	85032
GANNON	9620 E ARROWVALE DR	CHANDLER	AZ	85248
GANZ	374 W PECAN PLACE	TEMPE	AZ	85284
GARCIA	1230 N CONCORD AVENUE	CHANDLER	AZ	85225
GARCIA	1441 E IRWIN AVENUE	PHOENIX	AZ	85042
GARCIA	1532 W WIER AVENUE	PHOENIX	AZ	85041
GARCIA	1645 N CHESTNUT CIR	MESA	AZ	85213
GARCIA	1759 W BLUEJAY CT	CHANDLER	AZ	85286
GARCIA	1846 N 28TH ST	PHOENIX	AZ	85008
GARCIA	2060 E DETROIT ST	CHANDLER	AZ	85225
GARCIA	7501 S 20TH STREET	PHOENIX	AZ	85042
GARCIA	1373S W MONTEBELLO AVE	LITCHFIELD PARK	AZ	85340
GARCIA	2401 W LONGHORN DR	CHANDLER	AZ	85286
GARCIA	6341 W KEIM DR	GLENDALE	AZ	85301
GARCIA	808 E TURNEY AVE 9	PHOENIX	AZ	85014
GARCIA	8347 W MONTE VISTA RD	PHOENIX	AZ	85037
GARCIA	8620 S 46TH LN	LAVEEN	AZ	85339
GARDNER	43 W JUNIPER ST	MESA	AZ	85201
GARDNER	6744 W CAMPBELL AVE	PHOENIX	AZ	85033
GARDNER SIMPSON	21987 E ESTRELLA RD	QUEEN CREEK	AZ	85142
GARFIELD	13039 W DESERT GLEN DR	SUN CITY WEST	AZ	85375
GARFINKEL	8410 N 108TH LN	PEORIA	AZ	85345
GARLAND	5119 N 39TH DR	PHOENIX	AZ	85019
GARLOCK	2157 E TECOMA RD	PHOENIX	AZ	85048
GARNER	12252 S MANDAN STREET	PHOENIX	AZ	85044
GARNER	3009 W AUGUSTA AVE	PHOENIX	AZ	85051
GARRETT	2636 N LEMA DR	MESA	AZ	85215
GARRETT	7030 S 30TH STREET	PHOENIX	AZ	85042
GARVIN	19109 N CATHEDRAL POINT CT	SURPRISE	AZ	85387
GARZA	16586 W TONTO ST	GOODYEAR	AZ	85338
GARZA	2837 W GRENADINE RD	PHOENIX	AZ	85041
GASEOMA	7414 W ALEXANDRIA WAY	PEORIA	AZ	85381
GASIECKI	20427 N SKYLARK DR	SUN CITY WEST	AZ	85375
GASS	10108 W SELLS DR	PHOENIX	AZ	85037

Comment Document				
Last Name	**Address**			
GAVIN	1325 N 71ST ST	SCOTTSDALE	AZ	85257
GAWLIK	8415 W MISSION LN	PEORIA	AZ	85345
GAY	10314 E TWILIGHT CT	CHANDLER	AZ	85248
GAYLORD	2440 E CHEERY LYNN RD	PHOENIX	AZ	85016
GEBHART	1783 E CONSTITUTION DRIVE	CHANDLER	AZ	85225
GEHRANDT	3040 N 36TH ST E107	PHOENIX	AZ	85018
GEIGER	8609 W PURDUE AVE	PEORIA	AZ	85345
GEIST	5608 W VERDE LN	PHOENIX	AZ	85031
GELLMAN	6871 S BIRDIE WAY	GILBERT	AZ	85298
GENNARO	16218 W CARIBBEAN LN	SURPRISE	AZ	85379
GENTRY	3236 E CHANDLER BLVD 1038	PHOENIX	AZ	85048
GEORGE	31526 N 167TH AVE	SURPRISE	AZ	85387
GEPHART	761 E STACEY LANE	TEMPE	AZ	85284
GERGELY	2522 N 134TH AVE	GOODYEAR	AZ	85395
GERHARDT	13725 N 93RD AVE 222	PEORIA	AZ	85381
GERHOLT	2311 E ALAMEDA DRIVE	TEMPE	AZ	85282
GERMAN	18204 N SHADOW CT	SURPRISE	AZ	85374
GERMAN	205 S HIGLEY RD 290	MESA	AZ	85206
GERSTEN	2023 E CORNELL DR	TEMPE	AZ	85283
GETIY	2647 N 73RD PL	SCOTTSDALE	AZ	85257
GIAMMARINARO	1114 E EL CAMIN	PHOENIX	AZ	85020
GIANNINI	15401 W CELESTIAL CT	SURPRISE	AZ	85374
GIBBENS	4450 E SOUTHERN AVE	MESA	AZ	85206
GIBBONS	2308 E MISSOURI AVE	PHOENIX	AZ	85016
GIBBONS	859 E 10TH PL	MESA	AZ	85203
GIBBS	1173 E DEVON DR	GILBERT	AZ	85296
GIBBS	1768 W LOS ARBOLES CT	CHANDLER	AZ	85224
GIBBS	951 E TORNASOL CIR	LITCHFIELD PARK	AZ	85340
GIBSON	9036 W PORT ROYALE LN	PEORIA	AZ	85381
GIBSON	9814 N BALBOA DR	SUN CITY	AZ	85351
GICOUDIS	3919 E PERSHING AVE	PHOENIX	AZ	85032
GIDWANI	8314 N 21ST DR	PHOENIX	AZ	85021
GIEBELHAUS	8646 E HOLLY ST	SCOTTSDALE	AZ	85257
GIECK	1464 E TYSON STREET	CHANDLER	AZ	85225

Comment Document				
Last Name	**Address**			
GIEL	16237 W MANZANITA DR	SURPRISE	AZ	85374
GIGNAC	17794 W HOLLY DR	SURPRISE	AZ	85374
GILBERT	4114 E ASHURST DR	PHOENIX	AZ	85048
GILBERT	21011 N 142ND AVE	SUN CITY WEST	AZ	85375
GILBERT	5001 E MAIN ST 1533	MESA	AZ	85205
GILBERT	816 S ASHBROOK	MESA	AZ	85204
GILBOY	19303 N NEW TRADITION RD 403	SUN CITY WEST	AZ	85375
GILDERSLEEVE	26633 S MARICOPA PLACE	CHANDLER	AZ	85248
GILFILLAN	414 N WILLIAMS ST	CHANDLER	AZ	85225
GILL	9755 N 67TH DR	PEORIA	AZ	85345
GILLAM	2173 W SHARON AVE	PHOENIX	AZ	85029
GILLEN	4773 E HOPI STREET	PHOENIX	AZ	85044
GILLIAM	948 S ALMA SCHOOL RD 31	MESA	AZ	85210
GILLMEISTER	15121 W GUNSIGHT DR	SUN CITY WEST	AZ	85375
GILMORE	5034 N 39TH AVE	PHOENIX	AZ	85019
GILOW	4623 S PEARL DRIVE	CHANDLER	AZ	85249
GILREATH	5402 E MCKELLIPS RD 140	MESA	AZ	85215
GINES	27805 N 203RD AVE	WITTMANN	AZ	85361
GIPSON	1315 E MINTON DRIVE	TEMPE	AZ	85282
GIRARD	861 N OXFORD LANE	CHANDLER	AZ	85225
GIZINSKI	8601 N 103RD AVE 131	PEORIA	AZ	85345
GLAGGERTI	4638 N 47TH AVE	PHOENIX	AZ	85031
GLATCZAK	4527 E SUNRISE DR	PHOENIX	AZ	85044
GLENN	7356 N 6TH WAY	PHOENIX	AZ	85020
GLENN	22506 N VEGA DR	SUN CITY WEST	AZ	85375
GLICK	4342 E TONTO ST	PHOENIX	AZ	85044
GLOETZNER	7720 N 46TH CIR	GLENDALE	AZ	85301
GLOSS	351 W AMOROSO DR	GILBERT	AZ	85233
GLUCK	8807 N 105TH DR	PEORIA	AZ	85345
GOBLE	3847 E ROLLING GREEN WAY	CHANDLER	AZ	85249
GODFREY	12021 S 45TH STREET	PHOENIX	AZ	85044
GODI	6215 N CASA BLANCA	PARADISE VALLEY	AZ	85253
GODINEZ	10407 W CAMINO	PEORIA	AZ	85383
GOEDE	10950 W UNION HILLS DR 1453	SUN CITY	AZ	85373

Comment Document				
Last Name	**Address**			
GOGAN	16183 W GLEN ROSA AVE	GOODYEAR	AZ	85395
GOHL	9842 W FORRESTER DR	SUN CITY	AZ	85351
GOITIA	532 E GENEVA DR	TEMPE	AZ	85282
GOLDEN	2900 W HIGHLAND ST 182	CHANDLER	AZ	85224
GOLDEN	4501 E LA SALLE ST	PHOENIX	AZ	85040
GOLDEN	4502 W OSBORN RD	PHOENIX	AZ	85031
GOLDEN	10950 N 87TH AVE 25	PEORIA	AZ	85345
GOLDMAN	24126 S BRIARCREST DRIVE	CHANDLER	AZ	85248
GOLDWIN	2428 E SAPIUM WAY	PHOENIX	AZ	85048
GOMEZ	3318 E PALM LN	PHOENIX	AZ	85008
GOMEZ	8833 W MARIPOSA GRANDE	PEORIA	AZ	85383
GOMEZ DIAZ	1521 W CARTER ROAD	PHOENIX	AZ	85041
GOMMELS	1021 S GREENFIELD RD 1025	MESA, AZ	AZ	85206
GONZALES	10 E VALENCIA DRIVE	PHOENIX	AZ	85042
GONZALES	12432 W MONTEBELLO	LITCHFIELD	AZ	85340
GONZALES	1821 E HUBBELL ST	PHOENIX	AZ	85006
GONZALES	3109 E PARKVIEW DR	GILBERT	AZ	85295
GONZALES	2162 W HAWKEN WAY	CHANDLER	AZ	85286
GONZALES	2218 E AMELIA AVE	PHOENIX	AZ	85016
GONZALES	802 S 113TH AVE	AVONDALE	AZ	85323
GONZALEZ	1452 E GAIL DR	CHANDLER	AZ	85225
GONZALEZ	4401 N MESA DR	SCOTTSDALE	AZ	85256
GONZALEZ	5015 N 13TH AVE	PHOENIX	AZ	85013
GONZALEZ	5225 N 14TH PL	PHOENIX	AZ	85014
GONZALEZ	6103 N 19TH AVE	PHOENIX	AZ	85015
GONZALEZ	8845 N 109TH AV	PEORIA	AZ	85345
GONZALEZ	4244 W CAVALIER DR	PHOENIX	AZ	85019
GONZALEZ-HERNANDEZ	820 E SAN REMO AVE	GILBERT	AZ	85234
GOODMAN	1528 E HERMOSA VISTA DR	MESA	AZ	85203
GOODMAN	22425 N MONTECITO AVE	SUN CITY WEST	AZ	85375
GOODMANSEN	2451 N FOREST CIR	MESA	AZ	85203
GOOLSBY	2045 S 6TH AVENUE	PHOENIX	AZ	85003
GORDEN	15330 W CAMINO	SURPRISE	AZ	85374
GORDER	7408 N 82ND LN	GLENDALE	AZ	85303

Comment Document				
Last Name	**Address**			
GORDON	1346 N 66TH PL	MESA	AZ	85205
GORDON	4050 E WALATOWA STREET	PHOENIX	AZ	85044
GORDON	7620 W BROWN ST	PEORIA	AZ	85345
GORMAN	17218 N CALICO DR	SUN CTIY	AZ	85373
GOSNELL	2322 S ROGERS 25	MESA	AZ	85202
GOSPER	1414 S SPUR	MESA	AZ	85204
GOUCHER	9447 W MORROW DR	PEORIA	AZ	85382
GOULD	7608 N 47TH AVE	GLENDALE	AZ	85301
GRABER	4225 E MANDAN STREET	PHOENIX	AZ	85044
GRACIA	295 N RURAL RD 238	CHANDLER	AZ	85226
GRAF	16601 S 37TH ST	PHOENIX	AZ	85048
GRAHAM	11313 E BOISE	APACHE JUNCTION	AZ	85120
GRAHAM	13761 W ACAPULCO LN	SURPRISE	AZ	85379
GRAHAM	18069 N PETRIFIED FOREST DR	SURPRISE	AZ	85374
GRANADO	618 W DEL RIO LANE	AVONDALE	AZ	85323
GRANADO	6738 N 45TH AVE	GLENDALE	AZ	85301
GRANILLO	870 S PALM LN 48	CHANDLER	AZ	85225
GRANSBURY	12717 W LEWIS AVE	AVONDALE	AZ	85392
GRANT	2242 E CAPRI CIR	MESA	AZ	85204
GRANT	3668 E DEL RIO ST	GILBERT	AZ	85295
GRAVES	2028 E BEAUTIFUL LN	PHOENIX	AZ	85042
GRAVES	4443 E WALATOWA STREET	PHOENIX	AZ	85044
GRAVES	2318 E CHIPMAN RD	PHOENIX	AZ	85040
GRAY	1723 E REDFIELD	TEMPE	AZ	85283
GRAY	3010 E HORSESHOE DRIVE	CHANDLER	AZ	85249
GRAY	7026 W MARIPOSA	PHOENIX	AZ	85033
GRAY	3737 E WAITE LN	GILBERT	AZ	85295
GRAY	7222 W LIBBY ST	GLENDALE	AZ	85308
GRAY	9323 W IRONWOOD DR	PEORIA	AZ	85345
GREEN	9508 E RIGGS RD 8333	CHANDLER	AZ	85248
GREEN	11322 W EMERALD LN	AVONDALE	AZ	85392
GREEN	1540 W COCOPAH ST	PHOENIX	AZ	85007
GREEN	17213 W GAMBIT TRL	SURPRISE	AZ	85387
GREENDALE	2936 N 36TH ST 229	PHOENIX	AZ	85018

Comment Document				
Last Name	**Address**			
GREENE	24619 S 124TH STREET	CHANDLER	AZ	85249
GREENE	3628 N 79TH AVE	PHOENIX	AZ	85033
GREENE	6120 S NASH CT	CHANDLER	AZ	85249
GREENSLATE	4019 N OLYMPIC CIR	MESA	AZ	85215
GREENWALD	270 S RANCHOS LEGANTE DR	GILBERT	AZ	85296
GRENCEVICZ	15342 N 87TH AVE	PEORIA	AZ	85381
GRENCIK	2531 W STREET CATHERINE AVENUE	PHOENIX	AZ	85041
GRENIER	19238 N 88TH AVE	PEORIA	AZ	85382
GRESH	2535 N BRIMHALL	MESA	AZ	85203
GRIESEMER	1650 W GLENDALE AVE 4274	PHOENIX	AZ	85021
GRIFFIN	2191 E KAIBAB PL	CHANDLER	AZ	85249
GRIFFIN	517 E COUNTRY PLZ	GILBERT	AZ	85234
GRIFFIN	531 E GENEVA DR	TEMPE	AZ	85282
GRIFFIS	5220 W NORTHERN AVE 312	GLENDALE	AZ	85301
GRIFFITH	12803 N SUN VALLEY DR	SUN CITY	AZ	85351
GRIFFITHS	10835 E CHESTNUT DR	CHANDLER	AZ	85248
GRIFFITHS	4026 W LOMA LN	PHOENIX	AZ	85051
GRIM	5325 E MCDOWELL RD	MESA, AZ	AZ	85215
GRIMES	8423 W SUNNYSLOPE LN	PEORIA	AZ	85345
GRING	15150 W WOODLANDS AVE	GOODYEAR	AZ	85338
GRISWOLD	5281 W KAREN DR	GLENDALE	AZ	85308
GRIVAS	16018 W MAUL LN	SURPRISE	AZ	85379
GROCE	17793 N WHITE HORSE TRL	SURPRISE	AZ	85374
GROSS	12363 W OBERLIN WAY	PEORIA	AZ	85383
GROSSNICKLE	5353 N LA PLAZA CIR	PHOENIX	AZ	85012
GROTT	19431 N CONCHO CIR	SUN CITY	AZ	85373
GROUT	7173 W TRAILS DR	GLENDALE	AZ	85308
GROWE	23610 S ROSECREST DRIVE	CHANDLER	AZ	85248
GRUBAUGH	1822 S RIVER DR	TEMPE	AZ	85281
GRUBB	7209 S 8TH WAY	PHOENIX	AZ	85042
GUADALUPE	2308 N 51ST PLACE A	PHOENIX	AZ	85008
GUALUE	8701 W VAN BUREN STREET #1603	TOLLESON	AZ	85353
GUDINO	8220 W PALMAIRE AVE	GLENDALE	AZ	85303
GUERIN	4438 E COCONINO ST	PHOENIX	AZ	85044

Comment Document				
Last Name	**Address**			
GUERRERO	2617 E CAMPBELL AVE	PHOENIX	AZ	85016
GUERRERO	7007 W EARLL DR	PHOENIX	AZ	85033
GUGGINO	15732 W VALE DR	GOODYEAR	AZ	85395
GUILBAULT	12800 S 43RD AVENUE 6	LAVEEN	AZ	85339
GUILLETIE	1506 E LARK ST	GILBERT	AZ	85297
GUINN	1138 E BALBOA DR	TEMPE	AZ	85282
GUINN	12421 N 128TH D	EL MIRAGE	AZ	85335
GULLIFORD	5006 E MESQUITE WOOD CT	PHOENIX	AZ	85044
GUNARAJ	1146 E CAROB DRIVE	CHANDLER	AZ	85286
GUNKEL	3938 E Page AVE	GILBERT	AZ	85234
GUNN	3330 E MAIN ST 515	MESA	AZ	85213
GUPTA	4456 S SANTIAGO WAY	CHANDLER	AZ	85248
GUPTA	6769 W FIREBIRD DR	GLENDALE	AZ	85308
GURIAN	3277 E RAVEN CT	CHANDLER	AZ	85286
GURIERREZ	214 W CARSON ROAD	PHOENIX	AZ	85041
GURLEY	842 N BUTTE AVENUE	CHANDLER	AZ	85226
GURULE	6937 E SIERRA MORENA CIR	MESA	AZ	85207
GUSS	11802 W CORRINE DR	EL MIRAGE	AZ	85335
GUTHRIE	646 E MALIBU DR	TEMPE	AZ	85282
GUTIERREZ	6324 N BLACK CANYON HWY 123	PHOENIX	AZ	85017
GUTIERREZ	7821 S 6TH DRIVE	PHOENIX	AZ	85041
GUTIERREZ	6045 W CLAREMONT ST	GLENDALE	AZ	85301
GUTMACHER	12618 S NAMBE ST	PHOENIX	AZ	85044
GUY	1483 E LAS COLINAS DR	CHANDLER	AZ	85249
HAAHR	10051 W AUDREY DR	SUN CITY	AZ	85351
HAAK	9903 E SUNBURST DR	CHANDLER	AZ	85248
HAASIS	314 E GLEN COVE ST	MESA	AZ	85201
HADDEN	5342 E HERMOSA VISTA DR	MESA	AZ	85215
HADZIHASANOVIC	1904 E FAIRMONT DR	TEMPE	AZ	85282
HAINES	2909 E NORTHRIDGE ST	MESA	AZ	85213
HALDEMAN	19830 N 86TH AVE	PEORIA	AZ	85382
HALDIMAN	1025 E HIGHLAND AVE 19	PHOENIX	AZ	85014
HALL	12330 W CORRINE DR	EL MIRAGE	AZ	85335
HALL	3611 N TUSCANY	MESA, AZ	AZ	85207
HALL	3724 E REMINGTON DRIVE	GILBERT	AZ	85297

Comment Document				
Last Name	**Address**			
HALL	809 N ASPEN DRIVE	CHANDLER	AZ	85226
HALL	9254 W BRIARWOOD CIR	SUN CITY	AZ	85351
HALL	1550 W CRESCENT AVE	MESA	AZ	85202
HALLETT	14409 N MCPHEE DR	SUN CITY	AZ	85351
HALTERMAN	10118 W MONTEROSA ST	PHOENIX	AZ	85037
HALVORSON	3625 N 21ST AVE	PHOENIX	AZ	85015
HAMELIN	11823 N 97TH AVE	SUN CITY	AZ	85351
HAMIILTON	3110 S 80TH DR	PHOENIX	AZ	85043
HAMILTON	14227 N NEWCASTLE DR	SUN CITY	AZ	85351
HAMILTON	3800 N EL MIRAGE RD 2933	AVONDALE	AZ	85392
HAMILTON	4231 N 11TH PL	PHOENIX	AZ	85014
HAMILTON	14532 W WILSHIRE DR	GOODYEAR	AZ	85395
HAMILTON	9839 W LINDGREN AVE	SUN CITY	AZ	85373
HAMLIN	4311 W ARDMORE ROAD	LAVEEN	AZ	85339
HAMLIN	440 S VAL VISTA DR 14	MESA	AZ	85204
HAMMETT	27103 N 86TH LN	PEORIA	AZ	85383
HAMMOCK	315 W LUCHANA DR	LITCHFIELD PARK	AZ	85340
HAMMOND	14686 W WILSHIRE D	GOODYEAR	AZ	85395
HAMPSHIRE	13471 W VENTURA ST	SURPRISE	AZ	85379
HAMPTON	610 N LITCHFIELD RD	GOODYEAR	AZ	85338
HAMRICK	9911 W WILLOWCR	SUN CITY	AZ	85373
HANCOCK	2520 N 104TH LN	AVONDALE	AZ	85392
HANCOCK	4710 S RIVER DRIVE	TEMPE	AZ	85282
HANCOCK	615 E PORTLAND ST 106	PHOENIX	AZ	85004
HANCOCK	2358 E MAPLEWOOD ST	GILBERT	AZ	85297
HAND	3040 S CASCADE P	CHANDLER	AZ	85248
HANEMAAYER	3620 N 6TH AVE 215	PHOENIX	AZ	85013
HANEY	2692 N 133RD DR	GOODYEAR	AZ	85395
HANNA	2443 W NOPAL AVENUE	MESA	AZ	85202
HANNAH	10523 W ROUNDELAY CIR	SUN CITY	AZ	85351
HANNAH	201 S 122ND AVE	AVONDALE	AZ	85323
HANNON	326 E MITCHELL DR	PHOENIX	AZ	85012
HANSEN	1055 N RECKER RD 1004	MESA	AZ	85205
HANSEN	10855 W HOPE DR	SUN CITY	AZ	85351
HANSEN	16308 N 170TH LN	SURPRISE	AZ	85388
HANSEN	2851 S SOUTHWIND DR	GILBERT	AZ	85295
HANSEN	4223 N LONGVIEW AVE	PHOENIX	AZ	85014
HANSEN	7218 W CARTER ROAD	LAVEEN	AZ	85339
HANSEN	7644 E SIERRA MORENA ST	MESA	AZ	85207
HANSMANN	7834 W CALAVAR RD	PEORIA	AZ	85381
HANSON	1500 N MARKDALE 13	MESA	AZ	85201
HAPP	27174 N 85TH DR	PEORIA	AZ	85383
HARDAWAY	6817 S BRADSHAW WAY	CHANDLER	AZ	85249
HARDENBURG	2681 S SANTA ANNA STREET	CHANDLER	AZ	85286
HARDIE	1852 W MEAD PL	CHANDLER	AZ	85248
HARDIN	9021 S 18TH WAY	PHOENIX	AZ	85042
HARDING	7025 S GOLFSIDE LN	PHOENIX	AZ	85042
HARDY	1611 W GENEVA DR	TEMPE	AZ	85282
HARE	1812 E ASPEN WAY	GILBERT	AZ	85234
HARGETT	761 N VELERO STREET	CHANDLER	AZ	85225
HARGREAVES	3102 W CETON DRIVE	LAVEEN	AZ	85339
HARKNESS	985 E GUNSTOCK RD	CHANDLER	AZ	85286
HARLACHER	514 W CHAMBERS STREET	PHOENIX	AZ	85041
HARLAN	5624 S 9TH PL	PHOENIX	AZ	85040
HARMON	2121 N CENTER ST 214	MESA	AZ	85201
HARMON	3426 E VAUGHN AVE	GILBERT	AZ	85234
HARPER	351 E THOMAS RD D303	PHOENIX	AZ	85012
HARPER	6711 W OSBORN RD 147	PHOENIX	AZ	85033
HARPER	8921 E MICHIGAN AVENUE	CHANDLER	AZ	85248
HARPER	9322 E ROCKY LANE DRIVE	CHANDLER	AZ	85248
HARR	4301 N 21ST ST 27	PHOENIX	AZ	85016
HARR	715 W BEECHNUT DRIVE	CHANDLER	AZ	85248
HARRAWAY	6806 N 32ND AVE	PHOENIX	AZ	85017
HARRELL	12101 W PERSHING AVE	EL MIRAGE	AZ	85335
HARRINGTON	6940 E MINTON ST	MESA, AZ	AZ	85207
HARRINGTON	1731 W VERDE LN	PHOENIX	AZ	85015
HARRIS	10501 E FLINTLOCK DR	CHANDLER	AZ	85248
HARRIS	13826 W CASA LINDA DR	SUN CITY WEST	AZ	85375
HARRIS	14014 S 36TH P	PHOENIX	AZ	85044

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Last Name	**Address**			
HARRIS	1621 E CHEERY LYNN RD 6	PHOENIX	AZ	85016
HARRIS	17511 W ACAPULCO LN	SURPRISE	AZ	85388
HARRIS	2556 N 44TH AVE	PHOENIX	AZ	85035
HARRIS	3323 N 4TH AVE	PHOENIX	AZ	85013
HARRIS	3341 E GRANADA RD	PHOENIX	AZ	85008
HARRIS	5325 W BUTLER DR 123	GLENDALE	AZ	85302
HARRIS	6020 N 18TH AVE	PHOENIX	AZ	85015
HARRIS	6750 W KERRY LN	GLENDALE	AZ	85308
HARRIS	9415 N 99TH AVE 2106	PEORIA	AZ	85345
HARRIS	2619 E HAZELTINE WAY	CHANDLER	AZ	85249
HARRIS	4021 E TAYLOR ST	PHOENIX	AZ	85008
HARRIS	1973 S COMANCHE DR	CHANDLER	AZ	85286
HARRISON	10233 W CORDES RD	TOLLESON	AZ	85353
HARRISON	20102 N 92ND AVE	PEORIA	AZ	85382
HARRISON	3469 E TURNBERRY DRIVE	GILBERT	AZ	85298
HARRISON	3820 W DUBLIN ST	CHANDLER	AZ	85226
HARRISON	6543 W HUBBELL STREET	PHOENIX	AZ	85035
HARRISON	13670 N 151ST DR	SURPRISE	AZ	85379
HARRISON	15871 S 11TH PL	PHOENIX	AZ	85048
HARRISON	15321 W CATALINA CT	GOODYEAR	AZ	85395
HARROLD	9217 E DIAMOND DR	CHANDLER	AZ	85248
HARSTAD	11002 W WAIKIKI DR	SUN CITY	AZ	85351
HART	4850 W WINDSOR AVE	PHOENIX	AZ	85035
HART	8745 W TONOPAH DR	PEORIA	AZ	85382
HARTLEY	2023 S IOWA PLACE	CHANDLER	AZ	85286
HARTLEY	7142 N 24TH AVE	PHOENIX	AZ	85021
HARTMAN	935 N SENATE ST	CHANDLER	AZ	85225
HARTZOG	13840 W ELMBROOK DR	SUN CITY WEST	AZ	85375
HARVEY	916 E BUCKEYE ROAD #231	PHOENIX	AZ	85007
HARVEY	23715 S BRONZE DR	CHANDLER	AZ	85248
HASENAUER	8617 W FAIRMOUNT AVENUE	PHOENIX	AZ	85037
HASLAM	1928 E RIVIERA DR	TEMPE	AZ	85282
HASSETT	316 W MARIPOSA ST	PHOENIX	AZ	85013
HASSETT	10321 W DESERT FOREST CIR	SUN CITY	AZ	85351
HATCH	2373 E SPRINGFIELD PLACE	CHANDLER	AZ	85286
HATCH	3110 E RUNAWAY BAY PL	CHANDLER	AZ	85249
HATCHEL	7340 W CYPRESS STREET	PHOENIX	AZ	85035
HATEFI	530 W VAUGHN STREET	TEMPE	AZ	85283
HATFIELD	15477 W JACKSON ST	GOODYEAR	AZ	85338
HATHAWAY	1102 W YALE DR	TEMPE	AZ	85283
HATTON	1260 E MANHATTON DRIVE	TEMPE	AZ	85282
HAUFF	10960 N 67TH AV	GLENDALE	AZ	85304
HAUGAN	10861 W MEADE DR	SUN CITY	AZ	85351
HAUPT	9526 W PINERIDGE DR	SUN CITY	AZ	85351
HAUPTMAN	4059 E HACKAMORE CIR	MESA	AZ	85205
HAUSMANN	5331 W SARAGOSA STREET	CHANDLER	AZ	85226
HAWKES	4218 E EMELITA AVE	MESA	AZ	85206
HAWKINS	1730 E CALDWELL STREET	PHOENIX	AZ	85042
HAWKINS	231 E ARABIAN DRIVE	GILBERT	AZ	85296
HAWKINS	26401 S NEW TOWN DR	CHANDLER	AZ	85248
HAWKINS	1965 N 107TH DR	AVONDALE	AZ	85392
HAWLEY	4156 W LAREDO ST	CHANDLER	AZ	85226
HAWN	7578 W DENTON LN	GLENDALE	AZ	85303
HAWS	3529 E FAIRBROOK CIR	MESA	AZ	85213
HAYES	1265 E WATERVIEW PLACE	CHANDLER	AZ	85249
HAYES	17455 N RAINDANCE RD	SURPRISE	AZ	85374
HAYES	240 S HILL	MESA, AZ	AZ	85204
HAYES	9415 N 99TH AVE	PEORIA	AZ	85345
HAYES	13638 N NEWCASTLE DR 116	SUN CITY	AZ	85351
HAYNES	18180 N SHIMMER LN	SURPRISE	AZ	85374
HAYNES-CALDWELL	19939 N CRESCENT WAY	SURPRISE	AZ	85374
HEAD	7893 W SPUR DR	PEORIA	AZ	85383
HEALY	3621 N 127TH DRIVE	AVONDALE	AZ	85392
HEALY	12435 W FIELDSTONE DR	SUN CITY WEST	AZ	85375
HEALY	13602 W GABLE HILL DR	SUN CITY WEST	AZ	85375
HEAP	2051 E HERMOSA VISTA DR	MESA	AZ	85213
HECKENBERG	2429 W ROSE LN	PHOENIX	AZ	85015
HECKERT	910 ETODD DR	TEMPE	AZ	85283
HECKMAN	17243 N 184TH DR	SURPRISE	AZ	85374
HEFLY	4940 W LAURIE LN	GLENDALE	AZ	85302

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Last Name	**Address**			
HEIDENBLUT	3812 N CIRRUS CIR	MESA	AZ	85207
HEIER	9915 W EDWARD DR	SUN CITY	AZ	85351
HEILD	1130 E BAYLOR LANE	CHANDLER	AZ	85225
HEIMKES	1139 E IVANHOE ST	GILBERT	AZ	85295
HEINER	12547 W HIGHLAND AVE	LITCHFIELD PARK	AZ	85340
HEINTZ	8354 W MICHELLE DR	PEORIA	AZ	85382
HEINZ	16690 W PACHECO CT	SURPRISE	AZ	85387
HELIN	4757 E SOUTH FORK DRIVE	PHOENIX	AZ	85044
HELL	10429 W TROPICANA CIR	SUN CITY	AZ	85351
HELLER	21221 N 53RD AVE	GLENDALE	AZ	85308
HELM	534 W PALM LN	PHOENIX	AZ	85003
HELMSTADTER	15209 W BOLA DR	SURPRISE	AZ	85374
HELRIEGEL	3102 N 157TH LN	GOODYEAR	AZ	85395
HEMEYER	4136 E FOX ST	MESA	AZ	85205
HEMMEN	5355 E DES MOINES ST	MESA	AZ	85205
HENDEL	2312 W DARREL RD	PHOENIX	AZ	85041
HENDERSON	1633 E CHAMBERS STREET	PHOENIX	AZ	85040
HENDERSON	19965 N SUMMER DREAM DR	SURPRISE	AZ	85374
HENDERSON	3199 E HAZELTINE WAY	CHANDLER	AZ	85249
HENDERSON	9011 E NACOMA DR	CHANDLER	AZ	85248
HENDERSON	3445 E WILDWOOD DR	PHOENIX	AZ	85048
HENDRICKSON	7013 W MCRAE WAY	GLENDALE	AZ	85308
HENNESSY	3632 W PECAN ROAD	PHOENIX	AZ	85041
HENNINGS	400 W BASELINE RD 1	TEMPE	AZ	85283
HENNINGS	9072 N 68TH LN	PEORIA	AZ	85345
HENRIKSEN	21819 N MONTEGO DR	SUN CITY WEST	AZ	85375
HENRY	13825 N CAVE CREEK RD 346	PHOENIX	AZ	85022
HENRY	17262 N 66TH LN	GLENDALE	AZ	85308
HENRY	2235 S 82ND LN	PHOENIX	AZ	85043
HERMAN	9705 W KEYSER DR	PEORIA	AZ	85383
HERMESCH	818 W LAGUNA AZUL AVENUE	MESA	AZ	85210
HERMSEN	1903 E DORAL DRIVE	CHANDLER	AZ	85249
HERNANDEZ	11102 W SPARTAN CT	SUN CITY	AZ	85351
HERNANDEZ	3125 W PIERSON ST	PHOENIX	AZ	85017

Comment Document				
Last Name	**Address**			
HERNANDEZ	315 N 1ST AVENUE	AVONDALE	AZ	85323
HERNANDEZ	6045 S 42ND ST	PHOENIX	AZ	85042
HERNANDEZ	7108 S 9TH STREET	PHOENIX	AZ	85042
HERNANDEZ	7642 S 42ND STREET	PHOENIX	AZ	85042
HERNANDEZ	8226 W VOLTAIRE	PEORIA	AZ	85381
HERNANDEZ	11038 W DURANGO ST	AVONDALE	AZ	85323
HERNANDEZ	1808 W PALOMINO DR	CHANDLER	AZ	85224
HERNANDEZ	3037 N 83RD LN	PHOENIX	AZ	85037
HERNANDEZ	3753 E YALE ST	PHOENIX	AZ	85008
HERNANDEZ	4411 E UTE ST	PHOENIX	AZ	85044
HERNANDEZ	9813 S 26TH LN	PHOENIX	AZ	85041
HERNDON	500 N ROOSEVELT AVENUE #130	CHANDLER	AZ	85226
HEROLD	16103 W IRONWOOD ST	SURPRISE	AZ	85374
HERRERA	2283 E SMOKE TREE ROAD	GILBERT	AZ	85296
HERRERA	14714 W CLARA LN	SURPRISE	AZ	85374
HERRIN	2608 N JAY ST	CHANDLER	AZ	85225
HESSE	9209 N 102ND DR	SUN CITY	AZ	85351
HESSELBROCK	811 W HAPPY VALLEY	PHOENIX	AZ	85085
HESSMAN	860 N MCQUEEN ROAD #1203	CHANDLER	AZ	85225
HESTER	2801 N LITCHFIELD RD 71	GOODYEAR	AZ	85395
HETRICK	10626 S 46TH ST	PHOENIX	AZ	85044
HEUER	1514 E DESERT LN	PHOENIX	AZ	85042
HEVIER	1728 N BULLMOOSE DR	CHANDLER	AZ	85224
HEWETT	1291 S PONDERSA DRIVE	GILBERT	AZ	85296
HEYN	5382 W ELGIN ST	CHANDLER	AZ	85226
HICE	4723 W DESERT LANE	LAVEEN	AZ	85339
HICK	9410 W CEDAR HILL CIR	SUN CITY	AZ	85351
HICKMAN	1715 W MOHAVE STREET	PHOENIX	AZ	85007
HICKS	15940 W ZINNIA CT	SURPRISE	AZ	85374
HICKS	1668 W GLENDALE AVE 320	PHOENIX	AZ	85021
HICKS	2222 E JUNE ST	MESA	AZ	85213
HIDALGO	23 W CITATION LANE	TEMPE	AZ	85284
HIGDON	1113 W EDGEMONT AVE	PHOENIX	AZ	85007
HIGGINS	10101 W PALMERAS DR 232	SUN CITY	AZ	85373
HIGGINS	12330 COUGAR DR	SUN CITY WEST	AZ	85375

Comment Document				
Last Name	**Address**			
HIGHWOOD	12668 N 77TH DR	PEORIA	AZ	85381
HILDERBRAND	10792 W RIO VISTA LN	AVONDALE	AZ	85323
HILDWINE	919 N GRANITE STREET	GILBERT	AZ	85234
HILE	12805 W ALVARADO RD	AVONDALE	AZ	85392
HILEMAN	5001 S WILLOW DRIVE	TEMPE	AZ	85282
HILL	133 E CANYON CREEK DR	GILBERT	AZ	85295
HILL	21351 N BLACK BEAR LODGE DR	SURPRISE	AZ	85387
HILL	411 N KYRENE ROAD #275	CHANDLER	AZ	85226
HILL	8319 N 28TH DR	PHOENIX	AZ	85051
HILLHOUSE	1438 W ROSEMO	PHOENIX	AZ	85027
HINDERS	2435 N MCCALLISTER AVENUE #204	TEMPE	AZ	85281
HINES	9011 W SUPERIOR AVE	TOLLESON	AZ	85353
HINRICHS	7355 N 84TH AVE	GLENDALE	AZ	85305
HINRICHS	26251 S YUCCA CIR	CHANDLER	AZ	85248
HIRALEZ	8008 W LYNWOOD STREET	PHOENIX	AZ	85043
HITCHENS-SUNQUIST	308 E 14TH ST	TEMPE	AZ	85281
HLODNICKI	11972 W JESSIE LN	SUN CITY	AZ	85373
HLOUSEK	12506 W JACKSON STREET	AVONDALE	AZ	85323
HNYDOWITZ	16617 S 27TH LN	PHOENIX	AZ	85045
HOCHSTATIER	2951 S FAIRWAY DR	TEMPE	AZ	85282
HOCHSTEIN	10015 W ROYAL OAK RD 267	SUN CITY	AZ	85351
HODGE	524 S STAPLEY DR 17	MESA	AZ	85204
HODGE	2141 E ROSARITA DR	TEMPE	AZ	85281
HODGES	17132 N WOODROSE AVE	SURPRISE	AZ	85374
HOEHL	4608 N 92ND LN	PHOENIX	AZ	85037
HOEL	19043 N 134TH DR	SUN CITY WEST	AZ	85375
HOFBERGER	6025 W ROBIN LN	GLENDALE	AZ	85310
HOFFARBER	7529 E CULVER ST 527	SCOTTSDALE	AZ	85257
HOFFMAN	4064 E CAROL CIR	MESA	AZ	85206
HOFFMAN	1184 E DEVON DR	GILBERT	AZ	85296
HOFFMAN	8710 W BEHREND DR	PEORIA	AZ	85382
HOFFMANN	17731 N BECKE LN	SURPRISE	AZ	85374
HOFFMANN	22451 S 215TH STREET	QUEEN CREEK	AZ	85142

Comment Document				
Last Name	**Address**			
HOFFNER	6616 W ROBIN LN	GLENDALE	AZ	85310
HOGAN	2645 E SOUTHERN AVE 592	TEMPE	AZ	85282
HOGG	10334 W SIERRA DAWN DR	SUN CITY	AZ	85351
HOGIN	3256 E JOSEPH WAY	GILBERT	AZ	85295
HOLCOMB	3103 S FAIRFIELD DR	TEMPE	AZ	85282
HOLCOMB	10616 W CAMPANA DR	SUN CITY	AZ	85351
HOLDS	13420 N 21ST PL 201	PHOENIX	AZ	85022
HOLGUIN	11221 N 74TH DR	PEORIA	AZ	85345
HOLIMAN	1409 E CORTEZ ST	PHOENIX	AZ	85020
HOLLADAY	8676 W GRANADA RD	PHOENIX	AZ	85037
HOLLAND	18318 W LISBON	SURPRISE	AZ	85388
HOLLAND	10022 W ANDOVER AVE	SUN CITY	AZ	85351
HOLLENBECK	17641 W STINSON DR	SURPRISE	AZ	85374
HOLLIDAY	4078 E BRECKENRIDGE WAY	GILBERT	AZ	85234
HOLLOBAUGH	26602 S MARICOPA PL	CHANDLER	AZ	85248
HOLLOWAY	4323 W PEARCE RD	LAVEEN	AZ	85339
HOLLOWAY	1137 N 60TH AVE	PHOENIX	AZ	85043
HOLM	13009 N 10TH AV	PHOENIX	AZ	85029
HOLM	22425 N HERMOSILLO DR	SUN CITY WEST	AZ	85375
HOLMAN	12522 N 82ND DR	PEORIA	AZ	85381
HOLMES	17839 W CLUB VISTA DR	SURPRISE	AZ	85374
HOLMES	24316 S DESERT VALE DR	CHANDLER	AZ	85248
HOLNESS	13023 W FOXFIRE DR	SUN CITY WEST	AZ	85375
HOLTZEE	11025 W ESCUDA DR	SUN CITY	AZ	85373
HOMER	1740 N SINOVA	MESA	AZ	85205
HONSBERGER	11084 W FRONTIER DR	SUN CITY	AZ	85351
HOOKS	7046 S 17TH ST	PHOENIX	AZ	85042
HOON	10433 W PINEAIRE DR	SUN CITY	AZ	85351
HOOVER	9025 W ELM ST 2	PHOENIX	AZ	85037
HOOVLER	13811 W SPRINGDALE DR	SUN CITY WEST	AZ	85375
HOPKINS	2444 E WIER AVE	PHOENIX	AZ	85040
HOPKINS	2734 S ROGERS	MESA	AZ	85202
HOPKINS	3374 E BELLERIVE PL	CHANDLER	AZ	85249
HORNEMAN	20056 N LONDON BRIDGE DR	SURPRISE	AZ	85387
HORNER	3602 N 50TH AVE	PHOENIX	AZ	85031

Comment Document				
Last Name	**Address**			
HORNSBY	624 W HOWE STREET	TEMPE	AZ	85281
HORTON	14611 W RAVENSWOOD DR	SUN CITY WEST	AZ	85375
HOSMAN	4126 E MONTECITO	PHOENIX	AZ	85018
HOSTETLER	4701 N 39TH DR	PHOENIX	AZ	85019
HOTTYA	2130 W EMELITA AVE	MESA	AZ	85202
HOUGH	9719 W ROYAL OAK RD	SUN CITY	AZ	85351
HOUSTON	8 W THURMAN DR	PHOENIX	AZ	85041
HOUTZ	8362 W SHAW BUTTE DR	PEORIA	AZ	85345
HOUX	18521 W CARIBBEAN LN	SURPRISE	AZ	85388
HOWARD	2121 E DESERT INN DRIVE	CHANDLER	AZ	85249
HOWARD	20967 N 96TH DR	PEORIA	AZ	85382
HOWSMON	8734 N 28TH DR	PHOENIX	AZ	85051
HUBBARD	3610 W OREGON AVE	PHOENIX	AZ	85019
HUBBARD	16300 N 151ST LN	SURPRISE	AZ	85374
HUBBARD	7035 S 19TH PL	PHOENIX	AZ	85042
HUCKABAY	2122 E MONTE CR	PHOENIX	AZ	85022
HUDDLE	2742 S ELM ST	GILBERT	AZ	85295
HUDDLESTON	9508 E RIGGS ROAD #A310	CHANDLER	AZ	85248
HUDGENS	461 W HOLMES AVENUE #207	MESA	AZ	85210
HUDSON	5953 E VIEWMONT CIR	MESA	AZ	85215
HUFF	8341 W STELLA WAY	GLENDALE	AZ	85305
HUFFMAN	108 N GREENFIELD RD 1319	MESA	AZ	85205
HUGGINS	1713 E DARREL ROAD	PHOENIX	AZ	85042
HUGHES	11720 W RIO VISTA LANE	AVONDALE	AZ	85323
HUGHES	1744 E AUGUSTA AVE	CHANDLER	AZ	85249
HUGHES	430 S LILA CIR	LITCHFIELD PARK	AZ	85340
HUGHES	1050 S LONGMORE 327	MESA	AZ	85202
HUGHES	236 N 61ST WAY	MESA	AZ	85205
HUGHES	17180 W LACHLAN CT	SURPRISE	AZ	85387
HUGHES	20108 N 110TH LN	SUN CITY	AZ	85373
HULETT	12700 N 113TH AVE 6	YOUNGTOWN	AZ	85363
HULL	151 N WILBUR	MESA, AZ	AZ	85201
HUMMEL	764 S RACINE	MESA	AZ	85206
HUMMON	7320 E TAYLOR ST	SCOTTSDALE	AZ	85257

Comment Document				
Last Name	**Address**			
HUMPHREY	1902 E MEADOWBROOK AVE	PHOENIX	AZ	85016
HUNT	1644 E LEHI RD	MESA	AZ	85203
HUNT	18755 E WALNUT ROAD	QUEEN CREEK	AZ	85142
HUNT	2352 W HEMLOCK CT	CHANDLER	AZ	85248
HUNT	3719 E INVERNESS AVE 3	MESA	AZ	85206
HUNT	283 W BRISA DR	GILBERT	AZ	85233
HUNTER	8228 N 59TH DR	GLENDALE	AZ	85302
HUNTINGTON	3011 E COUNTRY SHADOWS ST	GILBERT	AZ	85298
HUNTSMAN	540 W MCLELLAN RD	MESA	AZ	85201
HUNTSMAN	10413 W TROPICANA CIR	SUN CITY	AZ	85351
HURGUY	6230 E VIA ESTRELLA	PARADISE VALLEY	AZ	85253
HURLBURT	3631 E BROOKWOOD CT	PHOENIX	AZ	85048
HURLEY	6542 N 7TH AVE 1	PHOENIX	AZ	85013
HURST	1901 E MOBILE LANE	PHOENIX	AZ	85040
HURST	2716 S LAS FLORES	MESA	AZ	85202
HURTADO	518 E MCDOWELL RD	MESA	AZ	85203
HUSS	10552 W DALEY LN	PEORIA	AZ	85383
HUSSAIN	2143 W DESERT LN	PHOENIX	AZ	85041
HUSSER	421 W DESERT DR	PHOENIX	AZ	85041
HUSTON	3046 N 32ND ST 333	PHOENIX	AZ	85018
HUSTON	3127 E CHEERY LYNN RD	PHOENIX	AZ	85016
HUTCHENS	917 E WESLEYAN DR	TEMPE	AZ	85282
HUTCHINSON	1031 E GARY WAY	PHOENIX	AZ	85042
HUTCHISON	7208 S 14TH PLACE	PHOENIX	AZ	85042
HUTSON	3768 E PEACH TREE DRIVE	CHANDLER	AZ	85249
HUTTENBRAUCK	10227 W MISSOURI AVE	GLENDALE	AZ	85307
HUYNH	9128 W WILSHIRE AVE	PHOENIX	AZ	85037
HYNES	10241 W OREGON	GLENDALE	AZ	85307
HYSELL	12605 W CAMPBELL AVE	LITCHFIELD PARK	AZ	85340
IKBET	6842 W FILLMORE STREET #172	PHOENIX	AZ	85043
IMPERIAL	1928 E LOCKWOOD ST	MESA	AZ	85203
INCH	8216 W MONTECITO AVE	PHOENIX	AZ	85033
INGRAM	19398 E CARRIAGE WAY	QUEEN CREEK	AZ	85142

Comment Document				
Last Name	**Address**			
INIGUEZ	732 E LEHI RD	MESA	AZ	85203
INK	4727 E INDIGO STREET	GILBERT	AZ	85298
INTERPRETER	3830 E LAKEWOOD PKY 1028	PHOENIX	AZ	85048
IRBY	10633 W SELDON LN	PEORIA	AZ	85345
IRBY	814 S 117TH DR	AVONDALE	AZ	85323
IRVIN	8802 E MARYLAND AVENUE	CHANDLER	AZ	85248
ISON	1149 N 92ND STREET #127	SCOTTSDALE	AZ	85256
ISRAEL	11659 S HALF MOON DR	PHOENIX	AZ	85044
IVERSON	1020 E PUEBLO ROAD	PHOENIX	AZ	85020
IVY	3246 E PHELPS STREET	GILBERT	AZ	85295
JACK	253 S TIAGO DRIVE	GILBERT	AZ	85233
JACKSON	11401 W WINSLOW AVENUE	TOLLESON	AZ	85353
JACKSON	2137 E DESERT BROOM DRIVE	CHANDLER	AZ	85286
JACKSON	521 E PASEO WAY	PHOENIX	AZ	85042
JACKSON	5210 W GWEN STREET	LAVEEN	AZ	85339
JACKSON	6522 E MELROSE ST	MESA, AZ	AZ	85215
JACKSON	6903 W CARSON ROAD	LAVEEN	AZ	85339
JACKSON	7040 W OLIVE AV	PEORIA	AZ	85345
JACKSON	8415 S 55TH DRIVE	LAVEEN	AZ	85339
JACKSON	95 N COOPER ROAD #62	CHANDLER	AZ	85225
JACKSON	1515 S EXTENSION RD 1048	MESA	AZ	85210
JACKSON	15162 W REDFIELD RD	SURPRISE	AZ	85379
JACKSON	4727 E SOURWOOD DR	GILBERT	AZ	85298
JACKSON	900 W MOUNTAIN VIEW DR	MESA	AZ	85201
JACOBI	3602 S JOSHUA TREE LANE	GILBERT	AZ	85297
JACOBS	4103 E AZALEA DR	GILBERT	AZ	85298
JACOBS	31 S ESPERANZA DR	LITCHFIELD PARK	AZ	85340
JACOBS	521 N BEVERLY ST	CHANDLER	AZ	85225
JACOBSON	1355 E CALLE DE CABALLOS	TEMPE	AZ	85284
JACOBSON	1913 W SPRUCE DR	CHANDLER	AZ	85286
JACOBY	12530 W RAMPART DR	SUN CITY WEST	AZ	85375
JAHODA	7211 W VILLA CHULA	GLENDALE	AZ	85310
JAIME	14213 W ASTER DR	SURPRISE	AZ	85379
JAKUBCZYK	2515 E MEADOWBR	PHOENIX	AZ	85016

Comment Document				
Last Name	**Address**			
JAMES	1115 W LYNWOOD ST	PHOENIX	AZ	85007
JAMES	1503 W MESQUITE STREET	CHANDLER	AZ	85224
JAMES	707 W SAN PEDRO STREET	GILBERT	AZ	85233
JAMES	14831 S 19TH WAY	PHOENIX	AZ	85048
JAMES	1631 W POSADA AVE	MESA	AZ	85202
JAMESON	12025 S HONAH LEE CT	PHOENIX	AZ	85044
JANDA	16107 W MONTEREY WAY	GOODYEAR	AZ	85395
JANECKE	16822 W BARWICK DR	SURPRISE	AZ	85387
JANFRANCISCO	8155 E ROOSEVELT ST 122	SCOTTSDALE	AZ	85257
JANUARY	101 E PALM LN D	PHOENIX	AZ	85004
JARAMILLO	246 E SILVER CREEK ROAD	GILBERT	AZ	85286
JARMAN	1360 E 2ND AVENUE	MESA	AZ	85204
JAROCH	21551 N CASA ROYALE DR	SURPRISE	AZ	85387
JARRETT	2833 E RUNAWAY BAY PL	CHANDLER	AZ	85249
JARVIS	3761 E OMEGA CIR	MESA	AZ	85215
JARVIS	3036 E MICHELLE WAY	GILBERT	AZ	85234
JARVIS	9257 W UNION HILLS DR	PEORIA	AZ	85382
JARZAB	168 E BENRICH CT	GILBERT	AZ	85295
JASINSKI	1883 E BUENA VISTA DR	CHANDLER	AZ	85249
JASSO	2402 W CARSON ROAD	PHOENIX	AZ	85041
JASSO	2904 W ORANGEWOOD AVE	PHOENIX	AZ	85051
JAX	225 W HARVARD AVE	GILBERT	AZ	85233
JAY	7843 W CARIBBEAN LN	PEORIA	AZ	85381
JEANES	1200 E ALAMEDA DR	TEMPE	AZ	85282
JEFFERIES	9020 S 17TH PL	PHOENIX	AZ	85042
JEFFRIES	2941 N 17TH AVE	PHOENIX	AZ	85015
JEKLINSKI	1843 E WINDMERE DR	PHOENIX	AZ	85048
JENKINS	4405 N 71ST DR	PHOENIX	AZ	85033
JENKINS	4718 E MONTE WAY	PHOENIX	AZ	85044
JENKINS	4912 W LEODRA LN	LAVEEN	AZ	85339
JENKINS	11633 N 68TH AVE	PEORIA	AZ	85345
JENKINS	13373 N PLAZA DEL RIO BLVD 6607	PEORIA	AZ	85381
JENKINS	5050 E FAIRBROOK CIR	MESA	AZ	85205
JENKINS	9817 W PLEASANT VALLEY RD	SUN CITY	AZ	85351

Comment Document				
Last Name	**Address**			
JENNINGS	234 E LEHI RD	MESA	AZ	85201
JENSEN	7521 S COLLEGE AVE	TEMPE	AZ	85283
JENSON	9202 W MOLLY LN	PEORIA	AZ	85383
JEPSON	1736 E GREENWAY ST	MESA	AZ	85203
JESSEE	2541 E TOLEDO CT	GILBERT	AZ	85295
JEWELL	2230 W FAIRMOUNT AVE	PHOENIX	AZ	85015
JIMENEZ	4241 W MARYLAND AVE	PHOENIX	AZ	85019
JIMENEZ	10117 W LEVI DR	TOLLESON	AZ	85353
JIUNTA	10914 W HIBISCUS DR	SUN CITY	AZ	85373
JOBARIS	15910 W HEARN RD	SURPRISE	AZ	85379
JOHNSON	10601 E SUNNYDALE DR	CHANDLER	AZ	85248
JOHNSON	13601 N REDWOOD DR	SUN CITY	AZ	85351
JOHNSON	1376 N LOS ALTOS DR	CHANDLER	AZ	85224
JOHNSON	15669 W GLEN ROSA AVE	GOODYEAR	AZ	85395
JOHNSON	17602 N DESERT GLEN DR	SUN CITY WEST	AZ	85375
JOHNSON	2052 E NANCY LN	PHOENIX	AZ	85042
JOHNSON	20617 N 53RD AVE	GLENDALE	AZ	85308
JOHNSON	2161 W HIDALGO AVENUE	PHOENIX	AZ	86041
JOHNSON	2538 N 69TH ST	SCOTTSDALE	AZ	85257
JOHNSON	25723 S 188TH PL	QUEEN CREEK	AZ	85142
JOHNSON	3126 N 150TH DR	GOODYEAR	AZ	85395
JOHNSON	364 W BLUEBIRD DR	CHANDLER	AZ	85286
JOHNSON	4163 E INDIGO ST	GILBERT	AZ	85298
JOHNSON	4424 E BASELINE ROAD #1066	PHOENIX	AZ	85042
JOHNSON	6375 W KRISTAL WAY	GLENDALE	AZ	85308
JOHNSON	7702 S HEATHER DRIVE	TEMPE	AZ	85284
JOHNSON	8400 W VIRGINIA AVE 2109	PHOENIX	AZ	85037
JOHNSON	8505 W MITCHELL DR	PHOENIX	AZ	85037
JOHNSON	8845 S 51ST STREET #3	PHOENIX	AZ	85044
JOHNSON	10938 W TROPICANA CIR	SUN CITY	AZ	85351
JOHNSON	1101 E BETHANY	PHOENIX	AZ	85014
JOHNSON	13038 W RED FOX RD	PEORIA	AZ	85383
JOHNSON	13220 W MARKET ST	SURPRISE	AZ	85374
JOHNSON	1510 W EL MONTE PL	CHANDLER	AZ	85224
JOHNSON	16815 W CENTRAL ST	SURPRISE	AZ	85388

Comment Document				
Last Name	**Address**			
JOHNSON	2057 E PUEBLO AVE	MESA	AZ	85204
JOHNSON	2181 E PALM BEACH DR	CHANDLER	AZ	85249
JOHNSON	22614 N VIA TERCERO	SUN CITY WEST	AZ	85375
JOHNSON	7671 W TIERRA BUENA LN	PEORIA	AZ	85382
JOHNSON	8221 W ROSE GARDEN LN	PEORIA	AZ	85382
JOHNSON	13868 N 79TH AVE 155	PEORIA	AZ	85381
JOHNSTON	4800 W OCOTILLO	GLENDALE	AZ	85301
JOHNSTON	620 W SHERRI DR	GILBERT	AZ	85233
JOHNSTON	11303 E FLINTLOCK DR	CHANDLER	AZ	85249
JOHNSTON	19603 S 185TH DR	QUEEN CREEK	AZ	85142
JOHNSTON	9508 E RIGGS RD C113	CHANDLER	AZ	85248
JOHNSTONBAUGH	2983 S SALIDA DEL SOL CT	CHANDLER	AZ	85286
JONAS-SMITH	6822 S 41ST DR	PHOENIX	AZ	85041
JONES	11041 W MOUNTAIN VIEW RD	SUN CITY	AZ	85351
JONES	1922 W LAS PALMARITAS DR 1-101	PHOENIX	AZ	85021
JONES	2217 N 16TH AVE	PHOENIX	AZ	85007
JONES	3300 E BROADWAY RD 269	MESA, AZ	AZ	85204
JONES	65 S POPLAR WAY	CHANDLER	AZ	85226
JONES	6618 N 90TH AVE	GLENDALE	AZ	85305
JONES	7006 W WINDSOR BLVD	GLENDALE	AZ	85303
JONES	7108 N 15TH DR	PHOENIX	AZ	85021
JONES	7531 N 60TH AVE	GLENDALE	AZ	85301
JONES	7614 W COLLEGE DR	PHOENIX	AZ	85033
JONES	925 S LONGMORE #121	MESA	AZ	85202
JONES	240 W JUNIPER AVE 1264	GILBERT	AZ	85233
JONES	3006 W MALDONADO RD	PHOENIX	AZ	85041
JONES	8829 W CAMINO DE ORO	PEORIA	AZ	85383
JONES	10316 N 97TH PLACE	PEORIA	AZ	85345
JONES	7212 W ABRAHAM LN	GLENDALE	AZ	85308
JOOYAN	414 LEISURE WORLD	MESA	AZ	85206
JORDAN	16213 N 88TH AVE	PEORIA	AZ	85382
JORDAN	2855 E BROADWAY RD 113	MESA	AZ	85204
JORDAN	2869 E TYSON CT	GILBERT	AZ	85295
JORGENSEN	1485 E ALOE DR	CHANDLER	AZ	85286
JORGENSEN	303 W SHAWNEE DR	CHANDLER	AZ	85225

Comment Document				
Last Name	**Address**			
JORGENSEN	17041 N 106TH AVE	SUN CITY	AZ	85373
JORGENSEN	5044 E FLORIAN AVE	MESA	AZ	85206
JOSEPH	11305 W COTTONWOOD LN	AVONDALE	AZ	85392
JOSEPH	5026 W STREET KATERI DRIVE	LAVEEN	AZ	85339
JOSEPH	7510 S 46TH LN	LAVEEN	AZ	85339
JOY	1988 W PERIWINKLE WAY	CHANDLER	AZ	85248
JOYCE	2239 W DEL CAMPO CIRCLE	MESA	AZ	85202
JOYCE	7043 E VERNON AVE	SCOTISDALE	AZ	85373
JUAREZ	8608 S 9TH PLACE	PHOENIX	AZ	85042
JUAREZ	9737 S DARROW DR	TEMPE	AZ	85284
JUDD	620 E 7TH PL	MESA	AZ	85203
JULIEN	15797 W MERRELL ST	GOODYEAR	AZ	85395
JUSZYNSKI	14932 W ALPACA DR	SUN CITY WEST	AZ	85375
JUVE	1411 E TORREY PINES LN	CHANDLER	AZ	85249
KACKLEY	3121 S ROGERS	MESA	AZ	85202
KACSANEK	1719 W MUIRWOOD DRIVE	PHOENIX	AZ	85045
KAERCHER	1001 E OREGON AVE	PHOENIX	AZ	85014
KAHN	3060 N RIDGECREST 203	MESA	AZ	85207
KAISER	1301 W 8TH ST 48	MESA	AZ	85201
KALIA	2006 E MANHATTON DRIVE	TEMPE	AZ	85282
KALLAN	715 W TOWNLEY A	PHOENIX	AZ	85021
KANE	1630 W FLOWER CIR	PHOENIX	AZ	85015
KANE	17815 N 134TH DR	SUN CITY WEST	AZ	85375
KAPLAN	1930 E SAGITIARIUS PL	CHANDLER	AZ	85249
KAPPES	1611 E MALLORY ST	MESA	AZ	85203
KARMO	3301 E CEDAR DR	CHANDLER	AZ	85249
KAROL	4621 W STATE AVE	GLENDALE	AZ	85301
KARR	863 W MOUNTAIN VIEW DR	MESA	AZ	85201
KARSTADT	540 W WILSHIRE DR	PHOENIX	AZ	85003
KASLER	4064 E CLUBVIEW DR	GILBERT	AZ	85298
KASOVAC	2202 E BRANHAM LANE	PHOENIX	AZ	85042
KASTEL	16006 W TOHONO DR	GOODYEAR	AZ	85338
KATAUSKAS	16068 W WINDSOR AVE	GOODYEAR	AZ	85395
KAWULOK	2222 N 35TH ST	PHOENIX	AZ	85008
KAYES	6122 N 8TH ST	PHOENIX	AZ	85014

Comment Document				
Last Name	**Address**			
KEARNEY	10607 W WHYMAN AVE	TOLLESON	AZ	85353
KEARNS	2636 S NOCHE DE PAZ	MESA	AZ	85202
KEATING	101 N 7TH ST 209	PHOENIX	AZ	85034
KEELAN	3999 S DOBSON ROAD #1096	CHANDLER	AZ	85248
KEILHOLZ	1636 W KIOWA AVE	MESA	AZ	85202
KEITH	10529 W KINGSWOOD CIR	SUN CITY	AZ	85351
KEITH	17675 N COCONINO DR	SURPRISE	AZ	85374
KELLANEY	10540 E SUNNYDALE DRIVE	CHANDLER	AZ	85248
KELLER	2237 E MARILYN	PHOENIX	AZ	85022
KELLER	6427 E RAFTRIVER ST	MESA	AZ	85215
KELLER	10407 W EDGEWOOD DR	SUN CITY	AZ	85351
KELLEY	8914 W GLEN ROSA AVE	PHOENIX	AZ	85037
KELLY	1029 W 6TH ST	MESA	AZ	85201
KELLY	9422 W TONTO LN	PEORIA	AZ	85382
KELLY	2420 W LONGHORN DR	CHANDLER	AZ	85286
KELSO	21603 N 153RD DR	SUN CITY WEST	AZ	85375
KELTNER	6956 W HONEYSUCKLE DR	PEORIA	AZ	85383
KEMMERIES	26009 S 99TH DR	CHANDLER	AZ	85248
KEMPER	9559 W WILLOWBROOK DR	SUN CITY	AZ	85373
KENDRICK	8630 W WINDSOR DR	PEORIA	AZ	85381
KENNEDY	8113 E OAK ST	SCOTTSDALE 85257	AZ	85257
KENNEY	6407 E OAK ST	SCOTTSDALE	AZ	85257
KENSICKI	4707 E OLNEY AVE	GILBERT	AZ	85234
KENT	16619 W PARADISE LN	SURPRISE	AZ	85388
KEPLEY	814 E WINDSOR AVE	PHOENIX	AZ	85006
KERBER	401 E HERMOSA CIRCLE	TEMPE	AZ	85282
KERLEGON	10114 W CORDES ROAD	TOLLESON	AZ	85353
KERNAHAN	27852 N 98TH DR	PEORIA	AZ	85383
KERR	5728 W DEL RIO ST	CHANDLER	AZ	85226
KESSMAN	1806 N LAUREL AVE	PHOENIX	AZ	85007
KETCHENS	13361 N 79TH AVE	PEORIA	AZ	85381
KETTLER	4639 S RYAN COURT	GILBERT	AZ	85297
KHAN	555 N FEDERAL ST 2020	CHANDLER	AZ	85226
KHATRI	1045 E JULIAN DR	GILBERT	AZ	85295

Comment Document				
Last Name	**Address**			
KHOKHAR	927 W FORDHAM DR	TEMPE	AZ	85283
KIBBY	14212 S 12TH PLACE	PHOENIX	AZ	85048
KIDNEY	2645 E SOUTHERN AVENUE #A322	TEMPE	AZ	85282
KIEFER	5280 W DEL RIO ST	CHANDLER	AZ	85226
KIEVIT	1125 E MILADA DR	PHOENIX	AZ	85042
KIGGINS-SMITH	9514 W APPALOOSA DR	SUN CITY	AZ	85373
KILEY	15701 W PICCADILLY RD	GOODYEAR	AZ	85395
KIMBALL	4202 E BROADWAY RD 214	MESA	AZ	85206
KIMES	600 E BIRD LN	LITCHFIELD PARK	AZ	85340
KINBERG	901 S EVERGREEN ST	CHANDLER	AZ	85225
KINDLE	10441 E FLINTLOCK DR	CHANDLER	AZ	85248
KINDSVATER	26036 S BUTTONWOOD DRIVE	CHANDLER	AZ	85248
KING	2987 N 152ND DR	GOODYEAR	AZ	85395
KING	6711 W OSBORN RD 65	PHOENIX	AZ	85033
KING	162 W ELY LN	AVONDALE	AZ	85323
KING	3005 W HARMONT DR	PHOENIX	AZ	85051
KINGSLEY	4909 W JOSHUA BLVD 1127	CHANDLER	AZ	85226
KINSEY	7893 S STEPHANIE LANE	TEMPE	AZ	85284
KINSEY	10401 E SAN TAN BLVD	CHANDLER	AZ	85248
KINTSCHER	5608 W EILLIS DRIVE	LAVEEN	AZ	85339
KINYON	7656 E HERMOSA VISTA DR	MESA	AZ	85207
KIRGAN	4716 W ALICIA DR	LAVEEN	AZ	85339
KIRK	9619 E NACOMA DR	CHANDLER	AZ	85248
KIRKHAM	329 W KINGBIRD DR	CHANDLER	AZ	85286
KIRSCHKE	16617 N WEST POINT PKY 201	SURPRISE	AZ	85374
KIRSTEN	3030 N 14TH ST 114	PHOENIX	AZ	85014
KISER	5424 E CALLE CERRITOS 110	TEMPE	AZ	85283
KISTNER	14404 S 18TH ST	PHOENIX	AZ	85048
KISTNER	14824 W DOVESTAR DR	SURPRISE	AZ	85374
KITE	3601 W LAMAR RD	PHOENIX	AZ	85019
KLAJDA	1950 E CARVER ROAD	TEMPE	AZ	85284
KLAND	5150 N 20TH ST 106	PHOENIX	AZ	85016
KLASSEN	1643 E 2ND AVE	MESA	AZ	85204
KLEI	2025 E CORTEZ DR	GILBERT	AZ	85234

Comment Document				
Last Name	**Address**			
KLEIDON	1163 E CHANDLER BLVD	CHANDLER	AZ	85225
KLEIN	1323 E HORSESHOE AVENUE	GILBERT	AZ	85296
KLEIN	9418 S CALLE SAHUARO	TEMPE	AZ	85283
KLEWIN	20002 N 77TH DR	GLENDALE	AZ	85308
KLING	290 W BAYLOR LN	GILBERT	AZ	85233
KLINGER	305 W LEWIS AVE	PHOENIX	AZ	85003
KLOHR	3031 E TRIGGER WAY	GILBERT	AZ	85297
KLOOSTER	1983 E BUENA VISTA DR	CHANDLER	AZ	85249
KLUNG	3662 W SHANNON ST	CHANDLER	AZ	85226
KLUSOVSKY	12314 W MORNING DOVE DR	SUN CITY WEST	AZ	85375
KNAACK	13314 W FAIRMONT AVE	LITCHFIELD PARK	AZ	85340
KNACK	11218 W SHERIDAN STREET	AVONDALE	AZ	85392
KNAPPENBERGER	4437 E HIDDENVIEW DRIVE	PHOENIX	AZ	85048
KNECHT	6727 W CORRINE DR	PEORIA	AZ	85381
KNEDLHANS	835 E 9TH ST	MESA	AZ	85203
KNELL	20022 N HEARTHSTONE DR	SURPRISE	AZ	85374
KNIGHT	2635 E SOUTHERN AVE N2415	TEMPE	AZ	85282
KNIGHT	5143 E EDGEMONT AVE	PHOENIX	AZ	85008
KNIGHT	1019 N LAS VERDES DR	GOODYEAR	AZ	85338
KNIGHT	4620 E KARSTEN DR	CHANDLER	AZ	85249
KNISLEY	2303 N TAMARISK COURT	CHANDLER	AZ	85224
KNOBLACH	117 S LAKEVIEW BLVD	CHANDLER	AZ	85225
KNOLL	13829 S 42ND WAY	PHOENIX	AZ	85044
KNOX	1639 W ALTA VISTA ROAD	PHOENIX	AZ	85041
KNOX	1931 E PARK STREET	PHOENIX	AZ	85042
KNOX	500 N METRO BLVD 1156	CHANDLER	AZ	85226
KOCH	9030 E FAIRWAY BOULEVARD	CHANDLER	AZ	85248
KOEHLERMONK	4558 E ROCK WREN ROAD	PHOENIX	AZ	85044
KOENES	10854 W KAIBAB DR	SUN CITY	AZ	85373
KOFMEHL	9551 E KRAMER CIR	MESA	AZ	85207
KOHL	14539 N 159TH DR	SURPRISE	AZ	85379
KOHLER-HEARN	3622 E FAIRMOUNT AVE	PHOENIX	AZ	85018
KOLBE	1203 W CINDY STREET	CHANDLER	AZ	85224
KOLDEN	4432 E ELMWOOD ST	MESA	AZ	85205

Comment Document				
Last Name	**Address**			
KOLOSSVARY	909 E KALER DR	PHOENIX	AZ	85020
KOMATSU	4828 W OLNEY AVE	LAVEEN	AZ	85339
KONIJA	7514 E DIAMOND ST	SCOTTSDALE	AZ	85257
KONRADY	5133 W MCNEIL ST	LAVEEN	AZ	85339
KOPECKY	5035 E MESQUITE WOOD CT	PHOENIX	AZ	85044
KOPFF	16139 W MULBERRY DR	GOODYEAR	AZ	85395
KORBECK	1348 E VINEDO LN	TEMPE	AZ	85284
KORTIE	19001 N WELK DR	SUN CITY	AZ	85373
KOSMAN	224 STAN INA ST	GILBERT	AZ	85296
KOSTYUN	2209 N LAUREL AVE	PHOENIX	AZ	85007
KOTZMANN	1919 S 140TH PLACE	GILBERT	AZ	85295
KOVACH	9910 W RIVIERA DR	SUN CITY	AZ	85351
KOWATSCH	18180 W POST DR	SURPRISE	AZ	85388
KOWBUZ	12017 N 105TH AVE	SUN CITY	AZ	85351
KRAFT	10517 E SILVERTREE DR	CHANDLER	AZ	85248
KRAHL	6037 E BILLINGS ST	MESA	AZ	85205
KRAKLIO	2336 W GREGG DR	CHANDLER	AZ	85224
KRAMER	2123 N 28TH PL	MESA	AZ	85213
KRAMER	8721 W LAWRENCE LN	PEORIA	AZ	85345
KRAUSE	2033 N 11TH AVE	PHOENIX	AZ	85007
KRAUSE	24613 S ROSEWOOD DR	CHANDLER	AZ	85248
KRAUSHAR	10755 W VIRGINA AVENUE	AVONDALE	AZ	85392
KRAWIETZ	3105 S 81ST LN	PHOENIX	AZ	85043
KREBS	14420 W FUTURA DR	SUN CITY WEST	AZ	85375
KREFT	17232 N LIME ROCK DR	SUN CITY	AZ	85373
KREUSER	7717 E PALM LN	SCOTTSDALE	AZ	85257
KREY	4220 E SANDIA ST	PHOENIX	AZ	85044
KRIETENSTEIN	3418 N 27TH ST	PHOENIX	AZ	85016
KRISTO	1632 E SALT SAGE DR	PHOENIX	AZ	85048
KRITZ	10102 N 95TH DR B	PEORIA	AZ	85345
KRIZAN	4728 N 15TH ST 66	PHOENIX	AZ	85014
KROENER	17792 W CAMINO REAL DR	SURPRISE	AZ	85374
KROLL	15760 W MILL VALLEY LN	SURPRISE	AZ	85374
KROLL	9632 N 32ND PL	PHOENIX	AZ	85028
KRONK	1893 E SMOKE TREE RD	GILBERT	AZ	85296

Comment Document				
Last Name	**Address**			
KROSCH	15516 W PRAIRIE DUNES DR	SURPRISE	AZ	85374
KROUSE	17641 W DESERT LN	SURPRISE	AZ	85388
KRUEGER	916 S TUCANA LN	GILBERT	AZ	85296
KRUSKA	10744 W VISTA AVE	GLENDALE	AZ	85307
KRZMARZICK	1104 W BARROW DR	CHANDLER	AZ	85224
KUCHARSKI	9602 W GREENWAY RD	SUN CITY	AZ	85351
KUDES	5210 W PEDRO LANE	LAVEEN	AZ	85339
KUDULIS	12910 W PAINTBRUSH DR	SUN CITY WEST	AZ	85375
KUHN	3556 N TIROL CIR	MESA	AZ	85215
KUHN	17166 W DESERT LN	SURPRISE	AZ	85388
KULAKOWSKI	8956 W TOPEKA DR	PEORIA	AZ	85382
KULKA	1887 E ASPEN DRIVE	TEMPE	AZ	85282
KULKARNI	1068 S HAWK LN	GILBERT	AZ	85296
KULLBERG	2256 W ELLA STREET	MESA	AZ	85201
KUNER	2790 E BUENA VISTA DR	CHANDLER	AZ	85249
KUNITZ	1988 E OXFORD DRIVE	TEMPE	AZ	85283
KUNZE	491 N DANIELSON WAY	CHANDLER	AZ	85225
KURTZ	1909 E 8TH ST	MESA	AZ	85203
KUSY	4502 E NIGHTINGALE LN	GILBERT	AZ	85298
LABENZ	9839 W FORRESTER DR	SUN CITY	AZ	85351
LACY	926 W MESETO AVENUE	MESA	AZ	85210
LADUCA	7335 E SIERRA MORENA CIR	MESA	AZ	85207
LAFONTAIN	1116 E LOMA VISTA DR	TEMPE	AZ	85282
LAGOPOULOS	195 N COTTONWOOD STREET #39	CHANDLER	AZ	85225
LAHAIE	2926 E CONCHO AVE	MESA	AZ	85204
LAHANN	2759 E OAKLAND ST	GILBERT	AZ	85295
LAINO	1048 W HERMOSA DR	TEMPE	AZ	85282
LAKE	2810 E GLEN ROSA AVE 23	PHOENIX	AZ	85016
LALLISS	11944 W COLUMBINE DR	EL MIRAGE	AZ	85335
LAMB	1625 E MONTEREY STREET	CHANDLER	AZ	85225
LAMBLE	4723 N 26TH LN	PHOENIX	AZ	85017
LAMMERS	933 E FRYE RD	GILBERT	AZ	85295
LAMPHIER	4136 W HUNTINGTON DR	PHOENIX	AZ	85041
LANCASTER	13626 W VIA TERCERO	SUN CITY WEST	AZ	85375

Comment Document				
Last Name	**Address**			
LANCE	6683 S MINGUS DR	CHANDLER	AZ	85249
LANCETTE	12329 W CAMBRIDGE AVENUE	AVONDALE	AZ	85392
LAND	6337 E EVERGREEN ST	MESA	AZ	85205
LANDAS	6818 S 39TH DR	PHOENIX	AZ	85041
LANDIS	10840 W PALM LANE	AVONDALE	AZ	85392
LANDRUM	3508 W GLASS LANE	PHOENIX	AZ	85041
LANDRY	4202 E CACTUS ROAD	PHOENIX	AZ	85032
LANER	2625 E SOUTHERN AVENUE C235	TEMPE	AZ	85282
LANEY	15882 W WOODLANDS AVE	GOODYEAR	AZ	85338
LANGDON	540 N EUCALYPTUS PL	CHANDLER	AZ	85225
LANGE	15113 W VIA MONTOYA	SUN CITY WEST	AZ	85375
LANGE	10229 W BOLIVAR DR	SUN CITY	AZ	85351
LANGHURST	2526 E LOYOLA DR	TEMPE	AZ	85282
LANGMADE	720 E PALMAIRE	PHOENIX	AZ	85020
LANNHOLM	12413 W MONTEBELLO AVE	LITCHFIELD PARK	AZ	85340
LANPHIER	5415 W TONTO RD	GLENDALE	AZ	85308
LANTRY	3160 W FRANKFURT DR	CHANDLER	AZ	85226
LANZILLOTTI	16947 W EUREKA SPRINGS DR	SURPRISE	AZ	85387
LAPE	7803 W SHAW BUTTE DR	PEORIA	AZ	85345
LAPRAY	6552 E RIVERDALE ST	MESA	AZ	85215
LARA	6274 N 88TH AVE	GLENDALE	AZ	85305
LARA	6226 W CLAREMONT ST	GLENDALE	AZ	85301
LARGE	4654 E STREET CHARLES AVENUE	PHOENIX	AZ	85042
LARIOS	3216 W GRANADA	PHOENIX	AZ	85009
LARKINS	1733 E WIER AVE	PHOENIX	AZ	85040
LARKINS	6854 W PUGET AVE	PEORIA	AZ	85345
LAROUX	22 W DEL RIO DRIVE	TEMPE	AZ	85282
LARSEN	17503 W PERSHING ST	SURPRISE	AZ	85388
LARSEN	2103 E DES MOINES ST	MESA	AZ	85213
LARSON	1830 E AMELIA AVE	PHOENIX	AZ	85016
LARSON	3842 E THUNDERHEART TRL	GILBERT	AZ	85297
LARSON	6647 S 27TH AVENUE	PHOENIX	AZ	85041

Comment Document				
Last Name	**Address**			
LARSON	742 N EMERSON	MESA, AZ	AZ	85201
LARSON	9917 W KIRBY AVE	TOLLESON	AZ	85353
LARSON	2302 E SAN TAN ST	CHANDLER	AZ	85225
LARSON-ARNPRIESTER	19107 E KINGBIRD DR	QUEENCREEK	AZ	85142
LARSON-DEALVA	5610 N 75TH DR	GLENDALE	AZ	85303
LARSSON	127 E COLGATE DR	TEMPE	AZ	85283
LATHERN	1413 E SOUTHERN AVENUE	TEMPE	AZ	85282
LATHROP	1704 W BENTRUP CT	CHANDLER	AZ	85224
LATONA	9612 WHIDDEN VALLEY CIR	SUN CITY	AZ	85351
LATSCHAR	16042 N GIL BALCOME ST	SURPRISE	AZ	85374
LAUDERDALE	10651 W HUTTON DR	SUN CITY	AZ	85351
LAULETTA	7102 W SIERRA ST	PEORIA	AZ	85345
LAURANCE	6511 W ALICE AVE CT8118	GLENDALE	AZ	85302
LAURIE	1021 S GREENFIELD RD 1050	MESA	AZ	85206
LAW	3685 E BARTLETT WAY	CHANDLER	AZ	85249
LAW	13502 W STAR RIDGE DR	SUN CITY WEST	AZ	85375
LAWSON	5049 N 11TH AVE F113	PHOENIX	AZ	85013
LAZZARO	750 S PENNINGTON DR 157	CHANDLER	AZ	85224
LAZZERI	7266 W LONE CACTUS DR	GLENDALE	AZ	85308
LEACH	1354 W LARONA LANE	TEMPE	AZ	85284
LEADBETTER	3268 E VINEYARD RD	PHOENIX	AZ	85042
LEAL	1409 S 19TH DR 268	PHOENIX	AZ	85009
LEAR	26605 S HOWARD DR	CHANDLER	AZ	85248
LEBLANC	15853 N 73RD LN	PEORIA	AZ	85382
LECHAIX	11402 S SHOSHONI DR	PHOENIX	AZ	85044
LECHUGA	8051 W WELDON AVE	PHOENIX	AZ	85033
LECHUGA	936 W HORSESHOE AVENUE	GILBERT	AZ	85233
LECLAIR	14803 W TOMAHAWK WAY	SUN CITY WEST	AZ	85375
LEE	11036 W FLORIDA AVE	SUN CITY	AZ	85351
LEE	130 E COUNTRY CLUB DR	PHOENIX	AZ	85014
LEE	1717 W MISSOURI AVE 19	PHOENIX	AZ	85015
LEE	6121 E ALBANY ST	MESA	AZ	85205

Comment Document				
Last Name	**Address**			
LEE	13308 W PALO VERDE DR	LITCHFIELD PARK	AZ	85340
LEE	145 E CERCADO LN	LITCHFIELD PARK	AZ	85340
LEE	4199 E CASTLE LN	GILBERT	AZ	85298
LEFEBURE	17200 W BELL RD 1496	SURPRISE	AZ	85374
LEFEBVRE	14055 N TUMBLEBROOK WAY	SUN CITY	AZ	85351
LEFEVRE	6544 N 7TH AVE 9	PHOENIX	AZ	85013
LEFKOWSKI	3706 E JASPER DR	GILBERT	AZ	85296
LEHMAN	2209 E GRENADINE ROAD	PHOENIX	AZ	85040
LEICHLEITER	5649 E HUBER ST	MESA	AZ	85205
LEITH	1682 W GUNSTOCK LOOP	CHANDLER	AZ	85286
LEMAY	2699 E KAIBAB PL	CHANDLER	AZ	85249
LEMAY	1414 N SADDLE ST	GILBERT	AZ	85233
LEMBAS	4881 S PECAN WAY	CHANDLER	AZ	85248
LEMLEY	2559 N BRIMHALL	MESA	AZ	85203
LEMMONS	6560 S PEBBLE BEACH DRIVE	CHANDLER	AZ	85249
LEMON	6810 W MCKNIGHT LOOP	GLENDALE	AZ	85308
LEMONS	2328 E JENSEN ST	MESA	AZ	85213
LENAERTS	2050 W DUNLAP A	PHOENIX	AZ	85021
LENNARD	6060 W ROYAL PALM RD 133	GLENDALE	AZ	85302
LEON	830 N 61ST AVE	PHOENIX	AZ	85043
LEONARD	657 E GAIL DR	CHANDLER	AZ	85225
LEONARD	6652 W LINDA LN	CHANDLER	AZ	85226
LEPLEY	15312 W SIERRA VISTA DR	SURPRISE	AZ	85374
LESLIE	1071 E SHERRI DR	GILBERT	AZ	85296
LEVIE	4514 S ELM ST	TEMPE	AZ	85282
LEVINE	4015 E HARMONY AVE	MESA	AZ	85206
LEVINE	6250 N 19TH AVE	PHOENIX	AZ	85015
LEVY	4091 W HARRISON STREET	CHANDLER	AZ	85226
LEWICKI	886 N ARROYO LANE	GILBERT	AZ	85234
LEWIS	10333 W PEORIA AVE	SUN CITY	AZ	85351
LEWIS	1130 E MONROE ST 401	PHOENIX	AZ	85034
LEWIS	11415 N 113TH DR	YOUNGTOWN	AZ	85363
LEWIS	18548 W SUNBELT DR	SURPRISE	AZ	85374

Comment Document				
Last Name	**Address**			
LEWIS	2401 W BINNER DRIVE	CHANDLER	AZ	85224
LEWIS	4390 E LOS ALTOS DR	GILBERT	AZ	85297
LEWIS	19469 N STAR RIDGE DR	SUN CITY WEST	AZ	85375
LEWIS	4365 N DOBSON RD	SCOTTSDALE	AZ	85256
LEWIS	6289 S WHITE PLACE	CHANDLER	AZ	85249
LEWIS-COLLINS	1305 N CONNER AVE	GILBERT	AZ	85234
LEYBA	11125 W CAMEO DR	SUN CITY	AZ	85351
LEYVA	1270 S LOS ALTOS DR	CHANDLER	AZ	85286
LEYVA	4750 W MITCHELL DR	PHOENIX	AZ	85031
LIANO	2528 E ROCKY SLOPE DR	PHOENIX	AZ	85048
LIBERMAN	9359 E NANCE ST	MESA	AZ	85207
LICHTE	1242 E BISHOP DR	TEMPE	AZ	85282
LICKTEIG	17343 W GOULD MINE LN	SURPRISE	AZ	85387
LIEBMAN	614 E DEL RIO STREET	CHANDLER	AZ	85225
LIGHTFOOT	5131 W LAURIE LN	GLENDALE	AZ	85302
LIGOCKI-RUSSELL	10 W OCOTILLO R	PHOENIX	AZ	85013
LIJEWSKI	2214 N 21ST PL	PHOENIX	AZ	85006
LILES	542 N SPENCER	MESA	AZ	85203
LILLAGORE	8821 WASTER DR	PEORIA	AZ	85381
	5254 N 42ND DR	PHOENIX	AZ	85019
LINAREZ	313 W COCOPAH ST 723	PHOENIX	AZ	85003
LINCOLN	8748 W SIERRA VISTA DR	GLENDALE	AZ	85305
LINDER	5741 N 32ND DR	PHOENIX	AZ	85017
LINDQUIST	1926 LEISURE WORLD	MESA	AZ	85206
LINDQUIST	8663 W BEHREND DR	PEORIA	AZ	85382
LINHART	4010 N 11TH AVE	PHOENIX	AZ	85013
LINK	2762 E CAROB DRIVE	GILBERT	AZ	85298
LINK	13206 W SHADOW HILLS DR	SUN CITY WEST	AZ	85375
LISANTI	903 W TREMAINE AVE	GILBERT	AZ	85233
LISS	1097 E FREMONT DRIVE	TEMPE	AZ	85282
LISTER	14635 N 147TH LN	SURPRISE	AZ	85379
LITCHENBERG	26433 S RIBBONWOOD DR	CHANDLER	AZ	85248
LITTLE	22209 N MARAVILLA DR	SUN CITY WEST	AZ	85375
LITWA	15008 W COTIONWOOD ST	SURPRISE	AZ	85374
LIVINGSTON	7164 W CLAREMONT ST	GLENDALE	AZ	85303

Comment Document				
Last Name	**Address**			
LIVINGSTON	4132 E BEATRICE ST	PHOENIX	AZ	85008
LLOYD	2694 N ELLIS ST	CHANDLER	AZ	85224
LOAIZA	216 W FREMONT ROAD	PHOENIX	AZ	85041
LOBATO	16372 W MARCONI AVE	SURPRISE	AZ	85388
LOBOSCO	13610 N 70TH DR	PEORIA	AZ	85381
LOCICERO	8043 W ELM ST	PHOENIX	AZ	85033
LOEHNIS	2740 W ARDMORE ROAD	LAVEEN	AZ	85339
LOGAN	10925 W SARATOG	SUN CITY	AZ	85351
LOHR	254 E DEVON DRIVE	GILBERT	AZ	85296
LOKKEN	7106 S 14TH DR	PHOENIX	AZ	85041
LONCHAR	2307 E BROADMOR DR	TEMPE	AZ	85282
LONEY	15708 W LATHAM ST	GOODYEAR	AZ	85395
LONG	1946 E WHITTON AVE	PHOENIX	AZ	85016
LONG	26414 S SADDLETREE DRIVE	CHANDLER	AZ	85248
LONG	3860 E AMBERWOOD DR	PHOENIX	AZ	85048
LONGWELL	2604 S BALA DR	TEMPE	AZ	85282
LOOFT	14426 W WHITE ROCK DR	SUN CITY WEST	AZ	85375
LOOMIS	10604 E MICHIGAN AVE	CHANDLER	AZ	85248
LOPEZ	11143 W ASHLAND WAY	AVONDALE	AZ	85392
LOPEZ	1133 E MILADA DR	PHOENIX	AZ	85042
LOPEZ	11805 N 29TH ST	PHOENIX	AZ	85028
LOPEZ	1229 E WOOD STREET	PHOENIX	AZ	85040
LOPEZ	13627 N 108TH DR	SUN CITY	AZ	85351
LOPEZ	2939 N 103RD AVENUE	AVONDALE	AZ	85392
LOPEZ	4233 W GWEN STREET	LAVEEN	AZ	85339
LOPEZ	4260 E VINEYARD RD	PHOENIX	AZ	85042
LOPEZ	4327 N 15TH DR	PHOENIX	AZ	85015
LOPEZ	7001 E HUBBELL ST 1	SCOTTSDALE	AZ	85257
LOPEZ	7007 S 17TH AVENUE	PHOENIX	AZ	85041
LOPEZ	102 W BEAUTIFUL LN	PHOENIX	AZ	85041
LOPEZ	1728 E CHAMBERS ST	PHOENIX	AZ	85040
LOPEZ	4326 E FORD AVE	GILBERT	AZ	85234
LOPEZ	10951 N 91ST AVE 273	PEORIA	AZ	85345
LOPEZ	6565 W ABRAHAM LN	GLENDALE	AZ	85308
LORCH	3725 E NOWATA D	PHOENIX	AZ	85044

Comment Document				
Last Name	**Address**			
LORIMIER	3019 E NANCE ST	MESA	AZ	85213
LORING	7605 S 9TH WAY	PHOENIX	AZ	85042
LOUCK'S	4450 E WILLET STREET	GILBERT	AZ	85295
LOUCKS	2044 S DON CARLOS 3	MESA	AZ	85202
LOUK	7208 W VERNON AVENUE	PHOENIX	AZ	85035
LOVE	10118 W CARON DR	SUN CITY	AZ	85351
LOVE	13920 W MAUNA L	SURPRISE	AZ	85379
LOVE	2273 W ENFIELD WAY	CHANDLER	AZ	85286
LOWERY	18634 N PALOMAR DR	SUN CITY WEST	AZ	85375
LOWMAN	2431 E HERMOSA DR	TEMPE	AZ	85282
LOY	381 W ROADRUNNER DR	CHANDLER	AZ	85286
LOZANO	3737 W GROVE ST	PHOENIX	AZ	85041
LOZIER	3410 E DESERT TRUMPET RD	PHOENIX	AZ	85044
LOZOYA	7331 W CORDES ROAD	PHOENIX	AZ	85043
LUBOW	16502 N NAEGEL DR	SURPRISE	AZ	85374
LUCAS	9621 W EL CAMINJTO OR	PEORIA	AZ	85345
LUCAS	7232 W HEARN RD	PEORIA	AZ	85381
LUCKEY	731 W SIESTA WAY	PHOENIX	AZ	85041
LUDEKE	8540 N CENTRAL AVE 30	PHOENIX	AZ	85020
LUEBKIN	1606 E BELL DE MAR DRIVE	TEMPE	AZ	85283
LUECK	10702 E NACOMA DR	CHANDLER	AZ	85248
LUFT	16539 W CARMEN DR	SURPRISE	AZ	85388
LUJAN	6020 S 12TH STREET	PHOENIX	AZ	85042
LUJAN	9712 S 43RD AVENUE	LAVEEN	AZ	85339
LUMBARD	15977 W MERRELL ST	GOODYEAR	AZ	85395
LUMBY	1211 W MARINA DR	CHANDLER	AZ	85248
LUMPKIN	5607 W MICHELLE DR	GLENDALE	AZ	85308
LUNA	6610 S 24TH ST	PHOENIX	AZ	85042
LUNDBERG	5619 N 133RD AVE	LITCHFIELD PARK	AZ	85340
LUNDEEN	17697 N ESTRELLA VISTA DR	SURPRISE	AZ	85374
LUNDY	19076 N 85TH LN	PEORIA	AZ	85382
LUNGREN	1893 W SAN ANGELO ST	GILBERT	AZ	85233
LUNSFORD	1001 N PASADENA 175	MESA	AZ	85201
LUNSFORD	1053 W LA JOLLA DR	TEMPE	AZ	85282

Comment Document				
Last Name	**Address**			
LUONG	2345 W EL MORO CIR	MESA	AZ	85202
LUQUETTE	1403 E INDIAN WELLS DR	CHANDLER	AZ	85249
LUTZ	3020 E THUNDERHILL PLACE	PHOENIX	AZ	85048
LUTZINGER	3377 N 150TH DR	GOODYEAR	AZ	85395
LYBBERT	3047 S 101ST LANE	TOLLESON	AZ	85353
LYKKE	1211 W HAWKEN WAY	CHANDLER	AZ	85286
LYLE	5702 N 37TH DR	PHOENIX	AZ	85019
LYMAN	11192 W MADELINE CHRISTIAN AVE	SURPRISE	AZ	85378
LYNCH	15517 N 160TH AVE	SURPRISE	AZ	85374
LYNDE	304 E HACKAMORE ST	MESA	AZ	85201
LYONS	2747 E VIA DEL ARBOLES	GILBERT	AZ	85298
LYONS	106 N 86TH LN	TOLLESON	AZ	85353
LYSAUGHT	355 W KNIGHT LANE	TEMPE	AZ	85284
LYSEN	1309 N UDALL CIR	MESA	AZ	85203
MAAS	15638 W MEADOWBROOK AVE	GOODYEAR	AZ	85395
MABANTE-LEACH	1226 E RUTH AVE	PHOENIX	AZ	85020
MABRY	1456 S CRESTON CIR	MESA	AZ	85204
MACALUSO	12843 W SANTA YNEZ DR	SUN CITY WEST	AZ	85375
MACEDO	10030 E WATFORD WAY	CHANDLER	AZ	85248
MACGREGOR	1121 N ARROYA	MESA	AZ	85205
MACIAS	4927 W KRALL ST	GLENDALE	AZ	85301
MACK	7341 W VALENCIA DRIVE	LAVEEN	AZ	85339
MACKENZIE	6353 W DONALD DR	GLENDALE	AZ	85310
MACKILLOP	18466 N COCONINO DR	SURPRISE	AZ	85374
MACNEVINS	8350 E MCKELLIPS RD 3	SCOTTSDALE	AZ	85257
MACRIDES	8215 W BRIDEN LN	PEORIA	AZ	85383
MACUA	458 N CITRUS LANE	GILBERT	AZ	85234
MADDALOZZO	1660 W SPRINGFIELD WAY	CHANDLER	AZ	85286
MADDEN	13638 N NEWCASTLE DR 133C	SUN CITY	AZ	85351
MADDEN	14442 W POWDERHORN DR	SURPRISE	AZ	85374
MADERA	1334 W PECOS AVE	MESA	AZ	85202
MADGETT	1347 E BUTLER CIR	CHANDLER	AZ	85225
MADISON	4028 S 44TH ST 4028	PHOENIX	AZ	85040
MADISON	9833 E EMERALD DR	CHANDLER	AZ	85248

Comment Document				
Last Name	**Address**			
MADSEN	59 S HOBSON	MESA	AZ	85204
MADVIG	4751 EST ANNE AVE	PHOENIX	AZ	85042
MAFFUCCI	2304 N DEMARET DR	MESA	AZ	85215
MAGALLANEZ	6210 E ARBOR AVE 311	MESA	AZ	85206
MAGANA	721 E RANCH RD	GILBERT	AZ	85296
MAGIERA	14636 N CAMEO DR	SUN CITY	AZ	85351
MAHANEY	5175 W DEL RIO S	CHANDLER	AZ	85226
MAHON	1801 E COOLIDGE ST	PHOENIX	AZ	85016
MAHONEY	3551 S ARIZONA PLACE	CHANDLER	AZ	85286
MAIEFSKI	1132 E THUNDERHILL PLACE	PHOENIX	AZ	85048
MAJERCAK	1535 E KNOX ROAD	TEMPE	AZ	85284
MAJEWSKI	3691 E COLONIAL DRIVE	CHANDLER	AZ	85249
MAJOR	10119 W OREGON AVE	GLENDALE	AZ	85307
MALASKA	4060 N PINNACLE HILLS CIR	MESA	AZ	85207
MALCHOW	756 E LEHI RD	MESA	AZ	85203
MALCONE	545 N YUCCA CIRCLE	MESA	AZ	85201
MALEKOOTI	7230 S HAZELTON LANE	TEMPE	AZ	85283
MALHOTRA	3815 W DUNBAR DRIVE	PHOENIX	AZ	85041
MALIK	14673 W WHITTON AVE	GOODYEAR	AZ	85395
MALLO	12183 W VALENTINE AVE	EL MIRAGE	AZ	85335
MALLYA	2355 W WILDHORSE DRIVE	CHANDLER	AZ	85286
MALUNOWICZ	4227 N 41ST PL	PHOENIX	AZ	85018
MAMUN	6838 W LYNNE LN	LAVEEN	AZ	85339
MANDERA	8316 N 53RD ST	PARADISE VALLEY	AZ	85253
MANDUJANO	1350 S GREENFIELD RD 1134	MESA	AZ	85206
MANEPALLI	11635 E BELLFLOWER DRIVE	CHANDLER	AZ	85249
MANGANARO	13021 W SHEILA LANE	AVONDALE	AZ	85392
MANKAPURE	7221 S 41ST DR	PHOENIX	AZ	85041
MANNERING	2308 E FLINTLOCK PL	CHANDLER	AZ	85286
MANNING	13852 W REDFIELD RD	SURPRISE	AZ	85379
MANNING	8528 W WASHINGTON ST 12	PEORIA	AZ	85345
MANSFIELD	24629 N 46TH	GLENDALE	AZ	85310
MANSHOLT	1243 W IRIS DR	GILBERT	AZ	85233
MANTRI	622 W REDWOOD DR	CHANDLER	AZ	85248

Comment Document				
Last Name	**Address**			
MANUEL	5632 W FRIER DR	GLENDALE	AZ	85301
MAOUNTS	1713 W BENTLEY ST	MESA, AZ	AZ	85201
MARCHESA	15345 W PANTANO OR	SURPRISE	AZ	85374
MARCHESANO	26631 S NAVAJO PLACE	CHANDLER	AZ	85248
MARCHESE	22505 N HOMESTE	SUN CITY WEST	AZ	85375
MARCOS	517 N BEVERLY STREET	CHANDLER	AZ	85225
MARDIS	510 E MOUNTAIN SKY AVE	PHOENIX	AZ	85048
MARENO	11811 N 97TH AVE	SUN CITY	AZ	85351
MARIANO	5444 S 17TH DRIVE	PHOENIX	AZ	85041
MARIN	8432 W TONTO LN	PEORIA	AZ	85382
MARKIS	617 S KENWOOD LANE	CHANDLER	AZ	85226
MARONEY	2226 W WAYLAND RD	PHOENIX	AZ	85041
MARQUARD	941 E 8TH PL	MESA	AZ	85203
MARQUART	3040 N 36TH ST N206	PHOENIX	AZ	85018
MARQUEZ	6626 W COOLIDGE ST	PHOENIX	AZ	85033
MARQUEZ	7715 W SIERRAS	PEORIA	AZ	85345
MARQUEZ	1016 S HAZEL CT	GILBERT	AZ	85296
MARQUEZ	2823 E INDIAN WELLS PL	CHANDLER	AZ	85249
MARQUEZ	4515 E PECAN RD	PHOENIX	AZ	85040
MARQUIS	10224 W EDGEWOOD DR	SUN CITY	AZ	85351
MARSH	2514 N 69TH ST	SCOTTSDALE	AZ	85257
MARSH	314 W PATRICK ST	GILBERT	AZ	85233
MARSHALL	16805 S 34TH STREET	PHOENIX	AZ	85048
MARSHALL	1734 E ARDMORE RD	PHOENIX	AZ	85042
MARSHALL	6809 W GEORGIA AVE	GLENDALE	AZ	85303
MARSHALL	18733 E CHANDLER HEIGHTS RD	QUEEN CREEK	AZ	85142
MARSHALL	14014 N 130TH DR	EL MIRAGE	AZ	85335
MARSOLLIER	17613 N 51ST DR	GLENDALE	AZ	85308
MARTIN	10611 W HIGHWOOD LN	SUN CITY	AZ	85373
MARTIN	6248 E COLBY ST	MESA, AZ	AZ	85205
MARTIN	10936 W CLOVER WAY	AVONDALE	AZ	85392
MARTIN	3409 S RURAL RD 110	TEMPE	AZ	85282
MARTIN	4008 E KNOX ROAD	PHOENIX	AZ	85044
MARTIN	9816 W ECHO LN	PEORIA	AZ	85345
MARTIN SMITH	4932 W OLNEY AVENUE	LAVEEN	AZ	85339

Comment Document				
Last Name	**Address**			
MARTINEZ	1605 E 1ST PLACE	MESA	AZ	85203
MARTINEZ	1927 E HAMPTON AVE 253	MESA	AZ	85204
MARTINEZ	1941 E ELLIS DRIVE	TEMPE	AZ	85282
MARTINEZ	205 W ELM LN	AVONDALE	AZ	85323
MARTINEZ	2226 N 11TH ST	PHOENIX	AZ	85006
MARTINEZ	2553 E EDGEWOOD AVE	MESA	AZ	85204
MARTINEZ	2932 E WINDMERE DR	PHOENIX	AZ	85048
MARTINEZ	300 E CONSTITUTION DRIVE	GILBERT	AZ	85296
MARTINEZ	3025 W MADISON STREET	PHOENIX	AZ	85009
MARTINEZ	4527 S JOSHUA TREE LANE	GILBERT	AZ	85297
MARTINEZ	5403 S 4TH ST	PHOENIX	AZ	85040
MARTINEZ	6401 S 46TH ST	PHOENIX	AZ	85042
MARTINEZ	6711 W OSBORN RD 59	PHOENIX	AZ	85033
MARTINEZ	7015 S 67TH AVENUE	PHOENIX	AZ	85041
MARTINEZ	7508 S 74TH LANE	LAVEEN	AZ	85339
MARTINEZ	815 W ORION ST	TEMPE	AZ	85283
MARTINEZ	901 S 3RD ST	AVONDALE	AZ	85323
MARTINEZ	2133 W COLTER ST	PHOENIX	AZ	85015
MARTINEZ	4752 E ST CATHERINE AVE	PHOENIX	AZ	85042
MARTINEZ	589 W LA DONNA DR	TEMPE	AZ	85283
MARTINEZ GUERRERO	833 N 10TH AVE	PHOENIX	AZ	85007
MARTIN-RIVERA	3482 E COTTON LANE	GILBERT	AZ	85234
MARUSICH	4124 E BLUE SPRUCE LANE	GILBERT	AZ	85298
MARVETS	9664 W PURDUE AVE	PEORIA	AZ	85345
MARXER	7529 W LUKE AVE	GLENDALE	AZ	85303
MASI	5316 S PEACHWOOD DRIVE	GILBERT	AZ	85298
MASON	1513 S 76TH PL	MESA, AZ	AZ	85209
MASON	19396 N 86TH DR	PEORIA	AZ	85382
MASON	3242 E CITADEL DR	GILBERT	AZ	85298
MASON	8736 W BLUEFIELD AVE	PEORIA	AZ	85382
MASSEY	8759 W PARADISE LN	PEORIA	AZ	85382
MAST	2130 E NIGHTHAWK WAY	PHOENIX	AZ	85048
MASTERS	15403 W GUNSIGHT DR	SUN CITY WEST	AZ	85375
MASTERS	2855 S EXTENSION ROAD #125	MESA	AZ	85210

Comment Document				
Last Name	**Address**			
MASTRANGELO	342 W WINDSOR AVE	PHOENIX	AZ	85003
MASTRANGELO	5514 W WILSHIRE	PHOENIX	AZ	85035
MASTRAPASQUA	13150 N 82ND AVE	PEORIA	AZ	85381
MATHEW	1653 W MORELOS ST	CHANDLER	AZ	85224
MATHEWS	13825 N CAVE CREEK RD 229	PHOENIX	AZ	85022
MATHEWS	2110 E RADCLIFFE DRIVE	TEMPE	AZ	85283
MATHIEU	5518 E LINDSTROM LN 7B	MESA	AZ	85215
MATOS	913 W PIMA STREET	PHOENIX	AZ	85007
MATOUSEK	7532 E PAPAGO DR	SCOTTSDALE	AZ	85257
MATOUSEK	3216 E PIERCE ST	PHOENIX	AZ	85008
MATSEN	10125 E CHESTNUT DRIVE	CHANDLER	AZ	85248
MATTHEWS	14809 S 24TH STREET	PHOENIX	AZ	85048
MATTHEWS	451 E CASCADA RD	LITCHFIELD PARK	AZ	85340
MATTIA	7657 S DEBRA DR	GILBERT	AZ	85298
MATTOX	305 E CORNELL DR	TEMPE	AZ	85283
MATUS	9330 W MCDOWELL RD 2116	PHOENIX	AZ	85037
MAULDIN	6745 W PIUTE AVE	GLENDALE	AZ	85308
MAXON	12556 W FLOWER STREET	AVONDALE	AZ	85392
MAXWELL	10005 W MONTECITO AVE	PHOENIX	AZ	85037
MAY	2840 W SUNRISE DRIVE	LAVEEN	AZ	85339
MAY	641 E GABLE AVE	MESA	AZ	85204
MAY	15923 W MULBERRY DR	GOODYEAR	AZ	85395
MAYER	9405 S 47TH ST	PHOENIX	AZ	85044
MAYNARD	11154 W FILMORE ST	AVONDALE	AZ	85323
MAYO	2908 N REYNOLDS	MESA	AZ	85215
MAYWEATHER	2200 W SAN ANGELO ST 1027	GILBERT	AZ	85233
MAZER	850 W WHITTON AVE	PHOENIX	AZ	85013
MAZZOCCO	3297 N 146TH DR	GOODYEAR	AZ	85395
MCANERNEY	17227 W POST DR	SURPRISE	AZ	85388
MCBRIDE	3267 E HAPPY ROAD	QUEEN CREEK	AZ	85142
MCCALL	20856 E SADDLE WAY	QUEEN CREEK	AZ	85142
MCCALL	2868 E CLIFTON CT	GILBERT	AZ	85295
MCCAMMAN	2426 E EDGEWOOD AVE	MESA	AZ	85204
MCCARTHY	4138 E BERYL LN	PHOENIX	AZ	85028

Comment Document				
Last Name	**Address**			
MCCARTHY	10925 E SUNNYDALE DR	CHANDLER	AZ	85248
MCCARTHY	18653 E SEAGULL DR	QUEEN CREEK	AZ	85142
MCCARTHY	8642 W JOHN CABOT RD	PEORIA	AZ	85382
MCCARTY	3825 W ROYAL PALM RD	PHOENIX	AZ	85051
MCCARVER	4252 E ENCANTO ST	MESA	AZ	85205
MCCAWLEY	2511 E MENLO ST	MESA	AZ	85213
MCCLEAN	6107 W HIGHLAND AVE	PHOENIX	AZ	85033
MCCLELLAN	15642 S 31ST ST	PHOENIX	AZ	85048
MCCLELLAND	7521 E HOLLY ST	SCOTTSDALE	AZ	85257
MCCLENDON	310 W RIVIERA DR	TEMPE	AZ	85282
MCCLEVE	445 N ASH	MESA	AZ	85201
MCCOLLUM	1432 E HAZELTINE WAY	CHANDLER	AZ	85249
MCCOMBS	9052 W WATSON LN	PEORIA	AZ	85381
MCCORMICK	1825 W EMELITA AVE	MESA, AZ	AZ	85202
MCCORMICK	2073 W MEGAN ST	CHANDLER	AZ	85224
MCCORMICK	17200 W BELL RD 1560	SURPRISE	AZ	85374
MCCOY	1904 W HAZELWOOD PKY	PHOENIX	AZ	85015
MCCOY	5523 W WHITTON AVE	PHOENIX	AZ	85031
MCCOY	419 S COLORADO ST	CHANDLER	AZ	85225
MCCRAY	1645 E VIOLET DRIVE	PHOENIX	AZ	85040
MCCRITE	945 S HOBSON	MESA	AZ	85204
MCCUIN	2728 W LA SALLE ST	PHOENIX	AZ	85041
MCCULLAR	18813 E VIA DE ARBOLES	QUEEN CREEK	AZ	85142
MCCULLOUGH	3955 N SONORAN HILLS	MESA, AZ	AZ	85207
MCCUNE	1533 W MISSOURI AVE	PHOENIX	AZ	85015
MCCUSKER	6960 W PEORIA AVE 86	PEORIA	AZ	85345
MCDANIEL	10825 W KALER D	GLENDALE	AZ	85307
MCDANIEL	2722 W GRISWOLD RD	PHOENIX	AZ	85051
MCDANIEL	5315 W PIEDMONT DRIVE	LAVEEN	AZ	85339
MCDONALD	1281 E RUNAWAY BAY DR	CHANDLER	AZ	85249
MCDOUGAL	117 S RITA LANE	CHANDLER	AZ	85226
MCDOUGAL	4533 E ENID CIR	MESA	AZ	85206
MCDOWELL	410 W HACKBERRY DR	CHANDLER	AZ	85248
MCELMURY	29907 N 122ND D	PEORIA	AZ	85383
MCELROY	9338 W BERYL AVE	PEORIA	AZ	85345

Comment Document				
Last Name	**Address**			
MCENTIRE	6019 W LAURIE LN	GLENDALE	AZ	85302
MCFARLAND	6524 S JENTILLY LANE	TEMPE	AZ	85283
MCFARLIN	2929 N 37TH ST 12	PHOENIX	AZ	85018
MCGALE	136 W 3RD PLACE #B	MESA	AZ	85201
MCGEE	1317 S 19TH DRIVE #272	PHOENIX	AZ	85009
MCGEE	1512 W STOTTLER DRIVE	CHANDLER	AZ	85224
MCGEE	601 S FARMER AVE 211	TEMPE	AZ	85281
MCGEE	6851 W DARREL RD	LAVEEN	AZ	85339
MCGEHEE	20403 N MEADOWOOD DR	SUN CITY WEST	AZ	85375
MCGHEE	10629 W HILTON AVENUE	TOLLESON	AZ	85353
MCGINNIS	6721 E MCDOWELL RD 317-E	SCOTTSDALE	AZ	85257
MCGRATH	1219 E MARY LANE	GILBERT	AZ	85295
MCGRATH	16842 S 44TH PLACE	PHOENIX	AZ	85048
MCGRATH	15107 W WHITEWOOD DR	SUN CITY WEST	AZ	85375
MCHENRY	2065 E ALAMEDA DR	TEMPE	AZ	85282
MCINNIS	505 W BASELINE RD 1064	TEMPE	AZ	85283
MCINTURF	10338 W PRAIRIE HILLS CIR	SUN CITY	AZ	85351
MCKENZIE	1603 E DONNER DR	TEMPE	AZ	85282
MCKIBBIN	5638 N 134TH DR	LITCHFIELD PARK	AZ	85340
MCKIM	16521 W MCKINLEY ST	GOODYEAR	AZ	85338
MCKIMMY	2520 W CARTER DRIVE	TEMPE	AZ	85282
MCKINLEY	3402 E FAIRFIELD ST	MESA	AZ	85213
MCKINLEY	18706 E HUNT HWY	QUEEN CREEK	AZ	85142
MCKINNEY	1640 N TEMPLE ST	MESA	AZ	85203
MCKINZIE	16472 W LA POSADA LN	SURPRISE	AZ	85374
MCKNIGHT	19221 E HAPPY ROAD	QUEEN CREEK	AZ	85142
MCKNIGHT	5932 W STELLA AVE	GLENDALE	AZ	85301
MCLEOD	17973 W MAUNA LOA LN	SURPRISE	AZ	85388
MCLESTER	1283 LEISURE WORLD	MESA	AZ	85206
MCLIN	3116 S DELIA CT	GILBERT	AZ	85295
MCMAINS	20925 N 70TH DR	GLENDALE	AZ	85308
MCMASTERS	11275 N 99TH AVE 36	PEORIA	AZ	85345
MCMILLEN	9514 W RAINTREE DR	SUN CITY	AZ	85351
MCMILLIAN	2817 E GARY WAY	PHOENIX	AZ	85042

Comment Document				
Last Name	**Address**			
MCMULLEN	4722 S GRIFFITH WAY	GILBERT	AZ	85297
MCMULLIN	4202 N 33RD DR	PHOENIX	AZ	85017
MCMULLIN	723 S 54TH ST	MESA	AZ	85206
MCNAMEE	2428 E MALIBU DR	TEMPE	AZ	85282
MCNEIL	2627 N 49TH PL	PHOENIX	AZ	85008
MCNEIL	4223 E TERRACE AVE	GILBERT	AZ	85234
MCQUISTION	17471 N 85TH LN	PEORIA	AZ	85382
MCSHEFFREY	4630 S LAKESHORE DR 261	TEMPE	AZ	85282
MCWILLIAMS	410 E HIDALGO AVE	PHOENIX	AZ	85040
MEANS	7102 N 43RD AVE 546	GLENDALE	AZ	85301
MEASE	80 W BEECHNUT PLACE	CHANDLER	AZ	85248
MECHAM	260 SOLD LITCHFIELD RD 134	LITCHFIELD PARK	AZ	85340
MECHURA	9752 E EMPRESS	MESA	AZ	85208
MEDINA	5740 N 59TH AVE 2140	GLENDALE	AZ	85301
MEDINA	6832 S 17TH AVE	PHOENIX	AZ	85041
MEDINA	9206 W VERNON AVE	PHOENIX	AZ	85037
MEDRANO	4007 E TAYLOR ST	PHOENIX	AZ	85008
MEEHAN	21398 E ALYSSA ROAD	QUEEN CREEK	AZ	85142
MEEK	406 W PASEO WAY	PHOENIX	AZ	85041
MEELHUYSEN	1502 E CATAMARAN DRIVE	GILBERT	AZ	85234
MEERS	11111 W HOLLYWOOD AVE	YOUNGTOWN	AZ	85363
MEHARRY	152 S SANDSTONE ST	GILBERT	AZ	85296
MEHTA	23417 N 81ST DR	PEORIA	AZ	85383
MEITZ	837 E CAMBRIDGE AVE	PHOENIX	AZ	85006
MELANCON	12038 S TONALEA DRIVE	PHOENIX	AZ	85044
MELANG	9713 W RODEO CT	SUN CITY	AZ	85373
MELENDEZ	3302 N 90TH ST	MESA	AZ	85207
MELENDEZ	5342 N ORMONDO WAY	LITCHFIELD PARK	AZ	85340
MELHAD	13427 N 111TH AVE	SUN CITY	AZ	85351
MELILLO	1531 E CARLA VISTA DRIVE	CHANDLER	AZ	85225
MELIN	15011 W INDIANOLA AVE	GOODYEAR	AZ	85395
MELKOWSKI	2260 E CATALINA AVE	MESA, AZ	AZ	85204
MELLO	27161 N 172ND LN	SURPRISE	AZ	85384

Comment Document				
Last Name	**Address**			
MELLODY	1011 E CARMEN ST	TEMPE	AZ	85283
MELLUM	12647 W BUTTERFIELD DR	SUN CITY WEST	AZ	85375
MELTON	10434 W CHERYL DR	SUN CITY	AZ	85351
MELTON	402 W MINTON STREET	PHOENIX	AZ	85041
MENASCI	1804 E LOCUST PLACE	CHANDLER	AZ	85286
MENDEZ	321S W GARFIELD ST	PHOENIX	AZ	85009
MENDEZ	2448 E ALPINE AVE	MESA	AZ	85204
MENDEZ	12552 N 150TH LN	SURPRISE	AZ	85379
MENDIVEL	2321 S 112TH AVENUE	AVONDALE	AZ	85323
MENDIVIL	1522 W ROESER RD	PHOENIX	AZ	85041
MENDIVIL	1722 W BEDFORD STREET	MESA	AZ	85201
MENDOZA	1724 W FREMONT ROAD	PHOENIX	AZ	85041
MENDOZA	7802 W MITCHELL DR	PHOENIX	AZ	85033
MENDOZA	16142 W HILTON AVE	GOODYEAR	AZ	85338
MENGIS	3012 N 32ND ST 28	PHOENIX	AZ	85018
MERCER	4400 W MISSOURI	GLENDALE	AZ	85301
MERCHANT	14664 S 25TH WAY	PHOENIX	AZ	85048
MERDES	6435 W EL COR	PHOENIX	AZ	85083
MERTENSMEYER	8424 W VIA MONTOYA DR	PEORIA	AZ	85383
MESBERGEN	2929 S MARTINGALE ROAD	GILBERT	AZ	85295
MESCH	16028 N 174TH LN	SURPRISE	AZ	85388
MESQUITA	15664 W HAMMOND DR	GOODYEAR	AZ	85338
MESQUITA	8724 W CORONADO RD	PHOENIX	AZ	85037
MESSINA	12229 W PLANADA LN	SUN CITY	AZ	85373
MEYER	303 E COLTER ST	PHOENIX	AZ	85012
MEYER	16434 N 33RD WAY	PHOENIX	AZ	85032
MEZA	12036 S 45TH STREET	PHOENIX	AZ	85044
MEZA	7306 W ACAPULCO LN	PEORIA	AZ	85381
MEZZAPELLE CACACE	10854 N 108TH DR	SUN CITY	AZ	85351
MICHAEL	5200 S LAKESHORE DR 135	TEMPE	AZ	85283
MICHAELSON	15910 W COTTONWOOD ST	SURPRISE	AZ	85374
MICHIELI	7921 S MCALLISTER AVE	TEMPE	AZ	85284
MICKLEY	1036 S CHESHIRE LANE	GILBERT	AZ	85296
MIELKE	1235 N SUNNYVALE 100	MESA	AZ	85205

Comment Document				
Last Name	**Address**			
MIGHT	13319 E CINDY ST	CHANDLER	AZ	85225
MIHALIC	3510 N 25TH PL	PHOENIX	AZ	85016
MILAM	5822 N 129TH AVE	LITCHFIELD PARK	AZ	85340
MILBOURN	3144 E MINTON CIR	MESA	AZ	85213
MILES	2147 W IRONWOOD DR	CHANDLER	AZ	85224
MILES	252 S CHOLLA ST	GILBERT	AZ	85233
MILEY	727 E AUBURN DRIVE	TEMPE	AZ	85283
MILLANEZ	2661 N CHAMPLAIN AVE	TEMPE	AZ	85281
MILLENACKER	6715 W MCRAE WAY	GLENDALE	AZ	85308
MILLER	1 W LAWRENCE BOULEVARD	AVONDALE	AZ	85328
MILLER	1111 W APOLLO AV	TEMPE	AZ	85283
MILLER	1173 E LIBERTY LN	GILBERT	AZ	85296
MILLER	1825 W OCOTILLO RD 197	PHOENIX	AZ	85015
MILLER	20149 E AVENIDA DEL VALLE	QUEEN CREEK	AZ	85142
MILLER	236 S WINDSTREAM PL	CHANDLER	AZ	85225
MILLER	323 E PEBBLE BEACH DRIVE	TEMPE	AZ	85282
MILLER	3815 W LOMA LN	PHOENIX	AZ	85051
MILLER	4315 E GROVE ST	PHOENIX	AZ	85040
MILLER	5302 W OLNEY AVENUE	LAVEEN	AZ	85339
MILLER	657 W LEAH AVENUE	GILBERT	AZ	85233
MILLER	6748 E AIRE LIBRE	SCOTTSDALE	AZ	85254
MILLER	9611 E FOSTER AVE	CHANDLER	AZ	85248
MILLER	1561 E INDIGO DR	CHANDLER	AZ	85286
MILLER	2214 W RIVIERA DR	TEMPE	AZ	85282
MILLER	2550 W SHEFFIELD AVE	CHANDLER	AZ	85224
MILLER	887 E DEL RIO ST	GILBERT	AZ	85295
MILLER	9S5 ESOUTHERN AVE 170	TEMPE	AZ	85282
MILLER, JR.	11226 W ELM LN	AVONDALE	AZ	85323
MILLS	556 N FOUNTAIN CIRCLE	CHANDLER	AZ	85226
MILLS	14338 W LAUREL LN	SURPRISE	AZ	85379
MILLS	2146 S LAS FLORES	MESA	AZ	85202
MILONI	789 W EBONY WAY	CHANDLER	AZ	85248
MINAMI WHETTEN	10110 S 43RD AVENUE	LAVEEN	AZ	85339
MINARDO	640 W HACKBERRY DRIVE	CHANDLER	AZ	85248

Comment Document				
Last Name	**Address**			
MINNIEAR	561 S PARKCREST	MESA	AZ	85206
MINTON	13606 N 108TH DR	SUN CITY	AZ	85351
MIRABITO	8430 E HUBBELL ST	SCOTTSDALE 85257	AZ	85257
MIRAMONTES	8628 W WELDON AVE	PHOENIX	AZ	85037
MIRANDA	3901 E ST CATHERINE AVE	PHOENIX	AZ	85042
MIRANDA	8444 W MONROE S	PEORIA	AZ	85355
MISBEEK	5056 W LAURIE LN	GLENDALE	AZ	85302
MITCHELL	11418 S BANNOCK ST	PHOENIX	AZ	85044
MITCHELL	3894 E ANDRE AVENUE	GILBERT	AZ	85298
MITCHELL	10149 W THUNDERBIRD BLVD	SUN CITY	AZ	85351
MITCHELL	10910 W SARATOGA CIR	SUN CITY	AZ	85351
MITCHELL	1815 E BARTLETI PL	CHANDLER	AZ	85249
MITCHELL	8025 W SALTER DR	PEORIA	AZ	85382
MITTUN	2160 W THOMPSON PLACE	CHANDLER	AZ	85286
MIYABARA	3951 W WILSHIRE	PHOENIX	AZ	85009
MOEBS	5004 E MAGIC STONE DRIVE	PHOENIX	AZ	85044
MOEN	10111 W KINGSWOOD CIR	SUN CITY	AZ	85351
MOEN	11132 E CHESTNUT CT	CHANDLER	AZ	85248
MOHALSKI	10634 W GARNETTE DR	SUN CITY	AZ	85373
MOHAMED	4362 E BAYBERRY AVE	MESA	AZ	85206
MOHAMED	7245 W DONNER DR	LAVEEN	AZ	85339
MOHAMMAD	11024 W HAYWARD AVE	GLENDALE	AZ	85307
MOHR	250 E STONEBRIDGE DR	GILBERT	AZ	85234
MOLENAAR	4025 W IRWIN AVE	PHOENIX	AZ	85041
MOLES	8618 W RUE DE LAMOUR	PEORIA	AZ	85381
MOLINA	9931 W HUTTON D	SUN CITY	AZ	85351
MOLINE	4289 W PARK AVENUE	CHANDLER	AZ	85226
MOLITER	1771 W LYNX WAY	CHANDLER	AZ	85248
MOLLENCOPF	4475 E KNOX ROAD #147	PHOENIX	AZ	85044
MOLLERE	664 S ASHBROOK	MESA	AZ	85204
MOLLON	8250 W GEORGIA AVE	GLENDALE	AZ	85303
MONACO	10134 E ELMWOOD DRIVE	CHANDLER	AZ	85248
MONBERG	2323 E ISABELLA AVE	MESA, AZ	AZ	85204
MONCHAMP	7801 N 42ND AVE	PHOENIX	AZ	85051

Comment Document				
Last Name	**Address**			
MONGIOVI	3430 N MOUNTAIN RDG 2	MESA	AZ	85207
MONGOVAN	5168 W MORTEN AVE	GLENDALE	AZ	85301
MONK	2301 E UNIVERSITY DR 106	MESA	AZ	85213
MONROE	17106 N CATHERINE CT	SURPRISE	AZ	85374
MONROY	11750 W BANFF LN	EL MIRAGE	AZ	85335
MONTAGUE	2838 N 136TH DR	GOODYEAR	AZ	85395
MONTANO	6315 W WILLIAMS ST	PHOENIX	AZ	85043
MONTEMARANO	13619 N 94TH DR 238	PEORIA	AZ	85381
MONTGOMERY	15642 W FAIRMOUNT AVE	GOODYEAR	AZ	85395
MONTGOMERY	16811 W SHILOH AVE	GOODYEAR	AZ	85338
MONTGOMERY	3816 E MCDOWELL RD 220	PHOENIX	AZ	85008
MONTIEL	4803 W DESERT LANE	LAVEEN	AZ	85339
MONTIJO	3320 N SILVERADO	MESA	AZ	85215
MONTOYA	2556 N 118TH LANE	AVONDALE	AZ	85392
MONTOYA	4046 W RANCHO DR	PHOENIX	AZ	85019
MONTOYA	8419 S 3RD AVENUE	PHOENIX	AZ	85041
MONTOYA	4350 E JASPER DR	GILBERT	AZ	85296
MOODIE	5001 W CRITTENDEN LN	PHOENIX	AZ	85031
MOODY	1103 N ALBA CIR	MESA	AZ	85213
MOODY	1708 E VERDE LN	PHOENIX	AZ	85016
MOOK	7519 W TARO LN	GLENDALE	AZ	85308
MOON	152 S NEBRASKA ST	CHANDLER	AZ	85225
MOORE	1113 E INDIGO ST	MESA, AZ	AZ	85203
MOORE	3414 E WASHINGTON AVE	GILBERT	AZ	85234
MOORE	3628 E CLARENDON AVE	PHOENIX	AZ	85018
MOORE	4824 E APACHE CIR	PHOENIX	AZ	85044
MOORE	6209 E MCKELLIPS RD 94	MESA	AZ	85215
MOORE	6711 W OSBORN RD 146	PHOENIX	AZ	85033
MOORE	7138 N 45TH AVE C312	GLENDALE	AZ	85301
MOORE	9026 E COUNTRY CLUB DR	CHANDLER	AZ	85248
MOORE	1019 E LAGUNA DR	TEMPE	AZ	85282
MOORE	8638 W PICCADILLY RD	PHOENIX	AZ	85037
MOORE	10509 W CROSBY DR	SUN CITY	AZ	85351
MOORE-DEWITI	144 W PASEO WAY	PHOENIX	AZ	85041
MORALES	3388 E GOLDFINCH WAY	CHANDLER	AZ	85286

Comment Document				
Last Name	**Address**			
MORALES	3711 S COTTONWOOD	COTTONWOOD	AZ	85282
MORALES	6141 W PALMAIRE AVE	GLENDALE	AZ	85301
MORALES	815 W AZALEA DRIVE	CHANDLER	AZ	85248
MORALES	8774 W TUCKEY LN	GLENDALE	AZ	85305
MORAN	1327 W JUANITA AVENUE	MESA	AZ	85202
MORELLA	1381 E SHAMROCK STREET	GILBERT	AZ	85295
MORENO	340 W WHITTEN STREET	CHANDLER	AZ	85225
MORENO	530 E GREENWAY ROAD	PHOENIX	AZ	85042
MORENO	5347 N 104TH AVE	GLENDALE	AZ	85307
MORENO	5439 W BEVERLY RD	LAVEEN	AZ	85339
MORENO	701 E VIA MARIA ST	GOODYEAR	AZ	85338
MORENO	4202 E OAK ST	PHOENIX	AZ	85008
MORGAN	16214 N NASH ST	SURPRISE	AZ	85378
MORGAN	4394 E PEACH TREE DRIVE	CHANDLER	AZ	85249
MORGAN	1858 S SAGUARO CIR	MESA	AZ	85202
MORI	5515 E CALLE SENU	TEMPE	AZ	85283
MORIN	15311 W HERITAGE DR	SUN CITY WEST	AZ	85375
MORPHEW	17714 N 64TH DR	GLENDALE	AZ	85308
MORRIS	3431 S CAMELLIA PL	CHANDLER	AZ	85248
MORRIS	5136 E EVERGREEN ST 1147	MESA	AZ	85205
MORRIS	10101 W PALMERAS DR 120	SUN CITY	AZ	85373
MORRIS	13517 W COTTONWOOD ST	SURPRISE	AZ	85374
MORRIS	14951 W FAIRMOUNT AVE	GOODYEAR	AZ	85395
MORRISON	12423 W GINGER DR	SUN CITY WEST	AZ	85375
MORRISON	13555 W BALLAD DR	SUN CITY WEST	AZ	85375
MORRISON	2524 W BERRIDGE LN E113	PHOENIX	AZ	85017
MORRISON	3574 S PONDEROSA DRIVE	GILBERT	AZ	85297
MORRISON	3440 N 38TH ST 101	PHOENIX	AZ	85018
MORRISSEY	5174 S PEACH WILLOW LN	GILBERT	AZ	85298
MORRISSEY	6872 W MALDONADO RD	LAVEEN	AZ	85339
MORSE	10914 E TWILIGHT DRIVE	CHANDLER	AZ	85248
MORSE	3301 N 7TH AVE G107	PHOENIX	AZ	85013
MORTENSEN	10326 W THOMAS RD	AVONDALE	AZ	85392
MORTENSEN	18525 N 63RD DR	GLENDALE	AZ	85308
MORTON	6730 E HERMOSA VISTA DR 31	MESA	AZ	85215

Comment Document				
Last Name	**Address**			
MOSER	7248 W WILLIAMS	GLENDALE	AZ	85310
MOSLEY	16658 W HILTON AVE	GOODYEAR	AZ	85338
MOSLEY	8854 E PORTOB	MESA, AZ	AZ	85212
MOSS	4607 W BUTLER DR	GLENDALE	AZ	85302
MOSS	7933 S 69TH LANE	LAVEEN	AZ	85339
MOSS	9933 W SOUTHERN AVENUE	TOLLESON	AZ	85353
MOUCHETTE	9310 E CRYSTAL DRIVE	CHANDLER	AZ	85248
MOURAD	4061 N SAGE CREEK CIR	MESA, AZ	AZ	85207
MUDGE	6553 E MELROSE ST	MESA	AZ	85215
MUELLER	2241 E PINCHOT AVE B-3	PHOENIX	AZ	85016
MUELLER	4608 E WINDSOR AVE	PHOENIX	AZ	85008
MUGRIDGE	2401 W SOUTHERN AVENUE #220	PHOENIX	AZ	85282
MUHA	10914 W CIMARRON DR	SUN CITY	AZ	85373
MUIRHEAD	1753 S ROGERS CIR	MESA	AZ	85202
MULCH	1682 W FLINTLOCK WAY	CHANDLER	AZ	85286
MULLIGAN	1020 S PRESIDIO DR	GILBERT	AZ	85233
MULLINEAUX	1432 W EMERALD AVE 746	MESA	AZ	85202
MULLINS	5051 E EMERALD AVE	MESA	AZ	85206
MULVIHILL	15206 W PORT ROYALE LN	SURPRISE	AZ	85379
MUMMERT	20908 N 70TH DR	GLENDALE	AZ	85308
MUNOZ	1135 W WASHINGTON AVENUE	GILBERT	AZ	85233
MUNOZ	22520 N 87TH AVE	PEORIA	AZ	85383
MUNOZ	11401 W RIO VISTA LN	AVONDALE	AZ	85323
MUNSTEDT	16035 W DESERT MIRAGE DR	SURPRISE	AZ	85379
MURDOCK	650 S ASHBROOK	MESA	AZ	85204
MURDOCK	1049 W BUTLER CT	CHANDLER	AZ	85224
MURPHY	1301 E MORELAND ST	PHOENIX	AZ	85006
MURPHY	2901 E INDIAN SCHOOL RD 58	PHOENIX	AZ	85016
MURPHY	4700 E MAIN ST 2289	MESA	AZ	85205
MURPHY	19403 N PONDEROSA CT	SURPRISE	AZ	85387
MURPHY	19728 N CANYON WHISPER DR	SURPRISE	AZ	85387
MURPHY	8527 W INDIANOLA AVE	PHOENIX	AZ	85037
MURRAY	33 W MISSOURI AVE 30	PHOENIX	AZ	85013
MURRAY	12907 W SKYVIEW DR	SUN CITY WEST	AZ	85375
MURRELL	2224 W LOBO CIR	MESA	AZ	85202

Comment Document				
Last Name	**Address**			
MUSENGO-LICKFELT	3256 N PALMER DR	GOODYEAR	AZ	85395
MUSGRAVE	9965 W ROYAL OAK RD 3215	SUN CITY	AZ	85351
MUSIL	831 W MONTE WAY	PHOENIX	AZ	85041
MUSSELMAN	13740 W RANCHO DR	LITCHFIELD PARK	AZ	85340
MYERS	1424 E BRANHAM LANE	PHOENIX	AZ	85042
MYERS	9819 W BRANDING IRON DR	SUN CITY	AZ	85351
MYERS	17827 N ESTRELLA VISTA DR	SURPRISE	AZ	85374
MYERS	907 E HACKAMORE ST	MESA	AZ	85203
MYRICK	12629 S 71ST ST	TEMPE	AZ	85284
NANCE	4002 E CAMBRIDGE AVE	PHOENIX	AZ	85008
NAPOLEON	4647 N 59TH AVE	PHOENIX	AZ	85033
NAPORA	5648 W PIERSON	PHOENIX	AZ	85031
NARVESON	6278 E PINCHOT AVE	SCOTTSDALE	AZ	85251
NASON	1107 N FREEMAN COURT	GILBERT	AZ	85233
NASSER	3242 W STATE AVE	PHOENIX	AZ	85051
NAUMANN	2514 N SARATOGA ST	TEMPE	AZ	85281
NAUSEDA	15772 N 185TH AVE	SURPRISE	AZ	85388
NAVARRO	706 N OGDEN	MESA	AZ	85205
NAVARRO	12513 W WHYMAN ST	AVONDALE	AZ	85323
NAVARRO	3048 W CHANUTE PASS	PHOENIX	AZ	85041
NAVRATIL	15873 W RANCHO VISTA WAY	SURPRISE	AZ	85374
NECKES	2700 N HAYDEN RD 3012	SCOTTSDALE	AZ	85257
NEDRY	631 N PLEASANT DR	CHANDLER	AZ	85225
NEDRY	631 N PLEASANT DR	CHANDLER	AZ	85225
NEFF	10319 E ARROWVALE DRIVE	CHANDLER	AZ	85248
NEGRETE	7920 W LARKSPUR DR	PEORIA	AZ	85381
NEGRI	18650 N 91ST AVE	PEORIA	AZ	85382
NEHLS	7130 E SADDLEBACK ST 20	MESA	AZ	85207
NEIBACH	253 E HARRISON STREET	GILBERT	AZ	85295
NEIFFER	11520 N 147TH LN	SURPRISE	AZ	85379
NEIL	17867 W BUENA VISTA DR	SURPRISE	AZ	85374
NEILL	7030 W BASELINE ROAD	LAVEEN	AZ	85339
NEISER	26434 S NEW TOWN DRIVE	CHANDLER	AZ	85248

Comment Document				
Last Name	**Address**			
NELLI	333 N PENNINGTON DRIVE #77	CHANDLER	AZ	85224
NELLIS	6446 E TRAILRIDGE CIR 94	MESA	AZ	85215
NELSON	11041 S 44TH STREET	PHOENIX	AZ	85044
NELSON	1165 E ERIE STREET	GILBERT	AZ	85295
NELSON	1324 S PORTLAND AVENUE	GILBERT	AZ	85296
NELSON	1694 W GLENDALE AVE 554	PHOENIX	AZ	85021
NELSON	2150 E CALLE DE ARCOS	TEMPE	AZ	85284
NELSON	22 W 9TH PL 214	MESA	AZ	85201
NELSON	3633 N 154TH LN	GOODYEAR	AZ	85395
NELSON	4649 W KALER CIR	GLENDALE	AZ	85301
NELSON	6350 W LAWRENCE LN	GLENDALE	AZ	85302
NELSON	8061 W CARLOTA LN	PEORIA	AZ	85383
NELSON	900 S 94TH ST	CHANDLER	AZ	85224
NELSON	948 E HALIFAX ST	MESA	AZ	85203
NELSON	11210 S PEWAUKEE ST	PHOENIX	AZ	85044
NELSON	1130 E FAIRFIELD ST	MESA	AZ	85203
NELSON	215 W BROWN RD 103	MESA	AZ	85201
NELSON	2325 E LYNWOOD ST	MESA	AZ	85213
NELSON	15655 W BETHESDA CT	SURPRISE	AZ	85374
NEMETH	13207 S 38TH ST	PHOENIX	AZ	85044
NERENBERG	2073 E NATHAN WAY	CHANDLER	AZ	85225
NETERVAL	1236 W EDGEWATER DR	GILBERT	AZ	85233
NEUMANN	2827 S ELM ST	TEMPE	AZ	85282
NEVILLS	2529 E INTREPID AVE	MESA, AZ	AZ	85204
NEWBERG	16303 W DESERT CANYON DR	SURPRISE	AZ	85374
NEWBILL	1714 E VINEYARD RD	PHOENIX	AZ	85042
NEWCOM	9301 E MENLO ST	MESA	AZ	85207
NEWMAN	2235 W EMELITA AVE	MESA, AZ	AZ	85202
NEWMAN	23173 N 106TH LN	PEORIA	AZ	85383
NEWMAN	47S7 E UTE CT	PHOENIX	AZ	85044
NEWNAM	4540 N 18TH DR	PHOENIX	AZ	85015
NICHOLAS	5943 W ENCANTO BOULEVARD	PHOENIX	AZ	85035
NICHOLS	3630 S JOSHUA TREE LN	GILBERT	AZ	85297
NICHOLS	4502 E GLEN ROSA	PHOENIX	AZ	85018

Comment Document				
Last Name	**Address**			
NICHOLS	6203 W GREENBRIAR DR	GLENDALE	AZ	85308
NICHOLS	6335 W PONTIAC DR	GLENDALE	AZ	85308
NICHOLS	1948 E MARYLAND	PHOENIX	AZ	85016
NICHOLSON	7711 W KAREN LEE LN	PEORIA	AZ	85382
NICHOLSON	1260 E BISHOP DR	TEMPE	AZ	85282
NICHOLSON	8694 N 95TH AVE	PEORIA	AZ	85345
NICKERSON	16208 N 162ND LN	SURPRISE	AZ	85374
NICKERSON	2609 W SOUTHERN AVENUE #191	TEMPE	AZ	85282
NINER	1358 W MESETO AVENUE	MESA	AZ	85202
NIPANIKAR	24410 S 120TH PL	CHANDLER	AZ	85249
NISSEN	1175 W PECOS RD 2077	CHANDLER	AZ	85224
NIVER	5901 E LEWIS AVE	SCOTTSDALE	AZ	85257
NOBLE	1552 E DEL RIO ST	CHANDLER	AZ	85225
NOGA	13816 N WHISPERING LAKE DR	SUN LAKE	AZ	85351
NOLAN	2022 E BENDIX DRIVE	TEMPE	AZ	85283
NOLAN	8056 W EVA ST	PEORIA	AZ	85345
NOLTE	7810 W PEORIA AVE 84	PEORIA	AZ	85345
NOMURA	4450 E SHOMI STREET	PHOENIX	AZ	85044
NORDMAN	27135 N 86TH LN	PEORIA	AZ	85383
NORMAN	2431 W MONROE STREET	PHOENIX	AZ	85009
NORMAN	3137 E PALM BEACH DRIVE	CHANDLER	AZ	85249
NORTH	12533 W GAM BIT TRL	PEORIA	AZ	85383
NORTON	4701 E DES MOINES ST	MESA	AZ	85205
NORTON	7327 N 34TH AVE	PHOENIX	AZ	85051
NORTON	8820 W BELL RD 214	PEORIA	AZ	85382
NOSER	10903 E MICHIGAN AVE	CHANDLER	AZ	85248
NOVAK	3389 E REDFIELD ROAD	GILBERT	AZ	85234
NOVAK	207 E PASADENA AVE	PHOENIX	AZ	85012
NOVITSKY	11459 W CHAMBERS AVENUE	TOLLESON	AZ	85353
NOVOTNY	1830 N 112TH DR	AVONDALE	AZ	85392
NOWAKOWSKI	2001 W ORANGEWOOD AVE	PHOENIX	AZ	85021
NUNES	8210 S 34TH DR	LAVEEN	AZ	85339
NUNEZ	12955 W AVALON DRIVE	AVONDALE	AZ	85392
NUNEZ	3310 S HAZELTON LANE	TEMPE	AZ	85282
NUNEZ	441 N 38TH AVENUE	PHOENIX	AZ	85009

Comment Document				
Last Name	**Address**			
NUNEZ	6222 N 79TH LN	GLENDALE	AZ	85303
NYAGONG	4413 W BETHANY	GLENDALE	AZ	85301
NYE	11868 S HALF MOON DR	PHOENIX	AZ	85044
NYKL	2045 W BUTLER DR 165	PHOENIX	AZ	85021
OARDE	7029 W TETHER TRL	PEORIA	AZ	85383
OATES	12938 W PROSPECT DR	SUN CITY WEST	AZ	85375
OBERGH	502 W LYNWOOD ST	PHOENIX	AZ	85003
OBI	10818 W ADAM AVE	SUN CITY	AZ	85373
O'BRIEN	1842 W ROSE LN	PHOENIX	AZ	85015
O'BRIEN	4724 N 15TH AVE 1	PHOENIX	AZ	85015
OCHOA	402 W WHITTEN ST	CHANDLER	AZ	85225
OCHOA	8820 N 2ND ST	PHOENIX	AZ	85020
OCKASI	10417 E CHESTNUT DR	CHANDLER	AZ	85248
O'CONNELL	22365 E VIA DEL RANCHO	QUEEN CREEK	AZ	85142
O'CONNOR	10203 E TEAKWOOD COURT	CHANDLER	AZ	85248
O'CONNOR	3232 E BLUEBIRD PLACE	CHANDLER	AZ	85286
O'CONNOR	860 N MCQUEEN ROAD #1074	CHANDLER	AZ	85225
O'CONNOR	8905 W CHRISTA WAY	TOLLESON	AZ	85353
O'CONNOR	1620 W WHITTON AVE	PHOENIX	AZ	85015
O'COYNE	9605 S 23RD DRIVE	PHOENIX	AZ	85041
ODLE	3904 S BUTTE AVENUE	TEMPE	AZ	85282
O'DONOHOE	1880 E HARRISON ST	CHANDLER	AZ	85225
ODUGUI	2125 N 25TH PL	PHOENIX	AZ	85008
OGAZ	2910 W CARSON ROAD	PHOENIX	AZ	85041
OKAMURA	3510 W FILLMORE ST	PHOENIX	AZ	85009
OLIVAS	640 W 2ND STREET	MESA	AZ	85201
OLIVETE	2922 N CASA TOMAS CT	PHOENIX	AZ	85016
OLSON	196SO N CANYON WHISPER DR	SURPRISE	AZ	85387
OLSON	2012 N 23RD ST	PHOENIX	AZ	85006
OLSON	3511 ECOVINA ST	MESA	AZ	85213
OLSON	6789 S WILSON STREET	TEMPE	AZ	85283
OLTMAN	7032 W TONTO DR	GLENDALE	AZ	85308
ONEIL	8905 E STONEY VISTA DR	CHANDLER	AZ	85248
ONTIVEROS	8021 W MEADOWBROOK AVE	PHOENIX	AZ	85033
ONTIVEROS	6039 W VERNON AVE	PHOENIX	AZ	85035

Comment Document				
Last Name	**Address**			
ORADAT	6440 S 16TH PLACE	PHOENIX	AZ	85042
ORD	8935 E CEDAR WAXWING DRIVE	CHANDLER	AZ	85248
ORDING	8562 E PIERCE ST	SCOTTSDALE 85257	AZ	85257
ORGAN	7309 W CARTER RD	LAVEEN	AZ	85339
ORMROD	2230 N 24TH ST	MESA	AZ	85213
ORNELAS	12751 W MERRELL ST	AVONDALE	AZ	85392
ORNELAS	2926 E ADAMS ST	PHOENIX	AZ	85034
ORTEGA	3120 N 40TH AVE	PHOENIX	AZ	85019
ORTEGA	6163 E WOODRI	SCOTTSDALE	AZ	85254
ORTIZ	1617 E HIDALGO AVENUE	PHOENIX	AZ	85040
ORTIZ	2213 N 62ND LANE	PHOENIX	AZ	85035
ORTIZ	2223 E RIVERDALE ST	MESA	AZ	85213
ORTIZ	1045 S 8TH AVE 132	PHOENIX	AZ	85007
ORTIZ	6507 W ADOBE DR	GLENDALE	AZ	85308
ORTIZ RAMIREZ	6813 S ROOSEVELT STREET	TEMPE	AZ	85283
ORTIZ-GARZARAN	1906 E ORANGE DR	PHOENIX	AZ	85016
ORTO	1220 E JARVIS AVE 103C	MESA	AZ	85204
OSBORNE	13625 S 48TH STREET #2062	PHOENIX	AZ	85044
OSBORNE	1637 SASH ST	GILBERT	AZ	85233
OSBY	6405 W PIONEER ST	PHOENIX	AZ	85043
OSEGUERA	12535 W BOHNE ST	AVONDALE	AZ	85323
OSENGA	5717 N CASTANO DR	LITCHFIELD PARK	AZ	85340
OSMAN	7807 W MONTECITO AVE	PHOENIX	AZ	85033
OSTER	14431 W SUMMERSTAR DR	SUN CITY WEST	AZ	85375
OSTERDOCK	5001 E MAIN ST 1262	MESA	AZ	85205
OSTROV	6409 W PIONEER ST	PHOENIX	AZ	85043
OSUNA	8728 W MADISON ST	PEORIA	AZ	85345
OTERO	4632 E SUMMERHAVEN DR	PHOENIX	AZ	85044
OTTE	9319 W ARROWHEAD DR	SUN CITY	AZ	85351
OTTO	15737 W IRONWOOD ST	SURPRISE	AZ	85374
OUSLEY	13329 W COPPERSTONE DR	SUN CITY WEST	AZ	85375
OUSLEY	1848 W WIER AVE	PHOENIX	AZ	85041
OVERBY	13037 S 46TH WAY	PHOENIX	AZ	85044

Comment Document				
Last Name	**Address**			
OVERTURF	2318 E DIAMOND AVE	MESA	AZ	85204
OWEN	620 E BUNKER HILL DR	TEMPE	AZ	85281
OWEN	4018 E LUPINE A	PHOENIX	AZ	85028
OWENS	5339 N 28TH DR	PHOENIX	AZ	85017
PACHECO	2206 W MCNAIR ST	CHANDLER	AZ	85224
PACK	8625 W LAUREL LN	PEORIA	AZ	85345
PACKER	4062 E ELMWOOD ST	MESA	AZ	85205
PADGETT	653 W GUADALUPE RD 1014	MESA, AZ	AZ	85210
PAEK	1026 W PALO VERDE ST	GILBERT	AZ	85233
PAGANO	8420 W BEHREND DR	PEORIA	AZ	85382
PAGE	310S E COMSTOCK DR	GILBERT	AZ	85296
Page	15675 W ACAPULCO LN	SURPRISE	AZ	85379
Page	7108 W HATCHER RD	PEORIA	AZ	85345
Page	726 E FAIRMONT DR	TEMPE	AZ	85282
PAINTER	4376 S RIM COURT	GILBERT	AZ	85297
PAJAK	2004 W MEDINA AVENUE	MESA	AZ	85202
PALACIO	914 S CENTRAL AVENUE	AVONDALE	AZ	85323
PALADHY	4724 W DESERT LN	LAVEEN	AZ	85339
PALERMO	5401 S WILSON DRIVE	CHANDLER	AZ	85249
PALMATIER	2150 W IVANHOE ST	CHANDLER	AZ	85224
PALMER	2107 W ERIE ST	CHANDLER	AZ	85224
PALMER	17829 N 107TH AVE	SUN CITY	AZ	85373
PALUCH	13003 W BLUE SKY DR	SUN CITY WEST	AZ	85375
PANACCIONE	5416 E DALLAS ST	MESA	AZ	85205
PANDEL	850 W HEATHER DR	MESA	AZ	85201
PANTELIS	1027 E BETSY LN	GILBERT	AZ	85296
PANTOJA	10317 W ROANOKE AVENUE	AVONDALE	AZ	85392
PARENT	4351 E SOUTHERN AVENUE	PHOENIX	AZ	85042
PARITSKY	18320 N 147TH DR	SURPRISE	AZ	85374
PARK	4241 E ROMA AVE	PHOENIX	AZ	85018
PARKER	10003 W PLEASANT VALLEY RD	SUN CITY	AZ	85351
PARKER	17214 N 107TH AVE	SUN CITY	AZ	85373
PARKER	2344 E CABALLERO ST	MESA	AZ	85213
PARKER	10201 N 99TH AVE 66	PEORIA	AZ	85345
PARKHURST	5225 W SIESTA WAY	LAVEEN	AZ	85339

Comment Document				
Last Name	**Address**			
PARKIN	7026 W WAGONER RD	GLENDALE	AZ	85308
PARKS	19117 N TAMARISK FLOWER WAY	SURPRISE	AZ	85387
PARNELL	4433 N 62ND AVE	PHOENIX	AZ	85033
PAROT	7618 W CORRINE DR	PEORIA	AZ	85381
PARRA	10401 W LA REATA AVENUE	AVONDALE	AZ	85392
PARROTT	8631 E DIANNA DR	SCOTTSDALE	AZ	85257
PARRY	4877 S EXETER ST	CHANDLER	AZ	85249
PASSARELLA	21114 S 220TH PL	QUEEN CREEK	AZ	85142
PASSEY	2206 E SAN CARLOS PL	CHANDLER	AZ	85249
PATCH	401 E PALM ST	LITCHFIELD PARK	AZ	85340
PATCHELL	4400 W MISSOURI AVE 9	GLENDALE	AZ	85301
PATEL	2928 E WASHINGTON AVENUE	GILBERT	AZ	85234
PATEL	4650 E MOUNTAIN VISTA DRIVE	PHOENIX	AZ	85048
PATEL	472 W PELICAN DRIVE	CHANDLER	AZ	85286
PATEL	5077 S MARBLE STREET	GILBERT	AZ	85298
PATEL	465 S CAMELLIA DR	CHANDLER	AZ	85225
PATES	10977 W KELSO DR	SUN CITY	AZ	85351
PATIERSON	10536 W ANGELS LN	PEORIA	AZ	85383
PATON	10832 W SARATOGA CIR	SUN CITY	AZ	85351
PATRICK	14435 S 48TH ST 2104	PHOENIX	AZ	85044
PATTERSON	1942 S EMERSON 109	MESA, AZ	AZ	85210
PATTERSON	2005 E BUENA VISTA DRIVE	CHANDLER	AZ	85249
PATTERSON	8352 W GRANADA RD	PHOENIX	AZ	85037
PATTERSON	972 E LINDA LN	GILBERT	AZ	85234
PATTON	15191 W LAS BRIZAS LN	SUN CITY WEST	AZ	85375
PAUGH	2168 E MINTON DRIVE	TEMPE	AZ	85282
PAUL	11567 N 151ST DR	SURPRISE	AZ	85379
PAUL	7403 W KRISTAL WAY	GLENDALE	AZ	85308
PAULTER	7447 W CANDELAR	GLENDALE	AZ	85310
PAUPER	12832 S 41ST ST	PHOENIX	AZ	85044
PAVITI	19987 N CRESCENT WAY	SURPRISE	AZ	85374
PAXTON	19428 N COYOTE LAKES PKY	SURPRISE	AZ	85378
PAYAN	12825 W MAUNA LOA LN	EL MIRAGE	AZ	85335
PAYNE	2209 W COLT ROAD	CHANDLER	AZ	85224

Comment Document				
Last Name	**Address**			
PAYNE	9231 N 99TH AVE 208	PEORIA	AZ	85345
PAZ	2425 N 119TH DRIVE	AVONDALE	AZ	85392
PEARCE	1803 N SANDAL	MESA	AZ	85205
PEARCE	3106 S LOS FELIZ DR	TEMPE	AZ	85282
PEARCH	11209 W CORONADO RD	AVONDALE	AZ	85392
PEAVLER	5003 E DALLAS ST	MESA	AZ	85205
PECH	18819 N 96TH LN	PEORIA	AZ	85382
PECK	2844 N 104TH AVENUE	AVONDALE	AZ	85392
PEDERSON	10334 W TWIN OAKS DR	SUN CITY	AZ	85351
PEDREGON	4099 E LIBRA AVE	GILBERT	AZ	85234
PEDROZA	8821 W WILSHIRE DRIVE	PHOENIX	AZ	85037
PEFFER	701 E EAGLE LN	GILBERT	AZ	85296
PELLEGRINO	9250 E LAKESIDE DRIVE	CHANDLER	AZ	85248
PEMBERTON	4712 N 55TH DR	PHOENIX	AZ	85031
PENA	1964 E TYSON PL	CHANDLER	AZ	85225
PENA	5035 W ST ANNE AVE	LAVEEN	AZ	85339
PENA	18042 W LEGEND DR	SURPRISE	AZ	85374
PENCE	27042 N 207TH AVE	WITTMANN	AZ	85361
PENDERGRAFT	13620 W GEMSTONE DR	SUN CITY WEST	AZ	85375
PENLAND	10218 W MISSION LN	SUN CITY	AZ	85351
PENN	20323 N 110TH LN	SUN CITY	AZ	85373
PENNINGTON	1610 S YUCCA STREET	CHANDLER	AZ	85286
PERALES	26080 N 69TH LN	PEORIA	AZ	85383
PERALTA	13601 S 44TH ST 3086	PHOENIX	AZ	85044
PERALTA	2550 E MOBILE LANE	PHOENIX	AZ	85040
PERCENT	22402 N COCHISE LN	SUN CITY WEST	AZ	85375
PERCY	17300 N 88TH AV	PEORIA	AZ	85382
PEREZ	205 W STREET CATHERINE AVENUE	PHOENIX	AZ	85041
PEREZ	2314 W ALAMO DR	CHANDLER	AZ	85224
PEREZ	12203 W PERSHING AVE	EL MIRAGE	AZ	85335
PERIUS	808 E ROMA AVE	PHOENIX	AZ	85014
PERKINS	2532 N 55TH ST	PHOENIX	AZ	85008
PEROG	15720 W PATAGONIA WAY 878	SURPRISE	AZ	85674
PEROTTI	709 S 119TH AVENUE	AVONDALE	AZ	85323

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Last Name	Address			
PERRONE	1854 E FARMDALE AVE	MESA, AZ	AZ	85204
PERRY	16403 W MCKINLEY ST	GOODYEAR	AZ	85338
PERRY	3211 N 162ND DR	GOODYEAR	AZ	85395
PERRY	14415 W YOSEMITE DR	SUN CITY WEST	AZ	85375
PERRY	20010 N BROKEN ARROW DR	SUN CITY WEST	AZ	85375
PETE	8816 S 16TH PL	PHOENIX	AZ	85042
PETERS	1385 N BULLMOOSE CT	CHANDLER	AZ	85224
PETERSEN	2315 N 40TH ST	PHOENIX	AZ	85008
PETERSEN	8021 N 104TH AVE	PEORIA	AZ	85345
PETERSON	13267 W CLARENDON AVE	LITCHFIELD PARK	AZ	85340
PETERSON	1524 E GARY WAY	PHOENIX	AZ	85042
PETERSON	4215 E TAMAYA STREET	PHOENIX	AZ	85044
PETERSON	6290 S TURQUOISE PL	CHANDLER	AZ	85249
PETO	2402 W MINTON STREET	PHOENIX	AZ	85041
PETROSUIS	5193 W GERONIMO ST	CHANDLER	AZ	85226
PETROVSKY	7047 S 73RD AVE	LAVEEN	AZ	85339
PETTIT	3040 N 36TH ST S209	PHOENIX	AZ	85018
PFISTER	6309 N 16TH AVE	PHOENIX	AZ	85015
PFLUM	8101 S COLLEGE AVENUE	TEMPE	AZ	85284
PHARRIS	3872 E DOUGLAS LOOP	GILBERT	AZ	85234
PHEATT	236 E GRANDVIEW ST	MESA	AZ	85201
PHELPS	1031 E 9TH ST	MESA	AZ	85203
PHILLIPS	18957 N ALAMEDA DR	SURPRISE	AZ	85387
PHILLIPS	2027 S HENKEL CIR	MESA	AZ	85202
PHILLIPS	2610 W MCNEIL ST	PHOENIX	AZ	85041
PHILLIPS	6726 W COLTER ST	GLENDALE	AZ	85303
PHILLIPS	927 E GLENMERE DR	CHANDLER	AZ	85225
PHILLIPS	7644 W NORTH LN	PEORIA	AZ	85345
PHILLIPS	8208 S 25TH ST	PHOENIX	AZ	85042
PHILLIPS	11612 N HACIENDA DR	SUN CITY	AZ	85351
PIACENTINE	11840 S HALF MOON DRIVE	PHOENIX	AZ	85044
PICCIOU	1202 W MORELOS ST	CHANDLER	AZ	85224
PICHON	1724 N FRASER DR	MESA	AZ	85203
PICKUS	150 E CANYON CREEK DRIVE	GILBERT	AZ	85295

Comment Document

Last Name	Address			
PIEDRA	430 E HIDALGO AVE	PHOENIX	AZ	85040
PIERCE	8215 S 34TH LANE	LAVEEN	AZ	85339
PIERICK	15825 W JOSHUA TREE DR	SURPRISE	AZ	85374
PIERICK	15825 W JOSHUA TREE DR	SURPRISE	AZ	85374
PILBEAN	10960 N 67TH AVE 28	GLENDALE	AZ	85304
PIMLEY	13551 W BALLAD DR	SUN CITY WEST	AZ	85375
PINA	9205 W GARFIELD STREET	TOLLESON	AZ	85353
PINA	5207 W MILADA DR	LAVEEN	AZ	85339
PINA	16627 W MCKINLEY ST	GOODYEAR	AZ	85338
PINON	8539 W EDGEMONT AVE	PHOENIX	AZ	85037
PIPER	19819 N 146TH WAY	SUN CITY WEST	AZ	85375
PIRON	453 N 56TH ST	MESA	AZ	85205
PIRROTTA	9436 S 11TH AVENUE	PHOENIX	AZ	85041
PITTS	12941 N 74TH LN	PEORIA	AZ	85381
PLASKON	21586 N CASA ROYALE DR	SURPRISE	AZ	85387
PLATO	3251 S JOJOBA WAY	CHANDLER	AZ	85248
PLATT	15372 W CHARTER OAK RD	SURPRISE	AZ	85379
PLAX	10312 W TALISMAN RD	SUN CITY	AZ	85351
PLEW	6112 S 45TH GLANE	LAVEEN	AZ	85339
PLOSKUNAK	8454 W PERSHING AVE	PEORIA	AZ	85381
PLUMOS	14464 N 156TH LN	SURPRISE	AZ	85379
POCHARDT	2805 E TERRACE AVE	GILBERT	AZ	85234
POCHERT	5733 W DESERT DRIVE	LAVEEN	AZ	85339
POGORZELSKI	5433 W EL CAMINITO DR	GLENDALE	AZ	85302
POLA	7019 E BERNEIL DR	PARADISE VALLEY	AZ	85253
POLAND	13997 W FIELDINGS FERRY	SURPRISE	AZ	85374
POLK	8350 E MCKELLIPS RD 168	SCOTTSDALE	AZ	85257
POLLARD	8616 W GLENROSA AVE	PHOENIX	AZ	85037
POLVADORE	10733 W HARMONY LN	SUN CITY	AZ	85373
PONCEDECIGO	6 S 27TH AVE	PHOENIX	AZ	85009
PONSEIGO	13713 W ROBERTSON DR	SUN CITY WEST	AZ	85375
POOLE	3078 E GOLDFINCH WAY	CHANDLER	AZ	85286
POOVATTIL	4613 W DONNER DR	LAVEEN	AZ	85339

Comment Document				
Last Name	**Address**			
POPEJOY	9414 W POTIER DR	PEORIA	AZ	85382
PORTER	1131 W TUCKEY LN	PHOENIX	AZ	85013
PORTER	16253 W MOUNTAIN PASS DR	SURPRISE	AZ	85374
PORTER	5001 N 11TH AVE E201	PHOENIX	AZ	85013
PORTER	509 W LA MIRADA DR	PHOENIX	AZ	85041
PORTILLO	5843 S 15TH AVE	PHOENIX	AZ	85041
PORTSCHI	8905 E COPPER DRIVE	CHANDLER	AZ	85248
POTTENGER	404 E CONCORDA DRIVE	TEMPE	AZ	85282
POWELL	1674 W YELLOWSTONE WAY	CHANDLER	AZ	85248
POWELL	3601 E WINCHCOMB DR	PHOENIX	AZ	85032
POWELSON	19007 N 143RD AVE	SUN CITY WEST	AZ	85375
POWER	13633 W ROANOKE AVE	GOODYEAR	AZ	85395
POWERS	3916 E THORNTON AVENUE	GILBERT	AZ	85297
POWERS	750 E NORTHERN	PHOENIX	AZ	85020
PRATT	13702 E QUEEN CREEK RD	QUEEN CREEK	AZ	85286
PRATT	21603 N LIMOUSINE DR	SUN CITY WEST	AZ	85375
PRATT	5325 W BUTLER DR 115	GLENDALE	AZ	85302
PRENDERGAST	9803 E STONEY VISTA DRIVE	CHANDLER	AZ	85248
PRESCOTT	2121 N CENTER ST 32	MESA	AZ	85201
PRESTIGIACOMO	1682 E BRUCE AVE	GILBERT	AZ	85234
PRESTON	1621 W MINTON ST	PHOENIX	AZ	85041
PRESTON	6229 S WHITE PL	CHANDLER	AZ	85249
PREVITE	17246 N 55TH DR	GLENDALE	AZ	85308
PRICE	2421 W BEVERLY ROAD	PHOENIX	AZ	85041
PRICE	5427 W BEVERLY RD	LAVEEN	AZ	85339
PRICE	16625 S 39TH WAY	PHOENIX	AZ	85048
PRICE	5049 N 11TH AVE F109	PHOENIX	AZ	85013
PRIDDY	1387 W MARLIN DRIVE	CHANDLER	AZ	85286
PRIETO	2402 W JEFFERSON ST	PHOENIX	AZ	85009
PRINGLE	515 S PARKCREST 538	MESA	AZ	85206
PROBST	2517 E CHIPMAN RD	PHOENIX	AZ	85040
PROSISE	3308 N 40TH AVE	PHOENIX	AZ	85019
PROSSER	1825 W EMELITA AVE 241	MESA, AZ	AZ	85202
PRUSS	15921 N 76TH LN	PEORIA	AZ	85382
PRZEOR	1713 E JADE PL	CHANDLER	AZ	85286

Comment Document				
Last Name	**Address**			
PUGH	7574 W CAMERON DR	PEORIA	AZ	85345
PULJU	11001 S PIPA ST	PHOENIX	AZ	85044
PULLMANN	16329 W BRIDAL VEIL LN	SURPRISE	AZ	85387
PURTYMUN	7801 N 44TH DR 1036	GLENDALE	AZ	85301
PUTMAN	333 E 6TH ST 134	MESA, AZ	AZ	85201
PYLAND	4909 E CAMBRIDGE AVE	PHOENIX	AZ	85008
QENDRO	507 E WESTCHESTER DR	TEMPE	AZ	85283
QUACKENBUSH	17813 N 113TH AVE	SURPRISE	AZ	85378
QUADE	150 S ROOSEVELT RD	MESA	AZ	85202
QUAMMEN	10209 W DALEY LN	PEORIA	AZ	85383
QUERCIONE	4610 S RURAL ROAD #706	TEMPE	AZ	85282
QUICK	3290 N 150TH DR	GOODYEAR	AZ	85395
QUIGLEY	10211 W DEANNE DR	SUN CITY	AZ	85351
QUIJADA	11825 S COCONINO ST	PHOENIX	AZ	85044
QUIJADA	1707 S MARILYN ANN DR	TEMPE	AZ	85281
QUIJANO	930 W ISABELLA AVENUE	MESA	AZ	85210
QUILLEN	13396 W VIRGINIA AVE	GOODYEAR	AZ	85395
QUINLEY	6453 W DIANA AVE	GLENDALE	AZ	85302
QUINONES	4055 E MOUNTAIN VISTA DR	PHOENIX	AZ	85048
QUINTANA	4632 N 111TH DR	PHOENIX	AZ	85037
QUINTERO	911 W CLAREMONT ST	PHOENIX	AZ	85013
RACHAL	4640 E PEACH TREE DRIVE	CHANDLER	AZ	85249
RACOWSKY	2146 E LYNWOOD ST	MESA	AZ	85213
RADA	434 N 48TH ST	PHOENIX	AZ	85008
RADEMACHER	14766 N 154TH LN	SURPRISE	AZ	85379
RADJE	4696 W TYSON STREET	CHANDLER	AZ	85226
RADOBENKO	2354 W UNIVERSITY DR #1146	MESA	AZ	85201
RADZIK	17215 N 130TH AVE	SUN CITY WEST	AZ	85375
RAEL	1148 E LINDA LN	CHANDLER	AZ	85225
RAHMAN	4633 E GLEN EAGLE DR	CHANDLER	AZ	85249
RAIO	560 E ORCHID LANE	GILBERT	AZ	85296
RALL	10115 W CHERYL DR	SUN CITY	AZ	85351
RALPH	14214 W DUSTY TRAIL BLVD	SUN CITY WEST	AZ	85375
RAMEY	10906 W MANZANITA DR	SUN CITY	AZ	85373
RAMIREZ	10137 W RIVERSIDE AVE	TOLLESON	AZ	85353

Comment Document				
Last Name	**Address**			
RAMIREZ	1813 E 1ST PLACE	MESA	AZ	85203
RAMIREZ	2291 W GAIL DR	CHANDLER	AZ	85224
RAMIREZ	6803 N 1OTH AVE	PHOENIX	AZ	85013
RAMIREZ	1009 W GRANT ST 1015	PHOENIX	AZ	85007
RAMIREZ	3925 E GOLDFINCH GATE LN	PHOENIX	AZ	85044
RAMIREZ	916 E MONTE VISTA RD 1	PHOENIX	AZ	85006
RAMOS	1129 W ROMA AVE	PHOENIX	AZ	85013
RAMSEY	4535 E FARMDALE CIR	MESA, AZ	AZ	85206
RANAHAN	8350 E MCKELLIPS RD 165	SCOTTSDALE	AZ	85257
RAND	2544 W MESQUITE STREET	CHANDLER	AZ	85224
RANDALL	2625 N 115TH DRIVE	AVONDALE	AZ	85392
RANDALL	2433 E MCDOWELL RD 21	PHOENIX	AZ	85008
RANDALL	3963 E MONTECITO	PHOENIX	AZ	85018
RANGEL LEON	641 N COLORADO ST	CHANDLER	AZ	85225
RANNE	5025 N 63RD AVE	GLENDALE	AZ	85301
RANSOM	4860 E MAIN ST T113	MESA	AZ	85205
RANTA	16331 W ROANOKE AVE	GOODYEAR	AZ	85395
RAPHAEL	3042 E PALMDALE LN	GILBERT	AZ	85298
RAPP	308 E EL CAMINI	PHOENIX	AZ	85020
RASI	10015 W ROYAL OAK RD 105	SUN CITY	AZ	85351
RATCLIFF	4040 E AQUARIUS PL	CHANDLER	AZ	85249
RATINO URRUTIA	6132 W MCKINLEY STREET	PHOENIX	AZ	85043
RATTI	10725 W CONNECTICUT AVE	SUN CITY WEST	AZ	85351
RAUGUTH	1462 E COMSTOCK DR	GILBERT	AZ	85296
RAUSCHER	310 S 63RD ST 318	MESA	AZ	85206
RAVELO	16937 W SONORA ST	GOODYEAR	AZ	85395
RAVENNA	23842 N 97TH AVE	PEORIA	AZ	85383
RAWLEY	1962S N 99TH DR	SUN CITY	AZ	85373
RAY	220 N GREENFIELD RD 21	MESA	AZ	85205
RAY	14080 W SHAW BUTTE DR	SURPRISE	AZ	85379
RAYBURN	13010 W GELDING DR	EL MIRAGE	AZ	85335
RAYKOWSKI	3703 N GRANITE DR	GOODYEAR	AZ	85395
RAYMOND	19406 E ARROWHEAD TRL	QUEEN CREEK	AZ	85142
RAYNA	294 N HUDSON PL	CHANDLER	AZ	85225
READE	6331 S CHAMPIONSHIP DRIVE	CHANDLER	AZ	85249

Comment Document				
Last Name	**Address**			
REBER	8824 W SELLS DR	PHOENIX	AZ	85037
REDHOUSE	3428 E CAROL AVE	MESA	AZ	85204
REDONDO	3844 E TANGLEWOOD DR	PHOENIX	AZ	85048
REDONDO	14017 N LUNA ST	EL MIRAGE	AZ	85335
REED	15116 W WOODRIDGE DR	SURPRISE	AZ	85374
REED	1700 E LAKESIDE DR 63	GILBERT	AZ	85234
REED	8750 W MONTECITO AVE	PHOENIX	AZ	85037
REED	2267 W BOWKER ST	PHOENIX	AZ	85041
REELEY-BAKER	6811 W VILLA THERESA DR	GLENDALE	AZ	85308
REESE	2226 E ENID AVE	MESA	AZ	85204
REEVES	2744 E LUANN PLACE	CHANDLER	AZ	85225
REGALADO	10656 W CONNECT	SUN CITY	AZ	85351
REGEHR	2126 E BUENA VISTA DR	CHANDLER	AZ	85249
REICH	7745 E MANGUN RD	MESA	AZ	85207
REID	9022 E PALMER DRIVE	CHANDLER	AZ	85248
REID	3802 E BASELINE RD 3101	PHOENIX	AZ	85042
REILLY	15261 N GIL BALCOME ST	SURPRISE	AZ	85379
REIMANN	815 N HAYDEN RD B104	SCOTTSDALE	AZ	85257
REINKE	3075 E CORNELL AVE	GILBERT	AZ	85234
REISBICK	4142 E BLUE SPURCE LANE	GILBERT	AZ	85298
RELYEA	9105 E COUNTRY CLUB DRIVE	CHANDLER	AZ	85248
REMER	25614 S FAIRWAY COURT	CHANDLER	AZ	85248
RENDON	1813 E WINCHESTER PL	CHANDLER	AZ	85286
RENNER	6324 W LAREDO ST	CHANDLER	AZ	85226
RENOUARD	2931 N 115TH DR	AVONDALE	AZ	85392
RENTERIA	2228 E INCA ST	MESA	AZ	85213
RENTERIA	371 N KENNETH PL	CHANDLER	AZ	85226
RESETAR	14234 W MAUNA LOA LN	SURPRISE	AZ	85379
REVALLIONI	955 E SOUTHERN AVENUE #178	TEMPE	AZ	85282
REVELAS	1130 E WESTCHESTER DR	CHANDLER	AZ	85249
REVIS	10526 W SARATOGA CIR	SUN CITY	AZ	85351
REYES	11614 N 123RD LN	EL MIRAGE	AZ	85335
REYNA-CANO	12918 W DREYFUS DR	EL MIRAGE	AZ	85335
REYNOLDS	9401 S STANLEY PL	TEMPE	AZ	85284

Comment Document				
Last Name	**Address**			
RHEA	6223 E VIA ESTRELLA	PARADISE VALLEY	AZ	85253
RHODES	1197 E TYSON STREET	GILBERT	AZ	85295
RHODES	4266 E MICHELLE AVE	GILBERT	AZ	85234
RICARD	114 E MONTE WAY	PHOENIX	AZ	85042
RICE	1302 E GLENHAVEN DRIVE	PHOENIX	AZ	85048
RICE	6771 W SKYLARK	GLENDALE	AZ	85308
RICE	16354 W LIMESTONE DR	SURPRISE	AZ	85374
RICE	8014 W EMORY LN	PEORIA	AZ	85383
RICHARDS	15007 S FOXTAIL LANE	PHOENIX	AZ	85048
RICHARDSON	22875 S 208TH ST	QUEEN CREEK	AZ	85142
RICHARDSON	3122 W JEFFERSON STREET	PHOENIX	AZ	85009
RICHEY	1318 E ENCANTO	MESA	AZ	85203
RICK	3801 W ELM ST	PHOENIX	AZ	85019
RICKE	1661 W ORCHID LANE	CHANDLER	AZ	85224
RICO	17530 WASTER DR	SURPRISE	AZ	85388
RIDDLE	17741 W BRIDGER ST	SURPRISE	AZ	85388
RIDDLE	4308 E PRINCETON AVE	GILBERT	AZ	85234
RIDGLEY	901 N NIELSON ST	GILBERT	AZ	85234
RIECK	8619 S 45TH GLN	LAVEEN	AZ	85339
RIEKEN	12813 S 40TH PL	PHOENIX	AZ	85004
RIGBY	2696 N 162ND LN	GOODYEAR	AZ	85395
RIGG	11590 W PURDUE AVE	YOUNGTOWN	AZ	85363
RIGGS	410 W HERMOSA DR	TEMPE	AZ	85282
RIGSBY	4176 W GAIL DRIVE	CHANDLER	AZ	85226
RILEY	1018 W NEWPORT BEACH DR	GILBERT	AZ	85233
RILEY	6932 S NANTUCKET STREET	CHANDLER	AZ	85249
RILEY	1333 N 24TH ST 121	PHOENIX	AZ	85008
RINDELS	8020 S 51ST DR	LAVEEN	AZ	85339
RINEER HARLAN	118 W MARYLAND	PHOENIX	AZ	85013
RINGLE	3814 E AMELIA AVE	PHOENIX	AZ	85018
RINGSRUD	2526 E FAIRMOUNT AVE	PHOENIX	AZ	85016
RIORDAN	3414 E MOCKINGBIRD DRIVE	GILBERT	AZ	85234
RIORDAN	7625 E MINTON PL	MESA, AZ	AZ	85207
RIORDAN	14714 W HURON DR	SUN CITY WEST	AZ	85375

Comment Document				
Last Name	**Address**			
RIOS	6101 S RUBY DR	CHANDLER	AZ	85249
RISERVATO	2346 E SANOQUE CT	GILBERT	AZ	85298
RISPOLI	662 N ELM ST	CHANDLER	AZ	85226
RISPOLI	955 E SOUTHERN AVE 165	TEMPE	AZ	85282
RITCHIE	2650 W BROOKS ST	CHANDLER	AZ	85224
RITIA	5125 N 39TH DR	PHOENIX	AZ	85019
RITTER	3245 S LAGUNA DR	CHANDLER	AZ	85248
RITTER	8350 E MCKELLIPS RD 30	SCOTTSDALE	AZ	85257
RIVERA	2844 E AVALON DR	PHOENIX	AZ	85016
RIVERA	2940 W PALO VERDE DR	PHOENIX	AZ	85017
RIVERA	3628 E DESERT WILLOW ROAD	PHOENIX	AZ	85044
RIVERA	1330 W 11TH ST	TEMPE	AZ	85281
ROACH	11201 N EL MIRAGE RD F56	EL MIRAGE	AZ	85335
ROBERSION	6830 W POLK STREET	PHOENIX	AZ	85043
ROBERTS	1633 E LAKESIDE DRIVE #177	GILBERT	AZ	85234
ROBERTS	2771 S SOUTHWIND DR	GILBERT	AZ	85295
ROBERTS	3136 N COUPLES DR	GOODYEAR	AZ	85395
ROBERTS	3616 N 28TH PL	PHOENIX	AZ	85016
ROBERTS	9451 E NANCE ST	MESA	AZ	85207
ROBERTS	20403 N PALM CANYON DR	SURPRISE	AZ	85374
ROBERTS	340 W PINTURA C	LITCHFIELD	AZ	85340
ROBERTS	809 N WILLIAMS CIR	MESA	AZ	85203
ROBERTSON	3668 E LOS ALTOS RD	GILBERT	AZ	85297
ROBINSON	2052 N 78TH ST	SCOTTSDALE	AZ	85257
ROBINSON	2582 E LANTANA DRIVE	CHANDLER	AZ	85286
ROBINSON	4504 W PLEASANT LN	LAVEEN	AZ	85339
ROBINSON	4616 N 129TH AVE	LITCHFIELD PARK	AZ	85340
ROBINSON	5637 W ELLIS DRIVE	LAVEEN	AZ	85339
ROBINSON	6234 N 13TH PL	PHOENIX	AZ	85014
ROBINSON	9007 W CINNABAR AVE	PEORIA	AZ	85345
ROBINSON	15613 N BOWLING GREEN DR	SUN CITY	AZ	85351
ROBINSON	7331 W ASTER DR	PEORIA	AZ	85381
ROBLES	1113 W NANC LN	PHOENIX	AZ	85041
ROCKYVICH	31814 N 163RD AVE	SURPRISE	AZ	85387

Comment Document				
Last Name	**Address**			
RODD	6759 E MINTON ST	MESA	AZ	85215
RODGERS	6914 S CLARK DRIVE	TEMPE	AZ	85283
RODGERS	839 W PAMPA AVENUE	MESA	AZ	85210
RODRIGUEZ	3843 W PARK AVE	CHANDLER	AZ	85226
RODRIGUEZ	7021 W MCDOWELL RD 269	PHOENIX	AZ	85035
RODRIGUEZ	8104 N 31ST DR	PHOENIX	AZ	85051
RODRIGUEZ	2038 W MONTEBELLO AVE	PHOENIX	AZ	85015
RODRIGUEZ	3002 S 68TH AVE	PHOENIX	AZ	85043
RODRIGUEZ	5515 W WHITTON AVE	PHOENIX	AZ	85031
RODRIGUEZ	5529 W WOOD ST	PHOENIX	AZ	85043
RODRIGUEZ	5534 W WINSTON DR	LAVEEN	AZ	85339
RODRIGUEZ	6331 W HILTON AVE	PHOENIX	AZ	85043
RODRIGUEZ	6630 N 54TH DR	GLENDALE	AZ	85301
RODRIQUEZ	11228 W DEVONSH	PHOENIX	AZ	85037
ROELSE	10610 N 11TH PL	PHOENIX	AZ	85020
ROEST	5335 N 19TH AVE 908	PHOENIX	AZ	85015
ROGERS	15410 W WHITEWOOD DR	SUN CITY WEST	AZ	85375
ROGERS	3219 N 110TH AVENUE	AVONDALE	AZ	85392
ROGERS	868 S ARIZONA AVE 1056	CHANDLER	AZ	85225
ROGERS	9S6 S UTILIS DR	GILBERT	AZ	85296
ROGERS	10519 W CHICKASAW ST	TOLLESON	AZ	85353
ROGERS	2845 E GLENCOVE ST	MESA	AZ	85213
ROGERS	7517 E CULVER ST 406	SCOTTSDALE 85257	AZ	85257
ROGGEN	13373 N PLAZA DEL RIO BLVD 775	PEORIA	AZ	85381
ROHOLT	10329 W CAMEO DR	SUN CITY	AZ	85351
ROHR	3493 E Page AVE	GILBERT	AZ	85234
ROJAS	9239 W RASCON LOOP	PHOENIX	AZ	85037
ROJAS	12638 W SHAW BUTTE DR	EL MIRAGE	AZ	85335
ROLAND	4526 E FLORIAN CIR	MESA	AZ	85206
ROLAND	4643 N 54TH AVE	PHOENIX	AZ	85031
ROLLER	4011 S JUDD ST	TEMPE	AZ	85282
ROMER	4236 N 28TH ST	PHOENIX	AZ	85016
ROMERO	3816 W WILLETTA ST	PHOENIX	AZ	85009
ROMERO	6178 W EARLL DR	PHOENIX	AZ	85033

Comment Document				
Last Name	**Address**			
ROMERO	8034 S 25TH STREET	PHOENIX	AZ	85042
ROMERO DE ISIDRO	2060 N CENTER ST 481	MESA, AZ	AZ	85201
ROMO	10043 W HESS ST	TOLLESON	AZ	85353
ROMO	159 W CALDWELL STREET	PHOENIX	AZ	85041
ROQUE	5120 W SHUMWAY FARM RD	LAVEEN	AZ	85339
RORQUIST	1516 W WILSHIRE DR	PHOENIX	AZ	85007
ROSALES	3071 S SUNNYVALE AVENUE	GILBERT	AZ	85295
ROSALES	42 E MARIPOSA ST	PHOENIX	AZ	85012
ROSALES	727 N MAPLE DR	GILBERT	AZ	85234
ROSE	10220 W CAMPANA DR	SUN CITY	AZ	85351
ROSE	5179 W VILLAGE DR	GLENDALE	AZ	85308
ROSENTHAL	18510 N PARKVIEW PL 403	SURPRISE	AZ	85374
ROSIER	1413 W ORIOLE WAY	CHANDLER	AZ	85286
ROSNICK	1913 E JEANINE DR	TEMPE	AZ	85284
ROSS	3220 W T RYAN LANE	PHOENIX	AZ	85041
ROSS	482 W PELICAN DR	CHANDLER	AZ	85286
ROSS	932 E LONGHORN CIRCLE	CHANDLER	AZ	85286
ROSS	2908 E CONCHO AVE	MESA	AZ	85204
ROSSELLE	6590 S WHETSTONE PL	CHANDLER	AZ	85249
ROTH	12841 W CHAPALA CT	SUN CITY WEST	AZ	85375
ROTH	1250 E MESQUITE ST	GILBERT	AZ	85296
ROTHERMEL	7522 S 29TH WAY	PHOENIX	AZ	85042
ROW	1640 S ARROYO LN	GILBERT	AZ	85295
ROWDEN	2163 E FARMDALE AVE	MESA	AZ	85204
ROWINI	4239 E ADOBE ST	MESA, AZ	AZ	85205
ROWLAND	6917 E AVALON DR	SCOTTSDALE	AZ	85251
ROWLAND	2054 E HARVARD DR	TEMPE	AZ	85283
ROWLEY	14418 W RAVENSWOOD DR	SUN CITY WEST	AZ	85375
ROWSE	3248 E INVERNESS AVE	MESA	AZ	85204
ROZSA	3370 S HORIZON PL	CHANDLER	AZ	85248
RUBITO	11411 N 91ST AVE 68	PEORIA	AZ	85345
RUCKER	7505 S 45TH AVENUE	LAVEEN	AZ	85339
RUCKER	956 E TODD DRIVE	TEMPE	AZ	85283
RUEHRMUND	151 S CAPILLA CIR	LITCHFIELD PARK	AZ	85340

Comment Document				
Last Name	**Address**			
RUFFALO	1533 E TODD DR	TEMPE	AZ	85283
RUFFING	26654 S NEW TOWN DRIVE	CHANDLER	AZ	85248
RUFFING	10310 E MICHIGAN AVE	CHANDLER	AZ	85248
RUGGIERO	700 N DOBSON ROAD #58	CHANDLER	AZ	85224
RUIZ	1009 BUCKEYE ROAD	PHOENIX	AZ	85034
RUIZ	1450 S PALM STREET	GILBERT	AZ	85296
RUIZ	3527 E EMELITA AVE	MESA	AZ	85204
RUIZ	6015 S 30TH ST	PHOENIX	AZ	85042
RUIZ	8717 W TORONTO WAY	TOLLESON	AZ	85353
RUIZ	8301 N 50TH DR	GLENDALE	AZ	85302
RUMBLE	1802 N 37TH PL	PHOENIX	AZ	85008
RUMNEY	4727 E WARNER RD #2080	PHOENIX	AZ	85044
RUMPLE	3810 E HARMONY AVE	MESA	AZ	85206
RUNNINGER	4625 E DRY CREEK RD	PHOENIX	AZ	85044
RUPE	15522 W SKYVIEW WAY	SURPRISE	AZ	85374
RUSH	3122 N 38TH ST 8	PHOENIX	AZ	85018
RUSSELL	1292 S BRIDGEGATE DRIVE	GILBERT	AZ	85296
RUSSELL	375 N FEDERAL STREET #338	CHANDLER	AZ	85226
RUSSELL	4506 N 15TH AVE	PHOENIX	AZ	85015
RUSSELL	5222 W HOLLY ST	PHOENIX	AZ	85035
RUSSELL	555 E RAY RD 140	CHANDLER	AZ	85225
RUTKOWSKI	16441 W LA POSADA LN	SURPRISE	AZ	85374
RYAN	3422 E PEACH TREE DR	CHANDLER	AZ	85249
RYAN	6510 S PEBBLE BEACH DR	CHANDLER	AZ	85249
RYAN	815 N 52ND ST 1393	PHOENIX	AZ	85008
RYAN	815 N 52ND ST 1393	PHOENIX	AZ	85008
RYAN	9723 W TERRACE LN	SUN CITY	AZ	85373
RYDEN	1355 N 86TH WAY	SCOTTSDALE	AZ	85257
SAADI	2102 W ENFIELD WAY	CHANDLER	AZ	85286
SAAR	618 W 11TH STREET	TEMPE	AZ	85281
SABAL	4068 E OAKLAND STREET	GILBERT	AZ	85295
SADLER	10534 W COGGINS DR	SUN CITY	AZ	85351
SAENZ	1613 S 113TH DR	AVONDALE	AZ	85323
SAENZ-HERNANDEZ	11207 N 127TH AVE	EL MIRAGE	AZ	85335
SAFFRAN	9942 W CLAIR DR	SUN CITY	AZ	85351

Comment Document				
Last Name	**Address**			
SAGER	1122 E KENT PL	CHANDLER	AZ	85225
SAHR	3380 S OLEANDER DR	CHANDLER	AZ	85248
SAIZ	3537 E HAMPTON LANE	GILBERT	AZ	85295
SALA SOLO	1023 E CHEYENNE DR	PHOENIX	AZ	85044
SALAIZ	6243 S 19TH DRIVE	PHOENIX	AZ	85041
SALAZAR	718 E BAYLOR LN	CHANDLER	AZ	85225
SALEM	10245 N 87TH AVE C 102	PEORIA	AZ	85345
SALGADA	6205 S 2ND AVENUE	PHOENIX	AZ	85041
SAMMAK	3257 E WATERMAN ST	GILBERT	AZ	85297
SAMS	3861 N SAPPHIRE	MESA	AZ	85215
SANAI	4018 E MONTEBEL	PHOENIX	AZ	85018
SANCHEZ	318 W SUNLAND AVE	PHOENIX	AZ	85041
SANCHEZ	407 W SUNLAND AVE 3	PHOENIX	AZ	85041
SANCHEZ	4104 E BROADWAY RD 1015	MESA, AZ	AZ	85206
SANCHEZ	4111 W MULBERRY DR	PHOENIX	AZ	85019
SANCHEZ	6448 S 16TH PLACE	PHOENIX	AZ	85042
SANCHEZ	9416 S 10TH AVENUE	PHOENIX	AZ	85041
SANCHEZ	1915 W TONTO ST A	PHOENIX	AZ	85009
SANCHEZ	3114 E MCKINLEY ST	PHOENIX	AZ	85008
SANDBURG	11108 W FLORIDA AVE	YOUNGTOWN	AZ	85363
SANDERS	13015 W MONTEREY WAY	AVONDALE	AZ	85392
SANDEZ	2427 N 36TH PL	PHOENIX	AZ	85008
SANDLER	19303 N NEW TRADITION RD 246	SUN CITY WEST	AZ	85375
SANDOVAL	11208 W HOPI STREET	AVONDALE	AZ	85323
SANDOVAL	6156 W GARFIELD ST	PHOENIX	AZ	85043
SANDSTROM	1444 W HEATHER AVE	GILBERT	AZ	85233
SANFORD	6117 W PIUTE AVE	GLENDALE	AZ	85308
SANFT	44 S GREENFIELD RD 17	MESA	AZ	85206
SANGIORGI	1108 E OREGON AVE	PHOENIX	AZ	85014
SANTANA	2516 N 60TH AVENUE	PHOENIX	AZ	85035
SANTIVANEZ	5223 S 18TH AVENUE	PHOENIX	AZ	85041
SANTOS	19965 E VIA DEL RANCHO	QUEEN CREEK	AZ	85142
SARGENT	6225 E CATALINA DR	SCOTTSDALE	AZ	85251
SARTAIN	10610 W SUN CITY BLVD	SUN CITY	AZ	85351
SATHER	13826 W GREENVIEW DR	SUN CITY WEST	AZ	85375

Comment Document				
Last Name	**Address**			
SAUCEDO	4810 W BERKELEY RD	PHOENIX	AZ	85035
SAUER	17 W VERNON AVE 319	PHOENIX	AZ	85003
SAUNDERS	45 N PHYLLIS #202	MESA	AZ	85201
SAUNDERS	5915 W DUBLIN COURT	CHANDLER	AZ	85226
SAUNDERS	2645 E SOUTHERN AVE A339	TEMPE	AZ	85282
SAURO	305 S VAL VISTA DR 255	MESA	AZ	85204
SAVAGE	6500 S DRAGOON CT	CHANDLER	AZ	85249
SAVANAUSKAS	9226 W PINERIDGE DR	SUN CITY	AZ	85351
SAVARINO	1505 N EVERGREEN ST 86	CHANDLER	AZ	85225
SAVELA	18453 N 116TH DR	SURPRISE	AZ	85378
SAVLA	9101 N 48TH PL	PARADISE VALLEY	AZ	85253
SAVORY	8601 N 103RD AV	PEORIA	AZ	85345
SAWAYA	2050 E BELLERIVE PLACE	CHANDLER	AZ	85249
SAWHILL	2012 E GRANITE VIEW DR	PHOENIX	AZ	85048
SAWICKI	6202 E MCKELLIPS RD 113	MESA	AZ	85215
SAXTON	1071 E SANDPIPER DRIVE	TEMPE	AZ	85283
SAY	4023 N 156TH LN	GOODYEAR	AZ	85395
SAYLES	11701 W HADLEY ST	AVONDALE	AZ	85323
SCATES	16012 W MERCER LN	SURPRISE	AZ	85379
SCELZA	14874 LUNA CIR	LITCHFIELD PARK	AZ	85340
SCHACKMAN	15773 W LA REATA AVE	GOODYEAR	AZ	85395
SCHADE	1970 N HARTFORD ST 101	CHANDLER	AZ	85225
SCHAEFER	14184 W MORNING STAR TRL	SURPRISE	AZ	85374
SCHALOW	1736 E WASHINGTON CT	GILBERT	AZ	85234
SCHARFF	6980 S SENATE ST	CHANDLER	AZ	85249
SCHAUBLE	5985 S MACK COURT	GILBERT	AZ	85298
SCHELINSKI	3425 E VERBENA DR	PHOENIX	AZ	85044
SCHELLER	15620 W FLOWER CT	GOODYEAR	AZ	85395
SCHEMBER	1271 E MARYLAND AVE A	PHOENIX	AZ	85014
SCHEPPER	2671 W ESTRELLA DRIVE	CHANDLER	AZ	85224
SCHER	3921 W IVANHOE STREET #150	CHANDLER	AZ	85226
SCHIEMANN	2126 E INDIGO BRUSH RD	PHOENIX	AZ	85048
SCHILLER	2429 N SNEAD DR	MESA	AZ	85215

Comment Document				
Last Name	**Address**			
SCHINDLER	10606 W WHEATRIDGE DR	SUN CITY	AZ	85373
SCHIPPER	8709 W ESCUDA DR	PEORIA	AZ	85382
SCHLAGEL	2839 W RANCHO DR	PHOENIX	AZ	85017
SCHLAX	2727 E VIA DEL ARBOLES	GILBERT	AZ	85298
SCHLEISMAN	1526 W FLOWER CIR	PHOENIX	AZ	85015
SCHLENKER	3770 N 150TH DR	GOODYEAR	AZ	85395
SCHLEU	623 E BUNKER HILL DRIVE	TEMPE	AZ	85281
SCHLIEFER	10430 W PASADENA	GLENDALE	AZ	85307
SCHLOSSER	16960 W MAGNOLIA ST	GOODYEAR	AZ	85338
SCHLOTI	15740 W SHILOH AVE	GOODYEAR	AZ	85338
SCHMALZ	14539 W LA REATA AVE	GOODYEAR	AZ	85395
SCHMALZBACH	8850 E FAIRWAY BLVD	CHANDLER	AZ	85248
SCHMAUTZ	18510 N PARKVIEW PL 223	SURPRISE	AZ	85374
SCHMERBECK	12818 W SAN JUAN AVE	LITCHFIELD PARK	AZ	85340
SCHMIDT	1145 E ERIE ST	GILBERT	AZ	85295
SCHMIDT	1440 S VAL VISTA DR 1078	MESA, AZ	AZ	85204
SCHMIDT	2542 E ADOBE ST	MESA	AZ	85213
SCHMIDT	5518 E LINDSTROM LN 51	MESA	AZ	85215
SCHMIDTKE	15868 W STAR VIEW LN	SURPRISE	AZ	85374
SCHMITZ	25468 S TRURO DR	CHANDLER	AZ	85248
SCHNEIDERWENDT	26634 S PAPAGO PLACE	CHANDLER	AZ	85248
SCHNETZER	5480 E BOSTON ST	MESA	AZ	85205
SCHODT	1203 W ISLANDIA DRIVE	GILBERT	AZ	85233
SCHOENBECK	1436S W SHAW BUTTE DR	SURPRISE	AZ	85379
SCHONBERGER	14816 W HURON DR	SUN CITY WEST	AZ	85375
SCHOONOVER	3917 E PARKVIEW DR	GILBERT	AZ	85295
SCHREIBER	12802 W CERCADO LN	LITCHFIELD PARK	AZ	85340
SCHREINER	9027 E DIAMOND DRIVE	CHANDLER	AZ	85248
SCHROCK	2465 S FINCH ST	CHANDLER	AZ	85286
SCHROEDER	13828 N WHISPERING LAKE DR	SUN CITY	AZ	85351
SCHROEDER	725 W 12TH STREET	TEMPE	AZ	85281
SCHROEDER	1028 W HUDSON WAY	GILBERT	AZ	85233
SCHROEDER	3028 E EMILE ZO	PHOENIX	AZ	85032

Comment Document				
Last Name	**Address**			
SCHUKART	23402 S 223RD PL	QUEEN CREEK	AZ	85142
SCHULER	12806 W BLUE BONNET DR	SUN CITY WEST	AZ	85375
SCHULTZ	1642 LEISURE WORLD	MESA	AZ	85206
SCHULTZ	4141 N 31ST ST 322	PHOENIX	AZ	85016
SCHULZ	18019 N 71ST DR	GLENDALE	AZ	85308
SCHUMACHER	3140 E DESERT FLOWER LN	PHOENIX	AZ	85048
SCHUSTER	2620 N 68TH ST 2B	SCOTTSDALE	AZ	85257
SCHUSTER	10304 W CATALINA DR	AVONDALE	AZ	85392
SCORDATO	2606 E LA COSTA DRIVE	CHANDLER	AZ	85249
SCOTI	699 E BUFFALO ST	CHANDLER	AZ	85225
SCOTI	883 W NOLAN WAY	CHANDLER	AZ	85248
SCOTT	2221 E DARTMOUTH ST	MESA	AZ	85213
SCOTT	2350 N CABOT CIR	MESA, AZ	AZ	85207
SCOTT	2800 N ARIZONA AVE 112	CHANDLER	AZ	85225
SCOTT	9008 W YALE STREET	PHOENIX	AZ	85037
SCREPTOCK	3108 W CETON DRIVE	LAVEEN	AZ	85339
SCROGGINS	2305 E NANCY LANE	PHOENIX	AZ	85042
SCRUGGS	19641 N 73RD AVE	GLENDALE	AZ	85308
SEAGO	17149 W MAHOGANY WAY	SURPRISE	AZ	85387
SEAGRAVES	1424 N BEL AIR DR	MESA	AZ	85201
SEATON	2910 W BOWKER ST	PHOENIX	AZ	85041
SEATON	958 W GARY DRIVE	CHANDLER	AZ	85225
SEBASTIAN	651 S LAZONA DRIVE	MESA	AZ	85204
SEDILLO	2322 N 27TH PL	PHOENIX	AZ	85008
SEELEY	1706 E DUNBAR DR	TEMPE	AZ	85282
SEITH	3116 N 148TH AVE	GOODYEAR	AZ	85395
SELBY	3352 E FOUNTAIN ST	MESA	AZ	85213
SELBY	1025 E EL FREDA ROAD	TEMPE	AZ	85284
SELBY	15603 S 7TH ST	PHOENIX	AZ	85048
SELBY	2223 W MYRTLE DRIVE	CHANDLER	AZ	85248
SELVEY	4050 W ROVEY AVE	PHOENIX	AZ	85019
SEN	3727 E TIERRA B	PHOENIX	AZ	85032
SENSI	1754 E ALTA VISTA RD	PHOENIX	AZ	85042
SENTELL	1336 E GLENHAVEN DR	PHOENIX	AZ	85048
SENTER	9909 W PINEAIRE DR	SUN CITY	AZ	85351

Comment Document				
Last Name	**Address**			
SENUM	5055 W MONTEREY STREET	CHANDLER	AZ	85226
SERAFINI	2422 S EVERGREEN RD	TEMPE	AZ	85282
SERBIN	13518 W AVALON DR	AVONDALE	AZ	85392
SERNA	9162 W FILLMORE ST	TOLLESON	AZ	85353
SERRANOVILLA	7602 W INDIANOLA AVE	PHOENIX	AZ	85033
SERVAIS	1471 E PALM BEACH DRIVE	CHANDLER	AZ	85249
SETLIFF	10506 E OBISPO	MESA	AZ	85212
SEVERSON	7203 W ACOMA DR	PEORIA	AZ	85381
SEZATE	1027 E LEHI RD	MESA	AZ	85203
SHABAZZ	1929 W BURGESS LN	PHOENIX	AZ	85041
SHADLESKY	15406 W SENTINEL DR	SUN CITY WEST	AZ	85375
SHADLEY	15008 W DESERT HILLS DR	SURPRISE	AZ	85379
SHAFTON	2102 E SESAME ST	TEMPE	AZ	85283
SHAH	3121 E LYNX PLACE	CHANDLER	AZ	85249
SHAHREZA-GHOMSHEI	5063 N 71ST LN	GLENDALE	AZ	85303
SHAMS	19475 S 190TH ST	QUEENCREEK	AZ	85142
SHANNON	1752 E AUGUSTA AVENUE	CHANDLER	AZ	85249
SHANNON	3017 E CHEERY LYNN RD	PHOENIX	AZ	85016
SHAPIRO	13319 W MEEKER	SUN CITY WEST	AZ	85375
SHAPIRO	3937 E NAMBE ST	PHOENIX	AZ	85044
SHAPIRO	4137 W FLOWER ST	PHOENIX	AZ	85019
SHARF	1342 E GERONIMO STREET	CHANDLER	AZ	85225
SHARIFF	7328 W ELLIS STREET	LAVEEN	AZ	85339
SHARKEY	173 N PINEVIEW DR	CHANDLER	AZ	85226
SHARP	1110 E JENSEN ST	MESA	AZ	85203
SHARPE	4763 E SUMMERHAVEN DR	PHOENIX	AZ	85044
SHARPE	11440 N HAGEN DR	SUN CITY	AZ	85351
SHATTO	12029 N 112TH DR	YOUNGTOWN	AZ	85363
SHAULIS	238 W TULSA ST	CHANDLER	AZ	85225
SHAW	2228 E WISTERIA DRIVE	CHANDLER	AZ	85286
SHAW	5952 W MITCHELL DR	PHOENIX	AZ	85033
SHEEK	6252 N 90TH DR	GLENDALE	AZ	85305
SHELL	1815 N 39TH ST	PHOENIX	AZ	85008
SHELLEY	19830 N WHITE ROCK DR	SUN CITY WEST	AZ	85375

Comment Document				
Last Name	**Address**			
SHEPARD	4006 E ARBOR AVE	MESA	AZ	85206
SHEPHERD	10633 W WELK DR	SUN CITY	AZ	85373
SHEPHERD	4346 E MCNEIL STREET	PHOENIX	AZ	85044
SHEPPARD	3419 E BAUTISTA CT	GILBERT	AZ	85297
SHEPPARD	6209 E MCKELLIPS RD 356	MESA	AZ	85215
SHERIDAN	3543 E CALISTOGA DRIVE	GILBERT	AZ	85297
SHERMAN	116 W JASPER DR	GILBERT	AZ	85233
SHERMAN	26037 S FOXGLENN DRIVE	CHANDLER	AZ	85248
SHERMAN	13327 W ALEPPO DR	SUN CITY WEST	AZ	85375
SHERRICK	6809 N 10TH AVE	PHOENIX	AZ	85013
SHERRILL	1830 N 16TH AVE	PHOENIX	AZ	85007
SHERRY	1535 W ROVEY AVE	PHOENIX	AZ	85015
SHERWOOD	945 N PASADENA 138	MESA	AZ	85201
SHESTKO	4165 E SILVERWOOD DRIVE	PHOENIX	AZ	85048
SHETTY	4553 W ERIE ST	CHANDLER	AZ	85226
SHIELDS	12027 S TONOPAH DR	PHOENIX	AZ	85044
SHIELDS	7725 N 16TH LN	PHOENIX	AZ	85021
SHIELDS	16273 W MEADE LN	GOODYEAR	AZ	85338
SHIMONOWSKY	10919 W GOLDEN LN	PEORIA	AZ	85345
SHINPAUGH	11431 N 56TH ST	SCOTTSDALE	AZ	85254
SHIRLEY	3528 E SUNCREST COURT	PHOENIX	AZ	85044
SHIRLING	6417 E EL PASO ST	MESA	AZ	85205
SHIVERS	144 W DESERT DR	PHOENIX	AZ	85041
SHIYA	9247 N 24TH WAY	PHOENIX	AZ	85028
SHOCKEY	17889 N 99TH DR	SUN CITY	AZ	85373
SHONTELL	4065 E UNIVERSITY DR 343	MESA	AZ	85205
SHORT	4010 N 14TH AVE	PHOENIX	AZ	85013
SHOTTON	15238 S 17TH AVE	PHOENIX	AZ	85045
SHREVE	3808 N 154TH DR	GOODYEAR	AZ	85395
SHRODE	12988 W KOKOPELLI DR	PEORIA	AZ	85383
SHUFELT	3876 E BAITALA AVE	GILBERT	AZ	85297
SHUMAN	3302 S WADE DR	GILBERT	AZ	85297
SHUMAN	1483 E CONSTITUTION DR	CHANDLER	AZ	85225
SICA	17642 W STINSON DR	SURPRISE	AZ	85374

Comment Document				
Last Name	**Address**			
SIDES	4243 E STREET CHARLES AVENUE	PHOENIX	AZ	85042
SIDHU	11333 E BELLFLOWER CT	CHANDLER	AZ	85249
SIEBERT	321 E INGLEWOOD ST	MESA	AZ	85201
SIECKMAN	745 W COCHISE LANE	GILBERT	AZ	85233
SIEGEL	15211 W WILDFIRE DR	SURPRISE	AZ	85374
SIEK	14515 W GRANITE VALLEY DR E263	SUN CITY WEST	AZ	85375
SIEMS	4723 E SOUTH FORK DR	PHOENIX	AZ	85044
SIERRA	10516 W CHICKASAW STREET	TOLLESON	AZ	85353
SIERRA	4323 E AHWATUKEE DRIVE	PHOENIX	AZ	85044
SIEVERLING	3130 W HAYWARD AVE	PHOENIX	AZ	85051
SILBERMAN	10545 W ORCHID LN	PEORIA	AZ	85345
SILLAH	4825 S 35TH DRIVE	PHOENIX	AZ	85041
SILSETH	1021 S GREENFIELD RD 1028	MESA	AZ	85206
SILVA	1523 E GEMINI DR	TEMPE	AZ	85283
SILVA	18477 W ENOCH DR	SURPRISE	AZ	85387
SILVA	6502 E SUGARLOAF ST	MESA	AZ	85215
SILVA	3802 E BASELINE RD 1068	PHOENIX	AZ	85042
SIMANSON	3038 E COTTON LN	GILBERT	AZ	85234
SIMKINS	25445 S ONTARIO DR	CHANDLER	AZ	85248
SIMMONS	1121 N 44TH ST 1027 BLDG 4	PHOENIX	AZ	85008
SIMMONS	12014 W ALMERIA RD	AVONDALE	AZ	85392
SIMMONS	14828 W CORRAL DR	SUN CITY WEST	AZ	85375
SIMMONS	408 W DARROW ST	PHOENIX	AZ	85041
SIMMONS	7824 S 68TH DRIVE	LAVEEN	AZ	85339
SIMMONS	2425 N 68TH WAY	SCOTTSDALE 85257	AZ	85257
SIMMONS	8414 W DEVONSHIRE AVE	PHOENIX	AZ	85037
SIMON	253 W HAWK WAY	CHANDLER	AZ	85286
SIMON	8536 W PURDUE AVE	PEORIA	AZ	85345
SIMONS	9866 W QUAIL AVE	PEORIA	AZ	85382
SIMPSON	19761 S 194TH STREET	QUEEN CREEK	AZ	85142
SIMPSON	25918 N 84TH LN	PEORIA	AZ	85383
SIMPSON	4307 E PRINCETON AVENUE	GILBERT	AZ	85234

Comment Document				
Last Name	**Address**			
SIMPSON	15125 W ROUNDERS DR	SURPRISE	AZ	85374
SIMS	12207 N 113TH AVE	YOUNGTOWN	AZ	85363
SIMS	1877 S BUCHANAN STREET	GILBERT	AZ	85233
SIMS	6722 S 76TH DR	LAVEEN	AZ	85339
SINES	10701 N 99TH AVE 1	PEORIA	AZ	85345
SINGER	6457 E FAIRFIELD ST	MESA	AZ	85205
SINGH	12465 W GRANADA RD	AVONDALE	AZ	85392
SINGLETON	20015 N 146TH DR	SUN CITY WEST	AZ	85375
SINNOKROT	1232 E SIERRA MADRE AVE	GILBERT	AZ	85296
SIPES	9234 W BRIARWOOD CIR	SUN CITY	AZ	85351
SIPPEL	12711 W ALLEGRO DR	SUN CITY WEST	AZ	85375
SITTU	627 S ALLRED DR	TEMPE	AZ	85281
SITZE	2537 W BLOOM FIE	PHOENIX	AZ	85029
SITZMAN	16248 W WINDCREST DR	SURPRISE	AZ	85374
SKAGGS	12310 W WESTGATE DR	SUN CITY WEST	AZ	85375
SKAKOON	4033 S 7TH ST 315	PHOENIX	AZ	85040
SKALKA	4966 E THUNDERBIRD DR	CHANDLER	AZ	85249
SKERTICH	17693 N ELDORADO WAY	SURPRISE	AZ	85374
SKIBBIE	1016 S LEBANON LANE	TEMPE	AZ	85281
SKIDMORE	1055 N RECKER RD 1038	MESA	AZ	85205
SKILLMAN	18052 W TIERRA DEL SOL DR	SURPRISE	AZ	85387
SKORKA	2133 E FOLLEY STREET	CHANDLER	AZ	85225
SKOWRONEK	7401 E EDGEMONT AVE	SCOTTSDALE	AZ	85257
SLAVENS	752 N LISBON DR	CHANDLER	AZ	85226
SLEDGE	2518 E FRANCISCO DR	PHOENIX	AZ	85042
SLOAN	1742 E PALO BLANCO WAY	GILBERT	AZ	85296
SLOMINSKI	814 W ROSAL PLACE	CHANDLER	AZ	85225
SLONAKER	2452 N CABOT CIR	MESA, AZ	AZ	85207
SMALL	6250 N 89TH DR	GLENDALE	AZ	85305
SMALLEY	13638 N NEWCAST	SUN CITY	AZ	85351
SMALLWOOD	8411 W COOLIDGE ST	PHOENIX	AZ	85037
SMELNICK	16154 W WATSON LN	SURPRISE	AZ	85379
SMITH	10325 W SIERRA DAWN DR	SUN CITY	AZ	85351
SMITH	13136 W HUBBELL ST	GOODYEAR	AZ	85395
SMITH	13234 W CABRILLO DR	SUN CITY WEST	AZ	85375

Comment Document				
Last Name	**Address**			
SMITH	13323 W BOLERO DR	SUN CITY WEST	AZ	85375
SMITH	1361 S GREENFIELD RD 2060	MESA	AZ	85206
SMITH	14905 N 134TH LN	SURPRISE	AZ	85379
SMITH	15747 W CIMARRON DR	SURPRISE	AZ	85374
SMITH	1706 S 120TH LANE	AVONDALE	AZ	85323
SMITH	2015 W CACTUS ROAD	PHOENIX	AZ	85029
SMITH	3245 E MALDONADO DR	PHOENIX	AZ	85042
SMITH	3450 E YELLOWSTONE PLACE	CHANDLER	AZ	85249
SMITH	4214 N 77TH AVE	PHOENIX	AZ	85033
SMITH	44 W MONROE STREET #1906	PHOENIX	AZ	85003
SMITH	4517 E ENROSE ST	MESA, AZ	AZ	85205
SMITH	5622 E CARSON ROAD	LAVEEN	AZ	85339
SMITH	618 N HOBSON	MESA	AZ	85203
SMITH	6436 E MENLO ST	MESA, AZ	AZ	85215
SMITH	812 W PASEO WAY	PHOENIX	AZ	85041
SMITH	853 S ROCHESTER	MESA	AZ	85206
SMITH	855 E MORELOS STREET	CHANDLER	AZ	85225
SMITH	8968 W CITRUS	GLENDALE	AZ	85305
SMITH	1030 S STEWART 1147	MESA	AZ	85202
SMITH	1210 W AMELIA AVE	PHOENIX	AZ	85013
SMITH	13901 E MORGAN DR	GILBERT	AZ	85295
SMITH	1621 N 53RD AVE	PHOENIX	AZ	85035
SMITH	3101 E ATLANTA AVE	PHOENIX	AZ	85040
SMITH	4523 E FREMONT ST	PHOENIX	AZ	85042
SMITH	6413 W IRMA LN	GLENDALE	AZ	85308
SMITH	6910 E GRANADA RD	SCOTTSDALE	AZ	85257
SMITH	7205 S 41ST DR	PHOENIX	AZ	85041
SMITH	8328 W CLAREMONT ST	GLENDALE	AZ	85305
SMITH	916 W BUCKEYE RD 130	PHOENIX	AZ	85007
SMITH	985 E DEVON DR	GILBERT	AZ	85296
SMITH	11411 N 91ST AVE 209	PEORIA	AZ	85345
SNIEGOWSKI	10746 W CROSBY DR	SUN CITY	AZ	85351
SNIVELY	2228 S NOCHE DE PAZ	MESA	AZ	85202
SNOOK	2005 N POMELO	MESA	AZ	85215
SNYDER	1912 E CITATION LN	TEMPE	AZ	85284

Comment Document				
Last Name	**Address**			
SOBALVARRO	15756 W TOHONO DR	GOODYEAR	AZ	85338
SOCH	108 N GREENFIELD RD 1052	MESA	AZ	85205
SODERQUIST	7614 N 36TH DR	PHOENIX	AZ	85051
SOLANO	5102 W MCNEIL ST	LAVEEN	AZ	85339
SOLI	1846 W MARLETTE AVE	PHOENIX	AZ	85015
SOLIDAY	3315 E ATTLEBORO ROAD	GILBERT	AZ	85295
SOLIS	2430 S 86TH LN	TOLLESON	AZ	85353
SOLNIT	2429 N 37TH WAY	PHOENIX	AZ	85008
SOLOMAN	2609 W UPLAND DRIVE	CHANDLER	AZ	85224
SOMERS	15761 W SHERIDAN ST	GOODYEAR	AZ	85395
SOMERS	15272 W PANTANO DR	SURPRISE	AZ	85375
SOMMERFIELD	3512 N 108TH AVE	AVONDALE	AZ	85392
SOMMERS	14154 DENNY BLVD 242	LITCHFIELD PARK	AZ	85340
SOMOZA	8415 S 2ND AVENUE	PHOENIX	AZ	85041
SONDRUP	371 N BELL PL	CHANDLER	AZ	85225
SONNABEND	1394 W ORACLE WAY	CHANDLER	AZ	85286
SORDIA	153 W SOUTH MOUNTAIN AVE	PHOENIX	AZ	85041
SORENSEN	3920 E PINON CT	GILBERT	AZ	85234
SORENSEN	9242 E LAKESIDE DRIVE	CHANDLER	AZ	85248
SORENSON	4700 E MAIN ST 1812	MESA	AZ	85205
SORRELLES	4601 N 102ND AVE 1128	PHOENIX	AZ	85037
SOTO	15077 W TURNEY AVE	GOODYEAR	AZ	85395
SOTO	4624 W MONTEBELLO AVE	GLENDALE	AZ	85301
SOTO	908 E DARREL ROAD	PHOENIX	AZ	85042
SOTO	427 E EUCLID AVE	PHOENIX	AZ	85042
SOTO	6117 W GARFIELD ST	PHOENIX	AZ	85043
SOTUDEH	3831 E COCONINO STREET	PHOENIX	AZ	85044
SOUDERS	14595 W DESERT HILLS DR	SURPRISE	AZ	85379
SOUERS	14136 W GREEN HOLLOW TER	LITCHFIELD PARK	AZ	85340
SOUTER	224 W COURTNEY LANE	TEMPE	AZ	85284
SPANGENBERG-COOK	6601 E HERMOSA VISTA DR	MESA	AZ	85215
SPARKS	8239 W COLUMBINE DR	PEORIA	AZ	85381

Comment Document				
Last Name	**Address**			
SPEARMAN	11121 W PRIMROSE LANE	AVONDALE	AZ	85392
SPEARS	11102 W FAWN LANE	AVONDALE	AZ	85392
SPEELMON	778 E TEAKWOOD DR	CHANDLER	AZ	85249
SPENCE	4038 E HUBER ST	MESA	AZ	85205
SPENCE	10806 W CAMPANA DR	SUN CITY	AZ	85351
SPENCER	1109 W CAMPBELL AVE	PHOENIX	AZ	85013
SPENCER	1944 E BELLERIVE DR	CHANDLER	AZ	85249
SPENCER	14448 S 24TH WAY	PHOENIX	AZ	85048
SPERRY	351 E BRECKENRIDGE WAY	GILBERT	AZ	85234
SPICER	16444 W MAGNOLIA ST	GOODYEAR	AZ	85338
SPILMAN	6424 E CLAIRE	SCOTTSDALE	AZ	85254
SPIROFF	1859 E OXFORD DRIVE	TEMPE	AZ	85283
SPITALNICK	921 E CALLE ADOBE LN	GOODYEAR	AZ	85338
SPLAINE	11034 S CHEHIA ST	PHOENIX	AZ	85044
SPLITGERBER	10010 W ALABAMA AVE	SUN CITY	AZ	85351
SPRATT	2351 N TIERRA ALTA CIR	MESA	AZ	85207
SPREITZER	2703 E ROCKLEDGE ROAD	PHOENIX	AZ	85048
SPRINGER	13507 W NOGALES DR	SUN CITY WEST	AZ	85375
SQUICCIARINI	1310 S DODGE CT	GILBERT	AZ	85233
ST JAMES	25074 N 68TH AVE	PEORIA	AZ	85383
ST JOHN	14960 N 87TH LN	PEORIA	AZ	85381
STABASEFSKI	14566 W BISON PATH	SURPRISE	AZ	85374
STACHIW	17331 W CARIBBEAN LN	SURPRISE	AZ	85388
STAIR	5574 W ROSE GARDEN LN	GLENDALE	AZ	85308
STAIR	1943 N 163RD DR	GOODYEAR	AZ	85395
STALLONS	14547 W POINSETTIA DR	SURPRISE	AZ	85379
STALMAN	11216 S BANNOCK ST	PHOENIX	AZ	85044
STANFIELD	3519 N 105TH LN	AVONDALE	AZ	85392
STANGER	11462 W MCCASLIN ROSE LN	SURPRISE	AZ	85378
STARK	10039 W THUNDERBIRD BLVD	SUN CITY	AZ	85351
STARK	1060 E EL FREDA RD	TEMPE	AZ	85284
STARK	17959 W PRADERA LN	SURPRISE	AZ	85387
STARKS	2529 N 114TH AVE	AVONDALE	AZ	85392
STATEN	4728 W MONTEBELLO AVE	GLENDALE	AZ	85301
STATEN	2035 W OLNEY AVE	PHOENIX	AZ	85041

Comment Document				
Last Name	**Address**			
STATZER	16635 W MONROE ST	GOODYEAR	AZ	85338
STAUB	8021 W DESERT COVE AVE	PEORIA	AZ	85345
STAUBER	13625 S 48TH ST 2152	PHOENIX	AZ	85044
STAYER	6526 W ALTA VISTA ROAD	LAVEEN	AZ	85339
STEADMAN	1125 E LOCKWOOD ST	MESA	AZ	85203
STEDMAN	351 W BEECHNUT PLACE	CHANDLER	AZ	85248
STEELE	1910 E MOBILE LN	CHANDLER	AZ	85224
STEELE	11040 W OAK RIDGE RD	SUN CITY	AZ	85351
STEEN	11118 W DANA LN	AVONDALE	AZ	85392
STEFFEN	1523 W CAROL AVENUE	MESA	AZ	85202
STEGEMANN	10744 W WHITE MOUNTAIN RD	SUN CITY	AZ	85351
STEIMLE	5665 W GALVESTON STREET #110	CHANDLER	AZ	85226
STEINBINDER	5262 W KALER CIR	GLENDALE	AZ	85301
STEINER	16648 S 14TH STREET	PHOENIX	AZ	85048
STEINER	4926 E CRESCENT AVE	MESA	AZ	85206
STEINER	10007 W MEADOWBROOK AVE	PHOENIX	AZ	85037
STEPHENS	898 E SARAGOSA STREET	CHANDLER	AZ	85225
STERLING	14464 W MORNING STAR TRL	SURPRISE	AZ	85374
STERLING	6338 E DES MOINES ST	MESA	AZ	85205
STEVENS	10957 W SIERRA PINTA DR	SUN CITY	AZ	85373
STEVENS	12354 W GRANT ST	AVONDALE	AZ	85323
STEVENS	3018 E MINTON ST	MESA	AZ	85213
STEVENS	6837 W FILLMORE ST 182	PHOENIX	AZ	85043
STEWART	1321 W HADLEY ST	PHOENIX	AZ	85007
STEWART	18429 N CONQUISTADOR DR	SUN CITY WEST	AZ	85375
STEWART	3753 E WESTCHESTER DR	CHANDLER	AZ	85249
STEWART	6549 E ENSENADA ST	MESA	AZ	85205
STIEL	8432 W UTOPIA RD	PEORIA	AZ	85382
STILES	5318 N 20TH ST	PHOENIX	AZ	85016
STINSON	4914 E HARMONY AVE	MESA	AZ	85206
STITES	11017 N 153RD DR	SURPRISE	AZ	85379
STOCKER	1049 N OMAHA CIR	MESA	AZ	85205
STOCKER	19511 N 88TH AVE	PEORIA	AZ	85382
STOCKTON	19201 E VIA DE ARBOLES	QUEEN CREEK	AZ	85142
STOCKWELL	6838 E DIAMOND ST	SCOTTSDALE	AZ	85257

Comment Document				
Last Name	**Address**			
STOGNER	13449 W RIMROCK ST	SURPRISE	AZ	85374
STOKAN	6815 S MCCLINTOCK DRIVE #2205	TEMPE	AZ	85283
STOLTE	4655 E INDIGO ST	GILBERT	AZ	85298
STONE	13414 W CASTLE ROCK DR	SUN CITY WEST	AZ	85375
STONE	7310 W PIONEER STREET	PHOENIX	AZ	85043
STONE	4749 E THUNDERHILL PL	PHOENIX	AZ	85044
STONEBRINK	2625 N 141ST LN	GOODYEAR	AZ	85395
STORM	1105 W ELNA RAE ST	TEMPE	AZ	85281
STOUFER	3442 N 39TH ST	PHOENIX	AZ	85018
STOUT	20112 N PAINTED SKY DR	SURPRISE	AZ	85374
STOUT	536 E GLENCOVE ST	MESA	AZ	85203
STOUT	4105 E FREMONT ST	PHOENIX	AZ	85042
STPIERRE	325 W LOUIS WAY	TEMPE	AZ	85284
STRAIN	14676 W MONTEREY WAY	GOODYEAR	AZ	85395
STRANGE	4121 W MCDOWELL RD 326	PHOENIX	AZ	85009
STRANTZ	15306 W SENTINEL DR	SUN CITY WEST	AZ	85375
STRATTON	6240 W CORONA DR	CHANDLER	AZ	85226
STRAUSS-LEWIS FAMILY	16142 W MULBERRY DR	GOODYEAR	AZ	85395
STRAUTZ	6317 N 41ST AVE	PHOENIX	AZ	85019
STREICH	10302 W SAN MIGUEL AVE	GLENDALE	AZ	85307
STRICKLAND	14802 N 79TH LN	PEORIA	AZ	85381
STRINGFELLOW	2310 N ROSE	MESA	AZ	85213
STROHMEYER	10852 N 109TH AVE	SUN CITY	AZ	85351
STRONG	10330 W THUNDERBIRD BLVD C208	SUN CITY	AZ	85351
STROUD	6033 N 4TH PL	PHOENIX	AZ	85012
STROUSE	500 N METRO BOULEVARD #2145	CHANDLER	AZ	85226
STRYKER	2843 E TURQUOIS	PHOENIX	AZ	85028
STUDT	21019 N 141ST AVE	SUN CITY WEST	AZ	85375
STUK	6120 W POST RD	CHANDLER	AZ	85226
SUBLETT	2695 E PINTO DR	GILBERT	AZ	85296
SUE	17814 N 57TH AVE	GLENDALE	AZ	85308
SUESS	22007 N MONTEGO DR	SUN CITY WEST	AZ	85375
SULLIVAN	12949 W PANCHITA DR	SUN CITY WEST	AZ	85375

Comment Document				
Last Name	**Address**			
SULLIVAN	7302 W SIERRA ST	PEORIA	AZ	85345
SUMNER	13423 S 47TH PL	PHOENIX	AZ	85044
SUMNER	16543 W JACKSON ST	GOODYEAR	AZ	85338
SUNDARAM	45 E 9TH PL 15	MESA	AZ	85201
SUNDAY	9717 E VILLA PARK ST	CHANDLER	AZ	85248
SUTHERLAND	11618 WHOLLY ST	AVONDALE	AZ	85392
SUTPHIN	7550 N 16TH ST	PHOENIX	AZ	85020
SUTTON	105 N LINKS DR 1055	AVONDALE	AZ	85323
SUTTON	8314 W SHERIDAN ST	PHOENIX	AZ	85037
SUTTON	18819 N PALOMAR DR	SUN CITY WEST	AZ	85375
SWAIN	10250 W HIGHWOOD LN	SUN CITY	AZ	85373
SWAIN	12815 S 41ST ST	PHOENIX	AZ	85044
SWANSON	19519 N MAJESTIC VISTA CT	SURPRISE	AZ	85387
SWARTZ	13207 N 3RD PL	PHOENIX	AZ	85022
SWARTZ	16833 S 11TH WY	PHOENIX	AZ	85048
SWATZELL	1840 W EMELITA AVENUE #1009	MESA	AZ	85202
SWEETEN	4545 N MARYVALE	PHOENIX	AZ	85031
SWEETWOOD	4758 E UTE COURT	PHOENIX	AZ	85044
SWINGLE	2335 N SHANNON WAY	MESA	AZ	85215
SYBRANT-WILSON	26602 S HOWARD DR	CHANDLER	AZ	85248
SYVERSON	5214 W CAMBRIDGE	PHOENIX	AZ	85034
SZAKACS	9821 W SYDNEY WAY	PEORIA	AZ	85383
SZCZEBAK	16084 W BUCHANA	GOODYEAR	AZ	85338
SZYMANSKI	1650 E BROADMORE DRIVE	TEMPE	AZ	85282
SZYNAKA	4030 W LOMA LN	PHOENIX	AZ	85051
TADLA	13373 N PLAZA DEL RIO BLVD 6658	PEORIA	AZ	85381
TAFOYA	5219 W BERKELEY RD	PHOENIX	AZ	85035
TALBOTT	1904 W BELMONT AVE	PHOENIX	AZ	85021
TALKOWSKI	710 E TONTO DR	CHANDLER	AZ	85249
TAMPELLINI	1332 W STARFISH DR	GILBERT	AZ	85233
TANA	3615 E CALISTOGA DR	GILBERT	AZ	85297
TANTON	5801 S 14TH AVE	PHOENIX	AZ	85041
TARBY	7710 N HUMMINGBIRD	PARADISE VALLEY	AZ	85253

Comment Document				
Last Name	**Address**			
TARIN	2608 E HIDALGO AVENUE	PHOENIX	AZ	85040
TARKINGTON	1616 W MOODY TRL	PHOENIX	AZ	85041
TATE	25835 S 154TH STREET	GILBERT	AZ	85298
TATE	3938 E REMINGTON DRIVE	GILBERT	AZ	85297
TATE	4808 W LA MIRADA DRIVE	LAVEEN	AZ	85339
TAUBERT	1650 W GLENDALE AVE 3109	PHOENIX	AZ	85021
TAVASSOLI	23717 S HARMONY WAY	CHANDLER	AZ	85248
TAVERNARO	4132 N 12TH ST	PHOENIX	AZ	85014
TAYLOR	12356 W HARRISON ST	AVONDALE	AZ	85323
TAYLOR	23435 S 223RD CT	QUEEN CREEK	AZ	85142
TAYLOR	303 E S MOUNTAIN AVENUE #4	PHOENIX	AZ	85042
TAYLOR	840 W JAVELINA AVE	MESA	AZ	85210
TAYLOR	1186 W OAKLAND ST	CHANDLER	AZ	85224
TAYLOR	1605 E DARREL RD	PHOENIX	AZ	85042
TAYLOR	224 E JULIE DR	TEMPE	AZ	85283
TAYLOR	2607 W MARLBORO DR	CHANDLER	AZ	85224
TAYLOR	17857 W DREYFUS ST	SURPRISE	AZ	85388
TEEGARDEN	4301 E CHOLLA S	PHOENIX	AZ	85028
TEETER	1508 W NARANJA AVENUE	MESA	AZ	85202
TEMPLE	10609 E MERCURY	APACHE JUNCTION	AZ	85120
TEMPLE	12739 W CERCADO	LITCHFIELD	AZ	85340
TENNEY	714 N MILLER ST	MESA	AZ	85203
TENORE	22401 N VIA TERCERO	SUN CITY WEST	AZ	85375
TEPE	555 N FEDERAL ST	CHANDLER	AZ	85226
TETE	1507 S 84TH DRIVE	TOLLESON	AZ	85353
TETTER	21654 S 158TH STREET	GILBERT	AZ	85298
THAMES	14995 W DESERT HILLS DR	SURPRISE	AZ	85379
THARP	27804 N DENVER HILL DR	WITTMANN	AZ	85361
THEALL	6024 W TOPEKA DR	GLENDALE	AZ	85308
THELEN	608 W TARA CT	GILBERT	AZ	85233
THERIAULT	19643 E REINS RD	QUEEN CREEK	AZ	85142
SCHRODER	13828 N WHISPERING LAKE DR	SUN CITY	AZ	85351
THEUS	8408 S 50TH DR	LAVEEN	AZ	85339
THIBAULT	6020 E BILLINGS ST	MESA	AZ	85205

Comment Document				
Last Name	**Address**			
THIEL	6968 W ROSE GARDEN LN	GLENDALE	AZ	85308
THIEL	10905 W ALMERIA RD	AVONDALE	AZ	85392
THOMAS	8819 W WILLIAMS RD	PEORIA	AZ	85383
THOMAS	13621 N 98TH AVE F	SUN CITY	AZ	85351
THOMAS	2263 W WAYLAND ROAD	PHOENIX	AZ	85041
THOMAS	4266 S WINTER LANE	GILBERT	AZ	85297
THOMAS	24118 S STONEY LAKE DR	CHANDLER	AZ	85248
THOMAS	2930 E LINDA LN	GILBERT	AZ	85234
THOMAS	7021 W MCDOWELL RD 176	PHOENIX	AZ	85035
THOMAS	220 ANCORA DR	LITCHFIELD PARK	AZ	85340
THOMASON	1039 N DRESDEN	MESA	AZ	85203
THOMPSON	10004 E DIAMOND DR	CHANDLER	AZ	85248
THOMPSON	12401 W ENCANTO BLVD	AVONDALE	AZ	85392
THOMPSON	13271 N 75TH LN	PEORIA	AZ	85381
THOMPSON	13755 W NOGALES DR	SUN CITY WEST	AZ	85375
THOMPSON	2430 S MILL AVE 128	TEMPE	AZ	85282
THOMPSON	2512 E TULSA STREET	GILBERT	AZ	85295
THOMPSON	2609 W SOUTHERN AVENUE #364	TEMPE	AZ	85282
THOMPSON	3180 S JOJOBA WAY	CHANDLER	AZ	85248
THOMPSON	3407 N 24TH AVE	PHOENIX	AZ	85015
THOMPSON	3714 E ORANGE D	PHOENIX	AZ	85018
THOMPSON	6209 E CATALINA DR	SCOTTSDALE	AZ	85251
THOMPSON	6506 S ROOSEVELT STREET	TEMPE	AZ	85288
THOMPSON	9239 W CINNABAR AVE	PEORIA	AZ	85345
THOMPSON	1405 S 18TH AVE	PHOENIX	AZ	85007
THOMPSON	2465 E DONATO DR	GILBERT	AZ	85298
THOMPSON	3164 N PINNULE	MESA	AZ	85215
THONGER	250 N RIATA ST	GILBERT	AZ	85234
THORPE	1001 N BARKLEY	MESA	AZ	85203
THORSBY	6876 S SAPPHIRE WAY	CHANDLER	AZ	85249
THREADGILL	1393 W INDIGO DR	CHANDLER	AZ	85248
THUNDERCLOUD	4729 W HOLLY ST	PHOENIX	AZ	85035
THURSTON	10950 W UNION HILLS DR 2410	SUN CITY	AZ	85373
TIBBITS	2059 E BROWN RD 66	MESA	AZ	85213

Comment Document				
Last Name	**Address**			
TILLMAN	10372 W ROSEWOOD DRIVE	AVONDALE	AZ	85392
TIMMER	5657 N 36TH DR	PHOENIX	AZ	85019
TIMMONS	5631 W COLTER ST 2003	GLENDALE	AZ	85301
TIMMONS	3040 N 36TH ST E215	PHOENIX	AZ	85018
TINBERG	2041 S PASEO LOMA	MESA	AZ	85202
TINGLEFF	1219 E COMMODORE PL	TEMPE	AZ	85283
TINGLEY	8536 W ACAPULCO LN	PEORIA	AZ	85381
TINHAM	16009 N LAKEFOREST DR	SUN CITY	AZ	85351
TITCH	1335 W MUSKET WAY	CHANDLER	AZ	85286
TOBIAS	1841 E WOOD STREET	PHOENIX	AZ	85040
TOBIN	7514 S 20TH ST	PHOENIX	AZ	85042
TODD	1523 W WHITTON AVE	PHOENIX	AZ	85015
TODD	14409 W GREYSTONE DR	SUN CITY WEST	AZ	85375
TODD	14876 N 148TH LN	SURPRISE	AZ	85379
TOEPFER	23707 S STONEY PATH DRIVE	CHANDLER	AZ	85248
TOLIVER	3821 E COVINA ST	MESA	AZ	85205
TOLLEFSEN	1545 E HERMOSA VISTA DR	MESA	AZ	85203
TOMEK	3978 E VERNON ST	GILBERT	AZ	85298
TOMINI	4847 E LA PUENTE AVENUE	PHOENIX	AZ	85044
TOMLIN	3777 E MCDOWELL RD 1213	PHOENIX	AZ	85008
TOMLINSON	2029 S EL CAMINO DRIVE	TEMPE	AZ	85282
TONTO	1902 E SUNLAND AVENUE	PHOENIX	AZ	85040
TOOMBS	205 SHIGLEY RD 258	MESA	AZ	85206
TORGE	4145 W ORCHID LN	CHANDLER	AZ	85226
TORRES	12703 W MILTON	PEORIA	AZ	85383
TORRES	1823 W ATLANTA AVENUE	PHOENIX	AZ	85041
TORRES	2064 W DOBBINS RD	PHOENIX	AZ	85041
TORRES	3426 S 74TH LN	PHOENIX	AZ	85043
TORRES	194 WVERA LN	TEMPE	AZ	85284
TOVAR	4326 W FREMONT ROAD	LAVEEN	AZ	85339
TOVER	7355 W GEORGIA AVE	GLENDALE	AZ	85303
TOWNER	962 E MISSION DR	TEMPE	AZ	85283
TOWNSEL	115 E PALM LN C	PHOENIX	AZ	85004
TOWNSEND	26221 S SHERBROOK DRIVE	CHANDLER	AZ	85248
TOYNE	8425 S JENTILLY LN	TEMPE	AZ	85284

Comment Document				
Last Name	**Address**			
TRACY	113 S CATALINA ST	GILBERT	AZ	85233
TRACY	4909 E LAKE POINT CIRCLE	PHOENIX	AZ	85044
TRACY	2201 W MARLIN DRIVE	CHANDLER	AZ	85286
TRAHAN	2015 N CENTRAL DR	CHANDLER	AZ	85224
TRAINOR	207 W CLARENDON AVE 7E	PHOENIX	AZ	85013
TRAUTMAN	10340 W KELSO DR	SUN CITY	AZ	85351
TREMBLE	2828 E SCHOOL DRIVE	PHOENIX	AZ	85040
TRENBERTH	9031 N ARROYA G	PHOENIX	AZ	85028
TRENDA	15013 W WOODRIDGE DR	SURPRISE	AZ	85374
TRENNERT	3581 W GOLDEN LN	CHANDLER	AZ	85226
TRENT	6030 E PRINCESS DR	MESA	AZ	85205
TREVINO	2017 E CYPRESS ST	PHOENIX	AZ	85006
TRIANT	2870 S CHAPARRAL BOULEVARD	GILBERT	AZ	85295
TRIMBLE	7907 E STONECLIFF CIR	MESA	AZ	85207
TRINH	3800 N EL MIRAGE RD 833	AVONDALE	AZ	85392
TRIPATHI	3691 E HARRISON ST	GILBERT	AZ	85295
TRIPLETT	5403 W BOWKER ST	LAVEEN	AZ	85339
TRIPP	1669 E CANYON WAY	CHANDLER	AZ	85249
TRISTAN	8226 S 15TH AVENUE	PHOENIX	AZ	85041
TROLZ	11201 N ELMIRA	EL MIRAGE	AZ	85335
TROPIANO	3334 E HOPKINS ROAD	GILBERT	AZ	85295
TROTTER	123 W CALDWELL ST	PHOENIX	AZ	85041
TRUJILLO	107 W MARGUERITE AVENUE	PHOENIX	AZ	85041
TRUJILLO	3050 N 52ND PKY	PHOENIX	AZ	85031
TRUSH	500 W CLARENDON AVE D8	PHOENIX	AZ	85013
TRUSZKOWSKI	15714 W FUTURA DR	SUN CITY WEST	AZ	85375
TUERK	19225 N CONCHO	SUN CITY	AZ	85373
TUNNELL	6183 W SEQUOIA DR	GLENDALE	AZ	85308
TURMALA	2601 E ALLRED AVE 23	MESA	AZ	85204
TURMAN	2005 W JEFFERSON ST	PHOENIX	AZ	85009
TURNER	2426 S CATARINA	MESA	AZ	85202
TURNER	2427 S COLLEEN	MESA	AZ	85210
TURNER	5002 E ESTRELLA DRIVE	LAVEEN	AZ	85339
TURNER	15728 W LUNDBER	SURPRISE	AZ	85374
TURNER	4047 E APPLEBY DR	GILBERT	AZ	85298

Comment Document				
Last Name	**Address**			
TUTILE	3850 E YUCCA ST	PHOENIX	AZ	85028
TUTOR	20374 N 66TH AVE	GLENDALE	AZ	85308
TUTTLE	4706 N BROOKVIEW TERRACE	LITCHFIELD PARK	AZ	85340
TWARDOSZ	5672 W POTTER DR	GLENDALE	AZ	85308
TYLER	1540 E GROVE AVE	MESA	AZ	85204
TYUS	15007 W ROUNDERS DR	SURPRISE	AZ	85374
UDITSKY	3319 E UNIVERSITY DR 305	MESA	AZ	85213
UEBERJAHN	6917 W PALM LN	PHOENIX	AZ	85035
UECKER	18367 N KRISTA WAY	SURPRISE	AZ	85374
UHEN	8845 E FAIRWAY BLVD	CHANDLER	AZ	85248
UHLES	101 E JUNIPER AVE	GILBERT	AZ	85234
UNDERWOOD	2652 N 61ST ST	MESA	AZ	85215
UPTON	10511 W JESSIE LN	PEORIA	AZ	85383
URBACH	22832 N DUSTY TRAIL BLVD	SUN CITY WEST	AZ	85375
URSCHEL	1029 S BUTTE AVE	TEMPE	AZ	85281
VACHON	16726 W IBARRA CT	SURPRISE	AZ	85387
VAIL	30 W TONTO DRIVE	CHANDLER	AZ	85248
VALDEZ	10201 N 99TH AVE	PEORIA	AZ	85345
VALDEZ	1408 W COLT RD	CHANDLER	AZ	85224
VALDEZ	3016 W PIERCE ST	PHOENIX	AZ	85009
VALDISERRI	18026 N 137TH OR	SUN CITY WEST	AZ	85375
VALDIVIEZO	1813 E BRILL ST	PHOENIX	AZ	85006
VALENCIA	220 S OREGON ST B	CHANDLER	AZ	85225
VALENCIA	6234 S 5TH AVENUE	PHOENIX	AZ	85041
VALENZUELA	1025 N 24TH PLACE	PHOENIX	AZ	85008
VALENZUELA	5138 W VERDE LN	PHOENIX	AZ	85031
VALENZUELA	909 E LOYOLA DR	TEMPE	AZ	85282
VALLECILLO	3436 E KINGBIRD PLACE	CHANDLER	AZ	85286
VALLES	1315 W MONROE ST	PHOENIX	AZ	85007
VALLES	2206 N LOS ALTOS DR	CHANDLER	AZ	85224
VAN CAMP	2739 E VIRGO PL	CHANDLER	AZ	85249
VAN CLEVE	4171 W LINDA LN	CHANDLER	AZ	85226
VAN DUYNE	2280 S BOULDER STREET	GILBERT	AZ	85295
VAN KLOMPENBURG	2835 E HONEYSUCKLE PL	CHANDLER	AZ	85286

Comment Document				
Last Name	**Address**			
VAN LOOZENOORD	19620 N CONCHO CIR	SUN CITY	AZ	85373
VAN OVER	1457 E SOUTH FORK DR	PHOENIX	AZ	85048
VAN TASSEL	471 W CEDAR DR	CHANDLER	AZ	85248
VANAKEN	13560 W HOLLY ST	GOODYEAR	AZ	85395
VANBROCKLIN	20050 N SIESTA ROCK DR	SURPRISE	AZ	85374
VANDELLO	1957 E DEL SUR DRIVE	TEMPE	AZ	85283
VANDER WEIDE	3756 S SHILOH WAY	GILBERT	AZ	85297
VANDERBECK	6741 W SWEETWATER AVE	PEORIA	AZ	85381
VANDERBUR	15010 S 27TH STREET	PHOENIX	AZ	85048
VANICA	10625 W DALEY LN	PEORIA	AZ	85383
VANMARTER	2660 S DRAGOON DR	CHANDLER	AZ	85286
VANTHIEL	1092 E SHERRI DR	GILBERT	AZ	85296
VANZANEN	1037 W BUIST AVENUE	PHOENIX	AZ	85041
VARELA	4861 W OAKLAND STREET	CHANDLER	AZ	85226
VARGAS	3111 E HORSESHOE DRIVE	CHANDLER	AZ	85249
VARGAS	5241 W ESTRELLA DRIVE	LAVEEN	AZ	85339
VARGAS	1405 W 1ST PL	MESA	AZ	85201
VARNEY	887 E RIVIERA PL	CHANDLER	AZ	85249
VASQUEZ	7151 W INDIAN SCHOOL	PHOENIX	AZ	85033
VASQUEZ	140 W BUIST AVE	PHOENIX	AZ	85041
VASQUEZ	8400 W VIRGINIA AVE	PHOENIX	AZ	85037
VASQUEZCRUZ	131 W ELWOOD STREET	PHOENIX	AZ	85041
VAUGHN	2944 N EVERGREEN ST	PHOENIX	AZ	85014
VAZQUEZ	7224 W WHYMAN AVE	PHOENIX	AZ	85043
VEACH	5637 W EARLL DR	PHOENIX	AZ	85031
VEGA	3839 W MONTEBELLO AVE	PHOENIX	AZ	85019
VEGA	783 S LONA PLACE	CHANDLER	AZ	85226
VEGA	8610 N 40TH AVE	PHOENIX	AZ	85051
VEIRS	13405 W DESERT ROCK DR	SURPRISE	AZ	85374
VEITCH	2715 S SANTA BARBARA	MESA	AZ	85202
VELAQUEZ RAMIREZ	5635 W TONOPAH DR	GLENDALE	AZ	85308
VELASQUEZ	1836 E ILLINI ST	PHOENIX	AZ	85040
VELASQUEZ	5201 W LA MIRADA DR	LAVEEN	AZ	85339
VELAZCO	102 S MATLOCK STREET	MESA	AZ	85204

Comment Document				
Last Name	**Address**			
VENERABLE	1713 E APOLLO ROAD	PHOENIX	AZ	85042
VENROOY	225 E GRISWOLD	PHOENIX	AZ	85020
VERGARI	4038 N SAGE CREEK CIR	MESA	AZ	85207
VERHOEF	5048 S BARLEY COURT	GILBERT	AZ	85298
VERMONT	3236 E CHANDLER BLVD 1070	PHOENIX	AZ	85048
VERNON	1056 W COOLEY DRIVE	GILBERT	AZ	85233
VERSAILLES	2125 N RECKER RD	MESA	AZ	85215
VESELY	6932 W ROWEL RD	PEORIA	AZ	85383
VICKERY	80 W MARYLAND A	PHOENIX	AZ	85013
VIDAURE	10617 W MAGNOLIA ST	TOLLESON	AZ	85353
VIDMAR	6446 E TRAILRIDGE CIR 71	MESA	AZ	85215
VIGESAA	1792 S COMANCHE DRIVE	CHANDLER	AZ	85286
VIGIL	1604 E CLOVER A	MESA	AZ	85203
VIGNEAULT	10610 W CLAIR DR	SUN CITY	AZ	85351
VILLA	2922 W SOLANO DR	PHOENIX	AZ	85017
VILLAFANA	6292 S ONYX DRIVE	CHANDLER	AZ	85249
VILLALOBOS	2932 E OSBORN RD 438	PHOENIX	AZ	85016
VILLALPANDO	512 N ENTRADA ST	CHANDLER	AZ	85226
VILLASENORGOMEZ	773 E COMMONWEALTH PL	CHANDLER	AZ	85225
VINCENCIO-CASTRO	16013 S DESERT FOOTHILLS PKY 2071	PHOENIX	AZ	85048
VIOLA	1926 E ELFREDA RD	TEMPE	AZ	85284
VIRTUE	3414 E BETTY ELYSE LN	PHOENIX	AZ	85032
VISCAINA	11005 W HOLLY STREET	AVONDALE	AZ	85392
VLCEK	7913 W ALEX AVE	PEORIA	AZ	85382
VLIEM	1201 W LAJOLLA DRIVE	TEMPE	AZ	85282
VOGAN	18217 N 99TH DR	SUN CITY	AZ	85373
VOGEL	11621 S WARPAINT DRIVE	PHOENIX	AZ	85044
VOIGT	2322 S ROGERS STREET #13	MESA	AZ	85202
VOLSEY	2625 E SOUTHERN AVE C75	TEMPE	AZ	85282
VONBEHREN	6240 E HERMOSA VISTA DR	MESA	AZ	85215
VOORHEES	3837 E PARK AVE	GILBERT	AZ	85234
VREDENBURG	8905 E HERCULES CT	CHANDLER	AZ	85248
WACHTLER	235 E ESTERO LN	LITCHFIELD PARK	AZ	85340

Comment Document				
Last Name	**Address**			
WADE	6825 W DENTON LN	GLENDALE	AZ	85303
WAGNER	11102 W SIENO PLACE	AVONDALE	AZ	85392
WAGNER	18349 N OAK DR	SURPRISE	AZ	85374
WAGNER	2434 N CABOT CIR	MESA	AZ	85207
WAGNER	26241 S FLAME TREE DRIVE	CHANDLER	AZ	85248
WAGNER	3326 E WINDMERE DRIVE	PHOENIX	AZ	85048
WAITE	19437 E SAN TAN BOULEVARD	QUEEN CREEK	AZ	85142
WAITS	13356 W BANFF LN	SURPRISE	AZ	85379
WAKEFIELD	8669 N 108TH LN	PEORIA	AZ	85345
WALK	26603 S HOGAN DR	CHANDLER	AZ	85248
WALKER	103S7 W LOMA BLANCA DR	SUN CITY	AZ	85351
WALKER	1401 E IRWIN AVENUE	PHOENIX	AZ	85042
WALKER	14415 W ROBERTSON DR	SUN CITY WEST	AZ	85375
WALKER	312 W MARIPOSA ST	PHOENIX	AZ	85013
WALKER	4558 E LA MIRADA WAY	PHOENIX	AZ	85044
WALKER	11543 W CLOVER WAY	AVONDALE	AZ	85392
WALKER	1401 E CORONADO RD	PHOENIX	AZ	85006
WALKER	19628 N BELLWOOD DR	SUN CITY WEST	AZ	85375
WALKER	7013 W PECK DR	GLENDALE	AZ	85303
WALL	2062 E BISHOP DRIVE	TEMPE	AZ	85282
WALLACE	3402 E DIAMOND AVE	MESA	AZ	85204
WALLACE	2713 N 122ND AVE	AVONDALE	AZ	85392
WALLACH	1160 W CHICAGO ST	CHANDLER	AZ	85224
WALLIS	9045 W MOUNTAIN VIEW RD	PEORIA	AZ	85345
WALLOCK	4814 E PICCADIL	PHOENIX	AZ	85018
WALLS	932 E BROOKE PLACE	AVONDALE	AZ	85323
WALSH	17810 W CLUB VISTA DR	SURPRISE	AZ	85374
WALSH	2341 W MALDONADO DRIVE	PHOENIX	AZ	85041
WALSH	11619 N 97TH AVE	SUN CITY	AZ	85351
WALSH	7126 N 19TH AVE 117	PHOENIX	AZ	85021
WALTHER	3170 E GLENEAGLE DR	CHANDLER	AZ	85249
WALZ	3146 E HAZELWOOD	PHOENIX	AZ	85016
WAMBOLD	13434 S WARPAINT DRIVE	PHOENIX	AZ	85044
WANTY	6606 W MIAMI ST	PHOENIX	AZ	85043
WARD	17026 N 66TH DR	GLENDALE	AZ	85308

Comment Document				
Last Name	**Address**			
WARD	4633 E EDGEMONT AVE	PHOENIX	AZ	85008
WARDROP	1507 E TREASURE COVE DR	GILBERT	AZ	85234
WARE	317 N HUNT DRIVE	MESA	AZ	85203
WARE	5228 S 14TH PLACE	PHOENIX	AZ	85040
WARN	20902 E ORCHARD LANE	QUEEN CREEK	AZ	85142
WARNER	4591 E KARSTEN DR	CHANDLER	AZ	85249
WARNICK	17755 W CALAVAR RD	SURPRISE	AZ	85388
WARREN	2129 N 63RD PL	MESA	AZ	85215
WASHINGTON	4408 W PIEDMONT RD	LAVEEN	AZ	85339
WASHINGTON	6943 W CAMBRIDGE AVENUE	PHOENIX	AZ	85035
WASHINGTON	4008 E APOLLO RD	PHOENIX	AZ	85042
WASSON	3255 S LAGUNA DR	CHANDLER	AZ	85248
WATERS	3620 S 69TH AVENUE	PHOENIX	AZ	85043
WATKINS	11839 S WINNEBAGO STREET	PHOENIX	AZ	85044
WATKINS	3106 N 62ND ST	SCOTTSDALE	AZ	85251
WATKINS	1550 E HAMPTON CIR	MESA	AZ	85204
WATKINS-STEELE	4434 N 84TH LN	PHOENIX	AZ	85037
WATSON	2347 W PECOS AVENUE	MESA	AZ	85202
WATSON	1824 E ALOE PL	CHANDLER	AZ	85286
WATSON	3118 N 68TH LN	PHOENIX	AZ	85033
WATSON	4230 N 107TH LN	PHOENIX	AZ	85037
WATSON	8742 W BETTY ELYSE LN	PEORIA	AZ	85382
WATT	11818 W PLANADA LN	SUN CITY	AZ	85373
WAXMONSKY	9221 E ROCKY LAKE DR	CHANDLER	AZ	85248
WEAKLY	4235 E MELODY DR	GILBERT	AZ	85234
WEAVER	4880 W BETHANY	GLENDALE	AZ	85301
WEAVER	921 W OREGON AVE	PHOENIX	AZ	85013
WEBB	15605 N 21ST ST	PHOENIX	AZ	85022
WEBB	1942 E REDMON DR	TEMPE	AZ	85283
WEBB	2053 W NATAL CIR	MESA	AZ	85202
WEBB	3555 E SANTA FE LN	GILBERT	AZ	85297
WEBBER	13427 N 109TH AVE	SUN CITY	AZ	85351
WEBER	15577 W ROANOKE AVE	GOODYEAR	AZ	85395
WEBER	605 N SAGUARO	MESA	AZ	85201
WEBER	6322 W MAGNOLIA STREET	PHOENIX	AZ	85043

Comment Document				
Last Name	**Address**			
WEBSTER	8034 E HUBBELL ST	SCOTTSDALE	AZ	85257
WEBSTER	13235 W PROSPECT DR	SUN CITY WEST	AZ	85375
WEFLEN	3662 E PRESCOTT PL	CHANDLER	AZ	85249
WEHRLE	2645 E SOUTHERN AVE A698	TEMPE	AZ	85282
WEIDENHEIMER	10881 W CARLOTA LN	SUN CITY	AZ	85373
WEIDNER	16240 W TALARA WAY	SURPRISE	AZ	85374
WEIGLEY	2031 E MAGDALENA DR	TEMPE	AZ	85283
WEISBECK	3226 N REYNOLDS CIR	MESA	AZ	85215
WEISS	9942 W TONOPAH DR	PEORIA	AZ	85382
WEISS	4038 E PARADISE	PHOENIX	AZ	85028
WELCH	3020 E FRIESS DR	PHOENIX	AZ	85032
WELDER	5735 E MCDOWELL RD 135	MESA	AZ	85215
WELLS	20601 N 33RD	PHOENIX	AZ	85027
WELLS	7380 W PASO TRL	PEORIA	AZ	85383
WELZ	5416 W ORAIBI DR	GLENDALE	AZ	85308
WENGERT	26029 S COUNTRY CLUB DR	CHANDLER	AZ	85248
WENNMACHER	5722 W ORCHID LN	CHANDLER	AZ	85226
WENTWORTH	22 N ROBSON 1401	MESA	AZ	85201
WEST	2361 N YALE	MESA	AZ	85213
WESTERGARD	2736 S SANTA BARBARA	MESA	AZ	85202
WESTPHAL	1124 E REDONDO CIR	TEMPE	AZ	85282
WETZLER	4319 E DES MOINES ST	MESA	AZ	85205
WHELIHAN	311 W CAMBRIDGE AVE	PHOENIX	AZ	85003
WHETSTONE	26017 S DARTFORD DR	CHANDLER	AZ	85248
WHISNANT	99 E PHELPS STREET	GILBERT	AZ	85295
WHITE	13106 W LYRIC DR	SUN CITY WEST	AZ	85375
WHITE	18404 N LAUREL DR	SUN CITY	AZ	85373
WHITE	2645 E SOUTHERN AVENUE #A215	TEMPE	AZ	85282
WHITE	4009 E LA SALLE ST	PHOENIX	AZ	85040
WHITE	4455 E PARADISE VILLAGE PKY 1087	PHOENIX	AZ	85032
WHITE	4483 E DONATO DRIVE	GILBERT	AZ	85298
WHITE	462 E HACKAMORE ST	MESA	AZ	85203
WHITE	5311 N 130TH AVE	LITCHFIELD PARK	AZ	85340

Comment Document				
Last Name	**Address**			
WHITE	5827 W GLENROSA AVE	PHOENIX	AZ	85031
WHITE	6311 W BERRIDGE LN	GLENDALE	AZ	85301
WHITE	6831 N 34TH AVE	PHOENIX	AZ	85017
WHITE	946 E 7TH AVENUE	MESA	AZ	85204
WHITE	10829 W SARATOGA CIR	SUN CITY	AZ	85351
WHITE	1626 N 60TH LN	PHOENIX	AZ	85035
WHITE	875 E SAGITTARIUS PL	CHANDLER	AZ	85249
WHITE	13716 W GUNSIGHT DR	SUN CITY WEST	AZ	85375
WHITE	22614 N MIRAGE LN	SUN CITY WEST	AZ	85375
WHITEHEAD	16644 N 168TH AVE	SURPRISE	AZ	85388
WHITEN	7016 W CORRINE DR	PEORIA	AZ	85381
WHITFORD	3561 E MELODY LANE	GILBERT	AZ	85234
WHITLOW	16601 W WATKINS ST	GOODYEAR	AZ	85338
WHITMORE	8382 S MILL AVE	TEMPE	AZ	85284
WHITNEY	12739 W MAPLEWOOD DR	SUN CITY WEST	AZ	85375
WHITTAKER	1332 E SCOTT AVENUE	GILBERT	AZ	85234
WHITTAKER	1394 W ROCKROSE WAY	CHANDLER	AZ	85248
WHITTEN	10742 W CHERYL DR	SUN CITY	AZ	85351
WHYATT	3460 E FIRESTONE DRIVE	CHANDLER	AZ	85249
WIBBERLY	1809 W CITRUS WAY	PHOENIX	AZ	85015
WIBKER	10101 W PALMERAS DR 108	SUN CITY	AZ	85373
WICKERD	12010 N 55TH ST	SCOTTSDALE	AZ	85254
WICKERT	10019 W DESERT HILLS DR	SUN CITY	AZ	85351
WIEDERHOLD	21021 E DESERT HILLS CIRCLE	QUEEN CREEK	AZ	85142
WIGFALL	3851 N 28TH ST 125	PHOENIX	AZ	85016
WILBURN	4700 E MAIN ST A23	MESA	AZ	85205
WILCOXON	6034 E EDGEMONT AVE	SCOTTSDALE	AZ	85257
WILES	15011 W ANGEL BASIN WAY	SURPRISE	AZ	85374
WILHELM	5229 E TAMBLO DRIVE	PHOENIX	AZ	85044
WILKENING	1157 E ACACIA CIR	LITCHFIELD PARK	AZ	85340
WILKENS	901 E KALER DR	PHOENIX	AZ	85020
WILKIE	2709 N 26TH PL	PHOENIX	AZ	85008
WILLAMS	4625 N 53RD DR	PHOENIX	AZ	85031
WILLAMSON	6855 W TOWNLEY AVE	PEORIA	AZ	85345

Comment Document				
Last Name	**Address**			
WILLEY	9210 E EMERALD DR	CHANDLER	AZ	85248
WILLIAMS	12242 N SAINT ANNES DR	SUN CITY	AZ	85351
WILLIAMS	1307 E EVERGREEN ST	MESA	AZ	85203
WILLIAMS	139 W SAGEBRUSH ST	GILBERT	AZ	85233
WILLIAMS	1415 N POMEROY	MESA	AZ	85201
WILLIAMS	17102 W SAGUARO LN	SURPRISE	AZ	85388
WILLIAMS	1801 E WINGED FOOT DR	CHANDLER	AZ	85249
WILLIAMS	1941 E WOODSMAN PLACE	CHANDLER	AZ	85286
WILLIAMS	2216 W ALTA VISTA ROAD	PHOENIX	AZ	85041
WILLIAMS	2624 N 63RD AVENUE	PHOENIX	AZ	85035
WILLIAMS	27810 N 130TH AVE	PEORIA	AZ	85383
WILLIAMS	3282 E BONANZA RD	GILBERT	AZ	85297
WILLIAMS	520 E ORANGE DR	PHOENIX	AZ	85012
WILLIAMS	6310 W BETHANY HOME RD	GLENDALE	AZ	85301
WILLIAMS	7519 S 29TH WAY	PHOENIX	AZ	85042
WILLIAMS	8007 W COLTER S	GLENDALE	AZ	85303
WILLIAMS	923 E SAN JUAN	PHOENIX	AZ	85014
WILLIAMS	9707 W PLEASANT VALLEY RD	SUN CITY	AZ	85351
WILLIAMS	9904 W DESERT FOREST CIR	SUN CITY	AZ	85351
WILLIAMS	1223 E BARTLETI WAY	CHANDLER	AZ	85249
WILLIAMS	1501 E RIVIERA DR	CHANDLER	AZ	85249
WILLIAMS	3398 E FLAMINGO CT	GILBERT	AZ	85297
WILLIAMS	722 E HOLMES AVE	MESA	AZ	85204
WILLIAMS	903 W GLENDALE AVE 2	PHOENIX	AZ	85021
WILLIAMS	12952 W EAGLE RIDGE LN	PEORIA	AZ	85383
WILLIAMSON	18004 N EMELITA CT	SURPRISE	AZ	85374
WILLIAMS-WATKIN	144 W WINSTON DR	PHOENIX	AZ	85041
WILLIS	15182 W GUNSIGHT DR	SUN CITY WEST	AZ	85375
WILLIS	7641 E EDGEMONT AVE	SCOTTSDALE	AZ	85257
WILLOCKS	1326 E EARLL DR	PHOENIX	AZ	85014
WILLOUGHBY	10509 E MINNESOTA AVE	CHANDLER	AZ	85248
WILMES	3286 N PALMER DR	GOODYEAR	AZ	85395
WILMINK	1186 W COURTNEY LANE	TEMPE	AZ	85284
WILSON	15868 W EDGEMONT AVE	GOODYEAR	AZ	85395
WILSON	1938 E REDFIELD RD	TEMPE	AZ	85283

Comment Document				
Last Name	**Address**			
WILSON	2010 W NEWCASTLE	PHOENIX	AZ	85021
WILSON	4523 W CATALINA DR	PHOENIX	AZ	85031
WILSON	6547 N 62ND AVE	GLENDALE	AZ	85301
WILSON	657 S 167TH LN	GOODYEAR	AZ	85338
WILSON	671 S CATALINA ST	GILBERT	AZ	85233
WILSON	12221 S MANDAN ST	PHOENIX	AZ	85044
WILSON	415 W LONGHORN DR	CHANDLER	AZ	85286
WILSON	5818 W BUTLER DR	CHANDLER	AZ	85226
WILSONCROFT	728 E CHILTON DRIVE	TEMPE	AZ	85283
WILTBANK	5408 N 104TH AV	GLENDALE	AZ	85307
WIMER	12202 W FLORES DR	EL MIRAGE	AZ	85335
WIN INGAR	848 N COUNTRY PLZ	GILBERT	AZ	85234
WINCEK	13578 N 74TH LN	PEORIA	AZ	85381
WINKLER	2341 N 12TH ST 2	PHOENIX	AZ	85006
WINNEY	6928 E PALM LN	SCOTTSDALE	AZ	85257
WION	4031 W ALTA VISTA RD	PHOENIX	AZ	85041
WIRTZ	655 N 57TH PL	MESA	AZ	85205
WISEMAN	6916 W GETTY DRIVE	PHOENIX	AZ	85043
WISENER	7449 W MARY JANE LN	PEORIA	AZ	85382
WISNER	12407 W CANDLELIGHT DR	SUN CITY WEST	AZ	85375
WISSMAN	4713 W SOLANO DR	GLENDALE	AZ	85301
WITHERS	5031 W ST CATHERINE AVE	LAVEEN	AZ	85339
WITTER	14463 N LAKEFOREST DR	SUN CITY	AZ	85351
WITTREICH	860 N MCQUEEN ROAD #1118	CHANDLER	AZ	85225
WIXON	19218 N CONCHO CIR	SUN CITY	AZ	85373
WOISTMAN	2633 E LOUISE D	PHOENIX	AZ	85032
WOLD	6827 W SONNET DR	GLENDALE	AZ	85308
WOLF	13214 N 153RD DR	SURPRISE	AZ	85379
WOLF	614 W CHILTON STREET	CHANDLER	AZ	85225
WOLF	6810 S CALLAWAY DR	CHANDLER	AZ	85249
WOLFE	2045 E BETHANY HOME RD	PHOENIX	AZ	85016
WOLFE	333 W ROSE LN	PHOENIX	AZ	85013
WOLFE	5201 W CYPRESS ST	PHOENIX	AZ	85035
WOLLGAST	2096 N 133RD AVE	GOODYEAR	AZ	85395
WOLSKI	1204 E STEPHENS DRIVE	TEMPE	AZ	85283

Comment Document				
Last Name	**Address**			
WONDERLEE	1752 E PINTO DR	GILBERT	AZ	85296
WONG	6823 W IVANHOE STREET	CHANDLER	AZ	85226
WOOD	1766 W MONTE AVE	MESA	AZ	85202
WOOD	2232 S NIELSON STREET	GILBERT	AZ	85295
WOOD	4645 W DESERT CREST	GLENDALE	AZ	85301
WOOD	6149 W ECHO LN	GLENDALE	AZ	85302
WOOD	6414 E VERNON AVE	SCOTTSDALE	AZ	85257
WOOD	1802 W VISTA AVE	PHOENIX	AZ	85021
WOOD	21674 N 53RD DR	GLENDALE	AZ	85308
WOOD	9334 W GLEN OAKS CIR	SUN CITY	AZ	85351
WOODALL	21913 E ROSA RD	QUEEN CREEK	AZ	85142
WOODARD	3289 N SNEAD DR	GOODYEAR	AZ	85395
WOODARD	10045 W ROYAL OAK RD 66	SUN CITY	AZ	85351
WOODFORD	3635 N 132ND DR	LITCHFIELD PARK	AZ	85340
WOODLAND	5803 W BELMONT AVE	GLENDALE	AZ	85301
WOODS	1928 E CAMELBACK RD 510	PHOENIX	AZ	85016
WOODS	415 W WINSTON DRIVE	PHOENIX	AZ	85041
WOODS	104S S 8TH AVE 129	PHOENIX	AZ	85007
WOODS	1101 E FILLMORE ST	PHOENIX	AZ	85006
WOODS	3802 E BASELINE RD 2067	PHOENIX	AZ	85042
WOODWARD	13427 N 75TH DR	PEORIA	AZ	85381
WORKMAN	5001 E MAIN ST 1483	MESA	AZ	85205
WORLEY	2612 W BEAUTIFUL LANE	PHOENIX	AZ	85041
WRIGHT	1021 S 1ST AVE	PHOENIX	AZ	85003
WRIGHT	1024 W 16TH STREET	TEMPE	AZ	85281
WRIGHT	13854 N TAN TARA DR	SUN CITY	AZ	85351
WRIGHT	1814 N 17TH AVE	PHOENIX	AZ	85007
WRIGHT	5668 W MONONA DR	GLENDALE	AZ	85308
WRIGHT	6209 E MCKELLIPS RD 414	MESA	AZ	85215
WRIGHT	6640 E RIVERDALE ST	MESA	AZ	85215
WRIGHT	1090S W WILLOWBROOK DR	SUN CITY	AZ	85373
WRIGHT	1451 N SERINA CIR	MESA	AZ	85205
WRIGHT	2843 E WINDSONG DR	PHOENIX	AZ	85048
WYMAN	9926 N 97TH AVE B	PEORIA	AZ	85345

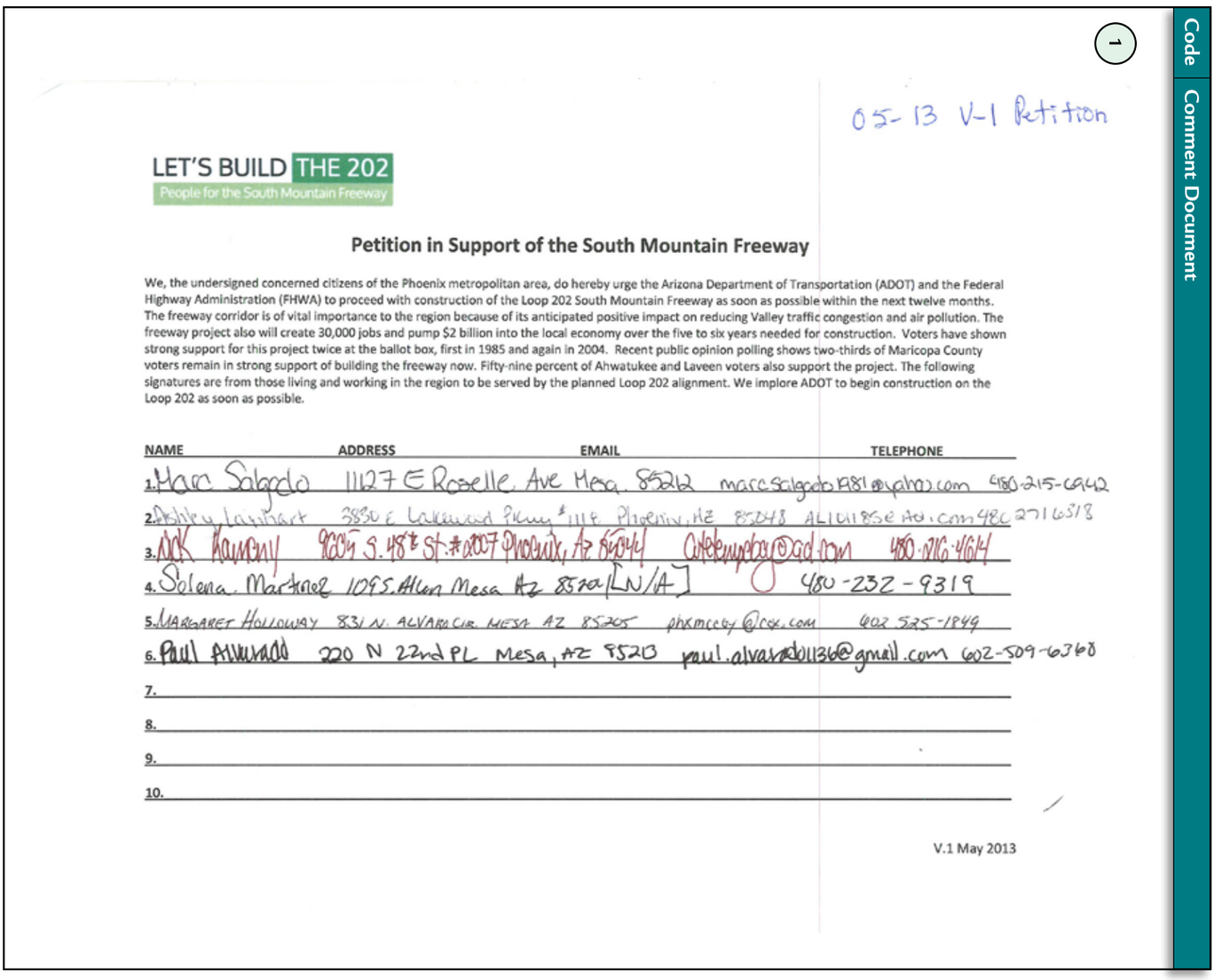
Comment Document				
Last Name	**Address**			
Y	9435 W PALM LN	PHOENIX	AZ	85037
YAEGER	16639 N 103RD AVE	SUN CITY	AZ	85351
YANCEY	19169 E MOCKINGBIRD DRIVE	QUEEN CREEK	AZ	85142
YANCY	13035 W FETLOCK TRL	PEORIA	AZ	85383
YANCY	8436 W WHYMAN AVENUE	TOLLESON	AZ	85353
YANCY	1629 W WIER AVE	PHOENIX	AZ	85041
YATES	8758 W GREER AVE	PEORIA	AZ	85345
YEAMAN	1416 N MANOR CIRCLE	CHANDLER	AZ	85225
YEE	2615 N 29TH PL	PHOENIX	AZ	85008
YEE	2121 W IAN DRIVE	PHOENIX	AZ	85041
YODER	1650 W GLENDALE AVE 1294	PHOENIX	AZ	85021
YOESTING	7039 W BLOOMFIELD RD	PEORIA	AZ	85381
YOGURTIAN	10518 W LA REATA AVE	AVONDALE	AZ	85392
YOIUNG	6833 W LINDA LANE	CHANDLER	AZ	85226
YOKAITIS	17968 W SAMMY WAY	SURPRISE	AZ	85374
YORK	640 S 28TH AVENUE	PHOENIX	AZ	85009
YORK	8039 S 54TH DRIVE	LAVEEN	AZ	85339
YOUNG	18581 E STRAWBERRY DRIVE	QUEEN CREEK	AZ	85142
YOUNG	2729 E PALMER STREET	GILBERT	AZ	85298
YOUNG	5741 N 26TH AVE	PHOENIX	AZ	85017
YOUNG	1707 S ROBERTS RD	TEMPE	AZ	85281
YOUNG	7213 S GOLFSIDE LN	PHOENIX	AZ	85042
YOUNT	402 N HOPI AVENUE	GILBERT	AZ	85234
YUHASZ	6818 W DARREL ROAD	LAVEEN	AZ	85339
YURKIEWICZ	18841 N 89TH LN	PEORIA	AZ	85382
YZQUIERDO	1825 E DONNER DR	PHOENIX	AZ	85042
ZABACK	1259 E INDIGO STREET	GILBERT	AZ	85298
ZABEL	5249 E DECATUR ST	MESA	AZ	85205
ZACHMAN	16304 W ESCONDIDO CT	SURPRISE	AZ	85374
ZAGAR	8622 S 51ST STREET #3	PHOENIX	AZ	85044
ZALUD	13030 W LIMEWOOD DR	SUN CITY WEST	AZ	85375
ZAMORA	7312 S HEATHER DRIVE	TEMPE	AZ	85283
ZAMORA	950 W ALTA VISTA RD 5	PHOENIX	AZ	85041
ZAPPOLA	3579 E TRIGGER WAY	GILBERT	AZ	85297
ZARAGOZA	3834 W PIERCE ST	PHOENIX	AZ	85009

Comment Document

Last Name	Address			
ZART	3778 E DEL RIO STREET	GILBERT	AZ	85295
ZARUBA	20785 S CLAUDIUS RD	QUEEN CREEK	AZ	85142
ZAWICKI	9539 W WILLOWBROOK DR	SUN CITY	AZ	85373
ZBIEGIEN	640 E GAIL DR	CHANDLER	AZ	85225
ZBONCAK	9843 E STONEY VISTA DRIVE	CHANDLER	AZ	85248
ZBYSZINSKI	580 W IRONWOOD DR	CHANDLER	AZ	85225
ZEA	2343 S 161ST AVE	GOODYEAR	AZ	85338
ZEDALIS	4310 W FREMONT RD	LAVEEN	AZ	85339
ZEPP	1433 E WINDSOR AVE	PHOENIX	AZ	85006
ZETTLER	17200 W BELL RD 1028	SURPRISE	AZ	85374
ZHOU	7217 S 39TH WAY	PHOENIX	AZ	85042
ZIELINSKI	15019 W REDFIELD RD	SURPRISE	AZ	85379
ZIEVE	1644 N SUNVIEW	MESA	AZ	85205
ZIMMER	23736 S VACATION WAY	CHANDLER	AZ	85248
ZIMMERMAN	1120 E SESAME STREET	TEMPE	AZ	85283
ZIMMERMAN	1440 E YUCCA ST	PHOENIX	AZ	85020
ZINDA	750 E NORTHERN AVE 1078	PHOENIX	AZ	85020
ZINNEL	21021 N VERDE RIDGE DR	SUN CITY WEST	AZ	85375
ZORC	1275 E UNIVERSITY DRIVE #303	TEMPE	AZ	85281
ZOUCHA	10510 W CAMBRIDGE AVE	AVONDALE	AZ	85392
ZUCZEK	1712 W MAGDALENA LN	PHOENIX	AZ	85041
ZUEHLKE	7115 N 72ND DR	GLENDALE	AZ	85303
ZWACK	11159 W KOLINA LN	SUN CITY	AZ	85351
ZWIER	9504 W HIDDEN VALLEY CIR	SUN CITY	AZ	85351
ZYBURT	813 E AQUARIUS PLACE	CHANDLER	AZ	85249

Comment Document

PETITION COMMENTS AND RESPONSES



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05-13 V-1 Petition

LET'S BUILD THE 202
People for the South Mountain Freeway

Petition in Support of the South Mountain Freeway

We, the undersigned concerned citizens of the Phoenix metropolitan area, do hereby urge the Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) to proceed with construction of the Loop 202 South Mountain Freeway as soon as possible within the next twelve months. The freeway corridor is of vital importance to the region because of its anticipated positive impact on reducing Valley traffic congestion and air pollution. The freeway project also will create 30,000 jobs and pump $2 billion into the local economy over the five to six years needed for construction. Voters have shown strong support for this project twice at the ballot box, first in 1985 and again in 2004. Recent public opinion polling shows two-thirds of Maricopa County voters remain in strong support of building the freeway now. Fifty-nine percent of Ahwatukee and Laveen voters also support the project. The following signatures are from those living and working in the region to be served by the planned Loop 202 alignment. We implore ADOT to begin construction on the Loop 202 as soon as possible.

NAME	ADDRESS	EMAIL	TELEPHONE
1. Marc Salgado	11127 E Roselle Ave Mesa, 85212	marcsalgado1981@yahoo.com	480-215-6942
2. Debbie Lamhart	3850 E Lakewood Pkwy #114 Phoenix, AZ 85048	ALLWISE@cox.com	480 2716318
3. Nick Kaminski	9605 S. 48th St. #2007 Phoenix, AZ 85044	Cutekmpdog@aol.com	480-276-4614
4. Solena Martinez	1095 S. Allen Mesa Az 85210 [N/A]		480-232-9319
5. Margaret Holloway	831 N. Alvarado Cir. Mesa AZ 85205	phxmccoy@cox.com	602 525-1849
6. Paul Alvarado	220 N 22nd PL Mesa, AZ 85213	paul.alvarado1136@gmail.com	602-509-6368
7.			
8.			
9.			
10.			

V.1 May 2013

Code | Comment Document

Code	Issue	Response
1		Comment noted.

LET'S BUILD THE 202
People for the South Mountain Freeway

Petition in Support of the South Mountain Freeway

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NAME	ADDRESS	EMAIL	TELEPHONE
1. HARIKRISHNAN SIBRAMANI	4727 W. Allen St, Laveen.	jamuna36@hotmail.com	602-441-3677
2. Dorothy Mccoy	4803 W. Allen Laveen.	mcyestic35@yahoo.com	6233763857
3. Miranda McCoy	4803 W. Allen Laveen	"	
4. *	4808 W Allen, Laveen,	bobduet@cox.net	602 507 8882
5. Christy Duet	4808 W Allen St Laveen	christyduet@cox.net	602 507 8882
6. Tina Montazavi	4815 W Allen St Laveen	Tina@HausOfTina.com	847 767 8462
7. Frank Even	4815 W. Allen St. Laveen	F@DFJKL.com	(602) 319 6363 (602) 510-1357
8. Juan Rodriguez	4823 W Allen St Laveen	J.Rod-1955@yahoo.com	
9. Maureen Wilkum	8607 S. 48th Lane Laveen AZ. 85339		602 368 4907
10. Raymond Pacheco	8606 South 48th Lane	raymondpacheco@yahoo.com	(602)422-4273

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NAME	ADDRESS	EMAIL	TELEPHONE
1.	4807 W Samantha Way Laveen	JMocks62@Gmail.com	602 633 2783
2. Dee Mocks	4807 W Samantha Way Laveen	JMocks62@gmail.com	602 633 2783
3. Burton Sisemalla	8707 S 48th LN Laveen	Burton.sisemalla@cox.net	480-205-8414
4. Krystal Sisemalla	"	"	
5. LATIF MUSTAPHA	LuvA1073@Yahoo.com	623 241 2084	
6. Alan Marble	4814 W Samantha Way	stroth78@gmail.com	602-738-1944
7. Dawn Marble	4814 W Samantha Way	"	602-570-2983
8. JUAN MORALES	4810 W SAMANTHA WAY		602-475-4668
9. FRancoise	4730W SAmatha Way		602-740-2883
10. Fausi Sint Kapelemba	4730 W Samatha Way.		480-288-0707

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	NAME	ADDRESS	EMAIL	TELEPHONE
1.	James Santo	1049 E Betsy Lane	JamesSanto@cox.net	480-726-7157
2.	Sharon Santo	1049 E. Betsy Lane	"	"
3.	Wayne T Barton	2133 West Enfield Way		6023215722
4.	DAN IKEDA	3128 S. HANSEN CIRCLE	Dan Ikeda	480-838-0997
5.	Wayne E Barton	2133 West Enfield Way		480-855-7278
6.	Steph Diaz	2070 W. Maplewood St.		480-326-3296
7.	Susan Ikeda	3128 S. Hansen Cir. Tempe		480-838-0997
8.	Maryann Ukena	4023 E. Rains Rd, Gilbert		480-213-3155
9.	Jeff S. Urakawa	4023 E. Rains Rd, Gilbert		480 329-5484
10.	[illegible]	7617 S. 39th Way PHOENIX		(602)740-7572

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	NAME	ADDRESS	EMAIL	TELEPHONE
1.	Angel Colmenero	4719 W. Samantha Way, Laveen	angel@damagecontrol-az.com	
2.	Ginna Takagami	4719 W Samantha way Laveen	secretar81@live.com	
3.	[illegible]	4727 W. Samantha Wy. Laveen	-ttrop@g.com	
4.	GLEN ALI	8717 S 47TH LANE, LAVEEN AZ.	IROCZ FAST@AOL.com	
5.	Tanah Baker	8709 S. 47th Ln Laveen, AZ	Tanahbaker@ymail.com	
6.	Terry Wilson	8705 S. 47th Ln Laveen, AZ	terrywilson2005@gmail.com	
7.	Mitch Garrett	4712 W. Allen st Laveen, AZ	mkg_@hotmail.com	
8.	Mandi Garrett	4712 W. Allen st. Laveen, AZ	mandigarrett@yahoo.com	
9.	FARMAN ALIAHI	4716 W. ALLEN ST LAVEEN, AZ	602 478 0375	
10.	ARSHAN BIBI	"	"	"

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Anna Pacheco	8606 S 48th Ln	anna.lisa.pacheco@hotmail.	602 326-9033
2. Victoria Pacheco	8606 S 48th Ln	pacheco1579@hotmail.com	602 294-9983
3. Santos Salas	8606 S. 48th Ln	Sasantos1980@Hotmail.com	602-3[illegible]-9033
4. MIHRET REZENE	8614 S 48Ln		(602)703-9232
5. Nathan Vigues	8618 S. 48th Ln	nathanvigues@gmail.com	602-377-1338
6. Lea Randy	5245 W. Dobbins Rd.	randylm@msn.com	6022357480
7. Peggy NDAS	4819 W. SAMANTHA Way	PNDAS@COX.NET	(602) 237-0011
8. Nathan Seymour	4815 W Samantha Way	desertspeedie30@gmail	(480) 202-7388
9. Dawn Seymour	4815 W. Samantha Way	dseymour767@gmail	(480)202-7390
10. Vasilica Sim. Furtuna	3236 W Shum Way Farm Rd		428 Phoe. 85041

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NAME	ADDRESS	EMAIL	TELEPHONE
1. ALFONSO FRADEN	8710 S. 48TH LN LAVEEN	ALFRADEN@COX.NET	480 223-2697
2. ANA FRADEN	8710 S. 48TH LN LAVEEN	BELKYS79@HOTMAIL.COM	480-223-2703
3. MARCOS PENA	8710 S. 48TH LN LAVEEN	MARCOSTPENA@HOTMAIL.COM	480.784-7677
4. STEVEN FRADEN	8614 S. 45th GLEN.	LAVEEN, STEVENFRADEN@YAHOO.COM	480 635-6785
5. LORENA FRADEN	" " " "		602-586-8569
6. DAVID FRADEN	3606 E. BASELINE Rd #214,	PHOENIX 85042 DAVIDFRADEN@HOTMAIL.COM	480-305-3411
7. INEZ MORALES	" " " " "	NEZLUV@GMAIL.COM	480-528-2371
8. W.C. STALEY	4728 W. ALLEN ST	LAVEEN AZ 85339	602-314-5727
9. GINA STALEY	" " " " " " " " "		
10.			

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Karim EL Kmiti	4721 W Fawn Dr, Laveen, AZ, 85339		480) 277.1930
2. Zeyad Almajali	4721 W Fawn Dr, Laveen AZ 85339		(480)967-9106
3. Angelica Elkmiti	4721 W. fawn Dr. laveen AZ 85339		(480) 567-5983
4. Maria Felix	7903 S. 47th Ln	Laveen AZ 85339	623 275-6524
5. JACK VILLALOBOS	7821 S 47th LN	LAVEEN AZ 85339	516-532-8932
6. Mercedes Contreras	7817 S 47th Ln	laveen 85339	602-348-0602
7. Luis Contreras	7817 S. 47th Lane	Laveen 85339	602 348-0602
8. Lizd Ramos	4829 W Fawn Dr	Laveen 85339	480) 217-6051
9. Christian Alvarez	4829 W Fawn Dr	Laveen 85339	602 413 3062
10. Teresa Ingram	7809 S. 47th Lane	Laveen, 85339	602-672-2593

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Victor Medina	4722 W fawn dr	Laveen AZ 85339	(623) 316-6056
2. Jose Salazar	4722 W. FAWN DR.	LAVEEN AZ 85339	(310) 775-7756
3. Oscar Sabino	7737 S. 47th LN	Laveen AZ 85339	(602) 358-7943
4. Maria Wilson	4654 W Pueblo Ln	Laveen AZ 85339	602 [illegible] 5886
5. K. Mc[illegible]	7809 S. 47th LN.	LAVEEN AZ 85339	—
6. Makenna Villalobos	7821 S 47th LN	LAVEEN AZ 85339	516 507 2488
7. Sophia Lindsey	5306 W Shumway Farm	Laveen AZ 85339	(602) 292-1118
8. Jason Lindsey	5[illegible] S 16th St	phx 85040	(925) 303-3585
9. Antoinette Dorsey	5018 S 16th St	phx 85040	(818) 308-6116
10. Sidney Joyner	5030 S 16th St	phx 85040	(818) 792-3062

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Rhoshawn Fletcher	7818 S. 69th		623 755 0865
2. Aiesha Barnett	7344 S. 69th		623 055 2849
3. STEVE CASTANEDA	9105 N 125th Dr		623 521 4428
4. Lydia Hill	P.O. Box 187 Sanders, AZ		602-207-7889
5. Marcus Olsen	4902 W. So. Mountain dr.		623-772-1608
6. Katie Haines	4317 W 43rd Dr Laveen Az		602-881-0682
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NAME	ADDRESS	EMAIL	TELEPHONE
1. Sylvia Pacheco	5 48th Ln	sillysy1@yahoo.com	602 299 8547
2.			
3.			
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NAME	ADDRESS	EMAIL	TELEPHONE
1. Vickie Agazzi	5415 W. PIEDMONT	LAVEEN AZ	VICKIEFLYS@MSN.COM
2. Dan Agazzi	5415 W Piedmt	Laveen AZ	
3.			
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NAME	ADDRESS	EMAIL	TELEPHONE
1. Joseph Carrillo	6709 S 40th ave Phx, AZ	Partisanalliance@gmail.com	480.678-5954
2. Cesar Salas	1918 W. OLNEY AVE PHX AZ	cesargraphics@mac.com	602 373 4674
3. KEN NELSON	8020 S 53 AVE LAVEEN AZ	CANARKANS314@COX.NET	602 243-9812
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NAME	ADDRESS	EMAIL	TELEPHONE
1. DAVID G. JOHNSON SR	5843 W DESERT DR	MOONLIGHTPATH98@COX.NET	602 799-1000
2. Ellen m. Johnson	5843 w Desert Dr	moonlightpath98@cox.net	602-799-8514
3. Jennifer Rouse	4821 W. Ellis St.	jennifer.rouse@gmail.com	602-488-2933
4. Bonnie Lynn	6420 S. 47th ln	dglynnscrib@yahoo.com	(602) 595-9806
5. John Mockus	4807. W. Samantha Way	JMockus62@gmail.com	602 633 2783
6. Jarrod Wakeford	4636 W. Magdalena LN 85339	jwakefor@circlek.com	602-770-2414
7. Frank Goldschmidt	8218 S. 48th Drive	desertbutterfly@centurylink.net	480. 399. 0644
8. William Jagrosse	8218 S. 48th Drive	desertguy67@Centurylink.net	
9. MARY SOUTHERN	7434 W. DAHAROM ST.		6026877589
10. Johnie Scott	5215 W. GLASS LN		~~480~~ 983-8457

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Mary Smith	PO Box 370	azsyme@cox.net	602-316-5906
2. DARYll Smith	PO Box 370	dpsmith710@cox.net	602-402-9458
3. Martina Martinez	8414S. 56Ln Laveen		6026331651
4. TRINIDAD MARTINEZ	8444 S 56th LN		6026331651
5. ALEXANDER BENEDA	4002 E. ACOMA RD		602.456.1230
6. CHARLES SANDERS	4036 W. ST CHARLES AVE, PHX85041	JULESSAND@AOL	602-237-1270
7. Kelly O'Grwell	4403 W. Harwell Rd		602-368-9335
8. Eric Brim	9007 S 49th ln	culbrim-electric@yahoo.com	602.237.9982
9. Shirley Waltenburg	4409 W. Monte Way	swaltenburg@mac.com	c:480.286.8677
10. Bonnie J. Bezold	5334 W Coles Rd Laveen,		602-318-6784

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Vicki Smith	4718W St. Kateri Dr	vickismith230@gmail.com	913-220-9884
2. Todd Smith	4718 W St. Kateri Dr.	twsmith230@gmail.com	623-433-6422
3. Trent Rhodes	8209 S. 45th Ln.	trentr9@cox.net	602-237-3586
4. Liliana Rhodes	8209 S. 45th Ln.	liliana_lar@hotmail.com	602-237-3586
5. Christine Mulcahy	7339 W. Maldonado Rd	cmulcahy01@reagan.com	602-314-2279
6. DAVE MULCAHY	" " "	~~[illegible]~~ dmulcahy01@reagan.com	"
7. James Corbett	4811 W. Gwen St.	Corbettfam5@gmail.com	602-237-0557
8. Gustavo Gil	3734 W. Apollo Rd	gustavo.a.gil@gmail.com	480-292-3716
9. LUDMILA JEGIER	5212 W SKUNKWAY FARM RD.	ljegier@gmail.com	623-313-6686
10. REGINALD FRAZIER	5212 W SKUNKWAY FARM RD	REGFRAZIER123@AOL.COM	520-907-8375

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NAME	ADDRESS	EMAIL	TELEPHONE
1. DANIEL DEMENTI	~~4900~~ 5 57TH DR	DAN.MARKETWISE@GMAIL.COM	602-690-1414
2. Tony Berasteguí	C913 S 38TH DR	TONY.BERASTEGUI@GMAIL.COM	602-431-8040
3. R. FRANKLIN	3418 W Ten DR.	nosss865@cs.com	602-301-1529
4. Erika Keenan	3418 W. Ten Dr.	KiKaKee@aol.com	602 373 5923
5. Claudine Reifschneider	4611 W Summerside Rd	lovinglaveen@aol.com	602-758-1902
6. Tim McGowan	5526 W. Ellis Dr.	Timothy.McGowan@azdoa.gov	602-615-6097
7. Wes Lines	5141 W Estrella	weslines@msn.com	602-237-2167
8. REID BUTLER	42 West Maitland St	reid@butlerhousing.com	602-315-5024
9. ACEVEDO, ALEX	6406 W. VALENCIA DRIVE	aacevedo44@yahoo.com	602 237-2756
10. Jennifer Hurzar Acevedo	6406 W. Valencia Dr.	Jen.hurzar@yahoo.com	480 776-4198

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LET'S BUILD THE 202
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NAME	ADDRESS	EMAIL	TELEPHONE
1. Miguel Ruiz	7003 S. 38th Dr	asuengineer@icloud.com	(480) 540-1857
2. Charmione Withers	5031 W. St. Catherine Ave	Charmreed@yahoo.com	(602) 535-4775
3. Thelbert Withers	5031 W. St. Catherine Ave	t.withers@cox.net	(602)535-4775
4. Ruby Eastman	6827 W Courtney Rd	Rubyandlee5@gmail.com	602 2379590
5. Edward Duke	8513 S. 55th dr, Laveen,	edukes37@yahoo.	602 2370273
6. Bertie NKosi	6916 W. ALTA Vista Rd	Laveen, Az. 85339	510-7279081
7. Christine Dickens	4508 W. COLES RD	LAVEEN, AZ 85339	Chrissydickens72@gmail.com
8. Ricardo Jimenez	6811 S. 69th AVE	Laveen, AZ 85339	602-237-0688
9. Derek Kreh	4029 W Darrow St	Phx 85041	DMKREH@yahoo.com 602-237-3322
10. Dorina Sola	4029 W Darrow St.	Phx 85041	dorinas444@hotmail.com 480-233-9795

602 930-4507

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Comment Document

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Robert Bearscomb	4422 w. St. Katerie Dr	Laveen, 85339	REDII2001@yahoo.com 480648-9882
2. Margaret Bearscomb	4422 w. St. Katerie Dr	Laveen, 85339	Margaret.Bearscomb@yahoo.com 602 237 9773
3. Julie Dunlap	6320 S. 45th Dr.	Laveen 85339	the.dunlaps@cox.net (602) 2372740
4. Lindsay Bateman	6316 S. 45th Dr	Laveen 85339	lindsaydbateman@cox.net
5. Chad Makovsky	10207 S 47th Ave	Laveen 85339	cmakovsky@gmail.com 602-237-8888
6. Stephanie Hurd	10207 S 47th Ave	Laveen 85339	hurdles10@gmail.com 602.790.2205
7. JANICE BLACKMON	7214 S. 53RD LANE	LAVEEN 85339	480-593-7502 mzcoach_jan@gmail.com
8. Gina Cernohous	10826 S 30th Ave	Laveen Az 85339	gcernohous@gmail.com
9. Joe Miranda	12175 W. McDowell Rd Apt 1205	Avondale AZ 85392	jmiranda44@gmail.com
10. Guillermo Vazquez-Gonzalez	6241 w. Southgate	Laveen Phx AZ 85041	junior9@gv@hotmail.com

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Mary Doherty	7342 W Magdalena Ln Laveen 85339	dmdhrty@gmail.com	219-796-6415
2. Donald Doherty	7342 W Magdalena Ln Laveen 85339	dmdhrty@gmail.com	219-796-6416
3. Jill Fenner	4711 W Magdalena Ln Laveen AZ	jillinaz@cox.net	602-412-3668
4. Chris Fenner	4711 W Magdalena Ln Laveen AZ	—	602-412-3668
5. DeeDee Lassila		hddlassila@hotmail	602-697-2384
6. Tessa Stotts	4316 W Happy Trail Laveen AZ	tastotts@hotmail.com	602-276-6184
7. Anita Sakkas	9006 S 47th Dr. Laveen AZ	msakkas@cox.net	-
8. Ashley Steele	5021 South 53rd Dr. Laveen AZ	ap-steele@hotmail.com	602-237-4627
9. Jeff Hale	4702 W. Piedmont Dr 85339	JEFFREY_HALE@YAHOO.com	602-237-7491
10. Patrice Herring	dpwill2@cox.net	5718 N. 41st ave Laveen	602-579-9218

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Carolyn Nutter	7357 W Valencia Dr Laveen, AZ	Cnutgvill@yahoo.com	602-218-6372
2. William Nutter	7357 W Valencia Dr Laveen AZ 85339	WNutter53@yahoo.com	602-218-6372
3. Adam Nutter	7357 W. Valencia Laveen, AZ 85339	mysoa2006@yahoo.com	"
4. PONCIANO MILLAN	9704 S 46TH LANE	ivyleuten@comcast.net	480-263-3644
5. IVY MILLAN	9704 S 46TH LANE	ivyleuten@comcast.net	480-263-3644
6. Jennifer Nelson	5502 W Glass Ln Laveen AZ	jennzrelson@yahoo.com	602-791-3880
7. Peter Nelson	5502 W Glass Ln Laveen AZ	PNelson@lesl.com	480-227-1317
8. Kari Fumusa	2810 W Harvest Grass Ln Phx	Karifumusa@cox.net	602-385-4029
9. Rochelle Peltzer	5416 W Atlantis Ave Phx AZ	rochellePeltzer@Cox.net	602-332-3916
10. Brian Peltzer	5416 W Atlantis Ave Phx AZ	bryan@pgg-eng.com	

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Pamela McIntosh	1265 S. 56th St Unit 9 MESA, AZ 85206	PMAC3[illegible]@yahoo.	480 634-7499
2. ISAAC VILLARREAL	5022 W WINDSOR 85035		602 4363563
3. Heather Lizell	2542 E. Pueblo phx AZ 85040		623-224-3259
4. Linda Ybarra	2805 W. Madison St. Phx Az 85009		480-249-1469
5. Darnell Ruiz Billups	P.O. Box 9471 Surprise AZ 85374		1(808) 443-1233
6.	512 W. Adams PHX AZ 85003		602-763-7028
7.			
8.			
9.			
10.			

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NAME	ADDRESS	EMAIL	TELEPHONE
1. M.E. Lord	4810 W Coronado Rd		602 269-5925
2. Santiago Ortiz	4232 W. Royal Palm Rd		623-322-4088
3. Anastacio Muñoz	8838 W. Highland Ave		6024777946
4. Betty Brooks	P.O. Box 11186		602 249-6607
5. Gilberto Martinez	814 w wellard rd		602-268-9041
6. M. Humberto Molina	3842 w monte vista Rd PX AZ.		602) 46899786
7. Yolanda N Jimenez	3516 W Encanto Blvd Phx AZ		602 2993226
8. Antonio Rondon	1056 E Greenway RD. PHX AZ 85042	Rondon9453@Hotmail.com	602.3389992
9. Ricardo Jiménez	25 North 11th St	(602) 252-2942	
10. Ricardo Peña		623) 980-1934	

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Nicasio S. Castro	8040 W. Glenrosa Ave Phx AZ. 85033		6232064296
2. LEROY CAMPBELL JR	3130 N. 15th Apt 371 Phx AZ 85014		602 326 2502
3. Sandy Williams	8135 W. 35th Dr. Phoenix	mrunify35@gmail.com	630-642-0438
4. Carlos Soliz	2617 w Monterey Way Phx az 85017		6023326402
5. G'C [illegible]	1337. W PALM CO		213-8508
6. FRANK SPARKS	15421 W. JENAN DR	SURPRISE	313 693-6057
7. [illegible]	10621 W SELDON LN	peoria AZ 85345	6182
8. Emilia Bravo	3530 W. Piedmont Rd.	Arlington 85322	602 531 2396 jusmidejesus@gmail
9. JORGE L BETANCOURT	7143 W ROANOKE AVE		623-225-23
10. Leopoldo Meraz	5628 w campbell ave.	Phoenix AZ 85031	623 846 3217

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NAME	ADDRESS	EMAIL	TELEPHONE
1. MANUEL P MARTINEZ	330 N 39th DR	N/A	602-326-1677
2. Raymond S. Montoya	1716 W. Saint Moritz LN	Phx. AZ 85023	(623)385 2205
3. Cesar Garcia M	8424 W Hubbell St	(602) 462 0825	
4. Arnulfo Garcia M	4537 w Purdue Avenue	Glendale Az 85302	(480)2632877
5. Felipe GAYTAN	3716 W Leodra 2N	Phx AZ 85041	520-490 1852
6. [illegible]	13494 W Young St	Surprise, AZ 85374	602-258-6521
7. Anibal Cuauhtemoc Calderon	8526 N. 27th Ave.	Phx. Az. 85051	602-561-3295
8. Michael Pierce	2134 W. Georgia Ave	Phx AZ 85015	602-841-7061
9. MASON SPARKS	7810 S. 30[illegible] DR.	[illegible] AZ 85338	623-521-6617
10. LINDA J. RODRIGUEZ	P.O. Box 153	ARLINGTON AZ	85322

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NAME	ADDRESS	EMAIL	TELEPHONE
1. Heather Nakagawa	7817 S. 39th Way 85042	HMMayes@hotmail.com	602 770 3616
2. Greg Nakagawa	10432 E. Mcdowell Dr. Scottsdale Az. 85255	gnakagawa1@hotmail.com	480-609-6979
3. Sally Ikeda	342 E Vermont Dr. Gilbert AZ 85295	sdeazi8@yahoo.com	480-775-7670
4. Art Nakagawa	4626 W. Marcus Dr Phx Az		(602) 909-8552
5. Betty Nakagawa	4626 W. Marcus Dr. Phx Az		(602) 909-7681
6. Ann Nigro	2517 E Flintlock Chandler		480-839-0324
7. Scott Ikeda	342 E. Vermont Drive. Gilbert Az 85295		480-775-7670
8. Shane Niimi	3158 E. Juanita Ave Gilbert Az 85234		480-832-2191
9. Kris Nakagawa	14 E Erie Dr. Tempe, AZ 85282		602 318-1520
10. J R Nakagawa	4522 W. Butler Dr. Butler Dr. Glendale, AZ		602 826-9245

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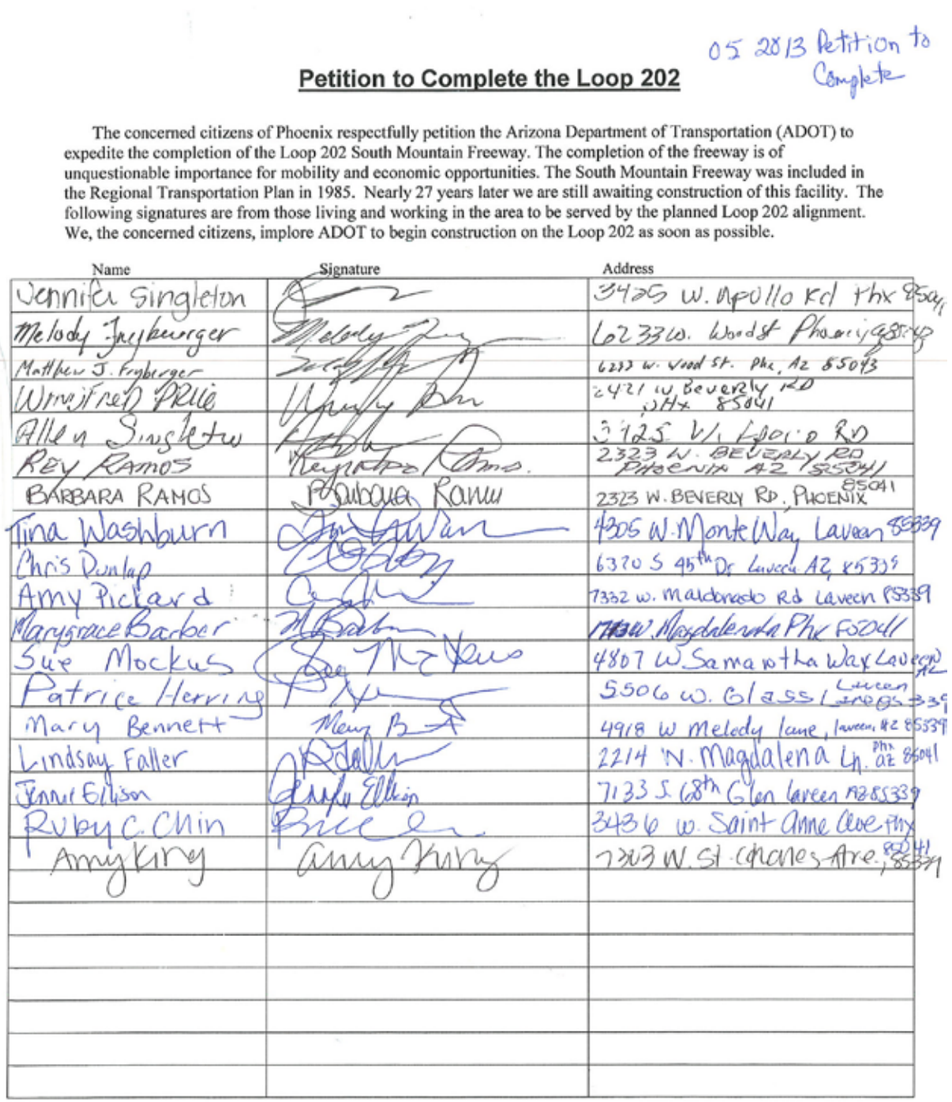
11. [illegible] 100 W. Spruce Dr Chdl Az 602-441-4444
12. Shane Niimi 3158 E. Juanita Ave, Gilbert, AZ 85234 480-832-2191
13. Loni Puckett 5238 E Wagoner Rd Scottsdale, Az 85254 (561) 818-3304
14. TODD Puckett 5238 E. Wagoner Rd Scottsdale, AZ 85254 (602) 531-5505
15. Masumi Ikeda 2104 S. Noche De Paz Mesa, AZ 85202 (48) 839-9050
16. Irene Ikeda 2104 S. Noche De Paz Mesa, Az. 85202 480-839-9050
17. BRETT Nakagawa 14 E. ERIE Dr. TEMPE, Az, 85282 (602) 377-0743
18. James Kobashi 4326 E. Cave Creek Dr Phoenix Az 85050 (602) 361-4524

Code	Comment Document
1	

05 2013 Petition to Complete

Petition to Complete the Loop 202

The concerned citizens of Phoenix respectfully petition the Arizona Department of Transportation (ADOT) to expedite the completion of the Loop 202 South Mountain Freeway. The completion of the freeway is of unquestionable importance for mobility and economic opportunities. The South Mountain Freeway was included in the Regional Transportation Plan in 1985. Nearly 27 years later we are still awaiting construction of this facility. The following signatures are from those living and working in the area to be served by the planned Loop 202 alignment. We, the concerned citizens, implore ADOT to begin construction on the Loop 202 as soon as possible.

Name	Signature	Address
Jennifer Singleton		3425 W. Apollo Rd Phx 85041
Melody Frybarger		6233 W. Wood St. Phx, AZ 85043
Matthew J. Frybarger		6233 W. Wood St. Phx, AZ 85043
Winifred Price		2421 W Beverly RD Phx 85041
Allen Singleton		3425 W. Apollo RD
Rey Ramos		2323 N. Beverly Rd Phoenix AZ 85041
Barbara Ramos		2323 W. Beverly Rd., Phoenix 85041
Tina Washburn		4305 W. Monte Way, Laveen 85339
Chris Dunlap		6370 S 45th Dr Laveen AZ, 85339
Amy Pickard		7332 w. Maldonado Rd Laveen 85339
MaryGrace Barber		7332 W. Magdalena Phx 85041
Sue Mockus		4807 W Samantha Way Laveen AZ
Patrice Herring		5506 W. Glass Laveen 85339
Mary Bennett		4918 W Melody lane, laveen, AZ 85339
Lindsay Faller		2214 N. Magdalena Ln. Phx AZ 85041
Jenni Ellison		7133 S. 68th Glen laveen AZ 85339
Ruby C. Chin		3436 W. Saint Anne Cove Phx
Amy Kirg		7303 W. St. Chanes Ave, 85041

Code	Issue	Response
1		**Comment noted.**

Comment Document

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Name	Signature	Address
MARGARET RAFFIN		9807 S. 44th Dr. LAVEEN
Dee Krippene		5507 West T. Regan Ln Laveen
Kamela Ruby Raff		9807 S 44th Drive Laveen 85339
Claudine Reischmeider		4611 W. Summerside Rd 85339
Dorina Sola		4029 W. Tarrow St Phx AZ 85041
Derek Krch		4029 W Durrow St Phx 85041
Shiguang Bates		8234 N. 42nd Dr. Phx AZ 85051
FRANKLIN MCGEE		1518 E IRWIN AVE PHX AZ 85042
Linasay Bateman		6316 S 45th Dr Laveen 85339
CRISTINA AMARA		6520 W. COAST AIRE WAY LAVEEN
ANDREW BATEMAN		6316 S. 45th Dr Laveen, AZ 85339
Meredith Worrell		2213 W. Hawk Phx AZ
Dan Worrell		2213 W. Hawk Ph AZ
Daphne Castaneda		6828 S 38th Drive Phx Az
Wendy Flood		8911 S. 40th Drive AZ
Julie Dunlap		10320 S. 45th Dr. Laveen AZ
Shirikia Price		4911 W St Kateri Dr. Laveen AZ
George Garcia		4936 W Magdalena Lane 85339
Domenica Tiller		7622 S. 69th Dr. Laveen AZ 85339
SHIRIN KHAN		1233 W. Alta Vista Rd Laveen AZ 85339
Mohammed Islam		7344 W. St Catherine Ave
AFROZA ISLAM		7344 W. St Catherine Ave
Carlos Corona		7210 S 41st Dr 85041
Lolia Tom		11
Emilio Tom		4435 W Kaler 85339

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Name	Signature	Address
Ivett Cuon		4938 W. Fillmore Drive
Kim Cassad		5235 W. Winston Dr.
Angela Beatty	Angella Beatty	7633 S 63rd Dr
Chena Byrd		1140 W. Rio Vista Ln
Elias Gutierrez		2927 N. 53RD DR. PHX 85281
Briana Price	Briana Price	2421 W Beverly Rd 85041
Kerrey Hunt		2635 W MINNEY PHX 85041
Paige Parker		2411 S. 48th Drive
Nicholas Rouse		4821 W. Willis St.
Teresa Green		3203 W. Sunnyside Dr.
Olga Solano		5102 W McNeil St
Ernesto Solano		5102 W. McNeil St.
CALVIN SCHNEIDMILLER		7239 S. 54TH DRIVE LAVEEN 85339
Juanita Perdue		5647 W. Sunland Ave.
THERESA BACA		5736 W. Davis Way Laveen
Lynne Latimer		6206 S. 50th Lane
CRYSTAL SMITH		6206 S. 50TH LANE
Nicole Burns		5730 W. Novak way
Rebecca Koury		4808 W. Piedmont Laveen 85339
Michael Koury		4808 W. Piedmont Laveen 85339
Tristan Saucedo		6613 S. 40th Ave
Teresa Parker		6613 S 40th Ave
William Holloway		8226 S. 39th Dr.
Kathy Wood		5226 W. Maldonado DR
Michael Wood		5226 W Maldonado Rd

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Name	Signature	Address
Regina Dukeyoo	Regina Dukeyoo	5410 W. Magdalena Lane

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Name	Signature	Address	E-mail
Ariel Elgar	Ariel Elgar	914 E. Osborn Rd Phoenix AZ 85014	ariel.elgar1@gmail.com
Eric Peter	Eric Peter	4509 W. Mulberry St Laveen AZ 85339	eric.peter@asu.edu
Matthew Ledbetter	Matthew Ledbetter	1220 N. 23rd St Phx AZ 85008	mledbetter@asu.edu
Kim Hunt	Kim Hunt	1012 N. 32nd Pl Phx AZ 85034	kimhunt@asu.edu

Comment Document

Petition to Complete the Loop 202

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Name	Signature	Address	E-mail
Curt Olson		4924 W. Stella Dr.	Laveencurtcarol@msn.com
Carol Olson	Carol Olson	" "	" "
Helen Clapper	Helen Clapper	6612 S. 18th Dr. 7th Ave 11	hclapper@msn.com

Comment Document

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Name	Signature	Address	E-mail
WAIVER		7335 W VALENCIA	
Jennifer Rouse	Jennifer Rouse	4821 W. Ellis St.	jennifer.rouse@gmail.com
Don Metzler	Don M Metzler	6730 WEST DESERT LANE	DonMetzler1@Cox.NET
Linda Waring	LW	6720 W. Desert Ln Laveen	
Stephanie Scovil	SS	7416 S 45th Ave Laveen 85339	Stefanywith.pep@gmail.com
Jason Scovil	JS	7416 S 45th Ave Laveen Az 85339	jms21678@yahoo.com
Jon Kimoto	Jon Kimoto	3216 W. Ansell Rd Laveen	n/a
Roger Catalano	RC	925 Crestview St	BSCATALANO@QWEST.NET
MAX MEALEY		710 W STOTTLER CHANDLER 85225	Medley1@cox.net
MARY MEALEY	Mary Mealey	710 W. STOTTLER DR. CHANDLER AZ 85225	CMMEALEY@COX.NET
Sara Catalano	Sara Catalano	925 Crestview St. CHANDLER AZ 85226	bscatalano@qwest.net
Maureen Buschke		872 W Oakland St Chandler AZ 85225	
Kent Mulkey			
Donna Jones	DJ	626 W Rocking Loop Casa Grande AZ 85122	jnbDon@AOL.com
Dawn Smith	DS	16852 S 41st Dr Phx AZ 85041	Dawnee041380gmail.com

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Name	Signature	Address	E-mail
Lisa DaRonal	Lisa Doronal	8222 S. 34th lane, Laveen AZ	phoenix@dressforsuccess.org
Carole Hanson	Carole Hanson	P.O Box 146, Laveen, AZ	
John Mockus	John Mockus	4807 W. Samantha Way, Laveen AZ	JMockus62@GMail.com
Danielle Poch	Danielle Poch	8036 S. 48th Drive Laveen AZ	
Maureen Poch	Maureen Poch	6931 E. Willetta St. Scottsdale AZ	
Diane Nelson	Diane Nelson	330 W. Maryland #105, phx 85013	
Randy Schilter	RW Schilter	8618 S. 54th Ln Laveen AZ 85339	
Anna Cwiklinski	Anna Cwiklinski	4731 W. Gumina Laveen AZ 85339	taguckenburg1@msn.com
Tracy Guckenberg	Tracy Guckenberg	4731 W. Gumina Laveen 85339	" "
Linda Cashman	Linda Cashman	915 W. Alta Vista #2034 Phx	linda.cashman@sbd.k12.az.us
Diana Berger	Diana Berger	7611 S. 31st St #230, 85042	~~dianaberger@~~ dianachristyhager@gmail.com
Shawn Rose	Shawn Rose	21220 N 23rd Ave Apt 220 85027	simprose1981@gmail.com
Deborah Arnold	Deborah Arnold	3871 W. Shumway Farm Rd 85041	
Louise Wazorick	Louise Wazorick	6128 N 183rd Ave Waddell AZ	
Sandra Cardena	Sandra Cardena	7220 S. 56th Ln Laveen Az 85339	

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Name	Signature	Address	E-mail
Deborah Lanni	Deborah Lanni	4308 W. Olney Ave Laveen	
Hal Nestor	Hal Nestor	P.O. Box 279 Laveen 85339	
Lena Nestor	Lena Nestor	" " " "	
William M. Johnson	William M. Johnson	2819 W. Palomino Dr. Chandler 85224	
Royce B. Johnson	Royce B. Johnson	2819 W. Palomino Dr. Chandler 85224	
Emmett R Baylor	Emmett R Baylor	4815 W. Siesta Way Laveen AZ	
Margaret Baylor	Margaret Baylor	4815 W Siesta way Laveen 85339	
Hector Chavez Jr	Hector Chavez Jr	7212 W. Sage Dr. Laveen 85339	
Lisa Chavez	Lisa Chavez	" " " "	
Cheis Arviso	Cheis Arviso	7025 W. St Catherine Ave Laveen, AZ 85339	
Maria Montoya	Maria Montoya	P.O. Box 8872 PHX AZ 85066	
Paul Montoya Jr	Paul Montoya Jr	P.O. Box 8873 Ph AZ 85066	
Raymond Montoya	Raymond Montoya		
Brandon Montoya	Brandon Montoya	7041 W. Orangewood Phx AZ 85021	
Michael Doronal	Michael Doronal	8222 S. 34th Lane, Laveen 85339	

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Name	Signature	Address	E-mail
[illegible] Young		514 W. Sunland 85041	
[illegible] Quintana		2420 W. Minton 85041	
Frank Grimes		8707 S 50th Ln 85339	fGG44@msn
Cheryl Grimes		8707 S 50th Ln 85339	cjg81@msn.com
Shella Dawson		4925 W Melody Ln 85339	sagg9909@yahoo.com
Conrad Dawson		4925 W. Melody Ln 85339	
Allyson Hall		4923 W. Desert Dr. Laveen 85339	
Robert Ramirez		4815 W Marley St. Laveen 85339	
Kyle Ethan		842 S. 50th Ln. Laveen AZ 85339	
Stacey Eshan		8401 S. 50th Ln., Laveen, 85339	
Darlene D Awad	Darlene D Awad	5716 S. 21 Ave Phx 85041	
Mandy Lee	Mandy Lee	5617 S 22nd Ave Phx 85041	
[illegible]		2577 W. Berridge Ln.	
Juanita B Walker	Juanita B Walker	6402 S. 58th Ave Laveen AZ 85339	
Marvin Walker		4602 W Park St 85339	

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Name	Signature	Address	E-mail
Cory Dietz		4612 S Dorsey Ln Tempe 85215	CoryDietz@yahoo.com
Aaron Dyer		4117 w. Alta Vista Phx 85041	BabyMcqueen@q.msic
Leticia Contreras		7118 W. Beverly Rd	
Judy Rogan	J Rogan	6337 ~~6033~~ W Valencia DR. Laveen AZ	J2ROG@hotmail-com.
Jacqueline Dever		6334 W Valencia Dr Laveen AZ	Jack2del@hotmail.com
Raul Pacheco	Raul Pacheco	3324 W Chuute Pass Phx 85041	Bpacheco@bgcmp.org
Marcus Sam		200 W. Washington Phx 85003	
DAVID RAGLE		1809 W. 33RD DR PHX 85041	
Vicki Smith		4718 W. St. Katen Dr. Laveen, AZ 85339	vickismith23@gmail.com
Todd W Smith		"	twsmith23@netscape.net
Spencer Shumway		200 W. Washington 85003	
BARB Henshaw		11808 S. 42nd DR Laveen	tex-barby@yahoo.com
Kim Henshaw		11706 S. 42nd Ave Laveen	ksigan@yahoo
Christina Arvis		2025 W. St Catherine 85339	ctarvis6@q.com
Inez Navarro		810 E, Greenway Rd 85040	

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Name	Signature	Address	E-mail
TOM TRESSETT		10826 S 29 AVE	
Christina Amadio	Christina Amadio	4701 W. Dobbins, 85339	christina4adi@hotmail.com
FRANK EVEN		4915 W. ALLEN ST, 85339	F@OFJKL.COM
JoAN W. Smith		4718 W. St. Kateri Dr Laveen AZ 85339	twsmith23@netscape.net
[illegible]		PO Box 413 Tolleson AZ 85353	jrod2544@gmail
SAM SHEA		6609 S. 57th Ave	
Jian Gu		6840 W Fremont Rd 85339	jiangu1@gmail.com
Naveed Ahmed	Naveed Ahmed	4511 W Pearce Rd.	naveed.ahmed@verizon.com
MujahidAlam	Mujahid		malam73@yahoo.com
Sheila Griffin Dawson		4925 W Melody Ln 85339	Sagg9909@yahoo.com
GARY ENSMINGER		6806 S 55th LANE 85339	gensming@mail.maricopa.gov
AIMEE JEFFREY		5409 W. HUNTINGTON DR	JEFFREYjinnov@hotmail.com
GARY JORDAN		3603 W. SHAWNEE DR. 85339	
Philip Mitchell		10020 N 23rd St Phx 85028	—
BOYCE PETROV		4407 E HOPI ST. PHX 85044	—

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Name	Signature	Address	E-mail
Katherine Gosiger	Katherine Gosiger	5408 W Novak Way, Laveen	KDosiger@msn.com
TOM RYAN	Tom Ryan	7004 S 30th LN PHX 85041	TRPHOENIX@HOTMAIL.com
Rachel Rios	Rachel Rios	5030 S Glass LN, Laveen	muzzy2006@MSN.COM
John Vanderwey		2241 E Colter St Phx 85016	jvanderwey@aol.com
Julie Gordon		8512 S 55th Dr. Laveen, AZ 85339	jegordan27@yahoo.com
Greg Gordon		8512 S 55th Dr. Laveen, AZ 85339	atraidsf1@yahoo.com
Francisco Laguna	Francisco Laguna	7311 W Jones PHX AZ. 85043	
[illegible]		5506 W. Glass Ln Laveen 85339	dpwill2@cox.net
Deborah Villegas	Deborah Villegas	3330 W Olney Ave, Laveen 85339	ddimundo@hotmail.com
Susan Nuñez		4541 W. Sophie LN Laveen 85339	Suebeenunez@aol.com
JAY MORGAN		5333 W. WINSTON DR LAVEEN	Jaymo2326@ME.COM
H. DEBAGNE		7332 W Alta Vista RD Laveen	HJDEG@gmail.com
Leah LaBarge	Leah LaBarge	22468 N. VanderVeen Way Maricopa AZ 85138	L.LaBarge@g.com
Eric Quinn		1738 W. Lydia Lane Phoenix AZ 85041	Equinn@hic.us
Carwin Villalobos		6509 S. 18th Ave Phx, AZ 85041	

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Bruce Purnell		1709 W. Lydia Lane Phoenix	purnell33@cox.net
Kurt vanBehrmann		1709 W Lydia Cane phoenix	behrmannart@cox.net
Ronald McGlade		7260 W ST CATHERINE AVE - 85339	SVTDRIVER1945-test@YAHOO.COM
DAVID PLEW		6112 S 45TH GLEN 85339	welp82@YAHOO.COM.
Lillian Plew		6112 S 45th Glen 85339	welp782@yahoo.com
Roland Bullerkist		6822 S 49th Dr.	rbb456@gmail.com
Barb Bullerkist		6822 S 49TH Dr.	rbb456@gmail.com
[illegible]		4736 W Carson Rd Laveen AZ	ALEXIS_herrera@yahoo.com
HOWARD HILL		13601 N 50TH PLACE 85254	
SANNA ALVAREZ		7015 W Sophie Ln 85339	
CHRISTIAN MAREZ		7015 W Sophie Ln. 85339	
WAKA OFAKFA		6806W Nancy Ln 85339	WAKAOFAFA@YAHOO.COM
Nick Costanzo		3713 W Nancy Ln 85041	NCostanz@cox.net
Connie Ruiz		3713 W. Nancy Ln 85041	Connie-Ruiz@Cox.net
Susan Sanborn		5023 W. Pedro Lane 85339	sjsanborn@cox.net

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Name	Signature	Address	E-mail
Robert Duet		4908 W Allen St Laveen AZ 85339	
HANK Arring		5618 S 41st AVE Phx 85041	
Julia Rodriguez		5576 W Lucia Ln 85339	
Patricia Facio		5341 W. CARSON RD LAVEEN 85339	pattyfacio69@msn.com
Christine Mahler		5134 W. Olney Ave Laveen 85339	
MICHAEL TATRON		5125 W TYLER LN LAVEEN AZ85339	ALGO_WARRANTY@HOTMAIL.COM
Nicole Tatron		5125 W. T Ryan Ln. 85339	nztrout@hotmail.com
Nita Rice		1212 W Morelos St Chandler AZ 85224	ricecarepatrol@gmail.com
Robert Schaffner		6015 Laveen Dr chandler AZ 85224	rcschaff@hotmail.com
Adriana Aguilera		4507 W Coplen Farms Rd Laveen 85339	dradrianaaguilera@gmail.com
Alfonso Castillo		4507 W Coplin Farms Rd Laveen 85339	
KATHY ALBIN		5610W DANIEL 85339	Kalbino549@yahoo.com
Michael Albin		5610 W Daniel 85339	
Barb Bullerks		6822 S 49TH Dr. 85339	
Lora B. Sanders		8909 S. 10th Dr. Phoenix AZ 85041	sanders-lora@yahoo.com

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Name	Signature	Address	E-mail
KAREN MENDEZ	Karen Mendez	17916 W Desert View Ln Goodyear	
MITCH MILLER		4309 W. Lodge Laveen 85339	
Deb Miller		4309 W Lodge DR Laveen 85339	
Kelly Hanson		7218 W. Carter Rd Laveen AZ 85339	
Rocky Hanson		7218 W. CARTER RD LAVEEN 85339	
Sally Ortega		1611 S. 38th Dr. Phx Az 85009	
Annamarie Tutewiler		3434 N. 11th St unit 13 Phx AZ 85014	
Fernie Escobedo		5610 W. Coles Rd Laveen 85339	
Tara Chunnai		7925 S Kelsie Dr Laveen 85339	
Sarah Chunnai		7925 S Kelsie Dr Laveen 85339	
T. Chongchaoan		- SAME	
Melissa Hunter		5417 W Grove St Laveen 85339	melissa.hunter@yahoo.com
Demetrius Hunter		5417 W. Grove St. Laveen, AZ 85339	
~~CHRISTY DIET~~			
Christy Diet		4808 W. Allen St Laveen AZ	

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Name	Signature	Address	E-mail
Carlos Ochoa		7006 S 40th Ln PHX, AZ 85041	carlos.ochoa@cox.net
Jacqueline Salamo		5116 W GRENADINE RD 85339	salamoj@yahoo.com
Wes Lines		5141 W Estrella Laveen AZ 85339	weslines@msn.com
Tim Stone		6622 S. Cottonfields Ln	
Lorena Sempson		4545 W. Sophie Ln Laveen AZ 85339	lsemp3@yahoo.com
Kristen Mayorga		4314 W. Buist Ave Laveen AZ 85339	toolindamayorga@gmail.com
Gary Gentry		2924 W Cheyenne Dr Laveen AZ 85339	ggentry32@msn.com
Gabriel Mayorga		4314 w. BUIST AVE, Laveen AZ 85339	gmayorga@sunfam.com
CRAIG May		4832 V Carson Rd Laveen AZ 85339	ctmay78@cox.net
JESUS BARRAZA		4826 W. MALAPAI DR Laveen AZ 85339	JMBURRSA@YAHOO.COM
Dennis Reilly		4802. W Carver	
H. Imota		"	
L. Lindsley		7137. W. Carter Rd	llp@cox.net
R. Zavala		5907 S. 55TH Dr.	
Dave Warren		200 W. MESQUITE ST	

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Randall Redarte		4824 W. Carson Rd. Laveen AZ 85339	randall.redarte@gmail.com
PHIL ROYER		5229 W. PLEASANT LN LAVEEN AZ 85339	PHILROYER@AOL.COM
Pamela Royer		5229 W. Pleasant Ln. LAVEEN, AZ 85339	legalwoman87@aim.com
MIKE KAPEL		8043 S. 54th Dr. LAVEEN AZ 85339	M.KAPEL@COX.NET
CARLOS PASCARELLA		5625 W WOOD ST, PHX 85043	CPASCARETTI@YAHOO.COM
STEVEN KLEIN		6820 S. 66th AVE, LAVEEN 85339	GROVENORWHIPPETS@EARTHLINK.NET
JASON HARRINGTON		7044 S. 7th lane, Phoenix, AZ 85041	Jason@harrington planningdesign.com
Luisa Lechuga		8206 S. 51st Dr. Laveen AZ 85339	realtorluisa@yahoo.com
Debbie Zapatka		6306 S 54th Ln Laveen AZ 85339	Zapatka@msn.com
Javier Villalpando		7904 S 73rd Dr Laveen AZ 85339	javiervf@gmail.com
Erika Esparza		7904 S. 73rd drive. Laveen AZ	erikasujey@gmail.com
[redacted]		[redacted]	[redacted]
John Meckes		4807. W. Samantha Way	JMeckes62@Gmail.Com
William Jagrose		8218 S 48th Drive	DesertGuy67@Centurylink.net
Joan Collinsworth		#53 W. Crivello Ave, Laveen 85339	JoanCollinsworth@msn.com

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CARLOS ALVAREZ		7015 W. Sophie Ln	CGAV96@AOL.COM
Jim McDuffie		5612 W. Euclid Ave Laveen	
Mark Borzych		5424 W. Siesta Way, Laveen AZ	mborz@cox.net
LARRY HITESMAN		4643 W. MAGDALENA LN, LAVEEN 85339	rlarryh@yahoo.com
Brad Goodman		6306 S. 54th Lane Laveen AZ 85339	
Joe Gosiger		5408 W Beck Way Laveen 85339	JGSIGER@MSN.COM
[redacted]		[redacted]	[redacted]
Jeanne Gentry		2924 W Cheyenne Dr Laveen Az	
LUKE SCHLOSSER		PO Box 5700 GOODYEAR 85338	SWLAND@COX.NET
Patrick Brennan		PO Box 69, Laveen, AZ 85339	pbrennan@gmail.com
Terrance Henriksen		8610 S 54th Ln Laveen AZ 85339	
Dave Stanley		7137 W. Carter Rd	DSL Honda@yahoo
Paul Balch		7716 S 22nd LN Phoenix, AZ 85041	paul.balch@dibblecorp.com
Maureen Comeau		6016 South 53rd Dr. Laveen, AZ 85339	maureen.comeau@gmail.com
KJ Irwin		1321 E Vertex Dr Tempe AZ 85281	Kenneth.Irwin@asu.edu

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Name	Signature	Address	E-mail
Christa Jewell		5208 W. Shumway Farm Rd	cjjwll@cox.net
Tony Hodges		5325 W Alberniz Pl	tpaulh-2000@yahoo.com
Miguel Ruiz		7003 S. 38th Dr	miguel.i.ruiz@gmail.com
Teresa Davila		820 S. 50th Ln	tdavila04@yahoo.com
Bill Straley		4725 W Allen St	
Jon Kimoto		3246 W. Ansell Rd - Laveen	n/a.
Vicki Smith		4718 W. St. Kateri Dr. Laveen	vickismith23@gmail.com
[illegible]		9407 S. 49th Ave	[illegible]
Ken Williams		6831 W. Carter Rd Laveen 85339	
Ethel Williams		6831 W Carter Rd Laveen 85339	
Vickie Mionskowski		4517 W. Hasan Dr. Laveen 85339	Vmionskowski@yahoo.com
Angie Escobedo	Angie Escobedo	1734 N Lydia Lane 85041	
Jesse Escobedo	Jesse Escobedo	" " "	
Vonnie Garcia		8806 S 18th Drive Phx Az 85041	garciavonnie@gmail.com
Rafaela Gutierrez	Rafaela Gutierrez	8806 S 18th Dr Phx Az 85041	

Comment Document

Code	Comment Document
1	

State of Arizona Likely Voter Survey
Ahwatukee/Laveen Corridor Survey Toplines
N=300

Age Group:
11.0% 18-29
17.0% 30-39
22.0% 40-49
32.0% 50-64
18.0% 65+

Sex:

48.0% Male
52.0% Female

Party:
36.0% Republican
39.0% Democrat
25.0% Independent/Other

Area:
28.0% 85044 - Ahwatukee
7.0% 85045 - Ahwatukee
25.0% 85048 - Ahwatukee
15.0% 85041 - Laveen
10.0% 85043 - Laveen
15.0% 85339 - Laveen

Hello, may I speak to_____ **[Speak Only to Voter on List]**. Hello, my name is _____ . I'm calling from _____. We are not selling anything, but are conducting a survey on some important issues and would like to ask you a few questions. Your name was chosen at random by computer and your answers are completely confidential.

Q. In general, would you say that Maricopa County is heading in the right direction, or off on the wrong track? **[IF RIGHT/WRONG: Would that be definitely right/wrong or probably right/wrong?]**

9.0% Definitely right direction
43.0% Probably right direction
9.3% Probably wrong track
13.0% Definitely wrong track
25.7% Don't know, refused

Q. The proposed South Mountain freeway planned along Pecos road through part of South Mountain Park and north along 51st Avenue has been twice approved by the voters, once in 1985 and again in 2004. The funding for the freeway is available through the voter approved plan. Knowing just what you know today, do you support or oppose the construction of the South Mountain freeway? **[Strongly/somewhat]**

28.3% Strongly Oppose
6.7% Somewhat Oppose
2.7% Neutral
13.7% Somewhat Support
45.3% Strongly Support
3.3% No Opinion, Refused

Just to help us tabulate our data:

Q. Did I reach you on a:

49.7% Home telephone
47.7% Cellular telephone
1.0% Office telephone
0.7% Other
1.0% Refused

Code	Issue	Response
1		**Comment noted.**

Comment Document

State of Arizona Likely Voter Survey
Maricopa County Survey – Toplines
N=400

Age Group:
10.0% 18-29
14.0% 30-39
20.0% 40-49
31.0% 50-64
25.0% 65+

Sex:
48.0% Male
52.0% Female

Party:
44.3% Republican
34.5% Democrat
21.2% Independent/Other

Area:
22.3 % District 1
22.7 % District 2
21.0 % District 3
23.7 % District 4
10.3 % District 5

Hello, may I speak to_____ **[Speak Only to Voter on List]**. Hello, my name is _____ . I'm calling from _____. We are not selling anything, but are conducting a survey on some important issues and would like to ask you a few questions. Your name was chosen at random by computer and your answers are completely confidential.

Q. In general, would you say that Maricopa County is heading in the right direction, or off on the wrong track? **[IF RIGHT/WRONG: Would that be definitely right/wrong or probably right/wrong?]**

11.8% Definitely right direction
41.3% Probably right direction
10.3% Probably wrong track
11.0% Definitely wrong track
25.8% Don't know, refused

Q. Which of the following do you consider the largest challenge facing the Maricopa County today? **[Rotate options]**

26.3% Illegal Immigration
23.0% Education funding
14.3% Political turmoil and infighting
11.0% Creating Jobs
7.0% Balancing the County Budget
5.8% Healthcare
3.3% Taxes
3.3% Traffic congestion
3.3% Don't Know, Refused
3.0% Other

Q. The proposed South Mountain freeway planned along Pecos road through part of South Mountain Park and north along 51st Avenue has been twice approved by the voters, once in 1985 and again in 2004. The funding for the freeway is available through the voter approved plan. Knowing just what you know today, do you support or oppose the construction of the South Mountain freeway? **[Strongly/somewhat]**

9.8% Strongly Oppose
9.8% Somewhat Oppose
11.8% Neutral
23.3% Somewhat Support
41.0% Strongly Support
4.5% No Opinion, Refused

Comment Document

Q. How long have you lived in the State of Arizona?

1.3% 5 years or less
11.3% 6 to 10 years
15.7% 11 to 15 years
13.7% 16 years to 20 years
57.3% Longer than 20 years
0.7% Refused

Q. In politics, do you consider yourself to be conservative, moderate, or liberal? [Wait for response. If conservative or liberal, ask:] Would that be very conservative/liberal or just somewhat conservative/liberal?

17.7% Very Conservative
17.7% Somewhat Conservative
32.3% Moderate
11.7% Somewhat Liberal
9.3% Very Liberal
11.3% Don't Know, Refused

Comment Document

Q. Next, I am going to read two statements. Please tell me which statement opinion is closer to your own opinion. **[Rotate 1 and 2]**

(1) Citizen Smith says in 1985 voters approved the South Mountain Freeway. In 2004, voters overwhelmingly affirmed that vote by approving the South Mountain once again. It doesn't make sense that a small number of people can block the will of the voters. We need to finish building the entire freeway system, which includes the South Mountain bypass.

(2) Citizen Jones says the South Mountain Freeway Project is opposed by the Gila River Indian Community and a broad coalition of neighbors and others who would be negatively impacted by the project. Placing the freeway down Pecos would destroy neighborhoods, threaten the South Mountain preserve, create smog, and hurt endangered wild life in the area. It is time to close the book on the South Mountain Freeway and find an alternate bypass route.

Which viewpoint comes closer to your own - that of Citizen Smith who supports the freeway OR that of Citizen Jones who opposes it?

65.3% Smith (supports)
22.8% Jones (opposes)
6.0% Neither
6.0% Other, Don't Know

Finally, just to help us tabulate our data:

Q. Did I reach you on a:

53.0% Home telephone
42.3% Cellular telephone
1.8% Office telephone
1.0% Other
2.0% Refused

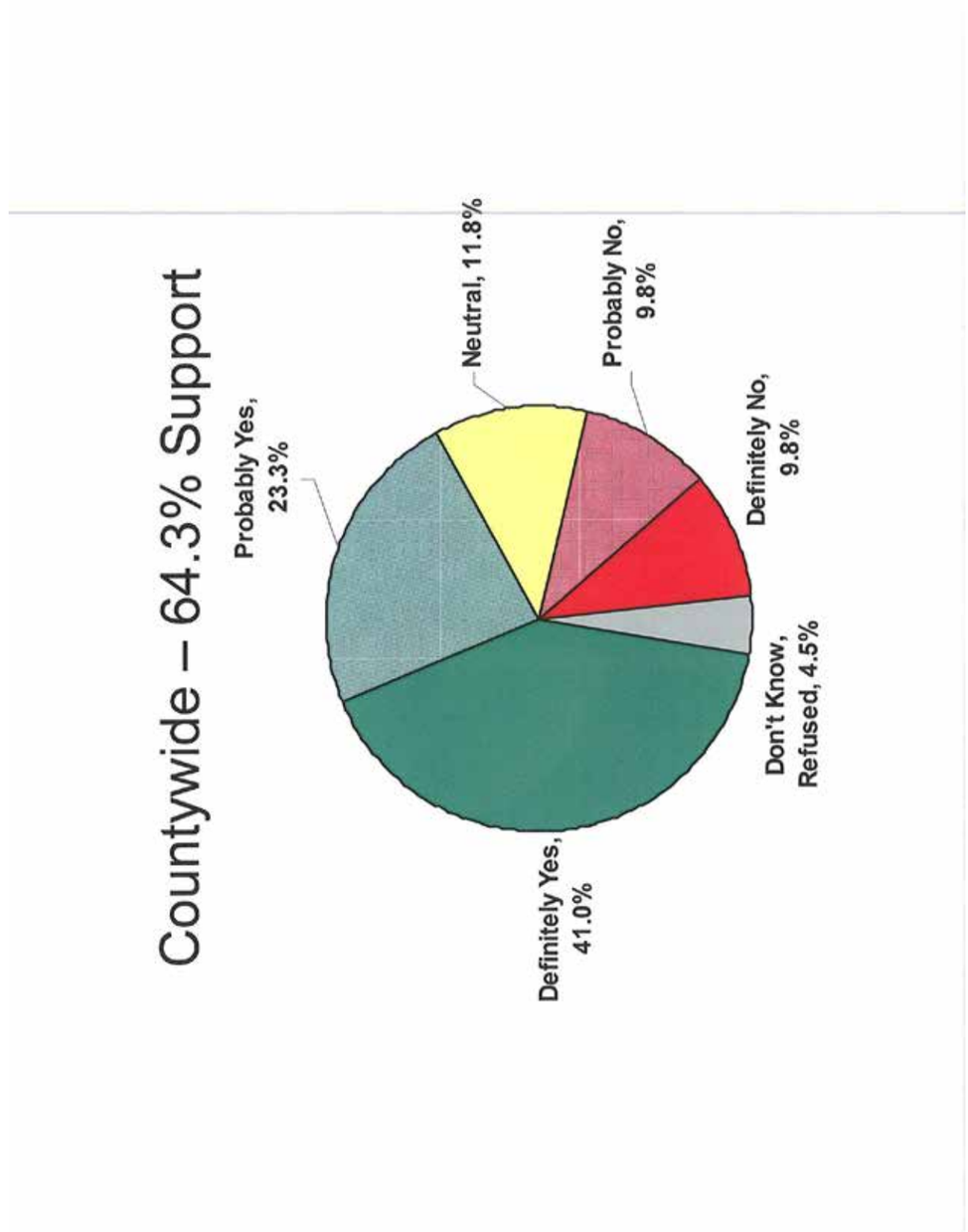
Q. How long have you lived in the State of Arizona?

3.5% 5 years or less
11.8% 6 to 10 years
13.8% 11 to 15 years
10.8% 16 years to 20 years
58.3% Longer than 20 years
2.0% Refused

Q. In politics, do you consider yourself to be conservative, moderate, or liberal? [Wait for response. If conservative or liberal, ask:] Would that be very conservative/liberal or just somewhat conservative/liberal?

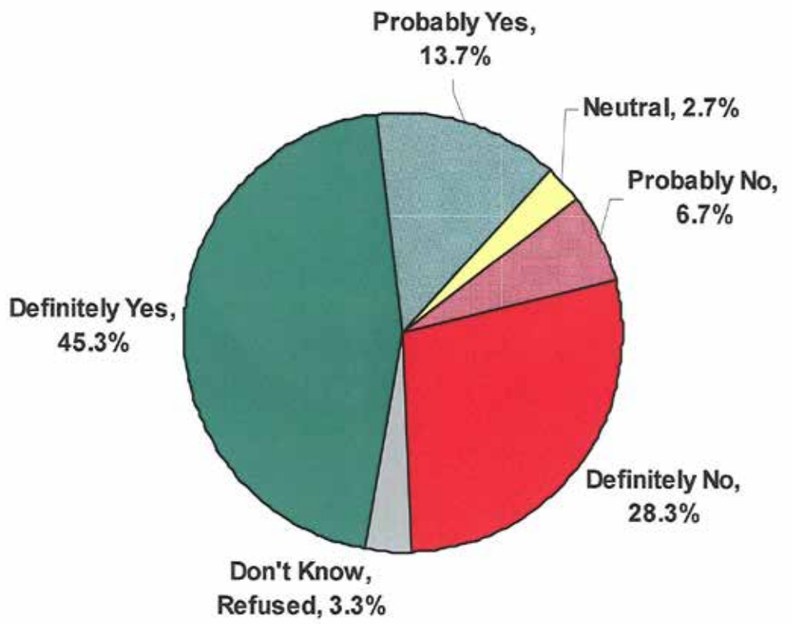
20.0% Very Conservative
18.8% Somewhat Conservative
33.0% Moderate
12.8% Somewhat Liberal
8.8% Very Liberal
6.8% Don't Know, Refused

Comment Document



Comment Document

Ahwatukee/Laveen – 59.0% support



Comment Document

CITIZEN COMMENTS AND RESPONSES

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 15, 2013 3:30:27 PM

From: Ryan A. Abbott [mailto:Raabbott@sundt.com]
Sent: Wednesday, May 15, 2013 3:28 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

BUILD THE SOUTH MOUNTAIN FREEWAY!!!! We thread together the inland empire with the Gulf of Mexico.

Ryan Abbott
Sundt Construction, Inc.
Cell: (602) 725-4995
Fax: (480) 629-0231
raabbott@sundt.com

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

affecting this proposed freeway.

Also, the second issue is that this is a unique freeway in that it connects the north part of I-10 to the south, which is a bypass or a wraparound that makes all interstate traffic and truckers going through the Ahwatukee area and having congestion at the end of the road, where there is already major congestion from the 202 freeway, and there's miles and miles of stop-and-go traffic on the way to Maricopa, on the way to Sun City, and to the casino at that location.

I have a much longer statement that I would like to put into the information that's being collected today. I greatly oppose this freeway.

THE FACILITATOR: Thank you, Ms. Sampson.

MS. SAMPSON: Thank you.

THE FACILITATOR: Linda Abegg. Good afternoon. Did I pronounce your name right?

MS. ABEGG: Yes, you did.

THE FACILITATOR: Ms. Abegg, you have three minutes, there's a timer right down here. Begin, please.

1 MS. ABEGG: I just wanted to say that I'm in support of building the 202 freeway. I live in Laveen, I have been there for about six or seven years, I think that this would benefit our community in bringing more of the amenities and things that our community is lacking

Code	Issue	Response
1		Comment noted.

Code	Comment Document

and help us to -- I feel like Laveen is somewhat at a crossroads and we can move forward to be a good community for our families. Or if it stays kind of stagnant where it is, that it's not going to be as good of a place for people with families trying to improve their community, so I support the freeway coming through. Thank you.

THE FACILITATOR: Thank you.

David Gould.

MR. GOULD: I hope this is not the walk of shame.

THE FACILITATOR: Not at all.

MR. GOULD: It's a lovely facility you have here. I'm from Maine and we don't have anything like this up there. Bear with me until I get my question.

THE FACILITATOR: Mr. Gould, before you begin, this is not a Q-and-A session, it's a --

MR. GOULD: I'm kind of hard of hearing, I apologize.

THE FACILITATOR: Yes. This is not a question-and-answer session, it's merely to gather your comments.

MR. GOULD: All right.

THE FACILITATOR: And you have three minutes and the timer is right there. Begin, please.

MR. GOULD: Okay. Well, there are a lot of

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 1:37 PM
CALLER: KATHY ABRAHMS	CALLER ADDRESS: 20426 NORTH 38TH DRIVE
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
And I am in support of the freeway, thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, June 24, 2013 9:05:50 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: DADAIR3015@aol.com [mailto:DADAIR3015@aol.com]
Sent: Saturday, June 22, 2013 8:24 AM
To: Projects
Subject: South Mountain Freeway

The whiners protesting the freeway have forgotten that the original purpose of the interstate was modeled on the German Autobahn, and while a convenience to motorists its primary use was for military mobility.

1 The people like, Greta Rogers, Jim Jochims, Steve Brittle, et.al; need to get a grip with reality. We need the extension to insure we have adequate means of egress in case of emergency evacuation and to mediate the problems with I-10, the Broadway Curve and to create a bypass for those not wanting to go 'downtown' but continue western routing.

This issue is not about personal desires but what is best for the metropolitan area and best for Phoenix.

Dennis E. Adair
5229 East Tamblo Drive
Phoenix 85044 (Ahwatukee)
dadair3015@aol.com
480 734 6368

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:55 PM
CALLER: JOHN ADAMCZYK	CALLER ADDRESS: 2328 WEST OBISPO AVENUE, MESA, AZ 85202
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in favor of the freeway going through South Mountain. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:34 PM
CALLER: FLORENCE ADOMOLEY	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Please go with the new freeway that's gonna connect our way to Tucson. We need it. Thank you very much.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 3:13 PM
CALLER: MARY AGEE	CALLER ADDRESS: 1719 S. PARKSITE DRIVE, TEMPE, AZ 85281
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the planning and construction of the South Mountain Freeway. It's important to reduce traffic congestion and the accidents that happen during the morning and evening rush hours.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Swati Aggarwal Document Created: 7/21/2013 9:13:39 AM by Web Comment Form Very good study. I hope the freeway gets built very soon.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Document Created: 7/23/2013 9:08:01 PM by Web Comment Form

1
2 3

I am writing to state my opposition for the proposed expansion of Loop 202/ South Mountain Freeway. I want to advocate " no built" as only the option that preserves the environment, health of Laveen & Ahwatukee resident & respects O'dham traditions.
Sencerely,
Rebecca Aguayo

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Cultural Resources**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comment on Proposed Loop 202 (South Mountain Freeway)
Date: Wednesday, July 24, 2013 10:55:31 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT
Communications

From: Mary Ellen Ahearn [mailto:quaildove@gmail.com]
Sent: Wednesday, July 24, 2013 10:53 AM
To: Projects
Subject: Comment on Proposed Loop 202 (South Mountain Freeway)

1 South Mountain Park would be irreparably harmed by having a major freeway crossing (or even close to) its western boundary. NO BUILD is the best option for the proposed Loop 202 Freeway extension.

2 As a resident of Ahwatukee, I urge that this project not go forward. A massive freeway just south of Ahwatukee will have negative consequences for our community and for South Mountain Park.

3 Vehicle exhaust – including noxious diesel fumes – from a massive freeway would foul the air in our neighborhood and in the park. Any expectation that the project would reduce regional air pollution simply reflects spreading that pollution into Ahwatukee. We don't want it. This would reduce the attractiveness of Ahwatukee as a place to live. If Ahwatukee becomes as hazy as the rest of Phoenix, property values here will suffer.

4

5 Additional traffic on a major freeway to our south and west would inevitably increase traffic in our neighborhoods – quite simply, there would be more cars in the area if a freeway is wrapped around us. Traffic here is bad enough as it is. Cut-through drivers would be speeding down our streets (endangering

(Comment codes continue on next page)

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, No-Action (No-Build) Alternative**	
3	**Air Quality**	
4	**Property Values**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
5	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
6	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
7	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

children, pedestrians and cyclists) when they realize that speed limits are not enforced in our residential neighborhoods.

The proposed project has many negatives for Ahwatukee and South Mountain, and precious few positives. The main positive results of this project would accrue to developers who would profit by increasing suburban sprawl, and to the firms that build the road. These profits would come at the expense of reduced quality of life in Ahwatukee.

6

Ahwatukee does not need or want increased air pollution and traffic. Yes, these will increase with time anyway, but they would increase to a greater degree (and sooner) with the 202 extension in our backyard.

7 3

South Mountain Park is a valuable asset to Phoenix and should not be degraded by placing a major freeway at its western boundary. NO BUILD is the only acceptable option for Ahwatukee and South Mountain Park.

1

Mary Ellen Ahearn, MS
Ahwatukee, Phoenix, AZ

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Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 10:45 AM
CALLER: AHMED	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support South Mountain 202. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Ray Albano Document Created: 6/4/2013 7:28:17 PM by Web Comment Form Please build the South Mountain Loop 202 connection. It will not only relieve the traffic on the I-10 but will benefit all the areas the freeway will pass thru. PLEASE PLEASE PLEASE!Ry

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	G Albano Document Created: 6/4/2013 7:55:35 PM by Web Comment Form Please build this freeway for environmental issues. It is detrimental that a freeway be built as such in an ever developing city where growth is necessary.It will relieve traffic and cut travel time, especially for the people in Laveen and surrounding areas that do not have the luxury of a close freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 3:12 PM
CALLER: JAMES ALBERTS	CALLER ADDRESS: 13015 N. JOAN DE ARC, PHOENIX, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I totally support the freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 10:09 AM
CALLER: JAMES ALBERTSON	CALLER ADDRESS: 1580 W. OAKLAND STREET, CHANDLER, AZ 85224
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I am in favor of the Loop 202. Thanks.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Alcumbrac

Document Created: 5/21/2013 5:10:09 PM by Web Comment Form

1

This Project is the completion of a great plan put in motion over two decades ago. It is imperative that the last leg of the program be completed. Without this leg of the 202 completed the congestion and ultimately the loss of commerce for the Valley is garanteed. My only comment on the preferred alignment is that with the 59th alignment the all vehicles that are using I-10 to 202S leg to bypass the core of the valley will still have have to travel deep into the city to gain access. The 101 alignments seems to be a better chose and will also gain easier access to the 101 corridor.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Mary Aldham Document Created: 5/21/2013 8:39:04 PM by Web Comment Form Hi there. I am a resident of Laveen. My husband and I chose Laveen because it was a great community. Having lived here for a year, it is evident that a freeway is much needed. You have professionals that have moved to Laveen either for the highly ranked schools for their kids, or for that small town sense of community on the outskirts of a big city... whatever the reason, without the 202, we all feel a sense of disconnect. Disconnect from shops, specialty grocery stores, malls, but most importantly, life-saving establishments such as hospitals, clinics, etc. The 202 is gravely needed. The 202 will ensure that we will not have to drive 30 minutes to go to the hospital. We won't have to drive a wasted 45 minutes to get to Chandler or Awhatukee. Most importantly, we won't have to waste time driving in grid-locked surface streets, such as Baseline to get to work. Please build the 202!!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

of three announcements. The last shuttle will be leaving at 7:30 for all routes, that's the orange, green, and blue routes or 1, 2, and 3. Again, the last shuttle will leave at 7:30. Thank you.

Mary Aldham.

MS. ALDHAM: Hi, I just want to tell you I live in Laveen; I am pro 202. We -- my husband and I moved to Laveen a year ago, and just because we love the community, we thought it was a great -- there was a great sense of community. We've been living there a year. The community is still very tight, but everybody in the community feels a sense of disconnect. They feel that -- I feel that we're disconnected from a lot of things, shops, restaurants, hospitals, like, and I go to work and, you know, I have to take surface roads. We have to take surface roads wherever we go, and it's grid-locked, stop, start, stop, start. Lots of traffic. And the lady that spoke just before me, she wanted you to consider the area that she lives in, the traffic. Well, we deal with the traffic every day. That's why we need the 202. We don't want to feel a sense of disconnect. I don't want to know that if I get sick or something like that, it's going to take 25 minutes to get to a hospital.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

So I -- I'm here in support of the 202. Just one of your statistics, people are talking about sacred land and so forth and South Mountain preservation land, taking your statistics, it's only going take .2 percent, which is 31 acres of the 16,600 acres of South Mountain Park.

So that's completely minimal. And, anyway, thank you for my -- for considering. Thank you.

THE FACILITATOR: Thank you.

If anybody out there would like to speak, please go out front and register at the front desk and then come on back in.

Before we call the next person up, the last shuttle will be leaving for all destinations at 7:30, that's orange, green, and blue or 1, 2, and 3.

Claudia "Leeschen," Leischen.

MS. LEISCHEN: Leischen.

THE FACILITATOR: Leischen. Would you mind using this other microphone, please.

MS. LEISCHEN: I wrote my statement. I live in Central Phoenix, just near Baseline and Central. As you know, Baseline is the main corridor for people who live in Laveen and work or shop in the East Valley. I suspect that an interchange on the proposed freeway at Baseline will now funnel even

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 South Mt. Loop
Date: Wednesday, May 22, 2013 10:52:41 AM

-----Original Message-----
From: Kathy Aleman [mailto:kathya@swproperties.com]
Sent: Tuesday, May 21, 2013 9:03 AM
To: Projects
Subject: 202 South Mt. Loop

ADOT,

1

Please continue to push forward with getting this important piece of the Phoenix freeway system designed & built. It is crucial to open up our down town to only the necessary traffic & get give the rest of us an option from funneling thru the neck at the Broadway curve. It's a crazy waste of time & energy for all.

The 60 & the rest of 202 is so wonderful now let's get an answer for that part of town & those passing thru Phoenix an option.

Thank you.

Kathy Aleman
Gilbert, Arizona

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:23 PM
CALLER: ALI ALI	ADDRESS: 1885 E. RIDGE DRIVE, TEMPE, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the Loop completely, the Loop 202 South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 was a promise
Date: Friday, May 24, 2013 8:42:00 AM

-----Original Message-----
From: Bill & Sue Alkema [mailto:all4alkema@cox.net]
Sent: Thursday, May 23, 2013 9:32 PM
To: Projects
Subject: Loop 202 was a promise

1

My husband and I attended the public hearing on the EIS draft last Tuesday in support of the continuation of the 202 but had a couple of questions. The video and the displays were very informative and the representatives were very helpful in answering those questions. We left feeling more confident that this freeway will finally be completed.

When we purchased our house in Ahwatukee in 2000, we were informed of and promised that the Loop 202 would eventually be completed. That was a deciding factor in the location of the home we chose. Following, in our opinion, are areas where this continuation of the 202 would be an asset.

FOR THE VALLEY - It will reduce the traffic throughout the city on the I-10 by drivers heading to the southeast of the Valley or out of the Valley towards Tucson and vice versa. It will also be another option when there are freeway closures or accidents on the I-10... which are often.

FOR AHWATUKEE - It will relieve the traffic for residents that have to commute during rush hour into the City, because those residing in the Desert Foothills would probably choose to exit Ahwatukee on the west end. Today at rush hour we sit in a parking lot on the I-10 from Chandler Boulevard to the Broadway curve. Also, our businesses might see more activity since the West Valley would now have easier access to our area's services and restaurants. But probably the biggest asset would be that many residents of Ahwatukee would save around 15 minutes or more driving time to the West Valley. And with high gas prices, saving 15 minutes is huge.

Susan and Bill Alkema
480-704-1441

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:38:42 AM

-----Original Message-----
From: Robert Allen [mailto:onerjallen@aol.com]
Sent: Saturday, May 11, 2013 4:25 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I completely support SMF. It should have happened years ago!

Sent from my iPad
Robert Allen

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Denise Allen
To: Projects
Subject: Freeway
Date: Tuesday, June 11, 2013 5:40:25 PM

1 2 3 4

As a parent in the Ahwatukee Foothills I am disheartened by the ruin of our community by adding a truck bypass, which is all this is, down Pecos. The pollution, noise and crime this will bring to our community is sad. My home will be affected by the all of the above. There has got to be a better route.

Denise Allen

Sent from my iPhone
Denise

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	
4	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. STOP negotiations with The GILA RIVER INDIAN TRIBE IF "NOT a YES" on the freeway BY NOW on their Land, Heres the answer; THEY DONT WANT IT. SO Dont WASTE Any more Time, And JUST FINALLY BUILD the freeway, or rather START BUILDING THE FREEWAY

1

Optional

Name Luther Allen Email Lgallen32@Gmail.com

Address

City State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-100

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

Luther Allen.

MR. ALLEN: Hi, I'm Luther Allen. I'm a recent graduate at the University of Arizona, and I got my degree in urban development, which involves a lot of what you guys do. I've been following this project for years, and it is feasible that something like this gets built, because being that, you know, Phoenix has basically hardly any bypass routes and Interstate 10 is basically getting congested on -- it seems like on a monthly basis, and there needs to be a reliever, you know, some airspace, other routes for traffic to go. And this would be great.

Now, this ain't something that's cropped up overnight. I know the residents of Ahwatukee may say otherwise about this, but this has been for planned in years. As a matter of fact, I have a map here that shows that this project is -- well, this is 1986, this was called the Southwest Loop, and now it's called the South Mountain Freeway. This was planned for years, long before Ahwatukee became what it is today.

So, now, I think the developers, you know, it's unfortunate that they didn't give the residents of Ahwatukee proper notice, or whatever information that the proposed freeways was going to

Code	Issue	Response
1		Comment noted.

Code	Comment Document

be in the making, you know, a few miles to the south of where they live, but the fact of the matter is, you know, this highway project is needed.

Now, I understand that, you know, you guys are negotiating with the Indian tribe called the Gila River to the south, since then the Proposition 400 taxes passed, If they haven't said yes by now, you know -- I understand you guys have been back and forth in negotiations with them -- if they haven't said yes by now, you know, I think they don't want it. So it's time to, you know, quit wasting time, move on, build this thing, because the longer you wait to build it, the more construction costs are going to skyrocket, and that's what we don't need right now today. And, what, another form of tax revenue will need to be passed to allow for more funding, so I say, get busy, build this thing, because it's desperately needed.

Now, the Proposition 400, you know, included, you know, this freeway project was included in those plans. And this is what the voters wanted, so I think it's time to, you know, give them what they wanted, and just, you know, stop negotiating, and build this thing. And that's all I got. Thank you.

Code	Issue	Response

Code	Comment Document

This environmental impact draft study doesn't seem to think that it will worsen the air quality on the sensor that's on 43rd Avenue, which will be two to three miles away from this construction. So it really needs to be understood that it could -- could risk Arizona losing its federal funds. And then the City and our citizens will have to pay the bill. This could turn into one of the more expensive highways. And I think a separate study of that impact is very, very important before we go to the final phase of the environmental study.

So thank you very much for your time. I appreciate the opportunity to comment.

MR. SMITH: They've already spent a lot of money studying this thing, right? And they might as well finish the project or a lot of people's work has been wasted already.

And as far as alignments go, I think, even though the one that's more expensive, that would link up to the 101, is probably a better option in the long run, even though it looks like it might be more expensive now. I don't think I have anything else to say.

MR. STROOP: Well, I just wanted to say that I am a Laveen resident and that I am for the proposal to build the freeway in any of the capacities that I saw today. I don't really have a preference on an alternative, but I would prefer it to get built as soon as possible.

MR. ALLEN: I don't know what ADOT's plans for

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(Comment codes begin on next page)

Code	Issue	Response

(Responses begin on next page)

Code	Comment Document

1

the -- for the 101 -- or I mean the 202 merging into the I-10, as far as lane -- you know, lanes merging, you know, lanes from the 202 merging into the 10.

But what I think is that lanes from the 202 should stay -- you know, should stay as extra lanes. Instead of merging in, just stay as extra lanes on Interstate 10 until they get to the 101, which is, like, another four miles westward, because some of that traffic coming from northbound 202 is going to want to connect with 101 going south instead of going to an Arizona Cardinals game.

So they're not going to have -- They're probably not going to have -- They're not going to have a purpose to merge onto the Interstate 10 and then merge back onto the -- you know, merge back to the right to get onto the 101. So they should just keep those lanes off of 202 as additional lanes, all the way out to the 101, and then maybe points further west. And then, after the 101, then that's when they should merge into the -- into what's existing on the Interstate 10, you know.

Because, the way I understand it now, it's going to merge some point, you know, a couple miles after -- a mile or so after the 202/Interstate 10 junction. And that's just going to create a traffic nightmare like the Broadway Curve. So but, if they keep the lanes -- keep them as additional lanes, all the way out to the 101, then I think that would be -- that

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Code	Issue	Response
1	**Design**	The construction of the proposed freeway would include widening along Interstate 10 to facilitate the entrance and exit of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26 on page 3-49 and Figure 3-29 on page 3-53 of the Final Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 was developed in accordance with Federal Highway Administration's Interstate System Access Informational Guide and has received an initial determination of operational and engineering acceptability from Federal Highway Administration.

Code	Comment Document

would be feasible. And that's what I've got.
MR. HAMILTON: I just did a comment via the computer, but I thought of something else.
COURT REPORTER: Okay. What is it?
MR. HAMILTON: You mean, specifically, my comment?
COURT REPORTER: Yes.
MR. HAMILTON: I would like ADOT to keep the preferred route, the purple route, in the west end. That's the only -- That's the only thing I forgot to add to my original comment.
MR. BRENNAN: Okay. So I already spoke inside, regarding some of the impacts specifically with traffic.
Oh, you have to do every stutter and "Oh," don't you? I'm sorry.
Traffic, particularly with existing traffic conditions with the trucks, the warehousing and shipping business located to the north of Laveen, currently using 51st Avenue going south, as well as spilling over frequently onto our surface streets like Baseline Road, as well as whenever traffic incidents slow traffic on the I-10, which pushes traffic onto our surface streets, and I think that that creates a negative impact on both the Laveen community as well as the rest of the South Mountain/South Phoenix area, which is where I presently live, and have previously lived in Laveen and remain fairly active in that part of the South Phoenix

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(Comments made by public members to the court reporter as follows:)

MR. HARTLEY: My name is Chad Hartley, Gilbert, Arizona. I travel the Santan on 202 daily towards 32nd Street and I-10.

I believe the Broadway Curve to be dangerous due to high congestion that it sees in the morning and the afternoon.

To alleviate that with the new 202 would be -- I support the construction to alleviate the congestion and the -- I believe it would help alleviate the -- I don't know how to say -- the dangerous Broadway Curve.

Thank you so much for your time.

1 LAWRENCE ALLEN: Lawrence Allen. Basically this South Mountain Freeway has been in place since early 1980s. You know, this map dates back to, what, 1986. So we might as well go back to 1980. So these are plans. So they had to, you know, think about this for a few years to actually put it on paper.

So this ain't something that cropped up yesterday, as the Ahwatukee residents are probably thinking. Now, it's unfortunate that the developers who built Ahwatukee where those residents live that

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

they weren't given the proper information from the developers, because I think the developers are more concerned about their pocketbook; or, you know, there may be rules where they had to disclose it. But I pretty much think the developers had a way of going around it without eking out the fine details.

So I think that, you know, the developers they didn't want to leak that information to the residents and say, "Oh, nothing is going to happen here, so let's just move right in." Lo and behold, you know, Phoenix grew to be the 5th largest city in the nation. You know, we were past Philadelphia a couple of years ago in terms of population alone.

So, yes, we need some bypass routes, because Interstate 10 is getting congested on a monthly basis. And there needs to be some more space on the freeway.

And if I am going from Southeast Valley to, let's say, going to Arizona Cardinals game, I don't want to drive through Central Phoenix if I don't have to. I don't want to drive through downtown if I don't have to. I want to bypass that route and avoid that whole area altogether, if I had to chose. But being Phoenix is so big as it is, we need that so desperate.

Now, the Indian tribe that ADOT has been negotiating with for, you know, what, five or six

Code	Issue	Response

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years, they have been back and forth: Well, maybe we should; maybe we shouldn't; maybe we will look at this. If they haven't said a definitely yes by now, they don't want it.

So ADOT needs to quit stalling with them and build this thing and stop wasting time. The longer they wait, the more construction is going to be. And then, what? We need another proposition sales tax to provide more funding?

So hopefully ADOT kind of comes to a conclusion that, you know, let's build this thing yesterday and, you know, get this thing built before, you know, something else comes through the cracks.

And that's pretty much all I've got.

Well, there's another concern that a few ridges of South Mountain Park will be taken out. Please. What portion of the park do 100 percent of the population visit? They visit the part that you come in, come in southbound on Central Avenue, on the other side of Ahwatukee. They don't go to that little itsy-bitsty, teeny-weeny little southwestern portion of the park. There's not even a road over there. They go to the other side.

So for them to say that cutting out a few small ridges of the park would be devastating, that's

Code	Issue	Response

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just completely bogus, because nobody visits that portion of the park anyway. It's very insignificant.

You know, if they want -- otherwise, how did Squaw Peak -- or actually Piestewa Freeway -- how did that get through. When you go through there, you see big ridges on either side of the freeway. So they -- you know, look, how about that? Either that, why don't we just take out that road and replace it to what it was before?

But to say a few ridges of the least-used portion of the park would be devastating, it just -- it's just, what do you say, really stupid, I would say.

And that's what I wanted to add; it's just insignificant.

MICHAEL MOSS: I live in the path of the freeway, in Laveen. And I have lived there most of my life. And the traffic over the last ten years has just doubled on the surface streets: on 16th, on Baseline Road, 51st Avenue, 67th Avenue, 91st Avenue.

So many people when the freeway I-10 plugs up, they go to the surface streets. And there's accidents and there's just major traffic. They go to the surface streets. They ditch off of I-10. If they're going to the east, they ditch off at 91st or 67th Avenue, which takes them to Baseline Road. And

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Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:38:48 AM

-----Original Message-----
From: Michael Allison [mailto:jalli87583@icloud.com]
Sent: Saturday, May 11, 2013 10:16 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

We have to constantly keep our interstates and streets able to handle the influx of people and new communities. I just spent 4 months in Indianapolis and their traffic and roads were not well planned for and it was very frustrating to sit in traffic everyday because the city planners thought that a new football stadium and a new airport were more important. I love Arizona and would hate to see it look anything like Indianapolis. You have done a wonderful job with the interstate systems we have today but now is not the time to drop the ball. Build the 202!

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 freeway
Date: Monday, May 20, 2013 8:23:46 AM

-----Original Message-----
From: Michael Allison [mailto:jalli87583@icloud.com]
Sent: Sunday, May 19, 2013 2:12 PM
To: Projects
Subject: 202 freeway

1 At this point I am proud of the interstate system here in the Phoenix area but it will not stay that way if we don't keep up with the growth. I just spent 3 months in Indiana caring for my aging parents and I guarantee you that if you drive you do not want our city to become like Indianapolis. The gridlock there is horrible and it is a pain to even go grocery shopping. The state government in Indiana would rather spend their money on frivolous stadiums and airports that are not needed. The roads were not planned well there to start with and some are still the same as they were when I was a young man in the 50's and 60's. Let's keep the Phoenix area a place that we can all be proud of. Life is stressful enough without having to sit in traffic for 2 hours every day. Thank you for your time, Michael Allison

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

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2
3

***

THE REPORTER: Please state your name.

MR. ALLISON: Matthew Allison.

I'm pretty much here today to put my comment to say no against the build 202. The reason I'm dressed as a zombie is that the air quality and the environmental state and just being our native culture of O'odham people, this will take a lot away from us as our people, as our mountain is sacred to our land. And I just would like to state that I would really strongly -- for the people to really look at the stand that we're trying to make. And we may be young and growing to come against this, but to me that's the start of us to grow as people and reclaim our land and reclaim our culture to rebuild it again, because it is -- it has been kind of lost, in a way, but we are trying to come and reclaim it back. And pretty much saying, it hasn't been lost.

That's all I want to say. Thank you.

THE REPORTER: Thank you.

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Cultural Resources**	

Code	Comment Document

From: Patricia Talcott
To: ADOT
Cc: Patricia Talcott
Subject: ENVOY #1314826854
Date: Tuesday, May 28, 2013 9:02:31 AM
Attachments: image001.png

The following was received on the ADOT ENVOY System:

Proposed Freeway
5/28/2013 7:22:33 AM
I recently lost my husband and can no longer afford my home at the above address. I have it listed wihtout any interest whatsoever. It would help me to know that if the freeway goes down Pecos, will this address be one to be eliminated. Thank you for your time. Joycxe Allred
Allred, Joyce - jallred@cox.net

Thank you.

Patricia A. Talcott
Program Project Specialist II
206 S. 17th Avenue, Room 101, MD118A
Phoenix, AZ 85007
602.712.7610
www.azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Aerial maps showing the proposed freeway (W59 and E1 *Alternatives*) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:38 PM
CALLER: CHARLES ALTENBERN	ADDRESS: GILBERT, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am 100% in favor of the South Mountain Freeway expansion across Pecos. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Thursday, June 13, 2013 1:25:28 PM

From: Richard and Jacque Alvarado [mailto:randjalvarado@yahoo.com]
Sent: Thursday, June 13, 2013 1:02 PM
To: Projects
Subject: South Mountain Freeway

Hi there,

1

We are absolutely in support of building the final phase of the Loop 202! As Laveen residents for just over a year now, we are excited to see how things are developing here. We fell in love with the "small-town" feel of the Laveen community, having participated in the annual parade, Laveen 5k, Laveen Turkey Trot and more this year, and we love getting to know people within our community. We dislike, however, the traffic heading down 51st Avenue, not to mention other major streets, on our daily commutes, and the congestion it causes around our neighborhood (at 51st Avenue and Dobbins Rd) day in and day out. Having freeway access will alleviate the traffic from the surface streets, and would actually help with pollution, getting some of the stagnant air moving. It would also provide an alternate route for semis, which really back up the surface streets in our community, as well as casino traffic, which typically uses 51st Avenue as a primary route. Basic business sense would also indicate improvement to our economy. With quick access to the area comes larger retail outfits, even opportunity for local businesses to grow and thrive, with the greater traffic flow, which, in turn, encourages residents to keep money local. I know, personally, we drive to Goodyear, Avondale, Tolleson, Ahwatukee, Tempe and Phoenix for our everyday shopping needs and HATE it! Even as just one family, this is a lot of money that could be spent within our community. If we had the opportunity to do so, at stores that would subsequently be built near the freeway, the Laveen economy would see immediate and exponential growth. We feel the Loop 202 South Mountain Freeway will be great for our community, and is necessary for its sustainability as a major Phoenix suburb.

Thank you for listening to the people of OUR community,
Richard and Jacqueline Alvarado

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

2

PROCEEDINGS

MR. ALVARADO: My name is Frank Alvarado. I just wondered if they were going to put in a light rail. It's been in the air or something. I think it could probably help with the recycling the rubber, the road as well.

Well, I need some kind of a -- help get started on the project, and there would be a lot of benefit in return. I guess I'm interested in probably rubber recycling for the freeway. And possibly putting the funds into a suspended light rail system.

Anything else? I don't know. That's where I'm at.

THE REPORTER: Okay. If you think of anything else, you're welcome to come back and speak with one of us again.

Page 2

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Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Design**	Rubberized asphalt was assumed in the Location/Design Concept Report cost estimate to further reduce noise impacts. Although not recognized by the Federal Highway Administration as mitigation, rubberized asphalt would be used as the top level of paving; it is discussed beginning on Final Environmental Impact Statement page 4-99.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 12:08 PM
CALLER: WENDY ALVERS	CALLER ADDRESS: 2741 E. BRIDGEPORT PARKWAY, GILBERT, AZ 85295
PHONE: 480-646-0491	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I absolutely, 100%, support the building of this freeway for the South Mountain Loop Freeway, and I hope it goes in sooner than later because it would really, really get rid of some of this congestion.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/15/13	INCOMING CALL TIME: 9:34 AM
CALLER: VIRGINIA ALVEY	CALLER ADDRESS: 1345 N. LAKESHORE DRIVE, CHANDLER, AZ 85226
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I approve the South Mountain Freeway. I think it would be a good thing. Thank you. Thanks. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 loop
Date: Wednesday, May 22, 2013 10:50:38 AM

-----Original Message-----
From: Amanda [mailto:amp7282@aol.com]
Sent: Tuesday, May 21, 2013 6:13 PM
To: Projects
Subject: 202 loop

1

The 202 loop is a fantastic idea. Please move forward.
Thank you,
Amanda

Sent from my Verizon Wireless 4G LTE smartphone

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2	P Amonte Document Created: 5/27/2013 11:51:42 PM by Web Comment Form Connection of this highway only poses threat to the safety and security of our children and families. We urge you not to connect the freeway system as proposed, but rather to leave the freeway system in its present state instead.

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
2	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Madhavi Anamala Document Created: 5/24/2013 12:14:48 PM by Web Comment Form I support loop 202 south

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Angela Andersen Document Created: 6/22/2013 12:45:12 PM by Web Comment Form I have lived in Ahwatukee 30 years, I still choose to live here and raise my children here because it is a great community. By putting this freeway this close to our community you will be ruining it! The village feel will be gone and along will come a ton of traffic and pollution! I am concerned the pollution from all the trucks will get "trapped" by South Mountain and we will be living in it. The impact on our community and health will be greatly impacted in a negative way on us. PLEASE MOVE THIS FREEWAY OUT AWAY FROM AHWATUKEE!!!! DON"T RUIN OUR COMMUNITY AND MY CHILDREN"S HEALTH!

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Air quality depends on several factors such as the area itself (size and topography), the prevailing weather patterns (meteorology and climate) and the pollutants released into the air. Cuts through the South Mountains would be expected to produce microclimate differences similar to those produced by a series of buildings in a large city that produce localized wind tunnel effects. The mountain cuts, however, would not affect regional air quality.

Code	Comment Document

1 2 3 4

Ryan Andersen Document Created: 6/22/2013 2:52:57 PM by Web Comment Form

I do NOT want this freeway built unless on Indian Land. I don't know why this freeway has to go on the Pecos Road plan when the Indians have plenty of unused land which would save homes, churches, pollution near schools, noise etc. I vote NO NO NO on this plan. The original plan is from 1985 at which time this plan sounded great, today not so much. Talk to the chief at the casino and get this moved and tell some politicians to do their jobs and help save peoples homes. This whole thing is just a pile of....

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Freeway
Date: Monday, May 20, 2013 8:35:37 AM

From: AZmjanderson@aol.com [mailto:AZmjanderson@aol.com]
Sent: Friday, May 17, 2013 9:34 PM
To: Projects
Subject: 202 Freeway

Attn: azdot,

1 The 202 is way past due. People driving to or from Tucson from the west can by-pass the heavy traffic in the city of Phoenix.

Thank you.

Sincerely,

Martha Anderson
azmjanderson@aol.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Timothy Anderson Document Created: 5/21/2013 2:31:42 PM by Web Comment Form I have lived in the Phoenix Metro area since 1982 and am a current Ahwatukee resident since 1998. I am a strong advocate for this freeway. I believe it should have been built years ago. We need to get more trucks off the freeways through town and also give our residents and visitors another option to get from the southern part of the valley to the west valley. I firmly believe that the construction of this freeway will improve my quality of life and the quality of life for the majority of the residents in the Phoenix area. This should also improve congestion which will ultimately reduce the air pollution from idling and slow moving commuters. Let's Build the 202!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 4:45 PM
CALLER: JOHN ANDERSON	CALLER ADDRESS: 9137 W. [UNCLEAR] DRIVE, PEORIA, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, May 14, 2013 9:48:12 AM

From: Jim Angrick [mailto:jdp-a@cox.net]
Sent: Monday, May 06, 2013 10:04 AM
To: Projects
Subject: South Mountain Freeway

1

I think that the W101 Alternative is the best option because:

1. It gathers the traffic from the north which wants to by-pass the city. This also will smoothly mesh traffic from the south on to both west bound I-10 or north loop 101.

2

2. The object is to relieve eastbound traffic on I-10. Why have more traffic build up all the way to 59th ave when much traffic could go south and by-pass the city with the W101 alternative

H. James Angrick
14230 W Domingo Ln
Sun City West, AZ 85375
jdp-a@cox.net

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Design**	The construction of the proposed freeway would include widening along Interstate 10 to facilitate the entrance and exit of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26 on page 3-49 and Figure 3-29 on page 3-53 of the Final Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 was developed in accordance with Federal Highway Administration's Interstate System Access Informational Guide and has received an initial determination of operational and engineering acceptability from Federal Highway Administration.

Code	Comment Document

Rita Anselmo Document Created: 7/23/2013 3:19:09 PM by Web Comment Form

Comments about South Mountain Impact on Ahwatukee

1 1.Better use of the Pecos Rd 202 alignment would be light rail going in both east and west directions of South Mountain and along I-10 to Tucson. Help get rid of traffic and congestion! Especially since Ahwatukee pays high taxes and doesn't even get City bus service! Well, very very limited service!

2 2.Place the 202 extension from I-10 along Queen Creek Road going west toward the City of Maricopa and prepare for the growth of the south west valley. It could then go north along the Estrella Mountains to connect at I-10. This would keep the noise, pollution, hazardous cargo etc. etc. all away from more populated areas. Also, if the road went to Maricopa, it could also connect I-8 with I-10 at a more convenient point for those going to Phoenix, Yuma, or southern California instead of south toward Tucson. It would also take some traffic off I-10 to travel along I-8 instead.

3 3.Keep the land at Pecos Road alignment for future necessity, not for main highway. Putting the proposed freeway along Pecos Road is like putting a new freeway through the middle of Paradise Valley. It would never happen for it would ruin the area!!!

4 5 4.When we moved to the Foothills of Ahwatukee in 1991, the only thing you could hear at night were the coyotes! It was so refreshing then. No dark brown cloud hanging over the area. You could breathe! Now, pollution is seen coming around the mountain and the noise from the traffic on Pecos Road wakes you up at night. I don't even live that close to the road, but the noise comes right up the slope of the land, because of the mountain, right to all

6 of the homes in the area. I can't even phantom the amount of noise pollution that all of the extra traffic and trucks would cause. I sell real estate and I know how hard it is to sell homes that are near the I-10 corridor that is routed alongside Ahwatukee between Baseline and Pecos Roads. It is so noisy!

7 5.Have you ever studied the traffic that is now on Chandler Blvd between 24th Street and the Ray Chandler Loop? During certain hours of the day it is almost impossible to make a left-hand turn out of the neighborhoods located here (from either direction), let alone try to cross the road on foot. It is extremely dangerous! What will happen when all the extra traffic being routed from the 202 to Chandler Blvd. enters this area! Do you have to wait until people are killed! This is a neighborhood area with schools, parks, bike trails, walking trails etc. that is not made for major traffic!

8 6.What about all the homes, schools, churches etc. that will have to be torn down! And what about the people that bought homes in a beautiful neighborhood only to find out that they will have to look at a freeway. If this was your home, you wouldn't like it!

9 7.Why haven't the people of Ahwatukee been able to vote on wanting or not wanting a freeway in their backyard? I can say that I don't know one person that lives here in Ahwatukee that wants a freeway in their backyard to connect around the mountain!

10 8. When there are accidents on the proposed 202 (and we know there will be) where will all of the traffic be diverted to? Bingo, onto the few streets we have in the largest cul-de-sac!!!!! Let's make it more difficult to live here. Let's make more pollution! What about the safety here? How will the residents of Ahwatukee get out if a disaster happened and the roads

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community Alignment**	
3	**Alternatives**	The proposed freeway would address the purpose and need criteria, including relieving Interstate 10 congestion. The discussion of the responsiveness of the proposed freeway to the purpose and need criteria is presented beginning on page 3-27 of the Final Environmental Impact Statement. Alternatives farther south, such as the Interstate 8/State Route 85 Alternative were considered in this study (see page 3-9 for more information). The Paradise Parkway was included in the original "Prop 300" packages of road improvements (see Figure 1-2 on page 1-6). However, it was dropped from the plan and was not included in the projects proposed in Prop 400 (the Maricopa Association of Governments *Regional Transportation Plan*). The South Mountain Freeway was part of both Prop 300 and 400 proposals.
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
5	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	
7	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
8	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

(Responses continue on next page)

Code	Comment Document
	already filled with trucks and auto congestion boxing us in on all 4 sides?
11	9.An extension of Pecos Road could be added later, but not as a main highway for trucks and hazardous materials etc. Only for local traffic.
12	10. Why take a beautiful area that people seek out to live in and destroy it while calling it progression for the future. Doesn't make any sense to me. I'm all for future plans that make sense, but not for stupidity! And this is stupidity!
13	11.It's always been said that if you follow the money you can figure out who benefits from things (ex: the alignment of the 202). One that I have noticed is the Casinos at either end of the proposed route. The Casino at the intersection of I-10 and proposed new freeway, and the other (the new Casino) at 51st Avenue right by where the proposed freeway would connect to I-10. Amazing no one has commented on this……get the tax payers to build a road to gambling meccas and we could care less about the impact on them!
	12.I haven't seen even one good reason to put the proposed 202 along Pecos Road yet. You show me the good in this! I'm very interested in finding out.

Code	Issue	Response
9	**Public Involvement**	No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period. The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400.
10	**Traffic**	Hazardous materials commodity flow studies and other information are considered by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) when developing emergency response plans. If the plan were amended, it would be made available to the Arizona Department of Transportation.
11	**Alternatives**	Extending Pecos Road through the South Mountains along the same alignment as the freeway would result in similar environmental impacts as the freeway. However, the arterial facility type would not meet the level of travel demand for this corridor (see page 3-19 of the Final Environmental Impact Statement).
12	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
13	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Friday, May 24, 2013 8:41:45 AM

From: Arlotti Family [mailto:arlotti@hotmail.com]
Sent: Thursday, May 23, 2013 9:22 PM
To: Projects
Subject: South Mountain Freeway

We oppose the freeway for so many reasons, not the least of which are:

1

1. You are exploiting Native Americans and infringing on their sacred land.

2

2. The plan includes extending Chandler Boulevard Westbound through beautiful hiking terrain on the SOuth Mountain Preserve, where new trails were JUST CREATED, and now you will destroy them and send a whole neighborhood of traffic through the pristine area to the neighborhood at the end of Pecos Rd. If this project goes through, you must create an exit for this neighborhood at the end of Pecos Road so that they do not go through the hiking area land.

3

4

3. You are being deceptive about the claim that pollution will be less with the new freeway. That is a farce for stupid people to believe who don't know any better. Adding highways has NEVER improved pollution.

5

4. Just the name tells you this project is not right - you are destroying a sacred mountain for the sake of development, when it is not absolutely necessary.

We urge you to reconsider!

Daniel and Jean Arlotti

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Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	South Mountain's newest trails are the Bursera and Pyramid Trails (see Final Environmental Impact Statement page 5-8). The E1 Alternative is approximately 1 mile south of the Pyramid Trail and even farther from the Bursera Trail; thus, it would not affect either trail. The trails have walk-in access from Chandler Boulevard and 19th Avenue, with on-street parking. This walk-in access would be north of and adjacent to the planned extension of Chandler Boulevard and, thus, would not be directly affected. The walk-in access point and the part of the Pyramid Trial at the access point are located adjacent to a residential neighborhood and the City of Phoenix's planned Chandler Boulevard Extension. These trails are typically used for high-intensity recreational activities such as running, hiking, and biking, not noise- or viewshed-sensitive activities. All proposed action alternatives would span existing and proposed trails to avoid impacts. However, during construction (if an action alternative were selected), trails that would be spanned or would be near potential freeway construction would be closed for limited times for safety reasons. Closures would necessitate that trail users detour around construction sites to rejoin the trails farther along their length. According to Phoenix South Mountain Park/Preserve rangers, the Gila Trail—although well-defined—is not a designated trail within the park. That said, the Gila Trail would not be affected by the proposed freeway or by the Chandler Boulevard Extension. The Draft Environmental Impact Statement Appendix A394 contains information directly from the Phoenix General Plan and early coordination with the City of Phoenix Parks Department. The trails in the preserve are exceptions to this statement and were always meant as such. The trails within 1/4 mile of the proposed alternatives were treated separately, as in the case of the Maricopa County Regional Trails System. Should an alternative be selected, the Arizona Department of Transportation and Federal Highway Administration would work closely with the City of Phoenix during final design to ensure the connectivity of trails is maintained, whether they are eligible as Section 4(f) resources or not.
3	**Traffic**	Impacts associated with extension of Chandler Boulevard are included in the Final Environmental Impact Statement. The new road is not located within the Phoenix South Mountain Park/Preserve boundary. The road is planned in the City of Phoenix General Plan and would be constructed eventually with or without the proposed freeway. The extension of Chandler Boulevard west of 19th Avenue is included in this project because access must be maintained to the neighborhoods at the west end of Pecos Road. Early in the study process an interchange at approximately 27th Avenue was evaluated but ultimately eliminated because of increased residential displacements and cost.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Section 4(f) and Section 6(f)**	

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 I OPPOSE THE FREEWAY EXTENSION

Optional

Name Sean Arloth Email

Address

City State Zip

Phone 602-513-6959 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: AZ Loop 202 South Mountain Freeway
Date: Tuesday, July 23, 2013 8:50:06 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT Communications

From: John Armstrong [mailto:armstrongjohna@icloud.com]
Sent: Tuesday, July 23, 2013 6:41 AM
To: Projects
Subject: AZ Loop 202 South Mountain Freeway

To whom it may concern,

1

I am a resident of Ahwatukee and I am a staunch supporter of the 202 expansion. I purchased a home there a little over year ago where my beautiful fiancee lives and it is the home that I hope some day to start a family in. I want someday my family to live in the best metro area in the US and I struggle to understand how that can happen without the 202 expansion.

In today's age and with private-political-activitst groups with their own self-serving agendas, it is so easy to find things wrong with development and progress. I hope that our leaders at ADOT recognize that this issue has a silent majority and that a boisterous few do not represent the citizens of Maricopa County.

No plan is 100% perfect but that shouldn't be the reason why a much needed project is thrown in the garbage. The Hoover Dam had its naysayers. The Chesapeake Bay Bridge-Tunnel had its critics. People at first hated the Eiffel Tower. Even the light rail in Phoenix had opponents. But it was cooler heads that prevailed and people who understood that real progress has some risks made the right decision. I sincerely hope ADOT's leaders will reconize that too.

Good luck. I wish you well in making your decision and I sincerely hope this project comes a reality.

John

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 2:22 PM
CALLER: BONNIE ARMSTRONG	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am for the freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Laurel Arndt Document Created: 6/7/2013 12:26:08 PM by Web Comment Form I have reviewed the Noise section on the DEIS. This information is not presented in a manner in which residents can compare the existing condition with the future conditions. On page 4-83, Table 4-39 shows the ambient noise monitoring results at various locations along the Eastern Section. It is relatively easy to identify where each on of the sites was located, they area pretty specific, allowing a resident to look on a map and see where the reading may have been taken. On page 4-88, Table 4-40 shows the noise analysis results that were modeled base on the proposed project. This information is useless in evaluating the change in conditions; as not only are the locations different but they do not give enough information for a resident to identify where the modeling points are. The locations identified in able 4-40 are not identifiable to the average resident. Residents to not know where "parcels" are. Why were the points in Table 4-39 not carried over and identified in Table 4-40, so a reviewer could actually see the difference before and after the proposed freeway is constructed? Why was the information but in "parcels" (Receiver ID #11-26a), this seems to cloud the analysis. The amount of information and the manner in which it is reported in Table 4-40 obfuscates the ability to evaluate the increase in noise at a one location and understand the impacts. I suggest that this Table 4-40 be redone to reflect comparative information and not just information for information's sake. The subconsultant can do the modeling at the same points which are in Table 4-39, THIS is the information which should be in Table 4-40.

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The locations used for measuring existing noise levels do not necessarily correspond to locations used for noise modeling for future conditions. Therefore, combining the two tables would not be practical. The neighborhood, or parcel, name was obtained from Maricopa County Assessor records and is the legal name for the residential development. This information is easily obtained on the Maricopa County Assessor's Web site. In addition to the name reference in the table, the monitor and receiver locations are shown on maps to assist the reviewer (see Figure s 4-29 to 4-32 in the Draft Environmental Impact Statement).

Code	Comment Document
1	Laurel Arndt Document Created: 6/7/2013 1:22:04 PM by Web Comment Form Presenting current and accurate information is part of the NEPA process. The DEIS does not reflect current conditions, and was not updated after it was first started in 2006, nor was it reviewed properly before being released. This is evident be many statement which do not reflect current conditions including the statement below in Chapter 5, page 5-25: "The cuts would be located in a remote portion of the SMPP, not near any trails and barely visible from any of the readily used trail." This is a erroneous analysis. This statement was true in 2006. The subconsultant and ADOT have not re-evaluated the study area since 2006. Conditions have changed, in 2011, the City of Phoenix added two new trails in the west end of SMPP. The trails start at the future 19th Ave Trailhead and go west and east along the Main Ridge South (and connecting to the National Trail). They are called the Bursera Trail and the Pyramid Trail. While the trails are physically more than a 1/4 mile away from the proposed project area, the project is clearly visible when you are on the Bursera Trail. These trails were not identified or evaluated for their 4(f) status, they are strictly for hiking and biking. Therefore the statement in the Appendix 5-1 pA586 is also false: "This statement in the General Plan indicates that pedestrian tails maintained by the City of Phoenix are used for transportation and thus not primarily recreational". This statement is a generalization which is incorrect. It is clear that these trails in the Preserve are not used for transportation and are strictly recreational. I request that these trails be inventoried, assessed and given a full Section 4(f) impacts analysis as to the visual and noise impacts of the proposed project on these resources.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	South Mountain's newest trails are the Bursera and Pyramid Trails (see Final Environmental Impact Statement page 5-8). The E1 Alternative is approximately 1 mile south of the Pyramid Trail and even farther from the Bursera Trail; thus, it would not affect either trail. The trails have walk-in access from Chandler Boulevard and 19th Avenue, with on-street parking. This walk-in access would be north of and adjacent to the planned extension of Chandler Boulevard and, thus, would not be directly affected. The walk-in access point and the part of the Pyramid Trial at the access point are located adjacent to a residential neighborhood and the City of Phoenix's planned Chandler Boulevard Extension. These trails are typically used for high-intensity recreational activities such as running, hiking, and biking, not noise- or viewshed-sensitive activities. All proposed action alternatives would span existing and proposed trails to avoid impacts. However, during construction (if an action alternative were selected), trails that would be spanned or would be near potential freeway construction would be closed for limited times for safety reasons. Closures would necessitate that trail users detour around construction sites to rejoin the trails farther along their length. According to Phoenix South Mountain Park/Preserve rangers, the Gila Trail—although well-defined—is not a designated trail within the park. That said, the Gila Trail would not be affected by the proposed freeway or by the Chandler Boulevard Extension. The Draft Environmental Impact Statement Appendix A394 contains information directly from the Phoenix General Plan and early coordination with the City of Phoenix Parks Department. The trails in the preserve are exceptions to this statement and were always meant as such. The trails within 1/4 mile of the proposed alternatives were treated separately, as in the case of the Maricopa County Regional Trails System. Should an alternative be selected, the Arizona Department of Transportation and Federal Highway Administration would work closely with the City of Phoenix during final design to ensure the connectivity of trails is maintained, whether they are eligible as Section 4(f) resources or not.

Code	Comment Document

Laurel Arndt

Document Created: 6/27/2013 10:51:16 AM by Web Comment Form

I am concerned that the DEIS does not address the secondary impacts of the freeway on local traffic in Ahwatukee.

1

The discussion on induced traffic in Chapter 4 p.4-168-169 is primarily a discussion on the traffic offsets (which the City of Mesa and Scottsdale experienced with the opening of the SR 101L and SR 202L) and the elimination of traffic congestion for the W59 Alternatives. This "analysis" only states how it relieved traffic on arterials in Mesa and Scottsdale. This is accurate for Laveen where the freeway is not replacing an arterial and will provide additional mobility.

This comparative is irrelevant for the E1 Alternative where the proposed SR202 is replacing a major arterial (Pecos Rd) and eliminating access to another collector (32nd St).

Pecos Road currently provides access for residents west of Desert Foothill Parkway and east of 40th Street to Desert Vista High School and Akimel Middle School. With the elimination of the 32nd Street access from Pecos Rd/SR 202, the traffic volumes will adversely impact Chandler Blvd and neighborhoods adjacent to the schools. The proposed SR202 will promote cut through traffic in the Lakewood community (directly east of the schools) and to the west via Liberty Lane (west of 24th Street) as residents try to access the schools on Liberty Lane without the use of 32nd Street via Pecos Road. Elimination of access south of these schools will lead to increased congestion on Chandler Blvd as students/resident reroute their travel to get to the schools.The increased use of the Pecos Rd/24th Street exit will also lead to increased congestion and cut through traffic as student are funneled to 24th Street exit to access Akimel Middle School and Desert Vista High School. Additionally, cut through traffic may chose to use Liberty west of 24th Street to get to the schools. This will contribute even further to local congestion and cut through traffic as there are already two primary schools operating on Liberty Lane (Keystone Montessori and Sierra Elementary). This will cause further traffic congestion because of the decreased speed limits and increased am traffic from working residents leaving the neighborhoods.

A traffic study should be conducted to evaluate the impacts on local traffic from the proposed South Mountain 202.

There are unintended consequences to eliminating Pecos Rd as a local arterial and eliminating access to 32nd Street from Pecos Road. These indirect impacts have been excluded from the DEIS and MUST be included in the secondary impacts analysis section of the DEIS. In order to properly assess the impacts a traffic analysis must be completed, analyzed and included in the DEIS in order to disclose the significant impacts to local traffic the proposed South Mountain 202 will have on Ahwatukee.

Code	Issue	Response
1	**Design**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

Code	Comment Document

From: Michelle Thompson
To: ADOT
Subject: FW: Support to Build the South Mountain 202 Freeway
Date: Friday, May 17, 2013 2:20:18 PM

Michelle Thompson
Senior Community Relations Officer
1655 W. Jackson St. MD: 126F
Phoenix, AZ 85007
602.316.4057
azdot.gov

From: Roc Arnett [mailto:rarnett@evp-az.org]
Sent: Friday, May 17, 2013 1:33 PM
To: Projects
Subject: Support to Build the South Mountain 202 Freeway

1 The South Mountain 202 Freeway should be built ASAP. Please report my support.

Roc
Roc Arnett
President & CEO
East Valley Partnership
Office: 480-834-8335 Ext. 202
Cell: 602-999-3444

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Eric Arnould
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 11:15:20 PM

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 3 4 I can hardly believe that in an era of emerging alternatives to the automobile and when the effects of climate change provoked by air pollution are becoming increasingly obvious all around us that ADOT can think of no other solution for traffic congestion than more roads. The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

5 6 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

7 8 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

9 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Eric Arnould

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	
7	**Section 4(f) and Section 6(f)**	
8	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	2825 N Tyndall Ave Tucson, AZ 85719-2545 (307) 399-3462

Code	Issue	Response
9	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway 7-06-13
Date: Monday, July 08, 2013 8:48:33 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Freddy Arteaga [mailto:freddyarteaga@cox.net]
Sent: Saturday, July 06, 2013 1:02 PM
To: Projects
Subject: South Mountain Freeway 7-06-13

1

While I was employed as a Hydrologist with the Gila River Indian Community (GRIC),
major South Mountain drainage issues flared up.
The Ahwatukee southerly flows had been diverted
to a concentration point impacting the El Paso natural Gas pipelines within
the GRIC Farmlands. During this time (1993-1995),
ADOT was busy preparing the South Mountain freeway alignment.
It seemed to me that a useful plan creating benefits for the State and GRIC
was to route the purposed freeway along the Queen Creek Wash,
within the GRIC, and north of the Gila River. This would utilize unusable lands bordering the wash.
By aligning the wash and superimposing the freeway on top of the Wash, the route would be
beneficial to everyone.
This implies the Tribe was made aware of the benefits of using unusable land and deriving fees for
such use.
Several factors were obvious — ADOT staff could not bring about such a proposal
without internal approval. Secondly, no one within the tribe could submit such
an idea without the entire Council approving the idea.
Thus, both sides would need concurrent approval to engage in such a proposal.
That is not a simple matter and thus a valuable alternative was never submitted.
Years later (2000), I worked for ADOT as a Project Manager (Local Govt. Section)
and acquired a better understanding of how ADOT approaches these complex issues.

2

A proposal to depress the freeway (Republic July 6, 2013) within its current alignment would not be
necessary.

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Drainage**	Pecos Road drainage is designed as a pass-through system. In other words water is allowed to drain along its natural existing pathway underneath the freeway and to Gila River Indian Community land. If an action alternative were to become the Selected Alternative, the E1 Alternative would be constructed aboveground and the existing culverts would extend to pass drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Doing so would ensure that there would be no adverse flooding impacts to adjacent properties. (See Draft Environmental Impact Statement pages 3-18, 4-98, and 4-107.)

Code	Comment Document

Freddy Arteaga P.E.
Hydrology Support Services LLC
3309 S Hazelton Lane
Tempe,Az 85282
ph 480 - 839 - 4015
Cell: 602 - 295 - 1343
freddyarteaga@cox.net

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Tempe,Az 85282
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Code	Issue	Response

Code	Comment Document
1	Sashanka Ashili Document Created: 5/24/2013 12:15:42 PM by Web Comment Form I support Loop 202 South. We need development in this area

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Krishna Ashili Document Created: 5/24/2013 12:16:50 PM by Web Comment Form I completely support Loop 202 South freeway extension. We need more development in South mountain area

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: ADOT Loop 202 South
Date: Friday, May 24, 2013 11:22:52 AM

From: Shashi Yahoo [mailto:sashili@yahoo.com]
Sent: Friday, May 24, 2013 10:18 AM
To: Projects
Subject: ADOT Loop 202 South

1

I support building the Loop 202 South. I am a home owner in Laveen and we need development in this area.

Shashanka Ashili
480-286-6880

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Jonas Atlason Document Created: 7/12/2013 2:03:10 AM by Web Comment Form I am expressing my opposition to the construction of the 202 South Mountain extension. There should be more effort put into public transportation infrastructure such as more light rail routes and efficient bussing system.

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, July 22, 2013 9:49:10 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Atonna, Arthur [mailto:Arthur_Atonna@tempe.gov]
Sent: Monday, July 22, 2013 9:34 AM
To: Projects
Subject: South Mountain Freeway

1

I was a member of the Transportation Board between 1983 and 1989. The South Mountain Freeway alignment was placed on all public materials produced by the Department before and after the 1985 bond election and again before and after the bond renewal election twenty years later.

Ahwatukee-Foothills is a much different place now than it was in 1985. Then there was the Warner-Elliot Loop, jackrabbits and little more. Therefore, there is more pressure brought to bear when discussing the South Mountain Freeway now than there was initially. Initially, no churches or homes were in the way of construction. Now there are both. However, the need for the freeway now is as great or greater than planners would have anticipated in 1985. That is the reality that must lead to one conclusion: the freeway must move forward and must be built as originally planned.

Individuals will be displaced and hurt by a freeway build but overall the freeway will become a major benefit to the whole Valley. Anyone who travels I-10 will welcome the congestion relief from large trucks. Anyone who plans our freeway road repairs will appreciate the lessened pressure on maintenance from so many heavy 18 wheelers. The occasional rush hour closures and delays from not too infrequent accidents involving 18 wheelers will decline.

Granted, ideally a positive vote by the Tribe allowing the freeway to be built on its land (like the 101 through Scottsdale) would have been ideal, but it's their land and they have said "no." That's reality and the remaining option must proceed. Talking and arguing time has gone far beyond what is constructive.

By the way, I lived in Cochise County when I was on the Board in the 1980's. For the past 23 years I have lived in Ahwatukee-Foothills. Our community will be enhanced, not unduly harmed, by the construction. I support moving forward with the design and building of the South Mountain Freeway.

Art Atonna, Phoenix
artjunque@msn.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Tom Auayfuay Document Created: 5/21/2013 3:07:19 PM by Web Comment Form Building the South Mountain Freeway would be of great benenfit for both the Valley and the State of Arizona. We will see immediate impact from the jobs that this freeway will create and will ease the I-10 of the congestion that it see's today when it is completed. Let's build it.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Please build the south mountain bypass freeway
Date: Wednesday, May 22, 2013 2:52:31 PM

From: Timothy Ault [mailto:tim.ault@asu.edu]
Sent: Wednesday, May 22, 2013 2:31 PM
To: Projects
Subject: Please build the south mountain bypass freeway

Hello,

1

I'm here to voice my support (via email) for the construction of the SM I-10 bypass freeway because the benefits truly outweigh the costs, especially over the long haul:

By reduced congestion/traffic on the current I-10 corridor with the bypass in place, the realized benefits would be:

1. Less fuel consumption, including the interstate truckers, benefits both locals and out of towners with their discretionary income
2. Less accidents/bodily injury, especially since the big rigs would be concentrated on the bypass (when the big rigs have traffic accidents, the whole freeway shuts down, evident of some recent spills on the phoenix freeways)
3. Less need for freeway construction expansion of the current I-10 corridor through Phoenix, which would cause additional traffic delays, increase traffic congestion, accidents, etc
4. Usually there would be a negative economic $$ impact as traffic congestion increases (people don't want to deal with traffic delays)

This benefits positively affect the quality of life, consumer spending (going shopping instead of I'll stay home because I don't want to be stuck in traffic), reduced government spending on maintaining the freeways and dealing with the accidents, and less use of fuel while crawling in traffic. Hopefully the project will be approved and we will see the benefits once this segment is completed. Regards.

Timothy Ault

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 1:24 PM
CALLER: LAURIE AUSTIN	CALLER ADDRESS: 102 EAST WAGONWHEEL DRIVE, PHOENIX, ARIZONA 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Ah yes, I support the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Anthony Avery

Document Created: 5/21/2013 2:54:13 PM by Web Comment Form

1

I am curious as to what consideration was given to including a multi-use bike/ped trail alignment within the freeway ROW. This would incorporate "multi-modal" aspect of ADOT's responsibilities into the project. Looking at the draft drawings, it would likely be very easy to incorporate a multi-use path on the south side of the freeway along the eastern alignment, connecting with the residential neighborhoods through standard street alignments. The western section would be more complex, but developing an onramp/offramp system along with but separated from the freeway on and off ramps and continuing the multi-use trail main line under those ramps to eliminate conflicts with vehicles would be the likely be the most economical way of doing that. This would provide a great benefit to the areas immediately adjacent to the freeway for recration and transportation, and connect the neighborhoods directly with the western edge of South Mountain Park. I know many people from Tempe and Mesa who would ride their bikes to South Mountain on Silent Sundays if it weren't so dangerous to ride on the local streets in the area; this would be a great opportunity to provide 365-day access to a safe, reliable transportation/recreation corridor for bicyclists and pedestrians, as well as access to the park that would reduce the need for regional automobile travel.

As or even more important than a multi-use path within the freeway alginment is the bike/ped access at the interchanges. What steps would be taken to create a SAFE and COMFORTABLE crossing of the freeway for persons walking or biking along the arterial streets, and how would that be an improvement over existing conditions at other freeway crossings? Thank you very much for taking the time to be sensitive to and aware of the multi-modal potential of this extremely large public works project.

Code	Issue	Response
1	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Draft Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

From: Anthony Avery
To: Projects
Subject: Loop 202 Freeway Bike Lanes
Date: Thursday, June 20, 2013 8:57:07 PM

Dear Sir or Ma'am,

1 My name is Anthony Avery and I am a concerned citizen residing at 6262 East Brown Road Unit 49, Mesa, AZ 85205 who feel like the Loop 202 extension through South Mountain will be a hazard to our environment and our standard of living. It has been demonstrated time (link to academic study through summary portal) and time again that adding freeway lanes only exacerbates the prevalence of suburban sprawl and contributes to traffic congestion, rather than the stated goal of relieving said congestion.

2 That being said, there is one addition I did not see at the exhibition at the convention center that would make me shift my support from opposing the construction of the South Mountain Freeway to supporting it, and that is a parallel bike facility. Early in 2012 I had the following conversation with your Twitter agent:
Me: You know what would be a cool project/job creator? Grade-separated bike trails along freeway alignments! @ArizonaDOT tinyurl.com/7vyqflf ADOT: @TripleAvery We have them in a few locations - in fact, there is one under construction in North Phoenix along the CAP. Me: @ArizonaDOT awesome! I know some underpasses. Any plans to design them into freeways? Would love to take 202 dwntwn 2 work via bike 4 exampl Them: @TripleAvery Oftentimes, ped/bike crossings are funded by local cities so money is always an issue. Crossings are integrated where possible. Me: @ArizonaDOT oh definitely. Let me re-phrase: Does ADOT have any funds allocated to build bike lanes in FWY ROW? Or at all? Is it possible?...

3 No response. What I was trying to articulate, and apparently couldn't, was exactly what I had seen on I-70 from Grand Junction to Denver, Colorado. If this were to be implemented, and the South Mountain Freeway be researched and included as a true multi-modal corridor, I would be more willing to lend my support to the project. Thank you very much for your consideration on this much contested issue. Because I clearly was unable to articulate what I was referring to, what I had seen on my trip to Denver should articulate what my words could not: I-70 trial.

Thank you for taking the time to respond to this very important e-mail as the South Mountain Freeway decision is one of the most important decisions that will be made concerning the MSA transportation options in the foreseeable future.

Sincerely,

Anthony A. Avery

Sincerely,

Anthony A. Avery
6262 East Brown Road Unit 49
Mesa, AZ 85205
480-280-8471
aaavery1@gmail.com

Code	Issue	Response
1	**Secondary and Cumulative**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: Loop 202 S. Mt.
Date: Thursday, July 25, 2013 2:20:21 PM
Attachments: image001.png

7/25/2013 2:01:42 PM
Dear Sir or Ma'am,

1 **My name is Anthony Avery and I am a concerned citizen residing at 6262 East Brown Road Unit 49, Mesa, AZ 85205 who feel like the Loop 202 extension through South Mountain will be a hazard to our environment and our standard of living. It has been demonstrated time (http://daily.sightline.org/2011/12/14/study-more-roads-more-traffic/ link to academic study through summary portal) and time (http://www.assmotax.org/Releases/AMCT%20release:%20building%20more%20roads%20relieves%20your%20wallet,%20not%20congestion.php) again that adding freeway lanes only exacerbates the prevalence of suburban sprawl and contributes to traffic congestion, rather than the stated goal of relieving said congestion.**

2

That being said, there is one addition I did not see at the exhibition at the convention center that would make me shift my support from opposing the construction of the South Mountain Freeway to supporting it, and that is a parallel bike facility. Early in 2012 I had the following conversation with your Twitter agent: Me: You know what would be a cool project/job creator? Grade-separated bike trails along freeway alignments! @ArizonaDOT http://tinyurl.com/7vyqflf ADOT: @TripleAvery We have them in a few locations - in fact, there is one under construction in North Phoenix along the CAP. Me: @ArizonaDOT awesome! I know some underpasses. Any plans to design them into freeways? Would love to take 202 dwntwn 2 work via bike 4 exampl Them: @TripleAvery Oftentimes, ped/bike crossings are funded by local cities so money is always an issue. Crossings are integrated where possible. Me: @ArizonaDOT oh definitely. Let me re-phrase: Does ADOT have any funds allocated to build bike lanes in FWY ROW? Or at all? Is it possible?...

3

No response. What I was trying to articulate, and apparently couldn't, was exactly what I had seen on I-70 from Grand Junction to Denver, Colorado. If this were to be implemented, and the South Mountain Freeway be researched and included as a true multi-modal corridor, I would be more willing to lend my support to the project. Thank you very much for your consideration on this much contested issue. Because I clearly was unable to articulate what I was referring to, what I had seen on my trip to Denver should articulate what my words could not (note the location of the bike lane on the diagram located about 1/4 of the way down the page): http://www.fhwa.dot.gov/publications/publicroads/04mar/04.cfm.

Thank you for taking the time to respond to this very important e-mail as the South Mountain Freeway decision is one of the most important decisions that will be made concerning the MSA transportation options in the foreseeable future.

Sincerely,

Anthony A. Avery
6262 East Brown Road Unit 49
Mesa, AZ 85205
480-280-8471
aaavery1@gmail.com

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov
ADOT Communications

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Code	Issue	Response
1	**Secondary and Cumulative**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
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3	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Pro-South Mountain Freeway
Date: Friday, June 21, 2013 3:27:09 PM

From: Aaron Avila [mailto:azhikeravila@gmail.com]
Sent: Friday, June 21, 2013 1:57 PM
To: Projects
Subject: Pro-South Mountain Freeway

1

Please build this freeway. The hazardous waste argument is fear mongering and the lost of bike trails is laughable. South Mountain Park, the largest in the country is just to the north, ride or run there.

Build it and save traffic issues on I-10 on both sides of the Valley.

4538 E. Rock Wren Rd, Phoenix, AZ 85044
623-889-4999

--
Aaron Avila

"O Sacred Heart of Jesus, I place all my trust in Thee"

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 12:07 PM
CALLER: KIM AZINE	CALLER ADDRESS: 4801 E ROVEY AVE, PARADISE VALLEY, AZ 85253
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the 202 Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

From: Randy Babchuk
To: Projects
Subject: Tolleson Supports the 59th Avenue Alignment
Date: Wednesday, June 05, 2013 4:47:27 PM

The city of Tolleson supports the recommendation of the South Mountain Freeway EIS which recommends the 59th Avenue alignment to connect the South Mountain Freeway to I-10.

Randy Babchuk
City of Tolleson
Parks and Recreation Manager
623-936-2705 Office
623-936-9793 Fax

This message has been scanned for malware by Websense. www.websense.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 Freeway
Date: Wednesday, May 29, 2013 1:01:18 PM

From: Mark Babington [mailto:markb@tenaire-bac.com]
Sent: Wednesday, May 29, 2013 12:56 PM
To: Projects
Subject: Loop 202 Freeway

1

Like it or not and not everybody will be happy with the result but the time for this project to proceed is now. A native Arizonan, I remember all the back lash when the very first freeway was built thru town. What would we do without them now? 2025 will be here before we know it and then where will we be? I vote build it on Pecos it the Gila Indians do not want it on their land.

Pls do not add my email to any lists.

Best regards,

Mark B. Babington, B.S.E.E.
President
Tenaire Inc.
480 894 9175 Phone
480 967 1319 Fax
markb@tenaire-bac.com
tenaire@tenaire-bac.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/29/13	INCOMING CALL TIME: NO TIME DISPLAYED
CALLER: ANTHONY BACCA	CALLER ADDRESS:
PHONE: 602-427-7850	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hello, my suggestion on the 202 Loop South Mountain Freeway Study, I would recommend alternative western option, therefore because we need get coming down Broadway and attaching to the Loop 101 already would be a great idea and plus the valley is growing. 99th Avenue and Broadway is going to be full of homes here soon. Again, W-101 alternative western option. Thank you. Have a good day.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Brett Bacon Document Created: 7/20/2013 7:06:37 PM by Web Comment Form Looks Good! Now get it done! No more delays please. You are already 10 YEARS behind schedule and costing the community dearly in time and money going the long way around the mountain from Laveen to SE Phoenix. Please get it finished like we were promised almost 30 years ago.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Sheila Bacon Document Created: 7/20/2013 7:08:17 PM by Web Comment Form I like it. Please proceed.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2 3 4	Humberto Badillo Document Created: 5/21/2013 6:07:31 PM by Web Comment Form Thank you for giving us an chance to give our comments on the proposeed freeway, the visuals are very helpful. The part of the proposed freeway that really concern's me is the Pecos Rd section of the freeway, specifically the Dusty Lane section. That part of the proposed freeway will cut through one of the best places visually of South Mountain Park. In that part of South Mountain Park, the Gila River Indian Community, Phoenix, and the park all link up in that specific area. From there, one can look west for an uninterupted view of the magnificent Estrella Mountains. Furthermore, that area contains a jackpot of historical and prehistoric resources that make the Phoenix metro area unique to the rest of the nation. It's no suprise that the City Archaeologist has spent countless days out there recording archaeological sites. Although we always take pride in our Native American population here in Phoenix, it is quite obvious that there is a clear divide between the reservation and the metro area. We see this every time we commute on the 101, the Santan portion of the 202, and even on Hunt Hwy in Chandler. This attitude toward reservation land on our part must change in order to have a united Phoenix Metro, not just Indian land and non-Indian land. We must start with the way we just push a proposed freeway system with out having a clear understading of how people who dont have the means to come to these pulic commnents feel about an 8- lane freeway cutting through there yard. Most of these people dont even have acess to the internet. In short, there is not much I could say about the portion of the freeway that will run north and south because I'm not very familiar with the area. However, I have been to western portion South Mountain Park, particularly the section where the freeway is going to cut through it, and I'm telling you that the area has too much historical and pre-historic relevance, not to mention the visual beauty, for a freeway to be cutting through there. Also, the Pecos Rd section of the freeway will just be another clear division between Phoenix Metro and the reservation. Just go down there yourself, and take a look towards the Estrellas.

Code	Issue	Response
1	**Visual Resources**	The Final Environmental Impact Statement on pages 4-160 and 4-161 states that construction of the proposed road cuts at the western end of the South Mountains would cause "severe visual impacts" and that these cuts "would be visually inconsistent with the natural setting of the surrounding area." These impacts would, however, be in a remote, seldom-used area of the Phoenix South Mountain Park/Preserve and not near any major trails. General mitigation measures to minimize these visual impacts are described on page 4-161. These measures would include the incorporation of newly exposed rock faces characteristic of the adjacent natural rock features. Contractors would respond to the faces' scale, shape, slope, and fracturing to the extent that could be practicable and feasible as identified through geotechnical testing and constructibility reviews. The Arizona Department of Transportation would require the contractor to round and blend new slopes to mimic the existing contours to highlight natural formations. The Arizona Department of Transportation would evaluate having the contractor adjust and warp slopes at intersections of cuts and natural grades to flow into each other or transition with the natural ground surfaces without noticeable breaks. A local example of such treatment would be the cuts associated with Dreamy Draw on State Route 51 in northern Phoenix.
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Environmental Justice/Lifestyle**	The Gila River Indian Community is a sovereign nation, and as such has the authority to regulate land uses and activities on its land (see Draft Environmental Impact Statement, page 2-1 sidebar, "*What is a sovereign nation?*"). Throughout the preparation of the Draft Environmental Impact Statement, consultation and coordination with the Gila River Indian Community has been occurring (see Draft Environmental Impact Statement, Chapter 2, *Gila River Indian Community Coordination*).

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
4	**Public Involvement**	This study, which began in July 2001, is expected to be completed in 2014. During the study process, community members have had and will continue to have various opportunities to ask questions, express opinions and provide comments about the proposed action (see Chapter 6, *Comments and Coordination*). To facilitate public input to the environmental impact statement process, a variety of communication tools were used at major project milestones, including: · During the EIS process, over 200 presentations were made to community groups, homeowners' associations, chambers of commerce, village planning committees, trade associations, and other interested parties. · Eleven formal public meetings were held. Fifteen days prior to each meeting, display advertising was placed in the *Arizona Republic*, the *Ahwatukee Foothills News*, the *Gila River Indian News*, the *East Valley Tribune*, *La Voz*, and the *West Valley View*. Total distribution was approximately 260,000 newspapers per formal meeting. · One meeting notice flier and four newsletters were distributed throughout the Study Area in the following quantities (per distribution per meeting): 28,500 door hangers, 5,000 inserts in the *Gila River Indian News*, and 28,000 inserts in the *Ahwatukee Foothills News*. In addition, newsletters and fliers were sent to over 4,500 individuals on the project mailing list. · The November 2008 project newsletter was mailed to 78,700 businesses and residences in the Study Area and to 3,300 individuals on the project mailing list. · The February 2010 project newsletter was mailed to 62,400 businesses and residences in the Study Area and to 3,600 individuals on the project mailing list. A project Web site was developed to provide the public with project information and obtain feedback. Approximately half of comments received were submitted electronically through the Web site's online survey or e-mail. Over 5,000 comments have been received by the project team. Since 2002, the Arizona Department of Transportation has worked with a South Mountain Citizens Advisory Team, representing various stakeholder groups in the South Mountain Freeway Study Area including Districts 4, 6, and 7 of the Gila River Indian Community and the Interstate 10/Pecos Road Landowners Association. The group met regularly to review environmental and technical data, discuss the interests and concerns of their respective organizations, and to help find a consensus solution for this proposed project. The general public was welcome to attend each one of these meetings. There also have been various community meetings through the course of this study. For a listing of the past South Mountain Citizens Advisory Team and community meetings, visit <azdot.gov/southmountainfreeway/meeting_notices.asp#communitypast>. Additionally, individual members of the community had an opportunity to review the Draft Environmental Impact Statement, attend the public hearing, attend the forum held at the Komatke Boys & Girls Club in District 6 of the Gila River Indian Community, and provide comments to be included in the Final Environmental Impact Statement.

Code	Comment Document

From: Carissa Bailey
To: Projects
Subject: Comments on the Loop 202 South Mountain Freeway
Date: Friday, May 31, 2013 9:20:43 PM

Hello

1 I would like to start by saying I am excited about an alternate route to the NE side of town. I currently work in Chandler and it takes me about 50 minutes to get to work each way. I think my first option would be the W101 Alternative because west side residents will not have to travel far to get to the interchange; specifically the central or west interchange. I think as we improve our freeways in AZ, businesses will be willing to expand to West valley.

Thanks

Carissa Bailey-Wade

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:36:28 AM

-----Original Message-----
From: Neal Baker [mailto:jetblast19@yahoo.com]
Sent: Monday, May 13, 2013 10:04 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I support the South Mountain Freeway!!

Sent from my iPad

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: ADOT Loop 202 South Mountain Freeway Study
Date: Tuesday, July 02, 2013 8:46:51 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

From: Richard Baker [mailto:rgbimail@gmail.com]
Sent: Monday, July 01, 2013 8:06 PM
To: Projects
Cc: Councilman Sal DiCiccio
Subject: ADOT Loop 202 South Mountain Freeway Study

1

How will ADOT ensure that residents that live around/near the Loop 202 South Mountain highway extension won't be infected by the sometimes deadly valley fever fungus? This disease is caused by the dispersal of fungal spores when the soil is disturbed. Highway construction is one of the means be which this dispersal can occur.

Recently a federal court ordered the removal of up to several thousand inmates out of two California state prisons...

http://www.latimes.com/news/local/political/la-me-pc-ff-court-orders-inmates-moved-out-of-valley-fever-prisons-20130624,0,2870415.story

The court judged that these individuals were at risk for getting severe infections or worse due to valley fever. Apparently, 36 people with this fever died over the past 6 years.

How many valley fever infections does ADOT judge to be an acceptable risk for building the Loop 202 South Mountain freeway? I wonder. Personally, I haven't heard or read how ADOT and the State of Arizona plans to address this issue.

Respectfully,

Richard Baker
3216 E. Ashurst Drive
Phoenix, AZ 85048

Code	Issue	Response
1	**Safety and Health**	Detecting the fungus responsible for valley fever in soils is not practical at this time. However, to reduce the amount of construction dust generated that could carry the fungus, particulate control measures related to construction activities would be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from the Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).

Code	Comment Document
1	Paul Balch Document Created: 7/15/2013 11:31:22 AM by Web Comment Form This is a much needed freeway! You have my complete support!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 freeway
Date: Monday, May 20, 2013 8:32:27 AM

-----Original Message-----
From: Norman.V.Balderrama@wellsfargo.com [mailto:Norman.V.Balderrama@wellsfargo.com]
Sent: Saturday, May 18, 2013 7:51 AM
To: Projects
Subject: 202 freeway

This is a must in our south mountain community. Norman balderrama
Thanks,

Norman Balderrama
Las Avenidas Market President
(602) 378-1259

1

This message may contain confidential and/or privileged information. If you are not the addressee or authorized to receive this for the addressee, you must not use, copy, disclose, or take any action based on this message or any information herein. If you have received this message in error, please advise the sender immediately by reply e-mail and delete this message. Thank you for your cooperation

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Document Created: 7/15/2013 1:29:37 PM by Web Comment Form James Ball I favor the W101 plan because it makes the most sense as an extension of the current 101 Loop.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 2:49 PM
CALLER: LINDA BANDLER	CALLER ADDRESS: 7130 N. 2ND PLACE, PHOENIX, AZ 85020
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
And I support the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I support building the 202
Date: Wednesday, May 15, 2013 10:45:43 AM

From: Jeff Banker [mailto:jbanker@bankerinsulation.com]
Sent: Wednesday, May 15, 2013 9:48 AM
To: Projects; info@buildthe202.com
Subject: I support building the 202

To whom it may concern,

1 I believe this project should be approved for many reasons. The studies that have been done show that this project delivers the most "bang for the buck" and in today's economy that is important. Along with relieving serious traffic issues this project will create many needed jobs and help boost the local economy.

Regards,

Jeff Banker
Banker Insulation, Inc.
602.273.1261 Office
480.553.5657 Fax
wwww.bankerinsulation.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

2

MR. BANYAI: James Banyai. My concern is the lack of alignment of the northern portion -- northbound portion, southbound portion with the 101. And I understand it's not even being talked about anymore. They say, oh, it's still on the table, but nobody's addressing it. That's a concern. I think that's going to be the biggest congestion in the whole mess. It's doubling the traffic flow through there and it's doubling the cost because you've got two T intersections and they're huge, both of them.

We're extending the 101 directly south and then bringing it over would make a lot more sense and it would be a loop. Right now it's not a loop. It's two Ts. That would be, I don't know, four miles or so of congestion. People trying to get to Los Angeles and back are going to be slowed down even more than they are today. People coming north have to swing east and then south, and that common area they're fighting the northbound or fighting the southbound traffic trying to get onto I-10. So to me it's a very poor choice as far as alignment. And I probably won't be around to see it. I'm 72 years old right now, but I think that's a major flaw in what I see today.

The other one would be -- I guess I don't

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www.drivernix.com

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Design**	The proposed connection to Interstate 10 (Papago Freeway) would include substantial improvements (widening) along Interstate 10 to allow traffic to and from the South Mountain Freeway to enter and exit the Interstate 10 main line smoothly (see page 3-48 of the Final Environmental Impact Statement).

Code	Comment Document

3

quite understand -- ignoring of working with the Indian community to put the -- at least half of the eastbound portion south of South Mountain on the other side of the power line easement. Just run the power down the center, half of it at least on Indian land.

And I think as far as the Indian community would be the least affected -- least impact on them. They'd lose some farmland, but it's a lot different than losing mountains, the corner of South Mountain, and the noise would be alleviated somewhat to South Mountain people.

But, you know, our wonderful planners have not established firm right-of-way plans early enough to make a difference, and that's why it's so expensive. I'm disappointed in the political aspects of that, I guess.

I think the 101 extension should have gone between the border of Tolleson and is it Avondale? And I realize it's been hard on those communities, but people built in the way of it thinking that for years, and it's kind of an impact that they devised themselves. And they could join with Laveen and join together and make common communities, not little provincial states. So that

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Code	Issue	Response
3	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

kind of argument is apparently fallen by the wayside. I'm sorry to see that. That's all I have to say.

(The proceedings concluded at 2:00 p.m.)

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 11:14 AM
CALLER: CYNTHIA BARAZA	CALLER ADDRESS: 118 WEST PUEBLO AVENUE, PHOENIX, AZ 85041
PHONE: 602-276-3534	EMAIL:
CALLER REMARKS/QUESTIONS: I am in support of the South Mountain Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

adding trucks and a longer length of I-10 that will congest the traffic even more, so the faster you can get them off I-10, the better off we will all be.

Other than that, I hope that they build it quickly, you know, cause this would not take forever to build.

Okay. Thank you very much.

MR. HUSTON: I just want to say that I am in favor of the project and after I've reviewed all the boards and the entire process, it seems to make sense what they've narrowed it down to. I think, based on cost alone, it seems like 59th is the best alternative. If cost weren't a factor, I think some of the ones that go further to the west would also be nice to help tie into the west valley. It seems like a long time coming.

It seems like a great project. I think it would be good for, not only our freeway system, but putting people back to work. Overall I just think it would be a really good thing for the community.

That's it.

MR. BAREHAND: My name is Harlan Barehand. I'm from the Gila River Indian Community. I'd like to thank ADOT for finally listening to us and not putting it on the Reservation. I just got through seeing a video next door; it was beautiful. I think it works out fine.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

2

It's not on the Reservation at all. It boundaries to it but that's about it.

The only comment that -- you know, since we didn't want it on the Reservation, it would be nice to have some egress onto the freeway on the Reservation areas especially between 40th Street and the curve all the way around to 51st Avenue. That's about it.

And also I hope that the tribe, the Gila River Indian Community, will take advantage of this opportunity. And since they don't want to have -- the whole reason that we didn't want to have the freeway on the Reservation is because we would have no control over it. We want control over things that happen on the Reservation from here on out.

It wouldn't have been -- it would have been fine if they would have put it on the Reservation, but we had no control over it. This way, if we put our own roads close to the freeway so we can get on the freeway easily from the Reservation side, that would be, I think, our next move for the Council to consider it. That's what we're going to submit to the Council meeting tomorrow morning.

I think this is great. I'm really happy with it. I'm happy that we don't have to vote on it a fifth time, vote on it on the Reservation for what would

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Code	Issue	Response
2	**Alternatives**	Federal law prohibits the denial of access to any community. Thus, traffic interchanges would be located along the freeway where it borders the Gila River Indian Community (see Final Environmental Impact Statement page 3-51). Roadway connections on Gila River Indian Community land to the traffic interchanges would be the responsibility of the Gila River Indian Community, in coordination with appropriate jurisdictions.

Code	Comment Document

be their fifth time. Four times we said no and they still want to bring it up. I think it's just the landowners that want to -- that are standing to make a lot of money off the freeway. It's not but a handful of them. I'm one of the handful. I would make a lot of money off of it.

I also realize that the land is more important itself because I need to keep that within my family to hand down to my children and their children, et cetera, et cetera. If we do it this way, we would lose it forever. They'd never have it. And it just decreases our Reservation by a thousand acres. Originally our reservation went down to Van Buren Street. You can imagine all this land all the way across we lost all to the City of Phoenix.

What have we got for it?

Nothing.

It wouldn't have done us any good the way they had everything set up. They had nothing for us to really build any businesses next to the Reservation. They really didn't consider Indians. The cost of having exits put on was their argument, it would cost too much to have all the exits. But they were here to serve the traffic problem and that was it. I just remember the first meeting they had when they said that we have a

Code	Issue	Response

Code	Comment Document

traffic problem. ADOT said, "We have a traffic problem."
When it was my turn to speak, I said, "No you have a traffic problem. Gila River does not have one. We didn't have a transportation problem. We have no transportation problems."
But I just want to say, thank you very much for the Arizona voters for not putting it on the Reservation. I thank you very much for ADOT to finally come to the decision to put it on the boundaries to it. I think that works out well. And I've seen the video; it's beautiful; it's gorgeous. Laveen will benefit big time and so will the Ahwatukee community, too, I think.
As far as the Gila River is concerned, we have a long ways to go to develop our own. Until we have complete control, we have to work on our own Tribal Council and people that we elect in our districts. Since all this money thing waged with the casino and all, it has really changed quite a lot of attitudes for a lot of people. I think that when our people become more educated, we can start handling our own real estate, our own financial affairs, our own businesses and so forth, then we can step into those shoes. Then we can start dealing with it. We can have our own economy boost.
As it is, I'm pretty sure we're still probably at poverty level, a third-world country even

Code	Issue	Response

Code	Comment Document

though we're right next door until we and our kids and our people realize that we can make bigger strides if we apply ourselves and our children and not be afraid to stand in places where we need to stand up. That's about it.

Thank you very much.

MS. FORGY: My name is Janet Forgy. I have lived in Laveen area, the 67th Avenue and Baseline subdivision, Laveen Meadows, for about six years in November. And I can tell you we desperately need to have this 202. It's imperative. It's like we're out in the boondocks. Businesses are not developing. We have to go five miles to get to I-10, that's the shortest distance, five or 13 miles to get to an interstate.

I-10 is like a parking lot sometimes. There's no development of businesses. I mean, there's nothing. We need that desperately, and so I strongly encourage the 202 to be developed as soon as possible without any delays cause we definitely need it.

UNIDENTIFIED SPEAKER: One of the things I want to stress is that when I purchased my house in November of 2007 I saw the possibilities of development and I was assured that it was going to be developed. It subsequently has not. As a matter of fact I understand because of the economic situations, things had a way of

Code	Issue	Response

Code	Comment Document

4366

tribes in Southern Arizona, being Tohono O'odham, Ak Chin, Salt River Indian Community, culturally it affects them and is disgusting to see how this is still being pushed forward.

THE FACILITATOR: Thank you.

If anybody else who has not registered would like to speak at the hearing, please make sure that you register at the registration desk and then come before us.

If you need additional time, please, if you would like to make additional comments, please give your comments to the court reporter. Thank you.

Harlan Barehand.

MR. BAREHAND: Good morning, sirs. Thank you for the opportunity to come and speak with you this morning. I am Harlan Barehand, I'm registered with the Gila River Indian Community. Thank you very much for not putting it on our reservation, we appreciate that very much. I hope that it will stay off our borders and into the Ahwatukee and the Laveen area. And I think that we can benefit financially through them, but our reservation as it is is very small and we cannot afford to lose any more land as it is. And history tells us that the original Gila River boundaries is Van Buren on this side, so you're asking for Gila River land, but that's history.

1

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

I came here primarily because I understood that the freeway was going to make a loop and enter our reservation at Pecos Road, and my niece just told me that I was mistaken, that it's not going to, that it is going to stay on Pecos Road, so my presentation is really ineffective and has no balance as to -- like I said, my whole thought is to not put anything on the reservation, because we cannot lose any more land, and I congratulate you on the wise decision not to put it on the Ahwatukee side, and I think that'll be best for everybody and speed up the process of the freeway and so forth. And I thank you very much, and that's all I have to say. Thank you.

THE FACILITATOR: Thank you.

Do we have another name up there? There it is.

Dave Von Tersch. Did I pronounce that right? Dave Von Tersch.

As a reminder, anyone in the auditorium, if you would like to speak just register at the front desk, your name will appear on the screen, and we will call you up.

Ken Lapierre.

Dave Von Tersch, is that you, sir?

MR. VON TERSCH: Hi, my name is Dave Von Tersch, I live in Ahwatukee. I'd like to suggest, as long as there's no ordinance against it or law against it, that the committee 202 project team might consider a

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commute. Thank you.

THE FACILITATOR: Thank you.

The next speaker, could you use this microphone, please. Thank you, ma'am.

Raven Barehand.

As we're waiting for the next speaker, I'd like to remind you to refrain from clapping or making comments regarding any speaker's position on any of this out of respect for their position.

Ms. Barehand, you can use this microphone here. You have three minutes, the timer is here in front of you. You may begin.

1 MS. BAREHAND: Okay. Hi, my name is Raven Barehand, I live over there in Laveen and Komatke in the Hillcrest area. One thing I'd like to say is that that freeway would steal the blue from the Estrella Mountain range. It's a brilliant blue, it's a brilliant, cobalt blue or very bright blue. There's no other mountain around here that is that blue as that mountain, and on days when there is a lot of smog that comes in from Phoenix, that mountain turns gray. And so I know that it would cause more emphysema, a lot of people don't want it but the thing is it would cause a lot more sicknesses to come to that area.

I know that the people who were pushing to have

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Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

their freeway built, they are thinking of economic development, but that's just people who are money -- they always want more money and some that is -- you can't buy that blue, you can't go back there and repaint it blue. So I just -- I'm against building of that.

I know we do need some kind of a roadway, because the existing 51 that turns into belt line is too small and we do need some kind of a widening through there to stop all this speeding and accidents; and when emergency vehicles need to get through, we do need more of a -- we do need a road or widening of that road, but for something like an eight-lane freeway, that's not really necessary. They can even do a smaller, two-lane or something that wouldn't cause so much traffic that would bombard, and it would -- there would be too much air pollution with an eight-lane freeway.

And so those are the points I wanted to make, and I know -- I am hoping that this doesn't go through, especially because we're trying to break a lot of rules to get it passed and hold back the studies and lying and moving information around; that just shows that they're shady, there's something wrong with that, there's something very wrong with what they're trying to do in passing that eight-lane freeway. So that's everything I have to say and I appreciate, you know, you having this

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Code	Issue	Response
2	**Alternatives**	An alternative that included widening 51st Avenue and Beltline Road was considered as part of this study. It was called the Riggs Road Alternative (see Final Environmental Impact Statement page 3-9). The Riggs Road Alternative would be almost entirely on Gila River Indian Community, would not complete the loop system as part of State Route 202L, and would require substantial out of direction travel. Therefore the alternative would not meet the project's purpose and need criteria and was eliminated from further study. Similarly, the concept of building an arterial or a parkway was also considered. In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statements page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Purpose and Need**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Draft Environmental Impact Statement page 3-27). The model projects demand for multiple modes of travel, including automobile, bus, and light rail. Key model inputs used to forecast travel demand in the Study Area included socioeconomic data (based on land use plans and population and economic forecasts), the anticipated average number of vehicle trips within the region on a daily basis, the distribution of transportation modes used by travelers in the region, the capacity of the transportation infrastructure to accommodate regional travel, and the future transportation infrastructure. The project team used the most recent and reliable data available. The Final Environmental Impact Statement (Chapter 1, *Purpose and Need*, and Chapter 3, *Alternatives*) provides more detail on the data inputs to the modeling effort and discussions of the assumptions used. The Maricopa Association of Governments approved new socioeconomic projections in June 2013. The new data are presented in the Final Environmental Impact Statement (see page 1-11). Although slower growth in total vehicle miles traveled was noted, the need for the freeway did not change. The revised traffic analysis validated that the proposed project is needed today.

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forum open, so no build. Do not build Loop 202. Thank you.

THE FACILITATOR: Thank you.

If there's anyone in the auditorium that would like to speak, please make sure you're registered at the front desk. Your name will appear on the screen and we'll call you up in the order that you register.

Again, if there's anyone in the ballroom who would like to speak, please make sure you register at the front desk. Thank you.

Ruben Gallego.

MR. GALLEGO: Hello.

THE FACILITATOR: Mr. Gallego, you have three minutes, here's the timer. Please begin.

MR. GALLEGO: Thank you. My name is Ruben Gallego, I'm a resident of South Mountain, I live right next to the mountain, I'm also the state representative for the area that would be impacted by this freeway. I represent the Laveen area, South Mountain, Gila River Indian Community, as well as portions of the west side of Phoenix. I'm here in support of the 202 highway, not only as a resident, but also as a representative of the people in the district. For years I've been hearing about complaints in terms of traffic and traffic congestion. A lot of the jobs that are currently being

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PROCEEDINGS

THE REPORTER: Please state your name.

MS. BAREHAND: Raven Barehand.

My first thought is, you know, instead of an eight-lane freeway, why not have a four-lane freeway in the style of the Maricopa Freeway? That's one thought. That way the people who are concerned about the animals that might lose access to that area, they can run across, you know, they'll chance it just like they do with the freeway now, but at least they get across to their different territories.

And the four-lane freeway wouldn't attract the constant, you know, there would be -- it wouldn't be such a draw of so much traffic, because you can see the Maricopa Freeway and even though there's a ton of traffic, they use that Maricopa Freeway, and it's -- it gives them space. It's not just congested all the time. And so that's my thought on that.

And the other thought is the money that they would save on building an eight-lane freeway with all that concrete laying and everything, they could just build a wall to shield the people in District 6 in that housing development and the hospital from the noise. They could plant a lot of

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Code	Issue	Response
1	**Alternatives**	The concept of building a four-lane freeway would be similar to an alternative that was considered, the Arizona Parkway. In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statements page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.
2	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	

Code	Comment Document

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trees to kind of offset the carbon dioxide and, you know, have reminders about updating your vehicle along the sides. And the ecological conservation or, you know, when they design the freeway, little information about the animals that live in the area, you know, "Please respect us, we live here too," you know, just little cute things. I mean, that would be a good education for the people who come through, like visitors. They don't know the desert animals out here and their habitat and everything. So that would kind of educate on that.

And what else? There was something else. How -- I wanted to know how do we -- because we could put it on the reservation and it's less invasive and then the tribe people who want money for their land would get, you know, something, and it wouldn't tear up that mountain. And I was one of the people who said no freeway, no freeway, no freeway, but I changed my mind, because this two-lane freeway of 51st and Beltline, every time I hear those sirens and I know they can't get through, because that two-lane gets backed up and where there's 20 cars sometimes. And during the rush-hour traffic, you'll just see a straight stream of cars, and there's no way. And then you hear the sirens, and I'm thinking, God, how

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Code	Issue	Response
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives, Gila River Indian Community Alignment**	

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did those ambulance and fire trucks get through?

And then I know throughout the years that two-lane freeway is too small anyway, it's like a two-lane freeway, but the oncoming traffic is versing each other. So we've had -- my ex-boyfriend was in a real deadly accident, and they were sober, and it was just the big 18-wheelers that go through and they go really fast. And here it would be like the people who didn't drive that much, and they get scared, people that are slow, and I've been doing it when I was younger and I was a daredevil, and I would get past there and almost get in accidents twice. And that's a dangerous two-lane highway.

I know we need another way through here, and I went to the end of the freeway where the freeway ends, and I said, we do -- they're going to build it no matter what, I hope they don't cut that mountain open. And I'm going to have to change my stance to, yeah, build it on the res, because before I was saying we don't owe them any more land, they keep taking little bits and pieces. Because in Ahwatukee, that was Gila River land in the '70s, and my uncle who kind of watches the council's decisions, he said, "When did we give that land away? For what?" And it was our land. The map showed it, and

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now it's not our land. And there's no documentation. And that was before they were really watching. That's before on the other side, or whatever.

That's just how I feel.

And it would benefit our businesses a little bit. I know they were already thinking of that. I was one who said no freeway, no freeway, no freeway. Now I'm saying a four-lane freeway, not an eight-lane freeway, and then something to block the noise, something to clean the air. Something to let the animals go through, they just chance it, and that's it. Those are my ideas.

THE REPORTER: Okay. Thank you very much.

MS. BAREHAND: I was wondering if I could make another statement.

THE REPORTER: Yes, of course.

MS. BAREHAND: Maybe a program could be started when -- what we notice on the reservation is that a lot of people who work in Phoenix will live in Tucson or in Maricopa, and you know, or Casa Grande, and they go back and forth. And so maybe people could get some kind of credit or a tax break for living in the town where they work. Because they're taking air out -- bad air out of the, you know, out of the atmosphere, or tax for fuel efficient

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vehicles, some kind of discount, like at the DMV, or something like that, to encourage more people getting the fuel-efficient cars. And so that -- so that will reduce the air pollution and then the travel. So that might benefit -- and then having -- encouraging, I don't know, but through the City of Phoenix, maybe encouraging more job advertisers who list the city they're in or the area they're in. That way people in that area will comply to that area, because they, a lot of times, they don't tell you, so that's just something to benefit the air.

And there was something else. I can't remember. I can't remember, but if I remember, I will come back and tell you again.

THE REPORTER: Okay. Thank you.

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MS. BAREHAND: Raven Barehand.

It is wrong that they don't have the study available at the Cesar Chavez Library because that is the closest library to the area that would be most impacted on the reservation, the District 6 area, or even the Ocotillo branch is close, that's in the southwest of Phoenix. But all these studies are being made available at three public libraries, and they are all far away.

And that shows that they are doing dirty work, kind of manipulating this whole situation. And it also shows down there on their EIS study they're blatantly lying. There's a part there that says it doesn't do cultural damage, and that is a lie. It shows that they weren't -- they didn't -- they don't have a connection with the people here, and they don't care about the people's culture here, because if they did, they would be talking to all these many voices who keep saying no 202. There's a -- that's our cultural -- that's what we're about, that's our man in the maize, that's Jesus Christ coming back to earth, that's who gave us this O'odham land. And it is a direct attack on our O'odham hemda. Our Pima way of life, our Pima and Tohono O'odham way of life.

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Code	Issue	Response
1	**Public Involvement**	The Draft Environmental Impact Statement was made available for the public to view online at <azdot.gov/southmountainfreeway>. Hardcopies were also made available for viewing at the following locations: Phoenix Public Library - Burton Barr Branch, Phoenix Public Library - Ironwood Branch, Avondale Public Library - Sam Garcia Western Avenue Branch, Tolleson Public Library, and the Arizona Department of Transportation Environmental Planning Group. Hardcopies of part or all of the Draft Environmental Impact Statement were also made available at the FedEx Office Print & Ship Center in Ahwatukee Foothills Village. A public forum was held in at the Komatke Boys & Girls Club on Saturday June 22, 2013. All study materials were available at that time for review and comment.
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Public Involvement**	The entirety of Chapter 2 of the Final Environmental Impact Statement is devoted to coordination and involvement with the Gila River Indian Community. A public forum was held in at the Komatke Boys & Girls Club on Saturday June 22, 2013. All study materials were available at that time for review and comment. Additional details related to the public outreach surrounding the release of the Draft Environmental Impact Statement can be found in Chapter 6, *Comments and Coordination*.

(Comment codes continue on next page)

Code	Comment Document

We are here still as people with a language, and it's not going to go away.

And God will not let this happen. God is on our side. He doesn't like that his mountain is being destroyed. And these are lies and manipulations to give them right-of-way that they've already decided on, that they've already approved. And this is a mockery that we even have a say right here, but we do have a say. We know that they have all these deals in place. The asphalt workers are ready to go, ready to pour. They're already ordering the supplies. They already have this whole plan in place. This is all a farce. And you can tell that they had it all worked out, maybe years ago, because why would they not have the library access for us? In Casa Grande, that Gila River has a, you know, it's available in Sacaton. That's only Sacaton. But they did not put the libraries that are of easy access to the Pima. They make sure it's far away, in places where people who don't even care about this area can access this, but it's not even -- it's at the Burton C. Central Library, but that's only because it's the main library, even that is hard to get to from here.

But I just want to say that they left out our cultural information. There is nothing out here

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about the Pima and Maricopa tribes. There is nothing about Gila River on this EIS study. There's nothing about the culture, the animals, nothing about it. It is all presented very one sidedly, and that's why this big, huge eight-lane freeway will not be built. We can let them put a two-lane level freeway, but this eight-lane freeway will not be built. I can speak right now. Yahweh will not let this freeway be built. That is not happening. It is not going to happen. No eight-lane freeway is going to be built.

That South Mountain is not going to be blasted, God's creation, his cultural marker for this tribe that goes from south of Flagstaff all the way down into Mexico is not going to be blown apart, and that is not the key to destroying my tribe, so that you can take my people's land in the year 3000, which is your plan, and I know. I already seen it in the paper. No.

Code	Issue	Response
4	**Cultural Resources**	Sensitive and confidential information regarding Native American sacred sites is not included in the Draft Environmental Impact Statement, a public document, as a means of protecting them. This information is included in the technical reports prepared for the project and is kept confidential.
5	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Dianne Barker Document Created: 5/21/2013 5:30:12 PM by Web Comment Form Thank you for the opportunity to participate in your very well organized Draft South Loop 202 EIS. I have spoken to the panel, gave testimony to the recorder, and entered my written comments. Just because I don't favor building, as specifically previously stated, the 202 loop, and think that ADOT simply is regurging old State Board adoption, does not mean am personally against ADOT. On the contrary, believe ADOT, our state "multi-modal" stated entity CAN do better! Good luck in the best endeavor, ADOT!!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Estudio de la Autopista
South Mountain
LOOP 202

2013

Reporte Del Impacto Ambiental
FORMULARIO DE COMENTARIOS

Comentarios Adicionales: Is simply "Old ADOT". It's rather unchanged since ADOT State BOARD'S 1980's Appsoval.

1 What is needed is an holistic review of all transportation of MAG with ADOT enjoining "IDOTS" Broadway Curve" — culprit of most pollution & congestion in Arizona!

2 Neither should we Pay more debt on our children with Status Quo expenditures Right-A-Way costs Pay (and owners — "Right to build on" floodplains deaths) Semi-Tolloress, Expensive public response to crash freeway accidents.

3 We need Safe, efficient, useful, Sustainable affordable, state-of-art to regional connective transportation. Even consider high-speed elevated fast train from Tucson to Phoenix around Broadway Curve as viable alternative!

4

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

PARA MÁS INFORMACÓN:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Final Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The determination of purpose and need for the proposed project includes an assumption that substantial improvements would be made to the Interstate 10 corridor between State Route 51 and U.S. Route 60 (see Final Environmental Impact Statement page 1-13). The Maricopa Association of Governments, in coordination with the Arizona Department of Transportation recently completed the Southeast Corridor Major Investment Study (see <azmag.gov/Projects/>) and developed multimodal concepts for addressing transportation issues in the Interstate 10 corridor. Even with these planned improvements to Interstate 10, the proposed project remains a vital component of the Regional Freeway and Highway System.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Safety and Health**	To reduce the number of freeway accidents and the expenses associated with responding to them, particular attention was paid to safety factors in the design of the proposed freeway. The proposed South Mountain Freeway's eight-lane section is shown on Final Environmental Impact Statement page 3-58, with discussion and remarks that the freeway would be consistent with the design of other freeways in the region and thereby would improve driver expectancy and safety. The sidebar on Final Environmental Impact Statement page 3-59 discusses the safety features of auxiliary lanes (used at traffic interchanges) for facilitating acceleration and deceleration, thereby reducing potential conflicts with through-traffic and travelers merging onto or exiting from the proposed freeway.
4	**Alternatives**	Alternatives were screened for their (see Final Environmental Impact Statement page 3-3): · ability to satisfy purpose and need · ability to minimize impacts on the human and natural environments · ability to improve operational characteristics of the region's transportation system · degree of public and political acceptability · ability to be constructed within project budget

Code	Comment Document

Estudio de la Autopista
South Mountain
LOOP 202

2013

Reporte Del Impacto Ambiental
FORMULARIO DE COMENTARIOS

Gracias por participar en el proceso de recopilación de comentarios sobre el Reporte del Impacto Ambiental del proyecto de la autopista South Mountain.

ADOT alienta a todos los interesados, a presentar sus comentarios por escrito sobre cualquier aspecto del Reporte del Impacto Ambiental. ADOT considerará todos los comentarios en la preparación final de este reporte e incluirá las respuestas a todos los comentarios, conclusiones finales sobre impactos potenciales, y la recomendación final de ADOT.

Para ADOT es muy útil recibir comentarios sobre:

- Alguna alternativa en particular, cúal sería su impacto ambiental y las medidas propuestas para reducir dicho impacto.
- Cualquier información que usted sienta que está incompleta o incorrecta.
- Cómo le afectará a usted la acción propuesta.

Los comentarios deben ser recibidos o tener el sello postal con fecha límite del 24 de julio de 2013. 7 Angela

Thank You for the Opportunity to be Heard and Considered in my following statement ADOT:

5 Am favoring "no build" Scenario. 40 CFR1502.4 stipulates this EIS be "rigourous exploration" of alternatives. Any real transportation/ congestion/pollution problem with determines action upon needs herein, should be current "Multi-modal". EVEN MAG's RTP in last 15 years considers all modes NOT just "freeways" an Oxymoron due to expensive costs, $$$. South loop 202 and its W59/E1 parts

Opcional

Nombre Dianne Barker Correo Electrónico dteam11@cox.net.

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Ciudad Arizona Estado AZ Código Postal 85003

Teléfono (602) 281-0917 Fax

Los comentarios deben ser recibidos o tener el sello postal con fecha límite de Julio 24,2013. Los comentarios pueden ser depositados en la reunión de hoy, enviados por correo electrónico a projects@azdot.gov **o por correo regular a :**
ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

PARA MÁS INFORMACÓN:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
5	**Traffic**	The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Draft Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The *Regional Transportation Plan* addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region. The Maricopa Association of Governments, as the region's metropolitan planning organization, has the responsibility to perform regional multimodal planning. The Arizona Department of Transportation is charged with implementation of the freeway program (of which the proposed freeway is a part) within the *Regional Transportation Plan*. Similarly, Valley Metro is charged with implementing the transit program within the *Regional Transportation Plan*.

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4352

We do have a light at 67th, which makes it a lot better for us. We didn't have the light for a long time. But they did put a light in, I guess, about a year or year and a half ago. Which I knew if they did that at the place where we exit from her home, it would make it a lot better too. They don't have a light there. They have one four blocks down the street. And we can sit there forever trying to get out of there.

And I guess that's about it for now. That's all I can think about right now.

Oh, except for the infrastructure. They did promise us we were going to have shopping centers and other things to make it convenient for us to live in that area. And they have never materialized.

My comments are certainly my own, and they may not be many of the other people's.

DIANNE BARKER: I am a resident, citizen resident here in Phoenix and have lived in the Valley for over 25 years.

I was raised in Ohio, The Buckeye State. And I do want to thank you for this opportunity to be heard and believe I will be considered by ADOT.

I am favoring no-build scenario. 40 CFR 1502.4 -- that's federal regulations -- stipulates that the Environmental Impact Statement, this EIS, be

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Code	Issue	Response
1	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Final Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The determination of purpose and need for the proposed project includes an assumption that substantial improvements would be made to the Interstate 10 corridor between State Route 51 and U.S. Route 60 (see Final Environmental Impact Statement page 1-13). The Maricopa Association of Governments, in coordination with the Arizona Department of Transportation recently completed the Southeast Corridor Major Investment Study (see <azmag.gov/Projects/>) and developed multimodal concepts for addressing transportation issues in the Interstate 10 corridor. Even with these planned improvements to Interstate 10, the proposed project remains a vital component of the Regional Freeway and Highway System.

Code	Comment Document

rigorous exploration of all alternatives.

Any real transportation, congestion, pollution problem which determined action upon the needs should be current with the idea of multimodal. It is a Maricopa, a MAG, regional plan trip term meaning many modes of transportation.

2

And MAG has been doing this in the last 15 years, considering all modes, just not the freeways and the traditional building of ADOT. By the way, freeway is an oxymoron due to the fact that somebody pays. They are very expansive too.

Now, South Loop 202 and its parts, W-59 and E-1, are simply old ADOT. It's rather unchanged since the ADOT state board approved it in the 1980s.

What is needed is a holistic review of all transportation of MAG with ADOT enjoining the I-10 EIS -- or MIS, as you may want to say -- around the Broadway Curve. That's the culprit here in the Valley. It's got the most pollution and congestion in Arizona, and it's right around six freeways of the Phoenix Sky Harbor, so you can understand that planes, trains, et cetera, commuter trains, freeways, and plumes, underground leakages; the whole ball of wax. That's where we should focus.

3

Now, neither should we lay more debt on our

Code	Issue	Response
2	**Purpose and Need**	The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Draft Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The *Regional Transportation Plan* addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region. The Maricopa Association of Governments, as the region's metropolitan planning organization, has the responsibility to perform regional multimodal planning. The Arizona Department of Transportation is charged with implementation of the freeway program (of which the proposed freeway is a part) within the *Regional Transportation Plan*. Similarly, Valley Metro is charged with implementing the transit program within the *Regional Transportation Plan*.
3	**Purpose and Need**	While the Interstate 10 Corridor Improvement Study was canceled by the Arizona Department of Transportation, there remains funding in the *Regional Transportation Plan* for substantial improvements along the Interstate 10 corridor. The Maricopa Association of Governments and Arizona Department of Transportation are initiating a new study to identify short-range improvements and a long-range multimodal framework for the Interstate 10 corridor.

Code	Comment Document

4

5

6

children with the status quo, using the exorbitant right-of-way freeway paid the landowners the highest buildout cost. The Arizona legislature has done that to us.

Nor should we ignore the many deaths, semi rollovers, and the expensive public responders to the many and frequent crash freeway accidents.

Now, what we need is safe, efficient, useful, sustainable, affordable, state-of-art regional connective transportation.

And even considering a fast train, high-speed elevated train, from Tucson to Phoenix around this Broadway Curve as a viable alternative.

MANUEL TOPETE: And I live in Laveen, 51st and Baseline. And I can't wait for this to happen. As simple as that.

My only regret is I won't live to see it. Just I wish it was already done. I think you should also hear this, aside from all this bad.

KARIN GRAY: I have been a resident of Ahwatukee for over ten years, moved here from Texas, and absolutely love South Mountain. One of the reasons I moved to that area was to have access to all 15 miles of the Nation Trail, from one end to the other on South Mountain, the biggest city park in the United States.

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
4	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Safety and Health**	To reduce the number of freeway accidents and the expenses associated with responding to them, particular attention was paid to safety factors in the design of the proposed freeway. The proposed South Mountain Freeway's eight-lane section is shown on Final Environmental Impact Statement page 3-58, with discussion and remarks that the freeway would be consistent with the design of other freeways in the region and thereby would improve driver expectancy and safety. The sidebar on Final Environmental Impact Statement page 3-59 discusses the safety features of auxiliary lanes (used at traffic interchanges) for facilitating acceleration and deceleration, thereby reducing potential conflicts with through-traffic and travelers merging onto or exiting from the proposed freeway.
6	**Alternatives**	The Arizona Department of Transportation is currently undertaking a study related to passenger rail between Tucson and Phoenix (see <azdot.gov/planning/CurrentStudies/PassengerRail/overview>). Passenger rail between Tucson and Phoenix would not adequately address projected capacity and mobility needs of the Phoenix metropolitan area and, therefore, would not meet the purpose and need criteria.

Code	Comment Document

family's safety, if for nothing else, I say yes, let's do it. And the 59th Avenue Freeway is the one that I would be concerned about.

Thank you very much.

THE FACILITATOR: Thank you, Ms. Williams.

We welcome our next speaker, Diane Barker. Welcome, Ms. Barker, you have three minutes.

MS. BARKER: Oh, thank you. And I imagine you're the ADOT board; is that who I'm addressing? Can I get you to respond? Okay. Now that you notice, I came in with my suitcase. I am a person that believes in [unintelligible]. I have just seen your video, and I've read the bulk of your EIS. And I would like to apologize up front if what I have to say offends anybody, but I believe it's the truth, certainly mine.

I favor a no-build. 40 CFR 15024 stipulates that the Environmental Impact Statement conducted by ADOT and all will be a rigorous exploration of alternatives to a real problem, need an action herein, of any possible growth in population with socioeconomic viability, as we are one of the USA's largest and fastest-growing counties, Maricopa.

Therefore, completion of the South 202 Loop

(Comment codes begin on next page)

Code	Issue	Response

(Responses begin on next page)

Code	Comment Document

is a regurgitative ADOT state board 1980s idea, out of date of current modes, multi-modalism, certainly defined by MAG's members, department and public deserving safe, efficient, convenient, affordable, state of art, usable, sustainable transportation. Resolution of any real or perceived problem of the region's priority and its plan should be holistic and inclusive of present and future largest pollution and congestion areas in MAG -- in the MAG region, the Broadway curve.

ADOT wrongly eliminated I-10 CIS, favoring building Loop 202 south. Why? Is it because the state legislative body still allows the building of public dollars going to right-of-way purchases? For example, landowners have to pay the highest in build-out compensation -- they would receive the highest in build-out compensation for their property when ADOT builds it.

These horrible and expensive life-taking accidents that are currently around our I-10 because of our current modes, the rollovers of trucks and so -- and a lot of vehicles, this extends from I-10 to Broadway curve down to Tucson, clutters our freeways, stops progress. I won't accept this. I won't ignore better multi-modal solutions, even high

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www.drivernix.com

Code	Issue	Response
1	**Purpose and Need**	The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Draft Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The *Regional Transportation Plan* addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region. The Maricopa Association of Governments, as the region's metropolitan planning organization, has the responsibility to perform regional multimodal planning. The Arizona Department of Transportation is charged with implementation of the freeway program (of which the proposed freeway is a part) within the *Regional Transportation Plan*. Similarly, Valley Metro is charged with implementing the transit program within the *Regional Transportation Plan*.
2	**Alternatives**	While the Interstate 10 Corridor Improvement Study was canceled by the Arizona Department of Transportation, there remains funding in the *Regional Transportation Plan* for substantial improvements along the Interstate 10 corridor. The Maricopa Association of Governments and Arizona Department of Transportation are initiating a new study to identify short-range improvements and a long-range multimodal framework for the Interstate 10 corridor.
3	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Safety and Health**	To reduce the number of freeway accidents and the expenses associated with responding to them, particular attention was paid to safety factors in the design of the proposed freeway. The proposed South Mountain Freeway's eight-lane section is shown on Final Environmental Impact Statement page 3-58, with discussion and remarks that the freeway would be consistent with the design of other freeways in the region and thereby would improve driver expectancy and safety. The sidebar on Final Environmental Impact Statement page 3-59 discusses the safety features of auxiliary lanes (used at traffic interchanges) for facilitating acceleration and deceleration, thereby reducing potential conflicts with through-traffic and travelers merging onto or exiting from the proposed freeway.
5	**Alternatives**	The Arizona Department of Transportation is currently undertaking a study related to passenger rail between Tucson and Phoenix (see <azdot.gov/planning/CurrentStudies/PassengerRail/overview>). Passenger rail between Tucson and Phoenix would not adequately address projected capacity and mobility needs of the Phoenix metropolitan area and, therefore, would not meet the purpose and need criteria.

Code	Comment Document

speed rail to --

THE FACILITATOR: Thank you, Ms. Barker, I'm sorry, your three minutes have run.

MS. BARKER: -- killing the citizens, just to satisfy old ADOT.

THE FACILITATOR: I'd like to welcome our next speaker, Travis Hardin.

Welcome, Mr. Hardin, you have three minutes.

MR. HARDIN: Thank you. To the committee that sits here today, I'm definitely in favor of this Loop 202 transition. I believe this is going to do two major things: One thing that's focused on is the congestion coming from the Southwest Valley, as well as the West Valley. I think you free up a lot of travel time, travel space for those community members that are in the Laveen area, Tolleson, Avondale. I think you're going to clear up with this project, with the proposed being a yes, I think you're going to clear up more room for retail. I think this brings a lot of retail opportunity for the Southwest Valley, and then you also -- you open up areas for the East Valley to meet with the West Valley. I'm not a native of Arizona, but you often hear about people in the West Valley saying they don't know much

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:44 PM
CALLER: MIKE BARKLY	CALLER ADDRESS:
PHONE: 602-633-4287	EMAIL:

1

CALLER REMARKS/QUESTIONS:

I am in support of the South Mountain Freeway. I am a native of Phoenix, Arizona and I own a freight forwarding business and I think this would be ideal for our economy. Thank you very much. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Jill Barnard
To: Projects
Subject: Pecos Rd Freeway
Date: Monday, May 27, 2013 12:51:04 PM

1 2 3 4 5 6 7

I currently reside at the end of Pecos Road in a Woodside housing development. My family moved here to be farther away from the hustle and bustle and to take advantage of Pecos Rd as a route to exercise and stay healthy. We bike ride as do hundreds of people who also enjoy running, rollerblading, and hiking.

I am extremely opposed to building a freeway on the Pecos alignment. This will not only change our ability to have a quiet out of the way place to live, but will ruin our environment, air quality, view and noise level. This would have an impact on our way of life in Ahwatukee.

Please consider other alternatives as hundreds of people will be impacted in a negative way including my family who has lived here for 10 years and plan to stay through retirement.

Sent from my iPad

Code	Issue	Response
1	**Traffic**	The study has considered concepts for parallel multiuse paths, however the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
2	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Neighborhood**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21).
4	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	
6	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
7	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 3:49 PM
CALLER: PATRICIA BARNELL	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I'm a voter, I live in Phoenix, Arizona and I am calling in support of the South Mountain freeway. I have been approved by voters and I am a strong believer that it should be completed as it will help with our traffic congestion. Thank you so much.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202
Date: Tuesday, May 14, 2013 9:46:37 AM

From: Javier Barraza [mailto:javier_b86@yahoo.com]
Sent: Friday, May 10, 2013 7:00 PM
To: Projects
Subject: Loop 202

1 Lets build it.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Susan Barrett

Document Created: 7/24/2013 8:36:06 PM by Web Comment Form

1 2 3 Please do not continue the efforts to extend the Loop 202 around South Mountain from Chandler to Laveen, AZ. Based on the materials provided, I do not agree that the extension would alleviate traffic or provide a vital traffic route around the city. I do believe that the extension would contribute to the degradation of the Valley's air quality, cost the taxpayers too much money and force the relocation of too many businesses and homes. No on 202 extension!

Code	Issue	Response
1	**Purpose and Need**	The proposed freeway is needed to serve projected growth in population and accompanying transportation demand and to correct existing and projected transportation system deficiencies. See Chapter 1, *Purpose and Need*, in the Final Environmental Impact Statement. Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Acquisitions and Relocations**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway (Loop 202)
Date: Wednesday, May 22, 2013 10:51:13 AM

From: benandelliesmomma [mailto:benandelliesmomma@gmail.com]
Sent: Tuesday, May 21, 2013 12:22 PM
To: Projects
Subject: South Mountain Freeway (Loop 202)

1 2

I want to express my absolute support to get this freeway built. We in Laveen are in need of infrastructure and transportation options... the whole west valley would benefit from greater infrastructure and transportation options that would alleviate congestion and provide better access to the I-10. It is a wonderful opportunity to connect people and places, creating a greater more beautiful community. Please also consider when building this freeway that families and communities would greatly appreciate bike paths, bridges and sound walls that would add functional beauty to all the communities! Please build for our future!!! Thank you.

Amberlee Barricklow

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Code	Issue	Response
1	**Design**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation's standard applications.
2	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 4:32 PM
CALLER: IQBAL BASHARAT	CALLER ADDRESS: 2701 E. BOSTON STREET, GILBERT, AZ 85295
PHONE: 480-775-6077	EMAIL:
CALLER REMARKS/QUESTIONS: I support the proposed freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments about South Mountain freeway
Date: Tuesday, April 30, 2013 8:52:57 AM

From: Faisal Bashir [mailto:fbashir79@gmail.com]
Sent: Saturday, April 27, 2013 7:56 AM
To: Projects
Subject: Comments about South Mountain freeway

1

Respected Sir/Madam
Extention of freeways is part of modern life and construction of South mountain free way will have positive impact on community especially laveen residents. Construction of South Mountain freeway is not only required but its also right of residents to reach hospitals, emergency cares, schools, colleges, work on time. It will definately help save lifes. Please go for it, this project should not be stopped for any reason.

Thanking you
Faisal Bashir
5817 S 53rd Glen
Laveen, AZ

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Wednesday, May 29, 2013 8:25:54 AM

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Anne Bassett
Sent: Tuesday, May 28, 2013 5:00 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.
(3) ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

The basis for building new roads is WILDLY UNREALISTIC PROJECTIONS OF UNSUSTAINABLE POPULATION GROWTH. Please do not destroy Arizona beauty for an almost extinct dependancy on personal automobiles & gasoline.
Thank you
Councilperson Anne Bassett

Sincerely,

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Ms. Anne Bassett
PO Box 34
32 Magnolia
Jerome, AZ 86331-0034
(928) 639-3875

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Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Sierra Club on behalf of Joan Batchelor
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Tuesday, June 04, 2013 9:37:50 AM

Jun 4, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) (6) (7) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

When relatives and friends from out of state visit, they all comment on what a great park we have in the South Mountain Park and it is often what they remember most.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mrs. Joan Batchelor

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	1022 N Delmar Mesa, AZ 85203-5002 (480) 710-8687

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Proposed Loop 202
Date: Wednesday, May 22, 2013 10:51:43 AM

-----Original Message-----
From: Andy Bateman [mailto:bonsaiandy@cox.net]
Sent: Tuesday, May 21, 2013 11:46 AM
To: Projects
Subject: Proposed Loop 202

Dear Sir, Ma'am,

1 I am writing in support of the proposed Loop 202 extension. This extension will provide a long-needed relief for surface streets in South Phoenix and Laveen, Arizona where I live. This will increase the level of overall safety on our streets and reduce the amount of wear-and-tear on the surface roadways, and reduce air and noise pollution where I live.

This extension is long overdue and needs to be fully funded and completed as soon as possible.

Sincerely,

Andrew Bateman
6316 S. 45th Drive
Laveen, AZ 85339
602-237-8288

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Proposed Loop 202
Date: Wednesday, May 22, 2013 10:51:41 AM

-----Original Message-----
From: Lindsay Bateman [mailto:lindsaydbateman@cox.net]
Sent: Tuesday, May 21, 2013 12:38 PM
To: Projects
Subject: Proposed Loop 202

1

> I am writing in support of the proposed Loop 202 extension. This extension will provide a long-needed relief for surface streets in South Phoenix and Laveen, Arizona where I live. This will increase the level of overall safety on our streets and reduce the amount of wear-and-tear on the surface roadways, and reduce air and noise pollution where I live.
>
> This extension is long overdue and needs to be fully funded and completed as soon as possible.
>
> Sincerely,
>
> Lindsay Bateman
> 6316 S. 45th Drive
> Laveen, AZ 85339
> 602-237-8288

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

4277

with the intention that the freeway had been approved. So we really struggle with being able to get to the places that we need to get to, particularly having a, you know, young son. We don't have the resources that we need. So we just really want to stay in Laveen. We want Phoenix and the Laveen area to stay liveable, but without the freeway, we're stuck in traffic. We can't get the hospital, the resources and things that we need without it.

So we just encourage moving forward with the plan for the freeway. Thank you.

THE FACILITATOR: Thank you.

Lindsay Bateman.

An announcement, please. The last bus will be running in about five minutes, at 7:30, for all destinations, orange, green, and blue, routes 1, 2, and 3.

MS. BATEMAN: Just talk? All right.

THE FACILITATOR: Are you Lindsay?

MS. BATEMAN: I'm Lindsay Bateman. I'm just here to support the South Mountain Freeway. I'm a resident of Laveen. And I'm just looking forward the economic development open to our area, and really relieve the congestion on the surface streets. And

1

Page 107

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

help the commute to work. I know a lot of times the freeway, I-10 gets closed and then the surface streets are just blocked all the time and I just really hope that we can get there. We moved to Laveen counting on that freeway coming in, knowing that it was approved, so I just really hope that you guys take that into consideration and support the freeway.

That's all I have to say. Thanks.

THE FACILITATOR: Thank you.

For those of you who may not have heard, the last bus is leaving in about three minutes for all destinations out there.

Jennifer Rouse, take your time.

MS. ROUSE: Hi, thank you. I wanted to speak on the record in favor of the 202. I live in Laveen, and have lived there for seven years. When we first moved there I lived close to 35th and [unintelligble] Road, where traffic jams pretty much with the big trucks going down the road, and things have changed, and having moved closer to 51st Avenue and Baseline, we see the semis that come through that earlier we heard people talk about how this is going to bring all of these semis coming through the neighborhood. It's already there. It's already

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:59 PM
CALLER: FRED BATES	ADDRESS: 1001 EAST BASELINE ROAD, PHOENIX, AZ 85042
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in support of the South Mountain Freeway that we have voted on twice, originally 20 some years ago. Thanks.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Friday, June 14, 2013 8:08:29 AM

-----Original Message-----
From: Sandy Bauer [mailto:sandy@whalen-family.org]
Sent: Thursday, June 13, 2013 6:56 PM
To: Projects
Subject: South Mountain Freeway

I support the Loop 202 South Mountain Freeway.

1

I live in the West Valley and think it will help cut down on the horrible congestion on the I-10 freeway.

Sandra Bauer
13615 W. Meeker Blvd
Sun City West, AZ 85375

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:52 PM
CALLER: JOHN BEAUREGARD	CALLER ADDRESS: 2422 E. RIVIERA PLACE, CHANDLER, AZ 85249
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I have been in Chandler for 18 years and I totally support this freeway. This freeway was known about this extension since I've been here and would great to get this extension put in. I work in Phoenix and this would greatly reduce my travel time. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 4:53 PM
CALLER FRANK BECK	CALLER ADDRESS: 2639 N. 33RD AVENUE, PHOENIX, ARIZONA 85009
PHONE: 602-423-0027	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, I'd like to voice my opinion and I'd like to support the South Mountain freeway. Ahh once again, I would like to support the new proposed freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Please give us out South mountain Freeway
Date: Tuesday, June 25, 2013 1:22:27 PM

From: melodie.beck@gmail.com [mailto:melodie.beck@gmail.com]
Sent: Tuesday, June 25, 2013 12:56 PM
To: Projects
Subject: Please give us out South mountain Freeway

1

We Moved to Laveen almost 10 years ago. Part of the reason we moved to this part of the valley was because we were told that the South Mountain Freeway would be built through Laveen. This area grew astronomically the first year we lived here. The traffic in our area has become so bad that getting on to Baseline road and 51st ave. can take you 7-10 minutes or longer during the morning and evening commuter traffic. Please honor the voters that passed the bills to build our freeway. We have taken our time to vote so don't show us that our votes don't count or that we should have voted differently for the people making the decisions.
Thank you for listening
Melodie Beck
602-502-8076

Sent from Windows Mail

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Brent BeDillon

Document Created: 5/21/2013 1:58:25 PM by Web Comment Form

1

As a daily commuter on I-10 I feel it is important that we have additional routes between the East and West valleys. The highways are congested now and with future growth the existing highways will not be able to handle the traffic. The existing roads are becoming unsafe with the amount of traffic that is expected to use them. Additional routes are needed to make the roads safe for our families to travel.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Southmountain Freeway Extension
Date: Wednesday, July 24, 2013 8:29:30 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT Communications

From: Gretchen Beers [mailto:ghbeers@cox.net]
Sent: Wednesday, July 24, 2013 8:28 AM
To: Projects
Subject: Southmountain Freeway Extension

1

It is time for ADOT to correctly interpret the needs of the South Mountain Freeway Extension as it relates to the needs of the US Interstate 10 that now provides the only access into and around Phoenix for residents and commercial entities in Ahwatukee and points south. ADOT has a duty to resolve the problems on the federally funded Interstate 10 that worsen on a daily basis. Interstate 10 is the primary southern conduit linking east to west, and it's capability to meet this need is already being compromised. The South Mountain Freeway Extension is a vital solution to ease the Interstate 10 problems, no matter what path it may take. As a member of the silent majority who regularly use Interstate 10 and wanting this project to go forward as planned, I urge ADOT to not be swayed by the relatively few who oppose the extension for selfish reasons, such as buying and owning homes that were clearly presented many years ago as being in the path of a future freeway.

Gretchen Holden Beers
3422 E Winona St
Phoenix, AZ 85044

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, July 16, 2013 10:08:26 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Jerry and Judy Bell [mailto:belljxj@yahoo.com]
Sent: Monday, July 15, 2013 4:19 PM
To: Projects
Subject: South Mountain Freeway

1

I think this is a total waste of taxpayer's money. Use the $2,000,000,000 to upgadre all of the roads throughout Arizona. 22 miles for $2Billion... forget it!

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Code	Issue	Response
1	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa County region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund the projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of Federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make additional funds available for other statewide projects.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Let"s Build the 202 South Mountain Freeway
Date: Wednesday, May 15, 2013 11:19:33 AM

From: Michel Bendeck [mailto:chmc98@aol.com]
Sent: Wednesday, May 15, 2013 11:13 AM
To: Projects
Subject: Let's Build the 202 South Mountain Freeway

Ref: Loop 202 South Mountain Freeway

1 I strongly support the construction of Loop 202 South Mountain Freeway.

Thank you,

Michel Bendeck
chmc98@aol.com
Off. 480-451-5200
Cell 480-201-1510

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 S MT. freeway...
Date: Monday, May 20, 2013 8:32:17 AM

-----Original Message-----
From: BENIKAT@aol.com [mailto:BENIKAT@aol.com]
Sent: Saturday, May 18, 2013 6:32 AM
To: Projects
Subject: 202 S MT. freeway...

1

I firmly support that proposal...

R BENI
Retired Phoenix P D.</HTML>

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Proposed South Mountain Freeway
Date: Monday, May 20, 2013 8:21:54 AM

From: Bennett, Marsha - SJHMC [mailto:Marsha.Bennett@DignityHealth.org]
Sent: Monday, May 20, 2013 6:31 AM
To: Projects
Subject: Proposed South Mountain Freeway

1 I am writing in opposition to this freeway taking portions of the South Mountain Preserve. Aside from the damage to the ecosystem, this project damages the heart of what makes living in PHoenix so wonderful.

For many years my out of town visitors remark at how much foresight and wisdom was done in preserving the mountain areas. My father stated: What a wonderful effort.

2 The mountain preserves are the only thing that makes living in Phoenix bearable. Hopefully, you can find a better alternate route.

Thank you,

Marsha Bennett

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.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, E1 Alternative**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:15 PM
CALLER: ROBERT BENNING	CALLER ADDRESS: 2514 S. LOS FELIZ, TEMPE, AZ 85282
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I'm for the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:19 PM
CALLER: JAMES BENSON	CALLER ADDRESS: 2220 S. SHANNNON DRIVE, TEMPE, AZ 85282
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the plans for the Loop 202 South Mountain Freeway. Thanks.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I SUPPORT THE NO ACTION (AKA NO BUILD) ALTERNATIVE FOR THE FOLLOWING REASONS:

1 ① AS A TRIATHLETE, I USE SOUTH MOUNTAIN PARK ON A REGULAR BASIS FOR BICYCLE TRAINING. THE PARK IS VERY POPULAR FOR CYCLISTS, RUNNERS AND HIKERS. THE PROPOSED FREEWAY WOULD CAUSE INCREASED AIR POLLUTION WHICH

2 WOULD NEGATIVELY IMPACT OUR HEALTH. IT IS NOT FAIR TO ASSUME THAT COMPARABLE AIR POLLUTION WOULD RESULT FROM THE NO ACTION ALTERNATIVE.

3 ② THE PROPOSED FREEWAY (ALL ACTION ALTERNATIVES) WOULD LARGELY BLOCK AN IMPORTANT WILDLIFE CORRIDOR CONNECTING SOUTH MOUNTAIN PARK TO THE ESTRELLA MOUNTAINS. (OVER)

Optional

Name DON BENTLEY Email DONBENTLEY@EARTHLINK.NET

Address 301 W. WINDSOR AVE

City PHOENIX State AZ Zip 85003

Phone 602-230-7273 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	
3	**Biology, Plants, and Wildlife**	

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

4 (3) IT IS UNCONSCIONABLE THAT OUR FREEWAY PLANNERS WOULD AGAIN LOOK TO OUR PRECIOUS MOUNTAIN PRESERVES AS AN EASY PLACE TO GET RIGHT-OF-WAY FOR THEIR FREEWAY PROJECTS.

5 (4) SOUTH MOUNTAIN PARK IS A WORLD FAMOUS URBAN PARK AND A MAJOR TOURIST ATTRACTION FOR PHOENIX. THE PROPOSED FREEWAY WOULD DETRACT FROM THE PANORAMIC DESERT VIEWS IN THE PARK AND WOULD

6 INCREASE NOISE LEVELS.

THANK YOU FOR THE OPPORTUNITY TO COMMENT ON THIS DRAFT EIS.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
6	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Sierra Club on behalf of Dahniayl Benyahmeen
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 11:14:51 PM

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

Only the "Anti-Christ" would approve of such a thing. Is that ADOT???

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Dahniayl Benyahmeen
PO Box 209

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	Grand Canyon, AZ 86023-0209

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

Thank you.

If anyone else is in the auditorium and would like to speak, please make sure you register at the front desk. Your name will appear on the screen, and we'll call you up in the appropriate order.

Thank you.

Also, please be respectful of all the speakers; your comments need to be kept to yourself, regardless of your side of the issue.

Thank you. The next speaker, could you use this microphone, please.

Tony Berastegui, I'm sorry, I probably didn't say that right.

MR. BERASTEGUI: That was pretty good.

THE FACILITATOR: I'm sorry, if I butchered it too much. You have three minutes. Please begin, thank you.

MR. BERASTEGUI: Alan, Steve, Matthew, thank you for your time, I'm Tony Berastegui, originally from Miami, Florida. I'm now a resident of Laveen. Graduated from Arizona State University. And I moved to Laveen because I thought they were going to build the 202 that was approved by voters in 1985 and again in 2004. And I'm kind of here to figure out why it hasn't been built yet, so I

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

educated myself.

It's time to build the South Mountain Freeway. Valley commuters have waited in traffic jams long enough. The freeway will cut traffic congestion across the metro area, reduce air pollution and save drivers time and money. 64.3 percent of likely voters in Maricopa County support construction of the freeway, according to the results of a new poll commissioned by the We Build Arizona. 19.6 percent said they were either opposed or likely to oppose a project. In a separate survey also commissioned by We Build Arizona, 59 percent of likely voters living in Ahwatukee and Laveen support the freeway as well. If we don't build the South Mountain Freeway, traffic in the region will get much worse over the next two decades. According to ADOT's own study, traffic on I-10 between Ahwatukee and Goodyear will grow 28 percent. Another 103,000 cars will use the Broadway curve each day. Another 38,000 cars will jam the tunnel every day. Morning and evening commute times will increase 39 percent to 82 percent, traffic congestion on city streets will increase 46 percent. The same report indicates the project also will reduce air pollution by reducing the time vehicles spend stuck in traffic. The

Code	Issue	Response
1		Comment noted.

Code	Comment Document

project will create 38,000 jobs during the five- to six-year construction period that will result in a $2 billion investment in the Phoenix area economy.

The money to build the freeway is in the budget, and again, this has been approved by voters twice, first in 1985 and again in 2004. I approve the 202, and I would like to see it built. Thank you for your time.

THE FACILITATOR: Thank you, sir. Garell Jordan. Did I get that name proper?

MS. JORDAN: Garell.

THE FACILITATOR: Ma'am, you have three minutes. Here's the timer; please begin.

MS. JORDAN: My name is Garell Jordan; I am a proud resident of Laveen for the last two years. We moved to Laveen, I live at 64th Avenue and Southern, so very close to the 59th Avenue alignment. We knew when we moved there that there was a freeway planned. And we moved there because we wanted more acreage; we wanted land for our animals; we have six dogs, three horses, and a bunch of chickens. But we also knew that we wanted to live in close proximity to downtown Phoenix, where I work, two blocks from here. And we knew that we wanted some of the amenities of living in the city that, you know,

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: south mt freeway
Date: Monday, May 20, 2013 8:34:25 AM

-----Original Message-----
From: David Berliner [mailto:dcberliner@mac.com]
Sent: Friday, May 17, 2013 9:42 PM
To: Projects
Subject: south mt freeway

1 Please--I have lived in Ahwahtukee and Tempe for over 25 years, always waiting for this freeway to be built.
NOW please build it before I get to old to ever use it.

David C. Berliner
Regents' Professor Emeritus
Arizona State University
120 E. Rio Salado Parkway
Tempe, AZ 85281-9116

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Kenneth Berry Document Created: 5/21/2013 3:27:59 PM by Web Comment Form Construction of the South Mountain Freewayy will complete the outer loop around Phoenix, reduce traffic congestion, and support economic development. I fully support the project.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:57 PM
CALLER: BONNIE AND CHARLIE BETTS	CALLER ADDRESS: 1527 S. LONGMORE COURT, CHANDLER, AZ 85286
PHONE: 480-899-5087	EMAIL:
CALLER REMARKS/QUESTIONS: We support the freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:36:25 AM

From: BEYERN@nationwide.com [mailto:BEYERN@nationwide.com]
Sent: Monday, May 13, 2013 1:34 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

DO IT!

Seriously.. Build the South Mountain Freeway... money well spent.. as opposed to the failed people mover project...I'm sorry I meant light rail...

Nationwide® On Your Side

Nate Beyer
Specialist, Customer Solutions
OT Run MCTS Windows 7 A+ | Nationwide
W 480-365-3933 | C 602-448-7061 | F 480-365-5443
beyern@nationwide.com
Nominate Someone for Bravo Recognition!

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 JUST IN CONSIDERATION OF THE COST, I DO NOT UNDERSTAND HOW THIS PROJECT CAN BE CARRIED OUT. IF THE LAND HAD BEEN PURCHASED & SET ASIDE BACK WHEN THE PROJECT WAS RECORDED, IT MAY HAVE BEEN FEISBLE. TODAY, HOUSES & COMMUNITIES

2 HAVE BEEN ESTABLISHED. THE CITY & STATE ~~DOES~~ DO NOT HAVE THE FUNDS TO PURCHASE & DESTROY WHAT HAS BEEN BUILT. THESE FUNDS CANNOT BE RECOVERED.

3 ON A PERSONAL SIDE, I DO NOT WANT THE ADDITIONAL TRAFFIC THAT WOULD BE ROUTED THROUGH OUR COMMUNITY.

Optional

Name LYNN BIAGIOTTI Email

Address 15820 S 25TH WAY

City PHOENIX State AZ Zip 85048

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-550

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land despite the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
2	**Purpose and Need**	The cost estimate for the proposed freeway includes the cost to acquire, relocate residents, and clear the necessary properties for the freeway as well as to build and design the project (see page 3-59 of the Final Environmental Impact Statement). The funding for the project is programmed in the Maricopa Association of Governments *Regional Transportation Plan*, adopted by the Maricopa Association of Governments Regional Council, and the Arizona Department of Transportation 5-year Transportation Facilities Construction Program, approved by the State Transportation Board. Both actions indicate this project is the highest priority for each agency. The funding for right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources.
3	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

Code	Comment Document

From: Sierra Club on behalf of Bettina Bickel
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Thursday, May 30, 2013 6:38:53 PM

May 30, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.

(3) ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more

(5) vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. What a shame that we would even consider destroying part of it with a freeway. The park was set aside to protect resources and to benefit our communities; it is a point of pride in our community that we should be protecting. By blasting a freeway through a portion of this park, wildlife and habitat

(7) will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center. Phoenix is one of the ten most dangerous cities for pedestrians and bicyclists, and we should spend money on making safe bikeways and greenbelts that will improve our health, reduce gasoline consumption, and improve air quality.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Ms. Bettina Bickel
9218 N 51st Dr
Glendale, AZ 85302-3401
(623) 939-1667

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

Dear Study Team,

(1) I strongly oppose the proposed South Mountain freeway. The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(2) (3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) (5) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. What a shame that we would even consider destroying part of it with a freeway. The park was set aside to protect resources and to benefit our communities; it is a point of pride in our community that we should be protecting. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(6) (7) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center. Phoenix is one of the ten most dangerous cities for pedestrians and bicyclists, and we should spend money on making safe bikeways and greenbelts that will improve our health, reduce gasoline consumption, and improve air quality.

(8) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

(1) Bettina Bickel
9218 N. 51st Dr.
Glendale, AZ 85302

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
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4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

4358

doing a great job and we appreciate that. Thank you.

At this point, David Bickford. Mr. Bickford.

MR. BICKFORD: Good morning, thank you for the opportunity. In discussing the proposed freeway's impact on South Mountain, ADOT spokesperson Tim Tate has said the following: "You can't build a freeway without some sort of consequence."

That's true, but what the statement omits is the distinction between acceptable consequences and unacceptable ones. If we allow the world's largest municipal park to be violated by a freeway, Phoenix may become the world's largest municipal laughingstock; that is clearly an unacceptable consequence. If we absolutely must have this freeway, then another route must be found. Nevertheless, it's unclear if this freeway is needed at all.

After reading the entire report, I believe it is based on out-of-date assumptions and faulty reasoning. On the issue of induced demand, I quote from the draft: "The purpose of the proposed action is not to promote economic development, but to respond to a growing need for additional transportation capacity as a result of regional growth occurring now and is projected. Therefore, the action alternatives are not expected to contribute to induced growth in the region."

Page 7

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Old Plan or Use of Old Data**	
3	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

That's like going to the doctor, telling him or her that you eat nothing but bacon, but you don't expect any negative impact on your health because you aren't eating bacon with the intent of hurting your health. If only we can simply wish away the unintended consequences of our actions. The more likely outcome is that this freeway will provide short-term relief but that induce more traffic. Contrary to the claims made in the report, induced demand happens routinely as a result of road building, even when transportation demand exceeds supply.

4

Of course, there are different ways to meet transportation demand, and a far better scenario is not a freeway connecting two suburban neighbors but instead, enriching those areas with the best possible rail and bus links to existing employment centers. Unfortunately, the draft report dismisses these options with insufficient consideration.

Chapter three notes that "No planned rail lines will serve the territory connected by the proposed freeway," but doesn't even contemplate that additional rail lines beyond those currently planned could be added. A strategy that does not rely exclusively on automotive travel would be aligned with shifting demographic realities, ones that were ignored in the draft EIS. Since 2005 there has been substantial downturn in driving

5

Page 8

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Code	Issue	Response
4	**Purpose and Need**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
5	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

6

and car ownership by young adults. Why, then, assume that patterns that held prior to 2005 will inevitably be repeated over the next few decades? Why not reinforce this positive trend toward diminished driving by enhancing transit, rather than building a freeway that may counteract the positive trend with an inducement to drive more?

Please don't destroy part of South Mountain on the basis of insufficient justification. I urge you to rethink this report and the freeway it recommends.

THE FACILITATOR: Thank you, Mr. Bickford.

Shana Velasquez.

MS. VELASQUEZ: Hi, thank you. I may not be as eloquent of a speaker as my speakers before me, but I'm here today as a mother that lives in Laveen. And we moved there originally four years ago because we were told there's going to be a lot more things that were going to be built, and so far that has not happened because we do not have the access to the 202. We can't have a hospital, we don't have a rec center, I have to drive my children 30 minutes just to, you know, take them to dance classes.

I personally work in Tempe, I used to work in North Scottsdale when I originally moved to Laveen and that takes me the same amount of time to get to Tempe as

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Code	Issue	Response
6	**Traffic**	The historical growth in the Maricopa County region is discussed in the Draft Environmental Impact Statement beginning on page 1-5. The critical factors such as available land, mild climate, affordable cost of living, and employment opportunities that led to the historical growth rates in the region remain unchanged. The comment relies heavily on national trends for travel; however the local conditions and setting of the Phoenix metropolitan area are not consistent with areas of high-density cities in other parts of the country. In Maricopa County, daily vehicle miles traveled levels increased by almost 2 percent between 2011 and 2012 and the 2012 daily vehicle miles traveled is approaching the prerecession peak in 2007. (*Source:* Arizona Department of Transportation Multimodal Planning Division Highway Performance Monitoring System Data for the Calendar Year 2012 and 2011). Even if the trend of vehicle miles traveled "per capita" decreasing continues, the total vehicle miles traveled in the region would still increase along with increases in total population. A critical factor not acknowledged in the comment is that the proposed project is needed today. Details of this need are presented in the Draft Environmental Impact Statement beginning on page 1-13. While new projections based on the 2010 Census and emerging national trends may show a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the need for the freeway has not changed. The Maricopa Association of Governments approved new socioeconomic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments on the South Mountain Freeway Draft EIS
Date: Wednesday, June 26, 2013 10:42:24 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: David Bickford [mailto:exit2lef@gmail.com]
Sent: Wednesday, June 26, 2013 10:16 AM
To: Projects
Subject: Comments on the South Mountain Freeway Draft EIS

I am commenting as a concerned citizen and not as a representative of any organization. In discussing the proposed freeway's impact on South Mountain, ADOT Spokesperson Tim Tait has said the following: "You can't build a freeway without some sort of consequence …." That's true, but the statement fails to distinguish between acceptable consequences and unacceptable ones. If we allow the world's largest municipal park to be violated by a freeway, Phoenix may become the world's largest municipal laughing stock. If we absolutely must have this freeway, then another route must be found. Nevertheless, it's unclear if this freeway is needed at all. After reading the entire report, I believe it is based on out-of-date assumptions and faulty reasoning. (1)

Starting with the issue of induced demand, I quote from the draft: "The purpose of the proposed action is not to promote economic development but to respond to a growing need for additional transportation capacity as a result of regional growth occurring now and as projected. Therefore, the action alternatives are not expected to contribute to induced growth in the region."

That wording is astonishing. The claim being made in the passage above can be compared to going to the doctor, telling him or her that you eat nothing but bacon, but that you don't expect any negative impact on your health because you aren't eating bacon with the intent of hurting your health. If only we could simply wish away the unintended consequences of our actions. The more likely outcome is that this freeway will provide short term relief but then induce more traffic.

Contrary to the claims made in the report, induced demand happens routinely as a result of road building, even when transportation demand exceeds supply. The induced traffic may not come primarily from the Laveen and Ahwatukee neighborhoods linked by the proposed freeway, but instead from more far-flung suburban regions that become more appealing when a commute that had been previously unthinkable suddenly becomes "not so bad." Is it really in the best interests of the metropolitan area to enable daily drives between Buckeye and Queen Creek, for example? (2)

Supporters of the South Mountain Freeway claim that construction of this road will bring economic development to Laveen. While a freeway is likely to bring construction projects and real estate investment to the area, the most likely result will be inefficient, unsustainable job sprawl instead of a strong local economy. The idea of decentralized employment has been pursued for years, most notably in Phoenix's urban village concept, and its failure is evident in the long suburb-to-suburb commutes that have resulted.

Because contemporary labor markets are so specialized, few job seekers find work in their particular professional niches close to home. Instead, the jobs in one suburb are often filled not by nearby

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

residents, but instead by people commuting long distances in single-occupant motor vehicles from another suburb miles away. Even if one is lucky enough to find work close to home, job transfers and office relocations are such a frequent occurrence that the congruence of residence and workplace can disappear with little notice. Likewise, even someone employed close to home may find his or her spouse, domestic companion, or adult child traveling a long distance to find employment in his or her area of specialized area of expertise.

For all those reasons, a far better scenario is not a freeway connecting two suburban neighborhoods and encouraging unproductive land use, but instead enriching those areas with the best possible rail and bus links to existing employment centers. Unfortunately, the draft report dismisses these options with insufficient consideration. Chapter 3 notes that no planned rail lines will serve the territory connected by the proposed freeway, but doesn't even contemplate that additional rail lines beyond those currently planned could be added.

3

That's quite an omission considering how many times the map of planned light rail extensions has been revised since the passage of Proposition 400 in 2004. The original map did not envision light rail in South Phoenix, but a line to that part of town is now being studied. A second phase extending that line to Laveen might be feasible. While the study acknowledges that other modes of transport could be added in the future, relegating non-automotive modes to a wish list is not responsible planning. The time to look at those alternatives in depth is now, before any park land is sacrificed for a freeway.

Similarly, the report considers each mode of transport in isolation without appropriate attention to the possibilities that an appropriate mixture of modes might present. Could the proposed freeway be built as a parkway with a smaller footprint? The study claims that would not fulfill transportation needs by itself, but doesn't address the possibility of a parkway combined with investments in public transit as a more balanced approach to regional transportation needs.

4

A strategy that does not rely exclusively on automotive travel would be in line with shifting demographic realities, ones that were ignored if the draft EIS. Since 2005, the date from which most projections in the report are extrapolated, there has been a substantial downturn in driving and car ownership, particularly by young adults. Quoting from the U.S. Public Interest Research Group's May 2013 report, "The Millennial generation is leading the change in transportation trends. 16 to 34-year-olds drove a whopping 23 percent fewer miles on average in 2009 than in 2001— the greatest decline in driving of any age group." Why then assume that patterns that held prior to 2005 will inevitably be repeated over the next few decades?

5

Of course, one might argue that a reduction in driving could offset the induced traffic mentioned earlier in these comments. That optimal balance between opposing forces would come about only with extraordinarily good fortune. Instead of relying on luck, why not reinforce the positive trend toward diminished driving instead of building roads that might have a contrary effect of inducing traffic? In addition, why spend substantial amounts of money on a freeway that may not be needed when it is clear that increasing numbers of Americans want to see more investment in public transit, along with bicycling and pedestrian infrastructure.

In light of all these considerations, the only logical conclusion is that the draft report relies on outmoded data and assumptions to forecast growth in vehicle miles traveled, and it casually dismisses non-automotive modes of travel that might meet transportation demand, either by themselves or in conjunction with a smaller road project. Even if ADOT's VMT projections are accurate, it likely the freeway will only worsen the problem due to induced demand. Don't destroy part of South Mountain on the basis of such insufficient justification. Please rethink this report and the freeway it advocates.

David Bickford
2001 E Orangewood Ave
Phoenix AZ 85020
exit2lef@gmail.com

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Code	Issue	Response
3	**Purpose and Need**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Draft Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
4	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Traffic**	The historical growth in the Maricopa County region is discussed in the Draft Environmental Impact Statement beginning on page 1-5. The critical factors such as available land, mild climate, affordable cost of living, and employment opportunities that led to the historical growth rates in the region remain unchanged. The comment is based on national trends for travel; however, the local conditions and setting of the Phoenix metropolitan area are not consistent with areas of high-density cities in other parts of the country. In Maricopa County, daily vehicle miles traveled levels increased by almost 2 percent between 2011 and 2012 and the 2012 daily vehicle miles traveled is approaching the prerecession peak in 2007. (*Source:* Arizona Department of Transportation Multimodal Planning Division Highway Performance Monitoring Program Data for the Calendar Year 2012 and 2011). Even if the trend of vehicle miles traveled "per capita" decreasing continues, the total vehicle miles traveled in the region would still increase along with increases in total population. A critical factor not acknowledged in the comment is that the proposed project is needed today. Details of this need are presented in the Draft Environmental Impact Statement beginning on page 1-13. While new projections based on the 2010 Census and emerging national trends may show a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the need for the freeway has not changed. The Maricopa Association of Governments approved new socioeconomic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 6:18 PM
CALLER JENNIFER BIFERT	CALLER ADDRESS: 314 W. PEYUTE AVENUE, PHOENIX, ARIZONA 85027
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am for the freeway, I think it is a good idea. We need to build it. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 4:34 PM
CALLER: BILL AND CATHY	CALLER ADDRESS:
PHONE:	EMAIL: BILLANDCATHY@MET.COM

CALLER REMARKS/QUESTIONS:

1 Hi, I am in favor of the 202 but if I ever receive a message from 'Let's build the 202' to my e-mail again without my permission, I'm going to create a stink. There is an opportunity at the bottom of the e-mail to opt out, but when you do you get a fake system message that says if you continue you might have a virus or you might contract a virus on your PC. But if you continue to it anyway it doesn't allow you to unsubscribe cause then it says you haven't picked any list to unsubscribe from. So I consider the whole thing complete and utter bullshit. So if you ever send a message to Bill and Cathy @ met.com again it will not be the last time you hear from me. Thank you.

Code	Issue	Response
1	**Public Involvement**	Comment noted. E-mail did not come from the Arizona Department of Transportation It was sent by a private group called We Build Arizona.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:17 PM
CALLER: DAVID BIMACHINSKI	CALLER ADDRESS: 438 E. NETTLES LANE, GILBERT, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I just wanted to say that I have complete support for that extension of the Freeway. It is going to avert traffic, heavy semi traffic out of the Phoenix area and let them get around to their destination faster and reduce the congestion of the freeway as it is now. So, I can't imagine a reason why it wouldn't be built and hope it goes forward.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:03 PM
CALLER: JAN BINDER	CALLER ADDRESS: 5707 N. 18TH PLACE, PHOENIX, AZ 85016
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: In favor of the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:32 PM
CALLER: JARRED BIRD	CALLER ADDRESS: 874 E. AQUARIUS PLACE, CHANDLER, AZ 85249
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I have lived in the valley 37 years. I am a high-paying tax citizen and I fully support the expansion of the South Mountain Freeway system. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:09 PM
CALLER: KEN BIRD	CALLER ADDRESS: 7207 W. GETTY DRIVE, PHOENIX, AZ 85043
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway project and Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Wednesday, May 22, 2013 10:54:21 AM

From: Tamal Biswas [mailto:tbiswas@gmail.com]
Sent: Tuesday, May 21, 2013 7:18 AM
To: Projects
Subject: South Mountain Freeway

Hello,
I am a resident of Laveen and would like to thank the ADOT project team for completing the Draft EIS.

By looking a the details of the Draft EIS, it absolutely makes sense that the E1 and the W59 are the Recommended Alternatives.

1

I am looking forward eagerly for this freeway to be built quickly as we have a huge commute problem in Laveen area. The Baseline road is heavily clogged during rus hours and also when it is free cars go at a very high speed through Baseline road due to unavailability of any nearby freeway for people travelling from Laveen to South East valley. Taking the I-10 E from Laveen for travelling to Chandler is not really an option.

Also I think this proposed South Mountain freeway would free-up the downtown congestion with I-10 and improve the overall air quality of central Phoenix area.

All the best to the ADOT project team!!

Regards,
Tamal Biswas

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I used to live in Laveen and work in Chandler. The commute traffic through Baseline was getting so worse that I had to move to Chandler. I still have my house in Laveen and I think the economic growth of the Laveen area will grow significantly when this freeway is built.

PLEASE BUILD South Mountain Freeway ASAP !!

Optional

Name Tamal Biswas Email tbiswas@gmail.com

Address 421 N Kenneth Pl

City Chandler State AZ Zip 85226

Phone 5209713979 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-100

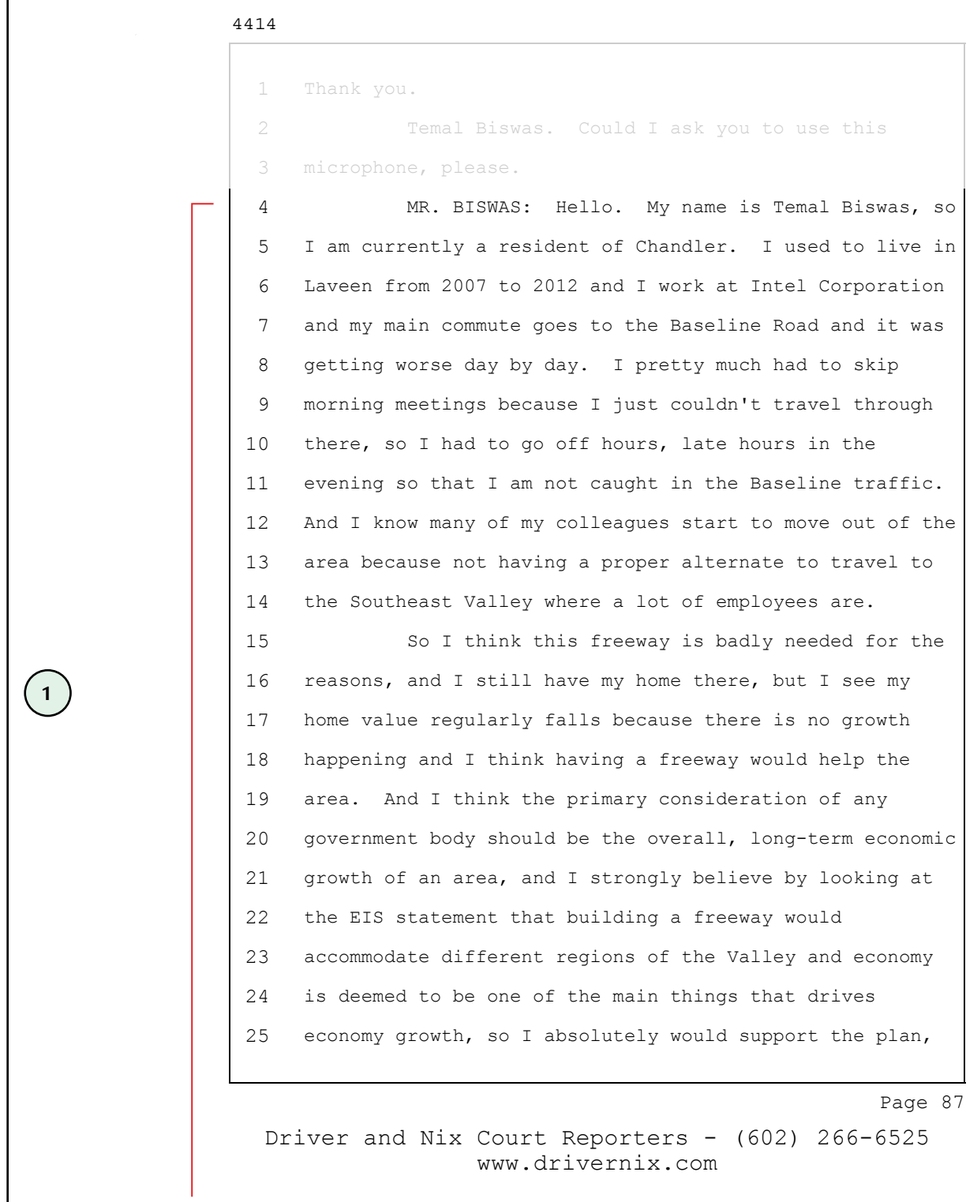
ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document



4414

Thank you.

Temal Biswas. Could I ask you to use this microphone, please.

MR. BISWAS: Hello. My name is Temal Biswas, so I am currently a resident of Chandler. I used to live in Laveen from 2007 to 2012 and I work at Intel Corporation and my main commute goes to the Baseline Road and it was getting worse day by day. I pretty much had to skip morning meetings because I just couldn't travel through there, so I had to go off hours, late hours in the evening so that I am not caught in the Baseline traffic. And I know many of my colleagues start to move out of the area because not having a proper alternate to travel to the Southeast Valley where a lot of employees are.

So I think this freeway is badly needed for the reasons, and I still have my home there, but I see my home value regularly falls because there is no growth happening and I think having a freeway would help the area. And I think the primary consideration of any government body should be the overall, long-term economic growth of an area, and I strongly believe by looking at the EIS statement that building a freeway would accommodate different regions of the Valley and economy is deemed to be one of the main things that drives economy growth, so I absolutely would support the plan,

1

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www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

the proposed alternative to build the freeway. Thank you.

THE FACILITATOR: Thank you.

Phillip Morales.

Use this microphone, please.

MR. MORALES: Good evening. Thank you for letting me speak. I'm kind of emotional right now, but I'm a veteran, I'm a Gila River Community member, I speak my language, I'm very related to my culture.

South Mountain is the most sacred mountain we have for the Akimel and O'odham people. And I know that's -- I'm from District 6 and I know that that freeway's going to go through our cultural sites. Elaborate petroglyphs that our great-, great-, great-, great-grandfathers kids' hands put their hands on there. You know, I could put my hand on there, I know I'm touching their hands from hundreds of years ago.

Suhu, man of the maize, you all know was -- this was the son of God, like Jesus Christ, it was son of our mountain tribes, we are all related to one God. He came down from heaven, we call him elder brother Suhu, he came and lived in South Mountain and he showed us how to live our life, the four stages of life: How to respect, how to learn your language, your first love, when you have a family do it right, then your third sage is to become

Code	Issue	Response

Code	Comment Document
1	Thomas Biswas Document Created: 7/21/2013 9:08:01 AM by Web Comment Form The video and the simulation was very informative. After viewing the materials in the website, I feel so much confident knowing that ADOT has done a through study to come up with the draft EIS and recommending the preferred alternatives. The Loop 202 South Mountain Freeway is badly needed to connect the east and west valley and will be a huge economic driver for the phoenix metro area.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4407

timer. Please begin.

MR. BIVVINS: Okay. Pretty much the same thing, I travel on this piece of freeway every day between the 99th and 59th Avenue, and it's the biggest bottleneck in town. We watch the news every morning and that piece of freeway is always backed up and a mess every day, every morning and every afternoon.

So the thought to me is to bring the 101 down and feed to the freeway and bring the 202 up and feed into that freeway. Everyone going north who wants to go north will get on that piece of I-10, Everyone going south would go on that piece of I-10. If you lined them up, that piece of freeway will not end up being jammed up with all this traffic, it will end up being funneled on that five-mile stretch of road.

I'm all for the 202, I just think it could be moved further west where Tolleson is at and go through that same piece of freeway, that same interchange and make it one big -- hopefully like the other things are in town. That's all I have. Thank you.

1

THE FACILITATOR: Thank you.

Another reminder for those of you who are in the ballroom, if you're planning on speaking please make sure you register at the registration desk, your name will appear on the screen, and we'll call you in the order

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 7:18 PM
CALLER: KIMARA BLACK [UNCLEAR]	CALLER ADDRESS: 5656 W. 17TH AVENUE, C7
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain Freeway. The building of it, I think is a wonderful thing.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:14 PM
CALLER: DOMINIC BLACKMORE	CALLER ADDRESS: P.O. BOX 50086, PHOENIX, AZ 85076
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am a long time resident of Ahwatukee and I definitely support the South Mountain Freeway. We need more ways in and out of this huge cul-de-sac. Thank you. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 6:06 PM
CALLER: MIKE BLACKWELL	CALLER ADDRESS: 16814 WEST ORACLE RIM, SURPRISE, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I just wanted to leave a message that I support the South Mountain freeway. I think it's good for the Arizona economy and would bring a lot of different jobs and subsequently would definitely make transportation much better when you move around the Phoenix area. Thank you. Bye now.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Raelynna Blair Document Created: 7/24/2013 11:40:16 PM by Web Comment Form I absolutely want the freeway. Laveen has no restauramts or anything for a family to do. With the 202 I could get to these things easier as well as get to work in Chandler easier. Also, this would help with the congestion on Baseline and the 10

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:44:01 AM

From: BBlake4192@aol.com [mailto:BBlake4192@aol.com]
Sent: Friday, May 17, 2013 5:56 PM
To: Projects
Subject: 202

1

We would like the South Mountain freeway to be built.
Thank you.
Michael and Elizabeth Blake

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build South Mountain Freeway Please
Date: Wednesday, May 22, 2013 10:51:39 AM

-----Original Message-----
From: Dorothy [mailto:mdbless@yahoo.com]
Sent: Tuesday, May 21, 2013 1:40 PM
To: Projects
Subject: Build South Mountain Freeway Please

Ladies & Gentlemen,

1 I vote in favor of this long over due project. I recently moved to Laveen, AZ (originally from San Antonio, TX) in March 2013 and agree that this highway would bring a positive economic impact to Laveen, AZ and help drivers like myself commute better in the metro Phoenix area. Please do not delay this project anymore. I can hardly wait to see the construction team to build...wish it were tomorrow!

Thank you for reading.

Sincerely,
Maria D. Blessing
6920 W. Darrel Rd.
Laveen, AZ 85539

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Charles
To: Projects
Subject: 202
Date: Wednesday, July 24, 2013 9:51:45 AM

1

To whom it concerns

I am against the the southwest portion of the 202 I feel the the draft EIS was not thorough . Much smarter infrastructure options exist in the city center

Charles Blonkenfeld

Phoenix, Arizona

Sent from my iPhone

Code	Issue	Response
1	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: public hearing phase of the Draft Environmental Impact Study/South Mountain Freeway
Date: Friday, June 07, 2013 3:26:49 PM

From: Brynda Blowers [mailto:taloatombi@gmail.com]
Sent: Friday, June 07, 2013 3:11 PM
To: Projects
Subject: public hearing phase of the Draft Environmental Impact Study/South Mountain Freeway

Dear ADOT,

As a longtime resident of Ahwatukee, I am deeply opposed to the freeway being built through the Ahwatukee Foothills.

I lived and raised my son in the Ahwatukee Foothills for many years. After 4 years in Seattle I have once again chosen Ahwatukee as my home for my my family. Ahwatukee is a unique part of Phoenix that enjoys access to one of the most beautiful parts of the city, the foothills and South Mountain Park. We live here because of the quality of life. It is quiet, has relatively low crime and traffic and has more of a "neighborhood" feel than most parts of the city. In addition, and probably most importantly, we are surrounded with the beautiful Sonoran Desert and it's wildlife. We enjoy seeing javelina, coyotes, owls, eagles etc. on a regular basis that reside in South Mountain Park and the surrounding desert. (1)

We currently reside just a couple of miles north of Pecos road at the base of South Mountain and would love to continue to make our home here. We chose the area specifically because of it's separation from the rest of the city, it's desert (not city) feel, it's distant proximity to a freeway and general quality of life.

Building the freeway would route the freeway by-pass directly through the Ahwatukee foothills. First of all, the noise pollution alone would ruin the serenity we currently enjoy as part of our quality of life. Secondly, the long-term impact of the pollution of hundreds of thousands of cars and trucks through this pristine desert environment is almost unimaginable. Not only to the desert animals we share our home with but to all of the residents of the Ahwatukee foothills. Thirdly, the quality of life that the residents chose the foothills for would all but disappear. Property values will plummet, crime will rise, and our "neighborhood feel" will be a thing of the past. Furthermore, there is always the potential of hazardous waste accidents on the freeway and an unimaginable impact from that alone. And lastly, the construction of the freeway itself would immediately and intensely disrupt the lives of all foothills and Gila River residents in a dramatically negative manner. (2) (3) (4) (5) (6) (7)

I simply cannot imagine climbing telegraph pass trail as I often do and instead of the serene beautiful view of the desert as far as the eye can see south, there is a roaring freeway and a resulting low hanging dark cloud of pollution. (8) (3)

The Ahwatukee foothills are one of the last remaining truly lovely and suburban desert areas of Phoenix with one of the highest qualities of life in the city in my opinion. This proposed freeway would forever ruin the area and I would imagine prompt many, many residents (including myself) that chose the area because of it's beauty and remoteness to leave.

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Air Quality**	
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138-47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Draft Environmental Impact Statement sidebar on page 4-21.
7	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.

Code	Comment Document
9	I urge you to find another solution to this proposed freeway to preserve the residents quality of life, the beautiful foothills and the desert surrounding it. Once the freeway is built this area will forever change for the negative and the desert foothills will never be the same. This brings tears to my eyes. Please find another solution with far less impact to this environment and neighborhood. Sincerely, Brynda L. Blowers 730 E. Mountain Sage Dr Phoenx, Az 85048 Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
9	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

1 2

3

4

5

MS. BLOWERS: I am deeply passionate about this neighborhood. My son grew up here, and we loved it so much. We moved to Seattle, and when we came back to Phoenix, we chose Ahwatukee again, to live here. So we love the neighborhood. We live up against South Mountain.

So I have several things I'm deeply opposed to about this.

Number one, the construction alone: the impact on the neighborhood traffic, the noise, the dust. I can't even imagine the problems we would have with that.

Number two, there is animals all over this place. It's separated from the city. You know, we hear the coyotes at night. We have eagles. We have owls. The environment alone, the exhaust from the freeway. The impact on the land and the animals would just change so much. South Mountain Park is something that we use a lot.

Number three, the proximity to the schools. My son attended Keystone Montessori. It's right next to where the freeway will be built. It's an amazing school. I can't even imagine how different it would be, being right next to a freeway, because, you know, it's just so -- It's so much desert. It's just desert out there. You can see the stars at night. You know, it's quiet. I would really be concerned about -- I just wouldn't want my son to attend a school next to a freeway.

Code	Issue	Response
1	**Construction**	The freeway construction staging plan for the area along Pecos Road would allow for keeping east-west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.) Where feasible, noise barriers would be constructed as early as possible in the construction phasing to shield adjacent properties from construction-related noise impacts
2	**Safety and Health**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
3	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Noise**	

Code	Comment Document

6

7

5

8

Number four, the housing impact. I think property values would drop considerably because the desirability of the neighborhood would greatly go down. I personally would -- probably would leave the neighborhood. So it just wouldn't be the same. And I think that would really impact the housing market.

Number five, it would route all the trucks with hazardous waste through the Ahwatukee Foothills. And all those trucks that are bypassing Phoenix: Right through.

Again, the school, the proximity to the schools; there is always a possibility of an accident. The -- I just -- I can't -- I would never move here if that were, you know, an issue.

Number six, the noise alone. I know there would be sound walls built. But we live up against South Mountain. I think that would create kind of a -- just a noise tunnel between the freeway and South Mountain. I think it would -- It's really quiet at night here. It's nice. It's serene. It's the reason we moved here. The freeway would change all of that, noise-wise, noise pollution.

And the most important point of all is that Ahwatukee is very unique in the Phoenix area. You know, there is places in other cities that -- Cave Creek has the term of the mountains of the desert. Parts of Scottsdale, Carefree, you know, they have that, what people move there for. And

Code	Issue	Response
6	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
7	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes, which may be elevated above the roadway, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Valley and across the country.

Code	Comment Document

9

people -- This is, I think, the last part of Phoenix that I know of that has that kind of charm and quietness, and you live in the city but you're not in the city.

The reason -- People don't move to Ahwatukee because it's convenient. They call it the world's largest cul-de-sac. I personally moved here because it's not convenient. Both times I moved here, we chose to be as far from the freeway as possible because we knew that's less pollution, less noise, less crime.

You build a freeway right through the Ahwatukee Foothills: The charm, I mean, you know, the noise. You would have exits. There would be, you know, who knows? Truck stops, gas stations would be built. Everything that comes with a freeway.

10

Immediately, crime is completely going to change. The crime is relatively not -- It's not bad out here. I mean, it is here, but we don't really worry about it much because, you know, it's too inconvenient. Things don't happen out here. You know, crooks don't want to come out and rob you and then drive 10 miles back to the freeway. It's just too -- You know, it does happen, but I think crime would go up exponentially.

The entire -- Again, the inconvenience of Ahwatukee. We're sandwiched back here in the corner, behind the mountain. We have the reservation on the other side. So it's this little micro-environment of: You know, we are part

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www.drivernix.com

Code	Issue	Response
9	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
10	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

of Phoenix, but we're completely separate. And we live here because we love that. We love that.

I don't mind driving, you know, 20 minutes into the city. I just don't mind it. For me, the tradeoff is worth it.

I think the entire charm, the neighborhood feel of Ahwatukee which it really has right now, would completely change. I think the impact on what Ahwatukee is, a neighborhood, a quiet neighborhood, a safe neighborhood, a place to raise children, a beautiful neighborhood -- Granted, you know, a lot of that, some of it won't change.

But the long-term impacts on the environment, on South Mountain. You know, I can't imagine climbing that, like we do all the time in the winter, and looking out and it's, you know, seeing a haze and seeing the freeway instead of just beautiful desert. I mean, it just will change everything.

11

And I -- It would make me so sad to -- I would want to leave. You know, I don't want to be that close to a big freeway. I don't want to be that close to -- to the noise. I don't want to be that close to -- Well, the reason we moved out here is because we're -- we're separate. We're far. We like it that way.

And I -- I think, generally, most people would agree with me. It makes -- It's a very, very unique neighborhood to Phoenix because of the way it -- because it's the world's largest cul-de-sac. It is -- It has charm. It has

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Code	Issue	Response
11	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.

Code	Comment Document

quiet. It has the environment. It has -- We're separated a little bit from the smog because of that. And that's very important to me.

I think a freeway down Pecos Road, where -- where they plan on, is just going to change everything. It's going to change everything. I just can't even imagine it. And it just brings me to tears to think about it. And I hope -- I hope the people, you know, are paying attention and they can find another alternative for this.

Or perhaps don't even build it. You know, ultimately, just leave it the way it is. Phoenix is big enough. You know, things -- Certain things are inconvenient. But, you know, find another solution because I think I speak for a lot of people. We don't want it. And I think it will just ruin what is the last of Phoenix's very unique neighborhoods.

You know, I would personally want to move to something like Cave Creek, if this happens, because of that.

So I just urge them to consider an alternative, something without the incredible, incredible environmental and neighborhood impact. There is only something like 77,000 residents here. The impact, you know, in the Foothills, to those people, would be enormous comparatively and to each individual family that lives there and the children.

And -- And I think, honestly think -- I can't

12

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Code	Issue	Response
12	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

13

imagine a lot of people staying, because the people that I know live in Ahwatukee because of how it is right now: quiet, serene, less pollution, less crime, dark, quiet.

And that would change everything. So they need to find another alternative.

Code	Issue	Response
13	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Lindsey Blum Document Created: 5/21/2013 3:42:21 PM by Web Comment Form I support the Loop 202 South Mountain Freeway. I think that it will benefit the valley greatly both economically, and for the sake of efficiency in traffic flow.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Barbara Boblett Document Created: 5/21/2013 1:46:52 PM by Web Comment Form I want to express my support for the proposed loop 202. It has been approved by the voters and discussed for over 20 years. The need for it has only increased. As a resident of Laveen for the past 7 years I have seen the great increase in traffic with little increase in businesses. I beleive this freeway will help not only the traffic but the economics of the area.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/14/13	INCOMING CALL TIME: 10:22 AM
CALLER: BARB BOBLETT	CALLER ADDRESS: 7118 W. ELLIS STREET, LAVEEN, AZ 85339
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Hi. I just wanted to leave a message with my support for putting in the freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: No South Mountain Freeway
Date: Monday, May 20, 2013 8:34:38 AM

From: Theodore Bodjanac [mailto:tbodjanacrelc@yahoo.com]
Sent: Friday, May 17, 2013 9:42 PM
To: Projects
Subject: No South Mountain Freeway

1
2
3
4

I am a resident of Laveen and I am completely against the new freeway idea as it will destroy the quality of life in this community. We don't want this to become another central Phoenix or Tempe. Life here is peaceful and it needs to stay this way. Please respect the lives of the people of our community and do not build this freeway through the South Mountain area.
Freeways divide communities, destroy nature and bring urban blight. You need to find another place for a bypass. We don't want it here.

Theodore G. Bodjanac
Laveen, AZ

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Code	Issue	Response
1	**Neighborhoods/ Communities**	The Laveen Village area is anticipated to have a built-out population of over 105,000 (see Final Environmental Impact Statement page 4-14). This proposed level of development places increasing demand on the road network. The City of Phoenix's General Plan for Laveen Village has designated areas along the proposed freeway for commercial development that cannot support the projected densities without implementation of the proposed freeway. Without the proposed freeway, the conversion of land from undeveloped and agricultural uses to residential, commercial, and industrial land uses would likely continue, placing a greater demand on surface streets (see Final Environmental Impact Statement page 4-14).
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need, Truck Bypass**	
4	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Sierra Club on behalf of Murray Bolesta
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 12:05:31 PM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

America's past was defined by rapacious exploitation. Her future will be defined by balanced conservation.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. (3) ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, (5) more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, (7) wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Murray Bolesta
291 W Calle Lecho
Green Valley, AZ 85622-1603

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/14/13	INCOMING CALL TIME: 2:15 PM
CALLER: GARY BONEBRIGHT	CALLER ADDRESS: 3844 E. SEQUOIA TRAIL, PHOENIX, AZ 85044
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway extension. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:31 PM
CALLER: DAVID BOONE	CALLER ADDRESS: CHANDLER, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I do support the Loop 202 South Mountain Freeway going down Pecos Road and connecting to Interstate 10 on the west valley. I am a supporter of that and I would like to see that pushed through. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:22 PM
CALLER: SHARON BOREAJON	CALLER ADDRESS: PARADISE VALLEY, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Hello, I support the 202 freeway extension around South Mountain.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 Freeway comment
Date: Tuesday, June 18, 2013 9:50:56 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Paul Bosch [mailto:paul.bosch@southmountaincc.edu]
Sent: Tuesday, June 18, 2013 9:21 AM
To: Projects
Subject: Freeway comment

To whom it may concern:

1 We would urge ADOT to make the connection with I-10 west (59th Ave) starting at Riggs Road and cutting west. This location has very few nearby homes or communities, that would suffer from the huge amount of air and noise pollution generated by a new Freeway.

2 3 4 The proposed route along Pecos road, in contrast, is very close to thousands of homes, along with churches and schools - with many people who would suffer daily from the intense pollution.

5 We also urge ADOT to avoid cutting into South Mountain Park. The Phoenix area had plenty of roads, highways, and sprawled developments, but the park is a irreplaceable jewel of peace, quiete, and desert habitat within this huge metropolitan areas. To have a freeway so close to the park (actually within part of the park) would be a tragedy for all of our valley residents and tourist visitors.

6 Lastly, Pecos road has become a Mecca for bicyclists, runners, roller bladers and others, with its wide shoulders and desert views. Putting a freeway there instead would of course destroy the value and current use of this important road.

Thank you for reviewing our comments,
Paul and Pamela Bosch

--
Paul Bosch: Ed.D
Professor of Biology
7050 South 24th Street Phoenix, AZ 85042
phone | 602-305-5795

Code	Issue	Response
1	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	
5	**Section 4(f) and Section 6(f)**	
6	**Neighborhoods/ Communities**	The study has considered concepts for parallel multiuse paths, however the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

email | paul.bosch@southmountaincc.edu
website | www.southmountaincc.edu

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Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:38:45 AM

From: Jeremiah Botello [mailto:jeremiah.botello@gmail.com]
Sent: Saturday, May 11, 2013 11:21 AM
To: Projects; info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Let's do it!

--
Jeremiah Botello

'A disciplined mind is one which can read, write critically and do efficient work in discovery.'

- Mortimer Adler

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Jeff Bowman Document Created: 5/21/2013 8:34:00 PM by Web Comment Form This section of the freeway is overdue to be built. It is unfortunate that the State did not lock up this land earlier and avoid the extra costs that will be incurred to build it today. I would prefer to see it built on the reservation and let Pecos remain as a street. It could be useful as a relief if there was ever an accident on the new freeway.

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 4:25 PM
CALLER: JOHN BOWN	CALLER ADDRESS: 2610 EAST BEVERLY ROAD, PHOENIX, ARIZONA 85042
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 And I am in support of building the extension of the freeway south of South Mountain to connect the 202 out to the Interstate 10. Thanks bye, bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Matthew Boyd Document Created: 7/12/2013 1:26:27 PM by Web Comment Form

1 Soon I will be leaving Arizona and the Ahwatukee Foothills area that I have called home for the past 31 years. ADOT do your best to destroy this wonderful community and I will remember it fondly as it used to be and should remain. What person has this project continuing seems to want to remain hidden but there is no doubt there is a person who is 2 driving this insistently forward. Aside from a few developers and greedy land owners, who couldn't care less about our community, no one wants to see the truck traffic this road will 3 bring. Anyone who has seen the roads and the traffic, as I have for many years traveling for work, knows the attraction of this by-pass will be irresistible for the big rigs. The prevailing winds will blow it all right into the Foothills and into Ahwatukee. Who is it that is so angry with 4 Ahwatukee Foothills?

Code	Issue	Response
1	**Purpose and Need**	The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I oppose the South Mt. Freeway for several reasons:

1 • Impact on air quality, e.g. children + schools near the Freeway. It's been determined that asthma + Autism are linked to auto + diesel exhaust fumes.

2 • No one has convinced me that this road is needed.

3 • No one has convinced me that it will not become a TRUCK route for CAN-MEX TRUCKS

Optional

Name John Boyer Email NBJohn@Cox.Net

Address 2545 E Cathedral Rock Dr

City Phoenix, AZ State Zip 85048

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 15-150

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Purpose and Need, Truck Bypass**	

Code	Comment Document

From: John Boyer
To: Projects
Subject: comments on S Mountain Freeway
Date: Wednesday, July 24, 2013 3:41:17 PM

As an Ahwatukee senior resident, and supporter of PARC, I appose the freeway for the following reasons:

1 Dated projections were used to justify the project. No justification to build it now. Plus growth conditions can change due to water shortages, etc. which could diminish the need of such an expensive and divisive project.

2 No emergency plan is part of "draft" to evacuate residents in the event of a chemical spill.

3 4 Mexican truck traffic would generate high sulphur diesel exhaust fumes, exasperating existing and causing new serious breathing problems.

5 It is an environmental travesty to ruin South Mountain Park by routing the unnecessary freeway through it. This would never be acceptable in environmental friendly states like Oregon, Washington, or California.

John f. Boyer
2545 E. Cathedral Rock Drive
Phoenix, AZ 85048

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Hazardous Materials**	
3	**Trucks**	
4	**Air Quality**	
5	**Section 4(f) and Section 6(f)**	

Code	Comment Document

Stephen Bradford

Document Created: 5/21/2013 3:39:56 PM by Web Comment Form

1 I am in favor of the new Freeway. I support either the W59 alternative or the W101 Central alternative with a preference of the W101. I beleive that the study participants have put forth a good faith effort to determine all the possible impacts that this new freeway will have and have done a good job of mitigating those impacts with the alternatives proposed. Phoenix is going to continue to grow whether this freeway is built or not, the only way to keep Phoenix a great place to live is to provide the people with adequate infrastructure.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
5/15/13	6:23 PM
CALLER: JOANNE BRADFORD	CALLER ADDRESS: QUEEN CREEK, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the building of the new freeway. Thank you. Bye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support South Mountain Loop 202
Date: Monday, May 20, 2013 8:32:25 AM

-----Original Message-----
From: Mike C. Bradley [mailto:mcbradley@safeguard.us]
Sent: Saturday, May 18, 2013 5:57 AM
To: Projects
Subject: Support South Mountain Loop 202

1

I'm writing in support of the building of the South Mountain Loop 202 Extension. This route is long overdue and will have a long term positive impact in our valley. I'm an Awhatukee/Foothills resident of 20 years and I urge you to move forward to build this freeway.

Mike Bradley
Sent from my iPad

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:31:52 AM

-----Original Message-----
From: Carol Bradley [mailto:mutzeraz@yahoo.com]
Sent: Saturday, May 18, 2013 8:29 AM
To: Projects
Subject: 202

1

I do NOT want 202 too many trucks

Sent from my iPhone

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Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Kenn Bradley
To: Projects
Subject: South Mountain Freeway
Date: Tuesday, July 23, 2013 6:17:58 PM

1 2 3 4

I would like to express my desire for a no build option on the proposed loop 202 South Mountain Freeway. I use Pecos Road for biking and find the unobstructed view of the mountains important to my community.

I do not want Ahwatukee to become a major thoroughfare for cross-country traffic. I believe this proposed freeway is a waste of taxpayer money.

5

Thank you for your time and consideration.

Kenneth Bradley
4023 E. Hiddenview Drive
Phoenix, AZ 85048

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
4	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
5	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Monday, May 20, 2013 8:27:42 AM

From: catherine bradshaw [mailto:catherine_bradshaw@yahoo.com]
Sent: Saturday, May 18, 2013 1:56 PM
To: Projects
Subject:

1

I support building 202

Cathy

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Red Mountain Freeway
Date: Monday, May 20, 2013 8:22:42 AM

From: Bob Brady [mailto:bob051904@yahoo.com]
Sent: Sunday, May 19, 2013 9:01 PM
To: Projects
Subject: 202 Red Mountain Freeway

AZDOT,

1 I support the 202 Red Mountain Freeway build. Traffic is constantly getting worse and will never get better. I understand that this is an expensive project, however, it will never be cheaper to build that right now and the need will only increase!

If more tax is needed for this project I for one will pay more taxes as this is a vital project and if Arizona is to continue to grow and attract more people and more business we must build it and as soon as possible. Thank you for listening to my thoughts!

Best Regards,

Robert H. Brady

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

KYLA BRAKER: I believe that there should be actually an exit also off of 32nd Street. That's all.

* * * *

Code	Issue	Response
1	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange would have displaced more than 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

Code	Comment Document
1	Dave Brandau Document Created: 7/23/2013 9:54:50 PM by Web Comment Form Build it! When looking at what has been done for the freeway transportation system in the phoenix metro area, it is more than obvious that the Loop 202 (South Mountain Freeway) is the primary component that is missing. When we see 2nd tier freeways being built prior to this (e.g. 303) and see what local government officials have been able do to influence extensions from other freeways (e.g. State Route 802), it only becomes a question of who else needs to be brought into the process of assuring that the 202 South Mountain is built. It is necessary for reasons articulated much better and in much more detail in the EIS than I can provide in these comments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 9:45 AM
CALLER: TUNDA BRAXTON	CALLER ADDRESS: 7118 W. MALDONADO ROAD, LAVEEN, AZ 85339
PHONE: 602-233-1244	EMAIL:
CALLER REMARKS/QUESTIONS: I am in favor of the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the 202
Date: Wednesday, May 15, 2013 11:12:28 AM

From: Michael Brennan [mailto:mike.brennan@mtba.net]
Sent: Wednesday, May 15, 2013 11:04 AM
To: Projects
Subject: Build the 202

1

I support the construction/extension of the 202 through Ahwatukee into the 10.

Michael T. Brennan
Executive Search Consultant
1777 E. Marquette Dr.
Gilbert, AZ 85234
Phone: (480) 503-4779
Cell (602) 999-7804
FAX: (480) 892-5606
mike.brennan@mtba.net
www.mtba.net

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN PUBLIC HEARING
Public comments to reporter)
May 21, 2013
10:00 a.m.
REPORTED BY:
Bonnie Ponce, RPR
AZ Certified Reporter No. 50669

1

2 MS. BRENNAN: Catherine Brennan.
3 So I'm just -- I'm for the Loop 202 because
4 it's going to help with economic development in Laveen
5 and help bridge the two communities of the East and
6 West Valley.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

at the registration desk, with the exception of some of the pre-registered folks. And we will wait until they arrive or until the next person has registered.

Patrick Brennan. Patrick Brennan.

Are you Patrick Brennan?

MR. BRENNAN: Yes. Sorry it took a minute to get in here. I haven't been watching, so I'm not sure of the appropriate format to address you guys, but --

THE FACILITATOR: You just have three minutes to provide your comments. If you exceed the three minutes, you're welcome to provide your information to our court reporters.

MR. BRENNAN: My name is Patrick Brennan; I live in South Phoenix, in the 85042 zip code, which is the eastern portion of South Phoenix. Although I do own a home in Laveen, which is currently rented, is where we used to live. And so I like to think that I have both the economic interest on the Laveen side of this issue, as well as some interest in how this freeway stands to impact the overall South Phoenix area, which is inclusive of the Laveen, South Mountain, and Ahwatukee Villages.

On one hand, from the Laveen side, I've been pretty actively involved in advocating for the

(Comment codes begin on later page)

Code	Issue	Response

(Response codes begin on later page)

Code	Comment Document

202 for a number of years, part of that is because of my background as a brand development specialist in hospitality, which allowed me to work with a whole lot of folks in the commercial real estate industry, and particularly on the development side, and one of the absolute truths that we can see about new development areas like this that have grown as much as they have in recent years in population, is that we are looking for commercial amenities, we're looking for healthcare, and we're looking for other basic things that that population needs, and we can't get that until we have some way to decrease drive times to about 10 minutes, 5 minutes, 10 minutes, 15 minutes, tend to be kind of the general rules of thumb, depending on what we're talking about.

And so in Laveen we have just over 40,000 households. In Ahwatukee, we have plenty more, I'm not sure of the precise number, what I do know is that the entire western portion of Ahwatukee is fairly isolated from the amenities that are accessible to the eastern portion of Ahwatukee. So what we'd like to see is bringing those areas together, the Ahwatukee and Laveen communities, simply so that we can get through some of those thresholds of population count. Bring in the

(Comment codes begin on next page)

Code	Issue	Response

(Response codes begin on next page)

Code	Comment Document

hospital, bring in some retail and everything else.

Now, one of the other issues, I know you're hearing from plenty of people who live particularly in some of the older, more established areas of Laveen close to 51st Avenue who've seen traffic just increase dramatically on 51st Avenue, and it's become really hazardous to the community in the surrounding area. We're seeing the same thing on Baseline, Baseline Road. Now living further east, I never thought that I would be as impacted by this, but we are; we see surface traffic from trucks that are being diverted off the freeway for various reasons. Some of them just use the area as a short-cut. We're also seeing the -- all the other overflow traffic every time there's an accident or something else.

1

We know that we have air pollution problems in South Phoenix that desperately need to be addressed, but I think it's time we bring those cars off the street and help them get through as fast as possible. And I'm over time. Thank you.

THE FACILITATOR: Okay. Thanks. Ed Mears.

MR. MEARS: Thank you very much for inviting us. Can you guys hear me just fine?

Page 48

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4301

would be feasible. And that's what I've got.

MR. HAMILTON: I just did a comment via the computer, but I thought of something else.

COURT REPORTER: Okay. What is it?

MR. HAMILTON: You mean, specifically, my comment?

COURT REPORTER: Yes.

MR. HAMILTON: I would like ADOT to keep the preferred route, the purple route, in the west end. That's the only -- That's the only thing I forgot to add to my original comment.

MR. BRENNAN: Okay. So I already spoke inside, regarding some of the impacts specifically with traffic.

Oh, you have to do every stutter and "Oh," don't you? I'm sorry.

Traffic, particularly with existing traffic conditions with the trucks, the warehousing and shipping business located to the north of Laveen, currently using 51st Avenue going south, as well as spilling over frequently onto our surface streets like Baseline Road, as well as whenever traffic incidents slow traffic on the I-10, which pushes traffic onto our surface streets, and I think that that creates a negative impact on both the Laveen community as well as the rest of the South Mountain/South Phoenix area, which is where I presently live, and have previously lived in Laveen and remain fairly active in that part of the South Phoenix

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

(Comment codes begin on later page)

Code	Issue	Response

(Response codes begin on later page)

Code	Comment Document

community, as well.

Some of the other things that I think are important to look at are the economic impacts. We've talked quite a bit about the population thresholds that we need to reach, for the sake of a hospital and for regional retail and other commercial amenities, additional employment for the area, for instance.

And I think, in addition to that, one of the other things to look at is housing. And we currently have a shortage of housing available for sale in the Phoenix market, which is why we see the construction and general construction-related services industries now lobbying in favor of the Loop 202. What I think is an important nuance to that part of the discussion is that we're not looking at overall increasing housing for the Phoenix area and looking at increasing growth for the Phoenix area.

What we are looking at, however, is increasing the incentives for growth in an area that's closer to our current population centers, that geographically would be in the central Phoenix area, close to downtown Phoenix, stretching across to Tempe. So, if we actually want to dissuade people from moving to the outskirts, like Queen Creek on the southeast side or to the extreme northwest side of town, and continue putting pressure on the northwest-to-southeast growth of population, then we absolutely need the infrastructure in this area, which creates that development opportunity in a more in-fill type

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(Comment codes begin on next page)

Code	Issue	Response

(Response codes begin on next page)

Code	Comment Document

1

location and also at the same time enhances the amenities within the City of Phoenix, keeps tax dollars here, keeps people able to stay within the lesser range for seeking out employment or shopping.

And I think that's about all that I can muster at this point, so I will probably be back if that's okay.

MS. DAD: I'm in favor of the acquisition for the freeway. I think it will be a benefit for the west side of the -- of the -- of the area, for people to be able to travel from the west side to the east side, avoiding the midtown congestion. I think they have studied every stick and stone and that they can now move forward and pick the 59 route. I think that is the best one for the freeway. That's it. I'm in favor of it.

MR. CARRILLO: I've been a resident of South Phoenix, in Laveen, all my life, which is 38 years old. I mean, I'm 38 years old now. And, absolutely, there's no question, the freeway being built would be the absolute best for that community in Laveen. And I did hold back in putting in my opinion, to study more concerning the South Mountain, the Gila River. A lot of them are my friends, and I understand their -- their dissatisfaction with everything.

But I do understand that they also had a problem with the casino first coming in there, a lot of these friends of mine. And, now that the casino has become something

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

lineup -- 59th connection would be an economic engine. And so it's designed that way. The setbacks are already set up that way. And it would be a -- It would just be a win/win for everybody at the end of the day.

And you're taking that from a person who lives in Tolleson but is employed by the City of Phoenix. So it's a win/win for me because that's how -- that's how I feed my family, with the City of Phoenix.

And the sales-tax revenue coming back to the City would be huge, especially during these -- especially during these difficult economic times. And who knows -- who knows how long it's going to last? But also because, as a long-term, long-time -- actually, life-long resident of the City of Tolleson, I would hate to see what happened to our city many, many moons ago happen again.

And so that, my friend, is what I have to say.

MR. BRENNAN: Another point that I would like to bring up regarding, sort of, a land-use concern of the Loop 202 is, in light of the recent Brookings Institution report that has been publicized in the last week regarding the shift in poverty from more urban to suburban areas around the country, while not being a total shift in the share of impoverished populations, it does illustrate the challenges that more suburban areas are -- are experiencing in trying to address those social problems.

(Comment codes begin on next page)

Code	Issue	Response

(Response codes begin on next page)

Code	Comment Document

1

And the issue with Laveen is that it has always been planned as a lower-density overall area, which has grown significantly in population. And as we see these populations would need, moving in to Laveen and actually Ahwatukee, as well, we are ill-prepared to handle those social needs that come with that increase in population.

And it's not just the low-income populations, but it's others that also have that kind of need. So without the freeway, we're not going to have that concentration of resources or really much opportunity to develop that concentration of resources. So, like the hospital argument where we need to bridge the populations to give ample rooftop counts to support a hospital, the same is going to be true of any other social services and -- and other amenities or public resources that -- that are there to serve based on larger concentrations of population. That's all.

MS. WINKLER: I think I am in favor of this. I think this is a good idea. I live in the central city area, and I know that a lot of people in the Ahwatukee area may be in opposition to this.

But I particularly look at this as an issue of equality, that if the rest of the city all has to have freeways that border or come into their areas, that no one single area should be exempt. I think it will complete the grid system for the freeway if -- the freeway grid system.

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www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:24 PM
CALLER: MIKE BRENNAN	CALLER ADDRESS: 1777 E. MARQUETTE DRIVE, GILBERT, AZ 85234
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I would like to voice my support for the Loop 202 South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Freeway
Date: Monday, May 20, 2013 8:25:30 AM

From: Jaime Bresson [mailto:jbresson2001@yahoo.com]
Sent: Saturday, May 18, 2013 9:53 PM
To: Projects
Subject: 202 Freeway

1

Please approve and authorize construction of the new freeway.

Thank you,
Jaime Bresson

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

4339

grow up and how I will be affected and my children's children.

And I also feel like all the health, like, complications to bring up, it's just crazy. Because I take early childhood and we talked about how freeways affect children and development and birth, and it's -- it's not good, like, at all. And I don't see how people can, like, just sit there and say they're for it without even thinking about all this stuff before and ahead of time.

And people are going to wish they didn't have this freeway. Like in, like, hundreds of years, they're going to wish we, like, stopped now and stopped, like, building stuff. And we don't have the money to build this stuff anyways, in the first place, with our economy. So, yeah, that's how I feel about this freeway.

MR. BRIGGS: Tom C. Briggs. And then -- I'm trying to think. My one suggestion would be is, try to work at removing the 32nd Street bridge and work to provide the U-Haul storage place with access through the tribal lands. No need to build a multibillion dollar bridge for that sole business's benefit. That's one.

The other comment would be within the

1

Page 25

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Design**	As noted in the comment, the bridge at 32nd Street is provided to allow existing access to a business to remain after construction of the proposed freeway. Because the business is located on Gila River Indian Community land, the Arizona Department of Transportation does not have the ability to acquire or relocate the business. Nor can the Arizona Department of Transportation construct alternative access roads on Gila River Indian Community land without the permission of the Gila River Indian Community. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

2

constraints of all the drainage out of Ahwatukee trying to sync the -- subset the bridges as low as possible at all the major interchanges, in particular 40th Street. Every foot the bridge can go down, the better for the sound walls. So I think that's kind of most of it.

UNIDENTIFIED SPEAKER: Hello. Okay. I have another perspective now that I've been looking around at all of these advertisements and these banners and I've been seeing what's been posted, and I'm understanding a little bit more completely now. But something that had me thinking twice is the level of medication that other people take, maybe the prescriptions, maybe these people who take prescriptions and different pills can't drive because they're afraid of getting a DUI, or maybe people who have, you know, no driver's licenses or something like that. I mean, they don't have the opportunities. Sure, there's going to be a freeway there. Maybe we should think twice about maybe putting a train there instead.

You know, it would be a little bit less of a headache for other people, you know, other people who have had DUIs or mental illness or something and they're a risk to other drivers. And

Code	Issue	Response
2	**Design**	The current level of engineering is used to determine the limits of environmental and construction impacts due to the proposed freeway. The location and profile of the freeway are evaluated to minimize potential changes to the freeway as the design level would progress. The current level of engineering is an accepted industry standard for determining impacts. (See Final Environmental Impact Statement sidebar on page 3-40 for more discussion.)

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:40 PM
CALLER: KIM BRITTAIN	ADDRESS: 2765 E. HOBART STREET, GILBERT, AZ 85296
PHONE: 602-488-3934	EMAIL:

CALLER REMARKS/QUESTIONS:

1

I use the 202 quite frequently and go up to the 10 and around Phoenix and the South Mountain Freeway would be awesome. Also coming from a position where my family had to sell our property, our way of living, our business, to the state in the 80's in order to have the 143 go through and this was at the time devastating, but it was for the greater good and I do not think a handful of people should be holding the entire Metro Phoenix area to congestion and needless gas. Also I think it would make that neighborhood a lot less congested and people would not have to us 48th Street going north and they could get out of Awatukee relatively easily and have two choices Pecos or the I-10.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Beth Broeker

Document Created: 7/24/2013 1:16:58 PM by Web Comment Form

The Loop 202 South Mountain freeway will have a significant negative impact on air quality. Its proposed proximity to so many schools, churches, parks, and even a YMCA puts children and adults who are asthmatic at risk for severe complications due to the dust and toxins released during construction, as well as increased pollution from the anticipated traffic on the new freeway. Phoenix has enough pollution already, and the number of high pollution days is already at an unacceptable level.

In addition, Valley Fever is on the rise, and the construction increases the likelihood that residents in the affected area will contract the disease, which is incurable and can be fatal. Valley Fever is contracted when spores are released from dirt, usually during construction.

Two members of our family are asthmatic, and we live in the Lakewood neighborhood. I fear the impact this freeway will have on the health of my family, both from the pollution impact and the potential for Valley Fever. Please examine and consider the health impact of this build on residents whose homes, churches, and schools are close to the proposed build site. So many people have asthma and other pulmonary issues; building this freeway so close to a residential community will do them irreparable harm. Do not build this freeway, or build it in an area that is not close to schools, churches, and other places where children congregate.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	
3	**Safety and Health**	Detecting the fungus responsible for valley fever in soils is not practical at this time. However, to reduce the amount of construction dust generated that could carry the fungus, particulate control measures related to construction activities would be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from the Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
4	**Neighborhoods/ Communities**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land despite the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 2:13 PM
CALLER: THERESA BROOKING	CALLER ADDRESS: TEMPE, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I would like to have it noted that I am a registered voter and in favor of the South Mountain Freeway project. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Monday, May 20, 2013 8:43:24 AM

From: Dann Brooks [mailto:montanabigsky2@yahoo.com]
Sent: Friday, May 17, 2013 6:19 PM
To: Projects
Subject:

We need this freeway bypassing Tempe & Awatooki areas for many a year. The setting in long lines with engines a idling & over heating & such causes more air polution than if traffic can get on out of town.Actually 107th or 99th avenues north to Riggs rd would be a better choice. But actually I'll vote on this project from 50th ave. north to Riggs as no other choice.
Thank you, DCB

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Monday, May 20, 2013 8:43:06 AM

From: Dann Brooks [mailto:montanabigsky2@yahoo.com]
Sent: Friday, May 17, 2013 6:21 PM
To: Projects
Subject:

1

Here's my vote FOR the 202 South Mt. project, also.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: S. Mountain Freeway
Date: Monday, May 20, 2013 8:27:34 AM

-----Original Message-----
From: Jerry. Brooks [mailto:brooksdidit@aol.com]
Sent: Saturday, May 18, 2013 4:07 PM
To: Projects
Subject: S. Mountain Freeway

1 I strongly support the construction of S. Mountain Freeway at the earliest possible date.

Jerry brooks
Chandler, AZ

Sent from my iPhone

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Colleen Brosnan

Document Created: 6/11/2013 12:37:43 PM by Web Comment Form

I moved to Phoenix in late 1993 and began looking for a house to buy in the area in early 1994. My realtor advised me not to look anywhere near Pecos Road (even though houses were cheaper than in Mountain Park Ranch) because a freeway was going to be built there.

Now, almost 20 years later, a church, school, and many houses have been built in that exact location--and people are protesting the freeway! Either their realtors didn't give them the information I gave or they didn't do due diligence on their own--or they chose to ignore it.

1

I commuted on I-10 for years and suffered through heavy traffic all the time. PLEASE get this freeway built! It will relieve congestion and pollution along I-10, which gets worse every year because traffic increases, not decreases, along this route!

Yes, it's too bad that some played Russian roulette with their choice of property, but that was their choice. Don't penalize the rest of us for their choices.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: azcolleen
To: Projects
Subject: South Mountain Freeway
Date: Tuesday, June 11, 2013 10:35:49 AM

I moved to Phoenix in late 1993 and began looking for a house to buy in the area in early 1994. My realtor advised me not to look anywhere near Pecos Road (even though houses were cheaper than in Mountain Park Ranch) because a freeway was going to be built there.

Now, almost 20 years later, a church, school, and many houses have been built in that exact location--and people are protesting the freeway! Either their realtors didn't give them the information I gave or they didn't do due diligence on their own--or they chose to ignore it.

1

I commuted on I-10 for years and suffered through heavy traffic all the time. PLEASE get this freeway built! It will relieve congestion and pollution along I-10, which gets worse every year because traffic increases, not decreases, along this route!

Yes, it's too bad that some played Russian roulette with their choice of property, but that was their choice. Don't penalize the rest of us for their choices.

Colleen Brosnan
2201 E. Cathedral Rock Dr.
Phoenix, AZ 85048

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support for South Mountain 202
Date: Monday, May 20, 2013 8:50:02 AM

From: Brad Brown [mailto:Brad.Brown@swgas.com]
Sent: Friday, May 17, 2013 3:29 PM
To: Projects
Subject: Support for South Mountain 202

I am writing to let you know that I support the extension of the Loop 202 South Mountain Freeway. I have no preference of whether it is built on the Gila River Indian Community property or on already purchased and required purchase of Right of Way.

I understand that if it is located off of the Community property, it may displace some existing homes and properties. I think that the net benefit to the Phoenix area will be worth the inconvenience of some existing homeowners and/or churches.

Completing the extension of the 202 around South Mountain is critical to the future of the Valley of the Sun.

1

I support the 202 extension!

Sincerely, Brad Brown - Gilbert Resident, Phoenix area native of over 50 years.

****
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Thank you for your cooperation.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Michelle Thompson
To: ADOT
Subject: FW: Opposition to South Mountain 202
Date: Monday, May 20, 2013 2:55:06 PM

Michelle Thompson
Senior Community Relations Officer
1655 W. Jackson St. MD: 126F
Phoenix, AZ 85007
602.316.4057
azdot.gov

From: Brown, Lawrence [mailto:lbrown@swlaw.com]
Sent: Monday, May 20, 2013 2:40 PM
To: Projects
Subject: Opposition to South Mountain 202

To Whom It May Concern:

I work in downtown Phoenix, Arizona and would like to voice my opposition to the proposed construction of the South Mountain 202 along the Pecos alignment in southern Phoenix.

I am a voter and taxpayer and would ask that ADOT only develop the South Mountain 202 if an alternative alignment were obtained. Traffic patterns on the I-10 have been reasonable over the past several years; the only times when traffic has been particularly burdensome has been when ADOT closes lanes on the freeway or arterial roads are closed down. My understanding is that (in coordination with ADOT?) the City is soon to put much of the arterial system around Pointe South Mountain under construction. I wonder if the intent is to purposefully cause driver frustration in an effort to generate support for the South Mountain 202. I would caution against that approach as it will, inevitably, undermine credibility and faith in your endeavors.

1 I oppose the Pecos alignment as I know it will significantly and adversely impact the neighboring community.

Thank you for your consideration of one person/families' viewpoint.

Lawrence Brown
Snell & Wilmer
Phoenix, Arizona
602-382-6510

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

PHOENIX, ARIZONA; TUESDAY, MAY 21, 2013
10:00 A.M.
* * *

1

CHRIS BROWN: I am totally for the project, the South Mountain Project, especially if it improves drive times.

I drive a lot for business from the south part of town, like Maricopa, the city of Maricopa, and have to get to like Buckeye and west valley cities and I think South Mountain would cut down on travel time quite a bit.

I am very much for it.

*****

JENNIFER NELSON: I am in support of the Loop 202 South Mountain Freeway, specifically the W59 Alternative. I am a resident for seven years of Laveen and South Mountain.

Previously I spoke before the panel of all of the statistics that will positively impact this community, including the quality of life, the infrastructure, and the feasibility of being able to connect the east and west valley.

I have requested the design and construction of community-value additions, such as a

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:07 PM
CALLER: NADINE MARNA BROWN	CALLER ADDRESS: 12044 S. TOMI, PHOENIX, AZ 85044
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I would like to leave my message that I do support that freeway. We need it and it should be done. It's been approved by the voters and thought that meant that it should go through. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: appose
Date: Thursday, July 11, 2013 8:28:41 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

From: Frank Myers [mailto:bringuslight@msn.com]
Sent: Wednesday, July 10, 2013 8:43 PM
To: Projects
Subject: appose

The only alternative for the South Mountain Freeway that makes any sense is the option W 101 alternative. The purpose of the "extension" is to connect the Valley freeways and make it easier to travel throughout the "valley". (1)

The current favored connection of the loop 202 freeway makes no logical sense. You are talking about taking the loop 202 off of the I-10 freeway and expanding the lanes of the I-10 both approaching the freeway exchange and leaving the exchange. Anyone who drives the I-10 freeway going East in the morning or going West in the evening can tell you what a lane reduction means to the traffic on the freeway. The I-10 reduces, going West at 35th Avenue, which creates a huge bottleneck. Should you make the 202 interchange at 59th or 63rd Avenue it will create the same bottleneck traffic situation. I cannot believe that the planners for this freeway are blind to this situation.

If, however, the 202 connects with the 101 freeway, continuing South, there would not be that bottleneck situation, and it would connect seamlessly with the Northbound 101 freeway and would indeed better connect the North and South valley, and in addition give faster and safer transport to the Vee-Quiva casino and the I-10 southbound to Tucson.I strenuously object to the current plan for the 202 freeway extension.

As planned, the current 202 freeway plan would create more traffic problems for the Valley than it will alleviate. (2)

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

Code	Comment Document

Thank you for your attention to my concerns,

Nicola Brown

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Code	Issue	Response

Code	Comment Document
1	Megan Brownell Document Created: 5/21/2013 7:05:11 PM by Web Comment Form As residents of Laveen for 12 years, we would love to see the Loop 202 be built as has been the plan. This freeway can do for Laveen and Ahwatukee what the Loop 101 did for Glendale, bringing much-needed retail, economic development and a boost to property values. It also will relieve traffic congestion on the I-10 and on 51st Avenue, which is filled with big-rigs at all hours of the day. Voters have already supported this freeway twice. There is no reason to continue delaying.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Wednesday, May 22, 2013 10:49:39 AM

From: J Browning [mailto:jc.browning2@gmail.com]
Sent: Tuesday, May 21, 2013 2:31 PM
To: Projects
Subject: South Mountain Freeway

Hello,

Connecting the 101 to the 202 will drastically improve traffic flow from the east and south valley to the north and west valley. It will also improve commerce in the southwestern area, reduce carbon monoxide gasses, and limit traffic and excessive wear and tear on the already overused urban streets in the Laveen area. In addition, after its compeltion, it will have limited to no negative impact to the South Mountain area. I am a resident of Trail Side Point (67 and Southern) and highly encourage this freeway to be built in my area. My preference is for the W101 Central or Eastern Option and for it to be built during the first phase of construction.

1

Respectfully,

Jason Browning

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 6:09 PM
CALLER: JIM BRUNNER	CALLER ADDRESS: 2848 E. HOUSTON, GILBERT, AZ 85234
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am calling in support of the South Mountain Freeway. I think that would be awesome. It would reduce a tremendous amount of traffic going through Phoenix, especially the big cross-country truck rigs. So, if that can be built, it would be incredible. Bye

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Chad Buck

Document Created: 5/21/2013 3:33:12 PM by Web Comment Form

1

As Phoenix continues to experience population growth, it is imperative to plan accordingly with our freeway/traffic plan. Without projects such as the 202 extension, congestion will get significantly worse for not only freeway traffic traveling through Phoenix, but for all residents living and working within Phoenix. Alleviating some of this congestion will have notable economic and quality of life impacts/improvements.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Chad Buckman — Document Created: 5/25/2013 9:07:20 PM by Web Comment Form

No to 202! The state and agencies responsible for our roads have failed miserably for years. The biggest example of this is the I-10 freeway, especially in the east valley. The section of I-10 between Chandler Blvd. and the I-10/I-17 split near 7th Street is a virtual parking lot every weekday morning and evening. Until we have a resolution for dealing with I-10 we shouldn't spend billions of dollars to connect more vehicles and traffic congestion to it. (1)

The committee needs to address I-10 first and if they can't take that on find another hobby that doesn't consist of wasting billions of dollars on needless freeways or light rail system (confirmed example of government wasteful spending with ROI nowhere near "expert" estimates).

At a time when our school systems continue to rank last or near the bottom in our Country I can't see spending billions on a freeway: (2)

a) nobody wants (3) (4)
b) causes more traffic delays on I-10 (5)
c) creates a virtual parking lot for east valley commuters (6)
d) ruins established communities (7)
e) harms the health of our citizens and nearby schools
f) destroy's homes, churches and business needlessly
g) doesn't address the real issues we have in this state.

No-2-202!

Code	Issue	Response
1	**Purpose and Need**	The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Final Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The determination of purpose and need for the proposed project includes an assumption that substantial improvements would be made to the Interstate 10 corridor between State Route 51 and U.S. Route 60 (see Final Environmental Impact Statement page 1-13). The Maricopa Association of Governments, in coordination with the Arizona Department of Transportation recently completed the Southeast Corridor Major Investment Study (see <azmag.gov/Projects/>) and developed multimodal concepts for addressing transportation issues in the Interstate 10 corridor. Even with these planned improvements to Interstate 10, the proposed project remains a vital component of the Regional Freeway and Highway System.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Traffic**	An assessment of conditions with and without the freeway in 2035 is presented beginning on Final Environmental Impact Statement page 3-27. The results of the assessment, supporting the need for the proposed freeway, are summarized in Final Environmental Impact Statement Table 3-9 on page 3-38.
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Neighborhoods/ Communities**	Generally, a freeway is perceived as incompatible with local businesses because the facility could divide service areas, resulting in limited local access and negatively affecting the market share necessary for their sustainability. While neighborhood businesses rely on a local customer base, the proposed freeway may, on the other hand, provide additional and improved access to some neighborhood businesses (see Final Environmental Impact Statement page 4-16).
6	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 4:13 PM
CALLER: BETTY BUELL	CALLER ADDRESS: 6844 N. 36TH STREET, PHOENIX, AZ 85018
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountian Freeway
Date: Tuesday, May 14, 2013 9:47:57 AM

From: Roberto Buenaver [mailto:Roberto@gdc-az.com]
Sent: Monday, May 06, 2013 12:00 PM
To: Projects
Subject: South Mountian Freeway

To whom it may concern,

I am aware that a hearing will be held to review the Draft EIS for Loop 202 on May 21, 2013.

1

I did not see any anticipated construction timing for this project on the ADOT website.

Is there currently any anticipated construction timing for this project that ADOT can share with the public?

Thank you.

Roberto

Roberto Buenaver | **Garrett Development Corporation**
Camelback Square
6991 East Camelback Road, Suite B-297
Scottsdale, Arizona 85251
Direct: 480.970.4004 | Main: 480-970-4001 | Mobile: 480.215.9392
roberto@gdc-az.com

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Code	Issue	Response
1	**Alternatives**	Upon completion of the environmental impact statement process, and if the Selected Alternative were to be an action alternative, the Arizona Department of Transportation would begin the design phase, which would be followed by the final right-of-way acquisition process. Then other early construction tasks such as utility relocations would begin. The corridor would be divided into multiple final design segments. Construction sequencing and duration could change based on several factors, including funding availability, traffic volumes, coordination with other major freeway projects, earthwork balancing, utility relocation schedules, and regional priorities.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain freeway
Date: Tuesday, July 02, 2013 2:04:28 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Roberto Buenaver [mailto:Roberto@gdc-az.com]
Sent: Tuesday, July 02, 2013 1:34 PM
To: Projects
Subject: Loop 202 South Mountain freeway

To whom it may concern:

1 I am looking to obtain more information on the anticipated start and completion of this freeway.

Who can I speak to learn more about this matter?

Thank you.

Roberto

Roberto Buenaver | **Garrett Development Corporation**
Camelback Square
6991 East Camelback Road, Suite B-297
Scottsdale, Arizona 85251
Direct: 480.970.4004 | Main: 480-970-4001 | Mobile: 480.215.9392
roberto@gdc-az.com

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Code	Issue	Response
1	**Alternatives**	Upon completion of the environmental impact statement process, and if the Selected Alternative were to be an action alternative, the Arizona Department of Transportation would begin the design phase, which would be followed by the final right-of-way acquisition process. Then other early construction tasks such as utility relocations would begin. The corridor would be divided into multiple final design segments. Construction sequencing and duration could change based on several factors, including funding availability, traffic volumes, coordination with other major freeway projects, earthwork balancing, utility relocation schedules, and regional priorities.

Code	Comment Document

From: Lori Buhlman
To: Projects
Subject: South Mountain highway project
Date: Monday, June 03, 2013 10:39:26 AM

1 2 3 4

I am writing to express my objection to the Loop 202 South Mountain Freeway Project. I understand that the idea of this new project is to relieve traffic congestion, but this is at the expense of the natural environment, Native lands, and air quality. It is my strong believe that better urban planning (e.g., better public transportation, improved pedestrian and cycling infrastructure and increased investment in central Phoenix schools) will encourage Arizonans to move closer to the city. This would improve our communitites by decreasing polution, boosting local business economy (rather than that of large chains, which dominate our suburbs) and creating a healthier, more active community.
Thank you for your consideration.
Sincerely,
Lori Buhlman, Ph.D.

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	
3	**Air Quality**	
4	**Purpose and Need, Lack of Support**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 6:15 PM
CALLER: DORIS BULK	CALLER ADDRESS: 4344 E. COCONINO, PHOENIX, AZ 85044
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I would just like to say that I am in support of building the 202 South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 8:02 PM
CALLER: BURDICK	CALLER ADDRESS: 551 NORTH ASH DRIVE, CHANDLER, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am much in support of this freeway and I would like to see it in. It should have been in 10 years ago. Let's get this thing done. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/10/13	INCOMING CALL TIME: 2:45 PM
CALLER: MRS. BURGE	CALLER ADDRESS:
PHONE: 602-237-3741	EMAIL:

CALLER REMARKS/QUESTIONS:

1

Hi, I own Country Garden Charter School which is right near the proposed freeway. I'm looking at a brochure that does not have the freeway inflicting my property. But I had a constituent go down and go to your hearing and said that you have changed your route now to go down 63rd Avenue which is right down the center of my school. So I need some information on this cause this is not the documentation I have been sent in the mail. And I am opposed to anything that is going to go down 63rd Avenue and take out our school and the neighborhood around it. We have been here 14 years and we provide schooling for over 400 students. Thank you.

RESPONSE:

I left a message with Kimberly, an assistant to Mrs. Burge at Country Garden Charter School, on Friday, July 19 at 11:30 a.m. Mrs. Burge was not in the office but Kimberly stated that she would pass my message along to Mrs. Burge immediately. As of Monday, July 22, I have not heard back. If I do receive a return call, I will provide the same information to Mrs. Burge as I shared with Dustin (who works for her charter school.) It appears there are a number of folks from the Country Garden Charter School who are concerned about this project and how it may affect them.

Jessica Amend
HDR/InfraConsult

RESPONSE DATE:	RESPONSE TIME:	HDR STAFF INITIAL:

Code	Issue	Response
1	**Acquisitions and Relocations**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.

Code	Comment Document

From: Scott, Lisa (Phoenix)
Sent: Tuesday, July 23, 2013 3:26 PM
To: Ellison, Gina
Cc: Bailly, Becky
Subject: FW: Mrs. Burge

Add this to the e-mail. Thanks. Lisa

LISA L. SCOTT
HDR Engineering, Inc.
Administrative Assistant|Trip Reduction Plan Coordinator

3200 East Camelback Road, Suite 350 | Phoenix, AZ 85018
602.522.7700 | d: 602.522.4330 | c: 602.882.1226
lisa.scott@hdrinc.com| hdrinc.com
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From: Amend, Jessica
Sent: Tuesday, July 23, 2013 3:11 PM
To: Scott, Lisa (Phoenix); Unger, Audrey C.
Cc: Book, Michael
Subject: Mrs. Burge

Hi ladies,

1 Mrs. Burge from the Country Gardens Charter School called me back just now and expressed (which she's done at the meeting and in writing already) that her preference is for the off ramp at 63rd Avenue to be moved 100 feet to the east so that it does not affect a portion of her school and property. She has old trees on the property that she would hate to see removed. Just wanted to pass that along even though it sounds like it's already in the record. Thanks!

JESSICA AMEND
HDR | InfraConsult
Public Involvement Specialist

6900 E. Camelback Rd, Suite 800 | Scottsdale, AZ 85251
o: 480.339.1041 | c: 623.606.2090
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Code	Issue	Response
1	**Design**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.

Code	Comment Document

1 ***
2 THE REPORTER: What is your name?
3 MR. BURGE: Zachary Burge, Z-a-c-h-a-r-y,
4 Burge, B-u-r-g-e.
5 THE REPORTER: Go ahead.
6 MR. BURGE: I work at the school in the
7 area, Country Gardens Charter School. I'm the
8 operations director there and I foresee -- and I also
9 live in the area on 64th Drive. I foresee, you
10 know -- I see the good side of the project. I see
11 that it can benefit our business and benefit our
12 community, by providing access to East Valley
13 residents to our area and sharing our beautiful
14 little community with the rest of Phoenix. But I
15 think the cons outweigh the pros in this situation,
16 because the amount of pollution that it's going to
17 bring to the area is not good. The amount of impact
18 of construction by our school, because it's so close
19 to us, is going to have a huge impact.
20 I run the transportation department at
21 our school. It's under my operational jurisdiction.
22 And my detours I'm going to have to make my buses go
23 on for my bus routes for my children is going to
24 be -- it's going to be very extensive. I'm going to
25 have to make alterations to our bus routes. We're

1
2

Page 7

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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Acquisitions and Relocations**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.

Code	Comment Document

going to spend almost double the money in fuel, which right now we have four buses, we spend around $200 a week a bus in fuel with our current bus routes. And we're going to have to do basically double the amount of miles because we're going to have to backtrack and do detours and everything else. We're a charter school, we don't get funding for busing. We just get money for payroll and land. That's about it. And our land is owned privately, so we don't get a big-time budget like other public schools do.

As long as -- the first notice we'd gotten for the freeway said that it was going through 63rd Avenue all the way up until Lower Buckeye, which would have taken out my house, the school, my neighbor's homes and the rest of my community. And I just don't think that's right in today's world.

The current drawing I'm looking at here today is saying that it's going through the alfalfa field next door. If that is true and if that is correct and if that is the final draft, I do not have a problem with it. But if it is not, and it is not the final draft, then I do have a problem with it. I moved to Laveen because it's a good area. I moved to Laveen because I love the area. I grew up on a farm in Tonopah, and Laveen reminds me of home. Good

Code	Issue	Response

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people, and it's a good place to live. And I don't want that to change. And I especially don't want to be forced out of my home because of eminent domain issues.

So I would appreciate the, you know, cooperation with ADOT and everyone else. And me saying keep the 202 where it's at, where your drawing is, the draft of the drawing I'm looking at, if you're going to -- I know you're going to do it, because you have the funding for it, keep it on 59th Avenue, away from my school and away from my neighborhood. It can be beneficial, but it can also hurt everyone very badly, economically and personally.

So final statement: Pros, it can help local businesses and local residents and bring more of the Valley to us. Cons, provides a lot of pollution, construction takes a long time. And I've seen construction in the Valley put businesses out of business because no one wants to go down that road, because it's under construction. So especially parents of kids in a school where they can't get in to drop their kid off. So as long as it stays where it's at, you know, I hope this is the final draft, I really do, because then it will most likely happen.

Code	Issue	Response

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But if it's not the final draft, I can guarantee the residents of Laveen are going to make sure it doesn't happen, one way or another with courts or anything else, because we're not moving, we're here to stay. We're not being bought out.

Have a good day.

THE REPORTER: Thank you.

Code	Issue	Response

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1 MR. BURGE: My name is Nick Burge. I am
2 the science director and coordinator for Country
3 Gardens Charter School which is a local charter
4 school in the area that may be impacted by the
5 proposed freeway. Essentially my concerns are
6 several. My concerns are the -- mainly the on-ramp
7 and off-ramp egress and ingress to the freeway coming
8 down Southern Avenue. The rest of the proposed
9 freeway in the state that it's in does not seem that
10 it will affect us that adversely. Maybe through
11 noise and some small amount of environmental impact.
12 We do have several species of animals
13 that live in a naturalized state on our campus
14 including Great Horned Owls, including Red-tailed
15 Hawks, California Kingsnakes, checkered garter
16 snakes, gopher snakes, many species that travel
17 through the corridor near our campus or on our campus
18 to the Salt River and to the Estrella -- Sierra
19 Estrella Mountains behind us and the South Mountain
20 corridor behind us as well.
21 Essentially a lot of those animals and
22 populations of wildlife will probably be affected by
23 this, but it does seem at this point that the route
24 that they've chosen, the W59 alternative is -- I
25 still will oppose it, but at the same time it seems

Code	Issue	Response
1	**Acquisitions and Relocations**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Biology, Plants, and Wildlife**	

Code	Comment Document

as if it has a decent route. It's just that we do not want it any further west.

At this point, if it goes any further west, it is going to cut into the property that the school sits on, it will interfere with daily operations of our school and will not benefit us in any way, shape or form. It may also affect housing and residences in the area that have been there for many, many years, some of them since the 1970s.

So basically at this point what I'm saying is, yes, if they could find another alternative to the W59 alternative, it would be wonderful. It would be great if they could utilize the W71 alternative or even the W101 alternative. However, the main thing is that we do not want the -- the project to expand any further west.

In fact, if it could actually move maybe even just 100 feet further east to accommodate the edge of the property of our school, which again is the area we call "The Wilds" which contains many of these native animals and urban wildlife that live and utilize that area almost like a miniature preserve. If they could move that on-ramp even just 100 to 200 feet further east, it would much better accommodate what we're trying to do for our school.

4

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Code	Issue	Response
4	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. When comparing action alternatives in the Western Section, the W71 Alternative was considered the least desirable because it would provide the least traffic operational benefits, would have high residential displacements, did not have support from the public and local or regional agencies, and would be inconsistent with local planning.

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Our school is a school that's always been top 10 percent in test scores for the state of Arizona for over eight years. We have a population of over 4 to 500 students annually. Every year we take trips to Costa Rica and Belize and many other conservation projects, not only locally. We built an 1800 square foot desert tortoise habitat that if the project moved further west would affect.

Again, there's numerous other projections there that we're expanding into as well. We have not only conservation projects, but also art and music programs and many, many other things. We just built a $350,000 barn for our horsemanship program that, again, is very close to that -- what would be the western edge of the freeway expansion, and we just really don't want it any further west than it is.

If they have to choose the W59 alternative, and that is the preferred alternative which it seems to be, no further west. It cannot go any further west. If it does, it will drastically affect a large population of students who are -- not only that, but a low -- sorry, a low-income area. Over 70 percent of our students are below the poverty level, and it would drastically, drastically affect their day-to-day education, as well as the

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livelihoods and employment of well over 30 to 50 people who live in our area and work on our campus as well.

Our payroll every year is over $1.5 million, and the amount of taxes that the area gets from our -- just from our income taxes alone is staggering. So if we had to relocate the school even partially, it would be disastrous and it would be quite a blow to the community.

We've been a pillar of the community there for well over 14 years, and it's something that we want to stay, we want to continue to be what we've been and continue to provide the good services that we want for the community.

We also have in the property, there are plans for a $4.7 million expansion project to include new buildings which would include a semipublic aquarium and zoological exhibits and workshops and things like that for music and an auditorium and a public pool for use by the community as well, and many other things that would drastically, drastically benefit this community.

However, if we were made to relocate, even partially, that project would be obviously unfeasible. So essentially at this point, my

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viewpoints on this issue are, I do have some concerns, mainly the on-ramps and off-ramps, again, the egress and ingress to the freeway off of Southern Avenue and 63rd. Southern Avenue and 63rd Avenue is my main concern.

Again, if they could move that on-ramp even just a little further east, even 100 to 200 feet, it would be very, very, very beneficial and could accommodate us very pleasantly, I think. The freeway could benefit us in the future as basically almost having an exit to us which would be nice, but again, we can't deal with the detractments that it would take from us if it were to be located further west than the current plan. Or, again, if we could have it accommodate us by moving a little tiny bit further east, even just 100 to 200 feet by the on-ramps and off-ramps for that exit, it would be fantastic.

Other than that, I have minor environmental impact concerns, again, because of the migratory wildlife in the areas and because of the owls and other animals that we have that live on residence, the urban wildlife that lives there. I would like to see more detailed environmental studies about how that may impact those types of things and

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3

the urban wildlife in that area between the Salt River corridor and the Sierra Estrellas and the South Mountain Regional Park as well.

The other concerns I have also are based on the video I just watched, is the very -- actually much larger than I thought previously cut that would be taken out of South Mountain Regional Park on the western side. That area is actually a home to a small, but viable population of Sonoran desert tortoises which are protected by law.

Also something that it seems nobody has addressed is the Gila Monster Heloderma suspectum is a resident of that area and is vigorously protected by law from game and fish, and through the state laws of Arizona is one of our state treasures essentially. That animal is so restricted that you can't even get close to -- too close to that animal to take a photograph. You can actually be ticketed for harassing native wildlife.

Seems like a freeway through that area is very much harassing native wildlife. They may in my opinion want to rethink how much of that they're cutting through and possibly reroute that slightly. I think it would be very beneficial to many species of wildlife, also mountain lions, bobcats, coyotes.

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Code	Issue	Response
5	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Biology, Plants, and Wildlife**	Sonoran desert tortoises have been documented in the Eastern Section of the Study Area, and suitable habitat for this species is present within Phoenix South Mountain Park/Preserve and the foothills of the South Mountains (see Draft Environmental Impact Statement pages 4-122 and 4-123). The E1 Alternative would directly adversely affect suitable habitat as the freeway would cross Phoenix South Mountain Park/Preserve and would be expected to affect individual Sonoran desert tortoises.

Code	Comment Document

3

There was a proposal at one time to reintroduce big horn sheep to the South Mountain range that they've already done in the Estrellas and the Sonoran desert monument to the west. If this freeway were to go in, they would need to definitely think about extended wildlife corridors either under or over the freeway to accommodate populations between the Sierra Estrellas and the South Mountain range in order to prevent inbreeding and increased genetic biodiversity.

For further comment and for more information on opinions and even actually biological studies that my students and I have done on the area and its native wildlife and urban wildlife, I can be reached at 602-931-7522. Again, that's 602-931-7522. That's my cell. You can also e-mail me at animalman1981@yahoo.com.

The website for the school is also available, www.cgcsaz.com. Our school's name is Country Gardens Charter School. Again, that's www.cgcsaz.com, and there's a link there to our Facebook page. I'm the admin on the Facebook page. If you would like to reach me for further comment or opinion or other information, it's easy to do. Other than that, thank you for your time.

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MS. BURGE: My name is Goldie Burge and I own the property and founded the school, Country Gardens Charter School which is located on 6313 West Southern Avenue. It's been in existence since 2000. And I also own the property with my house on it which is on the south end of the property of the school which would be also on the west side, would be facing the freeway as well.

I would prefer that the ramps coming off onto Southern, if at all possible, be shifted about 200 feet to the east so as not to impact our school entrance as much. And a little bit -- if they could move it slightly to the north on that right-of-way rather than going into our property on the south side of Southern. That would be my preference.

I want to just make sure that I would oppose any part of the freeway taking out our school, our property there and the houses that are around it. We have a viable charter school with 420 students with high test scores, and we have a very involved life science program that extends and has an outreach all the way to Costa Rica, Panama and Belize, and also we do outreach programs for other schools to come and visit our barnyard program.

And our biology teacher does outreach

1

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Code	Issue	Response
1	**Design**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.

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programs all over the state for the Arizona Herpetological Society. So he utilizes some of our animals to take to these presentations for disabled children, for educational seminars, etc. So we're a very different type of public charter school in that we're very hands-on life science focused, and we provide a totally different opportunity than the public schools in the area.

On the school property we have an extremely large amount of large about 80 to 100 foot trees that are over 5 feet in diameter that have been there back to the Pima Indians. There was a Pima Indian dig ruin site on Southern right in front of the school which SRP has now since covered back over, and some remains were also found on our property in the trees, as well as in those trees which is our "Wilds" area.

We have Great Horned Owls that breed there, as well as Red-tailed Hawks, plus some other species of animals such as the California Kingsnake, et cetera. So we would not want those habitats to be disturbed.

2

We're in the Migratory Bird Act -- we're protected under the Migratory Bird Act, and we're in what we call a migration zone. We get many other

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Code	Issue	Response
2	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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birds that come to the trees there, Lovebirds, parakeets in the wintertime that migrate through. So it's a pretty viable biology or biological corridor, if you will, and important to maintain that.

Our school employs over 35 people with a payroll of $1.5 million per year which is pretty significant. If the school were to have to be moved, it would impact quite a few families, both employees and 420 families of students.

And we are a 70 percent poverty level. We're a Title 1 school and we serve students not only in Laveen, but we bus students in from all over 10 to 12 districts so that these students can get a different type of school choice than they're offered in their public school district.

We provide opportunities for these low-income students that otherwise would never be offered to them, particularly our trips across country. We have two charter buses that we have outfitted with bunk beds, and we travel students every year on three-week and two-week trips in different regions of the U.S. for a very low amount of money so that they can afford to go. And we cover all 48 states in the United States on a four-year rotating basis.

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And then we take high school students to Costa Rica, Panama and Belize where we have life science studies in the rainforest for six to eight weeks, and in Belize for two weeks where we study the second largest Great Barrier Reef in the world and do archaeological studies on the Mayan Ruins there as well.

We also have a village we sponsor in Panama and marine biology tours that we do in Panama while we're in Costa Rica. So our students are getting these opportunities that typically only higher income or private school students would be offered, and they're offered it at a more affordable rate for them, and it's providing them the science and math opportunities for careers that they wouldn't be offered if they had not experienced these learning environments.

For example, we have students now wanting to be archaeologists. We have many students wanting to go into marine biology. We have students who are decided on many different science careers and are in college presently and doing very well. And they're all low-income kids that probably would have never pursued this had they not been on these trips. So that is a big factor for our school.

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And nobody in the whole state of Arizona offers any of this, and as far as we know in the United States not to this extent. For example, our trip to Costa Rica is six to eight weeks. Our kids only pay a total for everything, including airfare, $1,450. Our three-week trips, our students only pay $900 for three weeks across the United States seeing 30 venues.

For example, last year -- this last year we went to the Florida region, southern region of the U.S. and D.C. and actually met with Senator Jeff Flake. Had a meeting with him for over 30 minutes. Senator John McCain. We're very involved in the House of Representatives, and we got to see them voting in the Senate, plus all of the historical places, Williamsburg, Jamestown, et cetera. Over 30 places that they saw on a three-week trip just on that one southern region.

We have another region where we do Chicago, Mt. Rushmore and the Great Lakes region. That's next year. The year after that is our Rocky Mountain region which covers all of the state parks including Yellowstone, Bryce Canyon, Arches National Park and many other entities.

Our fourth trip is to the New England

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region where we tour all of New England, all the way to Maine, Statue of Liberty, New York, go over to Canada and Niagara Falls. We have many, many venues of historical significance throughout the whole New England region.

And then we have the pacific northwest where we do the whole pacific northwest coast. So basically our students traveling on these trips will cover all 48 states if they go on all the trips and be learning the whole time. They are not vacation trips.

So these are the things we offer. Besides that, our school is completely hands-on. We have a zoo lab that has over 300 species of animals where all the students get to go in and interact and work in science through living animals. We have a barnyard with all the farm animals. They interact with them and work with science on those. And all of our classrooms are hands-on with learning centers which is a very -- and it's a very accelerated learning program.

Our students are taking -- are taking more high school classes, more core classes than other high schoolers. Our tenth graders are outscoring all the schools in the region on --

Code	Issue	Response

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there's tests, especially in math, and -- and we have an extensive amount of homework that so that our students are college prepared.

We have a very high graduation rate from 80 to 100 percent, and most of our kids that are in college are in state colleges and are doing extremely well. So that's why the school needs to stay there so we can offer these opportunities to our -- especially our lower income students. Give them the opportunities that they're missing out when they're attending regular public school. That's probably it.

For example, one of our students, a young African-American student who really didn't have much ambition when he started our school in junior high was now our valedictorian a year ago, got a scholarship to ASU where he's attending, and he now -- his plans after going to Costa Rica and Belize is that he wants to be a foreign language interpreter. And he has also taught himself since then Portuguese as well as the Spanish we taught him and that he utilized in Costa Rica.

He was so excited when he was in Costa Rica to be able to speak to people and enjoyed that so much that now that is his focus. So these wonderful opportunities do make huge differences on

Code	Issue	Response

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these students' lives, so that is why we're working on maintaining this level of education for these kids.

(The proceedings concluded at 2:00 p.m.)

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Wednesday, May 29, 2013 8:22:59 AM

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Tina Burger
Sent: Tuesday, May 28, 2013 8:18 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) Although i am a former developer, we never took land that wasn't already infill or along a current road. The reason Scottsdale is so successful is we looked at long term sustainability to include open space/land, this is imperative in the attempt to preserve the beauty, environment and wildlife.The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Ms. Tina Burger
2200 E Dortha Ave Apt K
Flagstaff, AZ 86004-3663

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

(480) 215-6440

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Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Thursday, June 20, 2013 8:37:05 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Robert "Steve" Burkhart
Sent: Wednesday, June 19, 2013 6:20 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

Jun 19, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

I am a resident in the Ahwatukee area of Phoenix that would be most directly impacted by the construction of the freeway. I can't claim ignorance of the proposed project when I bought my residence in this area because I already knew the construction was in the long-term plan.
If that were the only factor involved I would not be writing this.
2 3 However there are broader issues involved that I feel compelled to address. Simply because a project has been on the drawing board is not good enough reason to bring it to fruition. Our knowledge of environmental impacts to the local ecosystems as well as to the entire world is much greater now than when it was first proposed. Our scientific knowledge of what is happening to our world is inconsistent with the ambitions of those who feel that development of such projects is the highest ideal. It is not. The health and survival of sons and daughters, and their children and children's children are of utmost importance and present a much higher value.
I do a considerable amount of hiking on the mountain and my property is also situated along the desert. I don't know what kind of research has gone into this , but it seems very clear to me that the ecosystem of South Mountain is already greatly impaired due to the city that surrounds it. My neighbors feed rabbits that the coyotes feast on, which surely must increase their numbers. I do a lot of hiking around the state of Arizona, and I have to tell you that I see far more
4 coyotes outside my residence than I ever see anywhere else. If you add to that by building a freeway that cuts off the wildlife corridor then their gene pool and ultimately their survival will become seriously impacted by negative effects of interbreeding. The coyote is just an example. There are many other species that will also be affected.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Old Plan or Use of Old Data**	
3	**Health Effects**	
4	**Biology, Plants, and Wildlife**	

Code	Comment Document

5

6 7

Beyond the local environment is the world-wide problem of global warming that can only be worsened by the spewing of pollution in the
air. Building more freeways is not the answer! They will encourage
even more urban sprawl and cars on the road that will just exacerbate the problem. There needs to be a greater concerted effort into building public transportation systems that will clean up the air and provide a healthy and enjoyable world for my grandchildren and yours to live in.

Sincerely,
Robert "Steve" Burkhart
3236 E. Chandler Blvd. #1042
Phoenix, AZ

Sincerely,

Robert "Steve" Burkhart
3236 E Chandler Blvd Unit 1042
Phoenix, AZ 85048-7281
(480) 695-2138

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Code	Issue	Response
5	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].
6	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

Code	Comment Document

MR. BURKHART: Robert Burkhart, and I reside at 3236 East Chandler Boulevard, No. 1042, Phoenix, Arizona 85048.

I'm an Arizona native. I was born at Good Sam Hospital and have lived in several communities, including at various times in the Valley. I know this doesn't give me any special privileges over someone who moved here, say, a year ago, but I also spent 20 years of my adult life in Alaska. I came home at least once a year to visit family and this gave me a bird's eye perspective.

You know, time-lapse photography, the kind where you set a camera up to take pictures every minute as a rose is blooming. A beautiful rose blossoms in front of your very eyes. This is so beautiful. I think you already know where I'm going with this. That's what it was like for me coming home to the Valley once a year to watch the blooming of the Valley.

Before I left, the rose was definitely in bloom with a wonderful downtown architecture including the Westwood Ho Hotel and of course the Biltmore in Scottsdale along with the general western theme of the area, but then something changed. The vine was still there, but the rose strangely faded in

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

the distance. A vine of freeways spread its insidious tentacles in every which direction. The city spread not like a rose of theme of fine architecture, but like a haphazard cancer with no organized plan and all its tentacles were thorns.

There were people coming from places like Chicago, Atlanta and D.C. who found that they have actually come to a place that is harder to get around in than the many places they left. There was no L, no Marta, and no Metro. Instead, they found themselves stuck on the vines in rush-hour traffic honking their horns going in the thorny road rage.

And I asked myself why? Is it because in Arizona we are still stuck in the dilution that this is the wild west and that every man needs his own horse to get around on? It's the real kind of Marlboro man who has his own horse. Yet because of that, chokes on the smoke and develops emphysema.

I live in the Ahwatukee area. You know, the one affected by the freeway. Please don't do me any favors by finding a faster way to Avondale when you will be increasing the noise and filth due to the out of control plan to make things worse than is already broken.

Hurray for putting in the Light Rail.

1

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

2

It's too little too late, and sorry it doesn't reach me, nor most other people in the Valley for that matter.

I have the lucky privilege of owning a residence on the edge of the desert where I can sit on my porch and watch the bunnies hop around while I sip my morning cup of coffee. I am blessed. There are plenty of rabbits because they are fed by neighbors who don't know any better. Most mornings that I'm actually looking, I'll see at least one coyote who I'm guessing is checking out the bunny scene, and sometimes chicken left out for them by another neighbor. Easy pickings.

3

I'm an avid hiker who sees far more bunnies and coyotes pass by my property in the city than I ever do in the wild. They're nice to look at, but there are way too many of them and it's nature out of balance. Now you're going to do something that throws this whole thing in reverse by cutting off a wildlife corridor, you'll be shutting off the coyotes' access to visiting coyotes from the Estrellas. And by doing so, you will affect their ability to interbreed. Without interbreeding, you get what? They get what? Right, they get dumb and they get diseases associated with recesssive traits.

Code	Issue	Response
2	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
3	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4

5

Because they are dumb and sick, they will die and the mountain will become a cold hard rock without them.

So maybe you're saying to yourselves, what's a few less Mangy Coyotes and a little more emphysema when we have to grease the wheels of commerce by way of truck between L.A. and El Paso. Well, if that's the way you see it, I know there's nothing I could ever say or present any kind of scientific evidence that could possibly change your mind. But if you have any inkling of a doubt, then please examine your conscience and feel it in your heart to draw a line in the sand to do what it takes to help us all breathe a little cleaner air and save many thoroughly gorgeous coyotes. Thank you.

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Purpose and Need, Truck Bypass**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Say "No!" to the Proposed South Mountain Freeway
Date: Friday, June 14, 2013 1:24:11 PM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov

-----Original Message-----
From: AMY BURKHOLDER [mailto:AMY.BURKHOLDER@EEOC.GOV]
Sent: Friday, June 14, 2013 12:37 PM
To: Projects
Subject: Say "No!" to the Proposed South Mountain Freeway

To Whom it May Concern:

I am a resident of Ahwatukee. My family and I moved from Oak Park, IL a few years ago when my husband's job transferred him to Phoenix. When we purchased our house in the Club West community and enrolled our children in the Ahwatukee public schools system, we felt like we won the lottery! Finally, we discovered a community where the public schools rivaled the schools in Oak Park (some would say they are even better) and the residents are friendly and the neighborhood is super safe. If that wasn't enough, we have one of the nation's greatest parks, South Mountain. My family and I routinely hike these trails and are never ceased to be amazed by its majestic beauty! There aren't many of these areas left in our great country!

1 2 3
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7 8

I truly believe building a freeway through South Mountain is a terrible idea. It's terrible for the health hazards brought by the increased congestion and vehicular traffic. With the increase in traffic, we will experience an increase in crime, air pollution as well as noise pollution, especially from the substantial increase in truck traffic.

Rather than destroying South Mountain to build the freeway, why doesn't Arizona begin constructing public transportation, including commuter trains and additional buses. Why aren't I10 and the 202 expanded to accommodate commuter trains that would assist residents from Ahwatukee, Chandler, Gilbert and Mesa to reach downtown. Finding ways to minimize crime and pollution should be the focus of Arizona, not adding to the problem which is what the proposed freeway represents.

Thank you for your consideration.

Regards,

Amy Burkholder

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Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Noise**	
6	**Trucks**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Noise modeling for the Final Environmental Impact Statement used this forecast truck traffic, with the model accounting for greater noise generation by trucks in the future (see Final Environmental Impact Statement page 4-88). Noise mitigation is designed for this predicted noise level, including the noise from trucks. The noise analysis was updated for the Final Environmental Impact Statement using the most recent Federal Highway Administration and Arizona Department of Transportation policy and traffic projections provided by the Maricopa Association of Governments. Discussion of this updated analysis begins on page 4-88 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted.
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Alternatives, Nonfreeway Alternatives**	

Code	Comment Document

From: Ken Burns
To: Projects
Subject: Public Input - Proposed South Mountain Freeway
Date: Tuesday, June 11, 2013 10:06:37 PM

I believe the proposed 202 South Mountain Freeway is short-sighted and does not reflect the current traffic patterns. The freeway was envisioned in 1985, but does not reflect the population growth over the past 30 years and the anticipated growth in the near future. In particular the recent and expected population growth in Goodyear and Buckeye will cause an explosion in the population west of the White Tank Mountains. (1)

- The South Mountain Freeway as proposed will do little to relieve the traffic congestion currently on the Papago Freeway. The 59th Avenue alignment is well east of the morning congestion point for inbound traffic. The same argument can be made for evening outbound traffic. (2)
- The South Mountain Freeway would become the de-facto "truck route" for semi-trailer traffic from the ports in California to points east of Phoenix. (3)
- The "truck route" designation will be even more evident with the completion of State Route 801.
- The South Mountain Freeway will not be similar to the San Tan Freeway. Because of the high volume of semi-trailer truck traffic, the South Mountain Freeway will be much noisier and provide much higher pollution to the neighboring communities. (4) (5)

I am not proposing a "no build" scenario. I can see the value of completing the 202 Loop and providing an alternate for traffic from the Chandler and Ahwatukee areas removing some of that traffic from the I-10 Broadway Curve. My recommendation relates to timing and scope.

- Before the South Mountain Freeway is built, I viable option should be built to pull traffic off the eastbound I-10 on west of Goodyear and reconnecting to I-10 south of the Phoenix metro. (6)
- Once the alternate route is completed, the South Mountain Freeway can be sized to accommodate the normal east-west traffic. Even then, the South Mountain Freeway will be primarily a pass-thru highway and not lead to significant population growth along its route (unlike the San Tan Freeway and the Loop 303), because of the South Mountain Freeway's proximity to tribal land and the fact that Ahwatukee is nearly built out. (7)

In conclusion, I believe that construction of the South Mountain Freeway should be postponed until:

1. The significant issues of the traffic congestion to/from the Goodyear and Buckeye communities is addressed. (8)
2. An alternate route for I-10 thru-traffic (especially semi-trailer trucks) is constructed. This would go a long way toward relieving the metro traffic congestion. The current proposal only serves to manage the traffic. A thru-traffic route would actually remove traffic from the metro freeway system. (6)

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	
3	**Trucks**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Noise modeling for the Final Environmental Impact Statement used this forecast truck traffic, with the model accounting for greater noise generation by trucks in the future (see Final Environmental Impact Statement page 4-88). Noise mitigation is designed for this predicted noise level, including the noise from trucks. The noise analysis was updated for the Final Environmental Impact Statement using the most recent Federal Highway Administration and Arizona Department of Transportation policy and traffic projections provided by the Maricopa Association of Governments. Discussion of this updated analysis begins on page 4-88 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted.
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	
6	**Alternatives**	There is an existing route (Interstate 8 and State Route 85) that provides a bypass of the Phoenix metropolitan area. Signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. This route continues to be available for interstate and interregional travel.
7	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Traffic**	The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Final Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The proposed freeway would serve as an important link to planned transportation facilities in the Goodyear and Buckeye areas, namely State Route 30 and State Route 303L. This system of freeways would help to improve traffic operations along Interstate 10 in the southwest metropolitan Phoenix area.

Code	Comment Document

Ken Burns
1762 W Thunderhill Dr
Phoenix, AZ 85045

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway comments
Date: Monday, July 01, 2013 8:45:40 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

ADOT Communications

From: Joe and Marie Burns [mailto:jmburns6@hotmail.com]
Sent: Sunday, June 30, 2013 1:57 PM
To: Projects; Joe and Marie Burns
Subject: South Mountain Freeway comments

1 2 3 4 5 6 7 8 9

We are strongly opposed to all of the current proposals that put the highway through Pecos Road. We disagree with the need to destroy part of South Mountain and think it should be preserved with alternative routes explored instead. We live a few blocks north of Pecos Road and are opposed to the increased traffic, noise, and pollution; loss of bike trails; unnecessary demolition of homes, church, and school; and potential increased crime rate that would result with a highway on Pecos Road. It sure seems like it would be less costly to run the highway through the open land south of Pecos where no homes, churches, or businesses would be negatively impacted.

We do believe the highway would best serve the community if it was located on GRIC land instead.

We look forward to having the GRIC route be put back on the table for further consideration.

Joe & Marie Burns

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	
6	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
7	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
8	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
9	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 5:17 PM
CALLER: MARILYN BURNS	CALLER ADDRESS: 10231 CONCORD AVENUE, SUN CITY, AZ 85351
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 3:22 PM
CALLER: JOHN BURTON	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the planning and construction of the South Mountain Freeway and think it should be built as soon as possible.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Let"s Build the 202!!!
Date: Monday, May 20, 2013 8:44:11 AM

From: Randy Bury [mailto:rbury@me.com]
Sent: Friday, May 17, 2013 5:46 PM
To: Projects
Subject: Let's Build the 202!!!

1

I am in support of building the 202 south mountain freeway and believe it is an extremely important freeway connection between the east and west valley.

Please support this construction. Thank you.

Randy Bury
480-993-7690

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:45 PM
CALLER: KELLY BUSK	CALLER ADDRESS: 5731 W. DUBLIN LANE, CHANDLER, AZ 85226
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the proposed South Mountain Freeway. Thank you for your time.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 1:39 PM
CALLER: JOHN BUSKOVITCH	CALLER ADDRESS:
PHONE: 602-678-1020	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain freeway extension. Thank you bye.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:56 PM
CALLER: DEBORAH BUSSER	CALLER ADDRESS: 1906 S. 65TH AVENUE, PHOENIX, AZ 85043
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am a registered voter and citizen of the City of Phoenix and I support the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 extension
Date: Thursday, July 11, 2013 10:43:34 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Jean and Mike [mailto:jeanandmikeb@cox.net]
Sent: Thursday, July 11, 2013 10:08 AM
To: Projects
Cc: council.district.6@phoenix.gov; Jim Jochim
Subject: Loop 202 extension

Ladies and Gentlemen:

1 We are residents of Ahwatukee and most definitely do not want the Loop 202 to be built in our community. For many reasons, mainly air pollution, we would like to see this project abandoned and funds expended elsewhere i.e. on the improvement of AZ 85 between I-8 and I-10. This would provide the "truck bypass" around Phoenix that supposedly everyone wants.

2

One of the main reasons we moved to Ahwatukee over 16 years ago, was that this area didn't get the infamous Phoenix "brown cloud." South Mountain protected the Ahwatukee area. If the freeway is constructed it (by itself) will most likely give us a "brown cloud" - that isn't healthy for anyone.

3 We both feel that ADOT has an obsessive need to build this road whether it is needed or not or wanted or not.

Jean Butterfield
Michael Butterfield
3126 E. Woodland Drive
Phoenix, AZ

480-706-8465

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Truck Bypass**	
3	**Purpose and Need, Old Plan or Use of Old Data**	

Code	Comment Document
	jeanandmikeb@cox.net Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments. .

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:39 PM
CALLER: ROBERT CAAN	CALLER ADDRESS: 9508 E. CAREFREE WAY, #D-315, SUN LAKES, AZ 85248
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the Freeway. I think you better get with it because it will never happen unless you do so. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 12:30 PM
CALLER: JOE CABRERA	CALLER ADDRESS: 8330 WEST SIERRA VISTA DRIVE, GLENDALE, ARIZONA 85305
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I live in Glendale. I just want to say I support the Loop 202 South Mountain freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Matthew Caggiano Document Created: 6/6/2013 7:29:18 PM by Web Comment Form Please do NOT build the south mountain freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Barbara Cain
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Tuesday, June 04, 2013 12:46:54 PM

Jun 4, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 I have fond memories of South Mountain Park in the late 40's and 50's. It is a valuable site for Phoenix folks and tourists. The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 5 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6 7 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Miss Barbara Cain
3489 N Camino La Jicarrilla
Tucson, AZ 85712-6042
(520) 881-5689

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:27 PM
CALLER: HEVER CALENBUTTERS	CALLER ADDRESS: 1881 N. ELLIS STREET, CHANDLER, AZ 85224
PHONE: 480-839-1610	EMAIL:
CALLER REMARKS/QUESTIONS: I support the 202 extension. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Raul Camacho Document Created: 6/20/2013 9:30:22 AM by Web Comment Form I really like and support the W59 Alternative.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 6:04 PM
CALLER: PAULINE CAMERON	CALLER ADDRESS: 249 W. PECAN PLACE, TEMPE, AZ
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I would like to voice my support for the South Mountain Freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Joseph Campell

Document Created: 7/24/2013 9:12:03 PM by Web Comment Form

Do Not Build & ruin Ahwatukee.

1

2 3

4 5

6 7

We do not need more trucks, cars & Buses to add to our pollution. A few years ago I participated in getting neighbors opinions and out of the area I live in only 1person (a truck driver) wanted it.

Home values will drop, pollution will increase, crime will increase, business will vacate this area.

The money wasted on this ill conceived plan is outrageous. Have you ever seen a plan this big which didn't require more and more funds as the contractors want more & more $$$.

I think train rails should prevail, or I-10 improved. Taxpayers don't want this boondoggle.

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
2	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
5	**Economics, Socioeconomics**	Businesses directly and adversely affected by implementation of an action alternative would be mitigated through relocation or site purchase at fair market value. The construction of the proposed facility would likely generate additional business and jobs in the corridor upon implementation because of the improved access it would provide.
6	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Alternatives, Nonfreeway Alternatives**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 12:39 PM
CALLER: FRANCIS CANITS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I do support the freeway construction. I live on the west side of the valley. Anyway I do support it. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support of South Mountain Loop 202
Date: Monday, May 20, 2013 8:49:34 AM

From: Rose Ann Canizales [mailto:RoseAnn@greatimpactinc.com]
Sent: Friday, May 17, 2013 3:48 PM
To: Projects
Subject: Support of South Mountain Loop 202

Dear ADOT:

1

I am writing in support of the South Mountain Loop 202 initiative. The economic "Crash" of 2008 in Arizona has devastated our state. The jobs created by this project will benefit the construction industry greatly and its community. The trickle down affect from general contractors to small business will aid commerce in Arizona and put people back to work.

The environmental impact to air quality will further bring pollutants counts down by aiding in decreased automobile emissions. The long term effects of this project will translate into boosting commerce and bringing contractors and their employees back to their state to find work.

Respectfully,

Rose Ann Canizales

President
Association for Construction Career Development
www.azccd.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

4303

location and also at the same time enhances the amenities within the City of Phoenix, keeps tax dollars here, keeps people able to stay within the lesser range for seeking out employment or shopping.

And I think that's about all that I can muster at this point, so I will probably be back if that's okay.

MS. DAD: I'm in favor of the acquisition for the freeway. I think it will be a benefit for the west side of the -- of the -- of the area, for people to be able to travel from the west side to the east side, avoiding the midtown congestion. I think they have studied every stick and stone and that they can now move forward and pick the 59 route. I think that is the best one for the freeway. That's it. I'm in favor of it.

MR. CARRILLO: I've been a resident of South Phoenix, in Laveen, all my life, which is 38 years old. I mean, I'm 38 years old now. And, absolutely, there's no question, the freeway being built would be the absolute best for that community in Laveen. And I did hold back in putting in my opinion, to study more concerning the South Mountain, the Gila River. A lot of them are my friends, and I understand their -- their dissatisfaction with everything.

But I do understand that they also had a problem with the casino first coming in there, a lot of these friends of mine. And, now that the casino has become something

1

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

lucrative for them, now there's not such an uproar about it. So I do believe that we are respecting their values and giving them a voice. But I also believe that there's a louder voice, including that with my community and residents in Laveen and everything, that absolutely this is the right choice and the right direction for growth.

MR. RODRIGUEZ: Yeah. Basically, I just want to state my absolute support for the 59th Avenue alternate. That's the priority one right now. I think it's probably -- Well, I know it's the best option based on the city planners of the City of Phoenix. They've expected this for a long time. It's a great benefit to Maricopa County. It's a great benefit to the Valley. And, quite honestly, a lot of people coming from the West Valley, all the way out to Buckeye, eventually, you have to cross 59th.

If it were to go any further west, then people that live on, for example, 51st, 59th, 67th, 75th, 83rd, they're not going to go back to try to catch it at the 101 if they're heading out to the East Valley. It's counterintuitive to what human nature would tell you. So they would just jump on the I-10, currently, and continue to take the regular flow, causing the same problems that we're experiencing downtown, when it comes to major traffic. So I would say 59th Avenue is, without a doubt, the best alternative.

The worst alternative is the one going through

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the202 freeway
Date: Thursday, May 16, 2013 8:14:35 AM

From: cr@zfine.com [mailto:cr@zfine.com]
Sent: Wednesday, May 15, 2013 8:48 PM
To: Projects
Subject: Build the202 freeway

1

This freeway has been studied, now let the bulldozers lose, it will be a great addition to Arizona's system.

Carl

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:40 PM
CALLER: DOROTHY CARLSON	CALLER ADDRESS: 1535 W. PELICAN COURT, CHANDLER, AZ 85286
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Brett Carlson Document Created: 7/17/2013 5:00:42 PM by Web Comment Form

1

I am leaving this comment in support of building the Loop 202 South Mountain Freeway. I am a native of Phoenix, living in the valley for over 35 years now. This section of freeway has been planned since 1985. It was determined back then that this connection was needed, when there were a lot fewer people living in our metro area. It is badly needed now to help relieve congestion on I-10, as well as other freeways and arterial streets. As the owner of a mobile photography business, I travel all over the valley using what has become a very large and overall efficient network of freeways. I believe the South Mountain Freeway is an important link that needs to be completed to connect the West and South West valley, with the South East valley. There are very few East-West freeway options, especially when you get to Downtown Phoenix and West of I-17. I would love to see this freeway built to give everybody another option instead of having to travel through downtown Phoenix. I live very close to I-10 at Baseline Road. I believe this freeway will help to relieve some pass through traffic on Baseline that heads to and from Laveen and other areas near there. That would be a much welcomed relief to those of us who live near Baseline Road. I have heard and understand the arguments from others, especially those in the Ahwatukee community. I believe there are just as many people in Ahwatukee that support the freeway being built, if not more, as there are against it. In reality, it will affect a very small number of people and businesses in that community. Noise levels will not increase that much, if at all, for residents 1/2 a mile or more away from the freeway. Again, I live within 1/2 a mile of I-10 with no sound walls, so I know. The pollution argument is a moot point. The pollution is already there. It's not like South Mountain prevents the pollution from the rest of the valley from entering Ahwatukee. I understand some homes and businesses may be removed to make room, and others may lose property value. But it's no different than any other community that other freeways have cut through in the past. And those areas have not died, they have thrived since the freeways have come through. Areas have become major employment centers in the valley because of freeways being completed nearby. So please, do not let a very vocal minority of people sway the decision on whether to build or not. I believe for every person like me who voices their opinion in support of building the freeway, there are at least 5-10 others who silently support building it. Let's complete what was planned 28 years ago and build the South Mountain Freeway! Thank you for your time and consideration of my comments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Five Year Program
To: ADOT
Subject: FW: No Loop 202 Expansion
Date: Tuesday, June 11, 2013 9:07:10 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Leahjo Carnine [mailto:leahjocarnine@gmail.com]
Sent: Sunday, June 09, 2013 4:50 PM
To: Five Year Program
Subject: No Loop 202 Expansion

1 2 3 4

To whom it may concern,
I live in the South Mountain area and am a tax paying, home owning citizen. The expansion of loop 202 is a violation a terrible transportation plan that violates our few remaining parks in the Phoenix area. Furthermore it is a violation of Indigenous land rights in the area. Please consider my input in the Environmental Impact assessment.

Leah Carnine
4202 E Vinyard Rd.,
Phoenix AZ 85042

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
4	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	D Carpenter Document Created: 5/29/2013 5:07:59 PM by Web Comment Form Highway is much needed, I believe it is important to maintain the sovereignty of the Gila river community. Please keep the highway on state land

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Victor Carranza Document Created: 6/23/2013 3:10:36 PM by Web Comment Form I am all in favor of the South Mountain Freeway. I moved in to the Ahwatukee area in 1993 and was advised at that time that the freeway was going to be built in ten years. It's now twenty years later and still no freeway. People who bought in the freeway access area did so at their own risk. They were advised as I was or else there was poor planning on their part. Build the freeway. The community needs it. Only 200 community members attended the last meeting in Ahwatukee. That's 200 out of approximately 85,000 residents living in the area who obviously want the freeway built. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Joseph Carreon

Document Created: 7/24/2013 4:44:13 PM by Web Comment Form

Hello:

1 Please do not build the 202 extension. It is harmful to the planet and our landscape and ourselves. In order for Phoenix to thrive other policies can be supported that have little to do with making more roads. Please do not build the 202 extension. Save our mountain preserve.

2 I disagree that a 202 extension should be built. Current indicators show that traffic will not increase--this is due to technology people will be working from home more often and

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 10:11 AM
CALLER: TONY CARRICCI	CALLER ADDRESS: 1111 WEST BARROW DRIVE, CHANDLER, AZ 85224
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I support the freeway, but I also would like to see some more light rail expansion.

Code	Issue	Response
1	**Alternatives**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

(1) A legitimate concern is the amount of traffic entering the I-10 from the preferred alternate W59. It will make the bottleneck even worse than it is now at morning commute. Will another I-10 lane be added to I-10 E and W?

(2) The Baseline Rd. ~~entrance~~ route to W59 is another concern. Heading west from 51st Ave, Baseline merges into one lane. Will Baseline be expanded?

Optional

Name Mary Carroll Email mcarroll8@q.com

Address 7304 S. 29 Ln

City Phx State AZ Zip 85041

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT · U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Design**	Construction of the proposed freeway would include widening along Interstate 10 to facilitate entrance and egress of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26 on page 3-49 and Figure 3-29 on page 3-53 of the Final Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 were developed in accordance with the Federal Highway Administration's Interstate System Access Informational Guide and has received an initial determination of operational and engineering acceptability from the Federal Highway Administration.
2	**Traffic**	Traffic interchanges (on- and off-ramps) would be located at Van Buren Street, Buckeye Road, Lower Buckeye Road, Broadway Road, Southern Avenue, Baseline Road, Dobbins Road, Elliot Road, 51st Avenue, 17th Avenue, Desert Foothills Parkway, 24th Street, and 40th Street. In the immediate area of the interchanges, the crossroads would be widened to their ultimate lane configuration based on the City of Phoenix General Plan. Adjacent improvements such as signals and road widening would be the responsibility of the City of Phoenix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, July 15, 2013 8:04:27 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Linda Carroll [mailto:gorda1148@gmail.com] On Behalf Of Sue Carroll
Sent: Saturday, July 13, 2013 1:59 PM
To: Projects
Subject: South Mountain Freeway

1

2

My husband and I live in the Sunrise subdivision in the foothills. We often walk through the desert and have seen some beautiful petroglyphs on the first of the three areas that will be destroyed if the freeway is built. The petroglyphs are just off the well worn trail and easily visible. We have not explored higher up but would not be surprised if there are not more. Do you take these ancient petroglyphs into consideration when making your decision? It seems a sad thing to destroy our history just to build roads.
My hope is that ADOT and the Indian Community will agree on the alignment a half mile south that will spare not only hundreds of homes but also those ancient petroglyphs.
Thank you for the opportunity to voice my opinion.
Linda Carroll
2804 W. Ashurst Dr.
Phoenix, AZ 85045

_____

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.

Code	Issue	Response
1	**Cultural Resources**	The freeway alternatives were surveyed for archaeological sites, which include petroglyphs (rock art). The archaeological survey documented several petroglyph locations. Subsequently, the freeway alternatives were redesigned to avoid the petroglyph sites. No petroglyphs would be destroyed by implementation of the proposed freeway. Because right-of-way fencing would limit access from the proposed freeway, damage to petroglyph sites would not be facilitated (see Final Environmental Impact Statement pages 4-151 and 4-172).
2	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Nicole Carson Document Created: 5/20/2013 5:11:03 PM by Web Comment Form How can I find out if my house is in the path of development and part of the plan for residentail displacement?

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Aerial maps are available through the hearing available on the project Web site: <azdot.gov/southmountainfreeway>.

Code	Comment Document

1

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:36:46 AM
Attachments: dd26a0.png
imagec1b5fa.PNG

From: Rebecca Carter [mailto:rcarter@wirc.co]
Sent: Monday, May 13, 2013 7:09 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

I am in full support of building the 202 South Mountain Freeway, I do not understand why anyone would oppose such a needed relief for our freeway system. Our freeways are just getting way to congested and we need more roadways to elevate that problem.

Rebecca Carter | Human Resources Manager

Western Industrial Resources Corporation
3640 South Cactus Road
Apache Junction, Arizona 85119-9200

480-396-7404(O), 480-396-7405(F), 480-505-5310(D)

Visit our Website

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:38 PM
CALLER: FRANK CARTER	CALLER ADDRESS: 1686 E. CAROB DRIVE, CHANDLER, AZ 85286
PHONE: 480-802-4379	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I fully support this venture. I hope it can move forward as soon as possible.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 4:26 PM
CALLER MARY ANN CASE	CALLER ADDRESS: 9449 W. MORROW DRIVE, PEORIA, ARIZONA 85382
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I do support building of the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2	Alice Casson Document Created: 5/24/2013 5:00:59 PM by Web Comment Form A major thoroughfare is not an appropriate use of government owned, public used land. The air quality alone would seem to be reason enough for such a project. Adding car pollution and the public disregard of littering and loitering would only worsen the atmosphere already stressed. We are intended to be caregivers of the land - NOT users and destroyers. Please reconsider and find another way.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	

Code	Comment Document
1	Andre Castaneda Document Created: 5/21/2013 3:44:04 PM by Web Comment Form The research provided seems to be the best alternative to build freeway in the proposed locations. I'm in favor of the proposed freeway as an Ahwatukee resident.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4257

speakers with respect. Please refrain from clapping or booing or whatever you might feel to do, out of respect to the people who have an opinion and comments as they address the panel.

So as soon as we get a new name on the list, we'll call that person and we will continue. Thank you.

Patrick Castle. Mr. Castle, could you use the microphone on this side here, please. Thank you.

Mr. Castle, you have a three-minute time period; you'll notice the timer right here.

MR. CASTLE: Okay. Great.

THE FACILITATOR: Begin, please.

MR. CASTLE: Thank you very much today for the opportunity. I just want to give a bit of anecdotal observation and evidence of what a freeway can do for enriching the fabric of the community, enriching the home values, enriching the cultural values. We currently live in Laveen where we've experienced growth of the community and quality of homes and we feel it's poised to expand; however, the lack of a freeway currently we see as one of the issues that's holding that back. One of our prior homes, though, we lived in an area that's approximately Cactus and where Highway 51 currently

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

is, and we lived there over 20 years ago, prior to the completion of Highway 51. So we lived during the building of Highway 51, we experienced the opening of that, and what we saw was an enrichment of the community far beyond our expectations. It enriched the school systems, the quality of the housing, the number of businesses then that were able to step up and see the opportunity to go into that community.

And so just from, again, an anecdotal, our own personal experience, we've seen the impact of the freeway, which, you know, we thought at the time, great, we'll have better access, but we didn't really anticipate the powerful impact it had in all aspects of that area. So we're just now seeing now the planned 202 extension in Laveen where we currently live as being a very similar opportunity, that the community is poised to expand in both commercial and in cultural ways that I think will be far beyond the expectations of the folks that are even pro the extension at this point.

That's all I have. Thank you.

THE FACILITATOR: Thank you, sir.

Those of you who just entered the room, if you're planning on speaking, please make sure that you register at the registration desk out front.

Code	Issue	Response

Code	Comment Document

don't get their jobs back. We'll give them to people with sense in their heads.

Anyhow, thanks for listening. ADOT, you're depressing as always.

* * *

UNIDENTIFIED SPEAKER: The biggest thing right now, I think, is why is it that it's only one day and during the workday, like, this particular public hearing and the forum and everything like that? Because normal people work Monday through Friday, 8:00 to 5:00, so it seems like it would be better, like, on a weekend, all day Saturday and all day Sunday.

Because there's a lot of information for people to kind of comprehend, especially for the people who may be newer to the community and not familiar with the NEPA process, not familiar with the technical process, I think a bigger span of time would have been better.

* * *

MR. CASTLE: Patrick, C-a-s-t-l-e.

I just spoke in the other room, but I think that the key thing that we saw in years in living in an area

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

that is now Highway 51 -- we lived there over 20 years ago prior to the Highway 51 expansion -- was that not only did it resolve many of the crowded freeway situations and the transportation impact, but it also enriched the quality of life way beyond our expectations.

And so we lived through the building of Highway 51. We were approximately at Cactus and the 51, where our house was. And that wasn't really a problem, the building phase. But once the freeway was done, we found that the business and cultural opportunities just really took off at that point because of access.

We now live in Laveen where we see a very similar circumstance and where the community has experienced a lot of growth in the last five, ten years. But because of a lack of a freeway, there's been reticence for many businesses to come in and really serve the community, and the commute for many of the folks is more than they would like.

So once that freeway is completed, we'll see not only expansion of businesses but also the expansion of the housing areas and the enrichment of the area, which I think is going to be way beyond the expectations of the folks that are proposing it, similar to the situation we experienced when Highway 51 was completed when that enriched the area far beyond expectations.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Thank you.

* * *

MS. KIMMICK: Debbie, Kimmick, K-i-m-m-i-c-k.
I live on 59th Avenue and Broadway, and I'm concerned about the alternate route or the proposed route. It's going to knock off my access heading north because that's turning into an access road, and I'm concerned that it's cutting my neighborhood in half.
So my concerns with it being there would be the noise, the air pollution, the extra congestion. I feel that it would be better if they went and connected it to the 101 instead of the 59th route.
I'm going to keep it that simple.

* * *

MR. KIMMICK: My name is Galen, G-a-l-e-n, Kimmick, K-i-m-m-i-c-k, and I live at 59th Avenue and Wood.
I have several concerns about this project and the noise it's going to create, the air pollution that I believe it's going to create in my neighborhood that I don't have now. I believe there's a better alternative by

Code	Issue	Response

Code	Comment Document

Document Created: 5/20/2013 1:14:17 PM by Web Comment Form

To Whom It May Concern,

I am writing to express my thought on the proposed loop 202 and 59th Avenue Route. My husband, family members, friends and I have voted for approval on the original route when it was first drafted and put on the ballot. Many of us bought our homes in this area with the knowledge that we would be able to access Awhatukee, Chandler and Tempe area by that route to get to work. I have always lived in the southwest valley and worked in the east valley it is a shame that they now they want to change the route. I hate to think of what it will do to our home values and what homes and busineses will have to be destroyed for the alternative routes. I know that this area is not a very affluent one, but it really irritates me that this area is always the last to get any type of expansion of transportation services.

1

2

Thank You
Joanna Castro

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The Preferred Alternative, W59 and E1 Alternatives, closely follows the original alignment adopted in 1988.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Elizabeth Cazan Document Created: 7/21/2013 1:54:47 PM by Web Comment Form

To Whom it Concerns,

As a native of Tempe Arizona (59 years) and homeowner in the Ahwatukee Foothills (21 years) I offer my opinion and feeling on the issues and concerns regarding the proposed South Mountain Freeway. I have and will continue to be COMPLETELY OPPOSED to the freeway being installed along Pecos Road!

1 I would be in agreement to a South Mountain Freeway Loop being installed about 1/4 mile South of Pecos and parallel to Pecos, on the Gila Indian Reservation ... with some condition, and that would be that the plan is useful and agreeable with a fair vote, to the Gila Indian Tribe.

2 I have followed and engaged in the issues and meetings surrounding the need for a S.M. Loop, for the past 21 years. A more recent suggestion is to have NO FREEWAY/NO ACTION/NO BUILD on or near Pecos but rather to have a truck by-pass route improved and connected to the outer region of Highway 85 and Gila Bend.

If an agreement cannot be made for a loop on the Gila Reservation then my vote is for improving and expanding on the outer loop connection to/through highway 85 and Gila Bend.

-Respectfully,

Elizabeth F. Cazan
480-734-7353
ecazan@gmail.com

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	An alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 was considered (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and inter-regional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, it was eliminated from further consideration.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Regarding South Mnt Freeway Loop
Date: Monday, July 22, 2013 8:47:03 AM

FYI

From: Elizabeth Cazan [mailto:ecazan@gmail.com]
Sent: Sunday, July 21, 2013 11:47 AM
To: Projects
Subject: Regarding South Mnt Freeway Loop

To Whom it Concerns,

As a native of Tempe Arizona (59 years) and homeowner in the Ahwatukee Foothills (21 years) I offer my opinion and feeling on the issues and concerns regarding the proposed South Mountain Freeway. I have and will continue to be COMPLETELY OPPOSED to the freeway being installed along Pecos Road!

1 I would be in agreement to a South Mountain Freeway Loop being installed about 1/4 mile South of Pecos and parallel to Pecos, on the Gila Indian Reservation ... with some condition, and that would be that the plan is useful and agreeable with a fair vote, to the Gila Indian Tribe.

2 I have followed and engaged in the issues and meetings surrounding the need for a S.M. Loop, for the past 21 years. A more recent suggestion is to have NO FREEWAY/NO ACTION/NO BUILD on or near Pecos but rather to have a truck by-pass route improved and connected to the outer region of Highway 85 and Gila Bend.

If an agreement cannot be made for a loop on the Gila Reservation then my vote is for improving and expanding on the outer loop connection to/through highway 85 and Gila Bend.

-Respectfully,
Elizabeth F. Cazan
480-734-7353
ecazan@gmail.com

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Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	An alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 was considered (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and inter-regional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, it was eliminated from further consideration.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Say no to the Loop-202 Extension
Date: Wednesday, May 22, 2013 10:48:24 AM

From: Scott Cecil [mailto:scottbcecil@gmail.com]
Sent: Tuesday, May 21, 2013 7:42 PM
To: Projects
Subject: Say no to the Loop-202 Extension

PEOPLE OF THE GREATER PHOENIX AREA: If you are opposed to the construction of the Loop-202 freeway expansion, please take the time to submit a public comment to projects@az.gov. Here is mine:

Once again, the moral callousness of eco-apartheid is rearing its ugly head in the Valley of the Sun. The Phoenix, Arizona greater metropolitan area, with its unsustainable urban sprawl, unchecked growth, rampant destruction of finite natural resources and wildlife habitats, and the most industrially polluted zip-code in the country, was recently cited as "The World's Least Sustainable City". As is the case with every major city In the United States, most of the negative externalities that are associated with these ecological crises are disproportionately dumped on the doorsteps of oppressed and subjugated populations. The proposed Loop-202 extension is yet one more chapter in the devastatingly sad and brutally savage story of cultural eradication of the indigenous peoples of this valley, who have lived here for hundreds of years. The expansionist eco-philosophy of our American culture has a total disregard for the fact that this land is sacred to the native peoples who still live here and rightfully call this land their home. Many others have commented today about the questionable, outdated and often inaccurate information provided in the environmental impact report for this project. Thusly, I feel it is imperative to focus on the cultural, ecological and spiritual rape that this freeway would commit on the peoples of the Gila River Indian Community. It would be extremely unwise, unfair and unjust to continue the failed model of perpetual growth that we have taken in and around Phoenix. Enough is enough. The line must be drawn here, this far and no farther. The only way that we can ever even begin to heal this land and the people whose culture we have systematically destroyed is to stop now and reverse the trend. Please do not build this freeway.

1

2

Scott B Cecil
Chandler, AZ

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Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Old Plan or Use of Old Data**	

Code	Comment Document

4371

Dale Huish; may have just registered.
Dale Huish. Did I pronounce that right, sir?
MR. HUISH: That's correct.
THE FACILITATOR: Sir, this isn't a --
MR. HUISH: I'm sorry.
THE FACILITATOR: That's okay. You're welcome to provide your comments, we just don't have a Q-and-A-type environment.
Thank you, sir.
Stephanie Hurd.
As soon as we finish with Stephanie, we're going to change the panel out and take a break.
So if you're ready, she can come up to this microphone and get ready to speak.
MS. HURD: So can I go?
THE FACILITATOR: The panel's fine with that.
Gina Cernohous.
MS. CERNOHOUS: Yep, that's me. I just moved here, I've had my house in Laveen for a couple months. I'm a contract graphic designer. I chose Laveen because I like the -- kind of the farm, open area, but I strongly, strongly support the freeway, just so it'll connect us to the rest of the city. I sympathize with the people who are against it, but the urban sprawl is there and we need the freeway to eliminate just the

1

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www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

terrible traffic. I'm sure I'm also like a lot of people that I live in Laveen and we have very few businesses, people have to go outside of the city, and I would love the freeway to enable businesses and encourage businesses to move into Laveen and get the traffic so people will stop spending their money elsewhere, so that's why I support it.

I think we can't go back in time, the houses are there, the people are there, and the freeway needs to be there, so I strongly support it and I really hope that you do too. Thanks.

THE FACILITATOR: Thank you. We're going to take a ten-minute break to change out the panel. When the ten-minute period is over, Ana Morago, if you're here we'll take you at that point. Thank you, panelists.

(The proceeding was at recess from 12:02 p.m. to 12:13 p.m.)

THE FACILITATOR: Good afternoon, everybody. May we begin again, please. We have a new panel I'd like to introduce up here. We have Matthew Burdick from ADOT, Randy Everett from Federal Highways, and we have Trent Kelso from ADOT.

May I please ask Ana Morago to come up and please come up to this microphone.

Lisa Doromal.

Code	Issue	Response

Code	Comment Document

Tony Cesarano Document Created: 6/27/2013 9:45:42 AM by Web Comment Form

1 I travel the entire Valley every week for work. Please accept this email as a strong YES to move forward with the South Mountain Freeway. If in your studies the 59th Ave. corridor was the best option than please start this process as soon as possible.
In my opinion the further we delay the project- cost rise. Land today is at a fair price, in a few years that will not be the case.
Finally - biggest impact is on the Broadway curve it is very overloaded today, this freeway will take pressure off of that area.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Draft Environmental Impact Statement now available
Date: Tuesday, April 30, 2013 8:54:10 AM

From: Yesenia Chacon [mailto:ychacon@ejmdevelopment.com]
Sent: Friday, April 26, 2013 10:22 AM
To: Projects
Subject: FW: South Mountain Draft Environmental Impact Statement now available

1

Hi,
I am a resident of South Phoenix, living close to South Mountain and I'm interested in receiving a draft route plan (pdf) of the proposed freeway.
I am excited about this development as it will facilitate traveling from our part of town to other areas of the valley.
Is the plan available on-line?

Thank you in advance!

Best,

Yesenia Chacon
EJM DEVELOPMENT CO.
7419 E. Helm Drive, Suite E
Scottsdale, AZ 85260
480.948.7880 ext. 122
480.948.8051
www.ejmdevelopment.com

From: Arizona Department of Transportation [mailto:adot@service.govdelivery.com]
Sent: Friday, April 26, 2013 10:09 AM
To: Yesenia Chacon
Subject: South Mountain Draft Environmental Impact Statement now available

[redacted]

South Mountain Draft Environmental Impact Statement Now Available

PHOENIX – The Arizona Department of Transportation and the Federal Highway

Code	Issue	Response
1	**Public Involvement**	Aerial maps and other study materials are available on the project Web site: <azdot.gov/southmountainfreeway>.

Code	Comment Document

Administration today released the Draft Environmental Impact Statement (EIS) for the proposed South Mountain Freeway. This release launches a 90-day public comment period.

The draft environmental document can be found on the project website — azdot.gov/SouthMountainFreeway — and at the following locations in the community:

- Phoenix Public Library – Ironwood Branch, 4333 E. Chandler Blvd., Phoenix
- Phoenix Public Library – Burton Barr Central Library, 1221 N. Central Ave., Phoenix
- FedEx Office Print and Ship Center, 4940 E. Ray Road, Phoenix
- Sam Garcia Western Avenue Library, 495 E. Western Ave., Avondale
- Tolleson Public Library, 9555 W. Van Buren St., Tolleson
- ADOT Environmental Planning Group, 1611 W. Jackson St., Phoenix (call 602.712.7767 for appointment)

The document covers potential impacts from building or not building a freeway, coordination with the Gila River Indian Community, purpose and need for a new freeway, alternatives studied and public outreach efforts since the study was launched in 2001.

To provide input during the 90-day public comment period, you can participate in the following ways:

- Attend a public hearing on May 21 from 10 a.m. to 8 p.m. at the Phoenix Convention Center
- Email projects@azdot.gov
- Submit comments at azdot.gov/SouthMountainFreeway
- Call 602.712.7006
- Mail comments to the South Mountain Study Team, 1655 W. Jackson St. MD 126F, Phoenix, AZ 85007

All public comments must be submitted by July 24.

The project's study team will incorporate input gained from comments to produce the final environmental impact statement, which will have a 60-day public review period. A record of decision is expected in 2014.

Construction of the South Mountain Freeway, if approved, could begin as soon as 2015. The eight-lane freeway would run from I-10 in the West Valley along 59th Avenue, cut across the southwest corner of South Mountain Park and connect with Pecos Road on the south side of Ahwatukee to connect with I-10 and the Loop 202 Santan Freeway.

Code	Issue	Response

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1 2 3 4 5 6

MR. CHADDERTON: I moved to Ahwatukee in '77 and started doing real estate then. And what I was telling them is, when I used to hike South Mountain, it was quiet and serene. Now, if you hike it, you can hear the diesel noise on I-10. And my house, I live on the golf course. Now, at 4:00 in the morning, I hear diesel and noise, even though they have the abatement wall.

In 1988 I worked on the CAC, Citizens' Advisory Committee, to master-plan South Mountain Park, for 22 months. I learned a lot about it. And I'm just concerned that putting that in is going to -- I was told that, whenever you put a road in, it affects the habitat for a one-mile corridor. So that's my concern.

The other thing is South Mountain was given to the City under a patent through the BLM, the Bureau of Land Management. And I'm wondering if they would have a problem if they want to cut into South Mountain. And I don't think they've looked into that, either.

But I'm just worried about pollution and noise. I think it's going to be a big factor that's going to affect all of Ahwatukee.

I think it would be neat if Pecos continued, as is, as a two-lane blacktop with lights, to 51st. And if they found -- could do an alternate truck route for the south, so that the trucks -- you know, let the local traffic get around

Code	Issue	Response
1	**Noise**	Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered "acceptable" by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.
2	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The history of the Phoenix South Mountain Park/Preserve, including information related to the conveyance of land from the Bureau of Land Management to the City of Phoenix, is presented in the Draft Environmental Impact Statement on page 5-25.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Noise**	
6	**Alternatives**	The Gila River Indian Community has not allowed the project team to consider alignments on its land, so extending Pecos Road to 51st Avenue is not feasible. In addition, in the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.

Code	Comment Document

but keep the trucks further south, so that we won't have to deal with so much pollution. That's my two cents.

I started the Chamber of Commerce in Ahwatukee and am the founding charter president of the Ahwatukee Chamber. And, as I said, I was on the Citizens' Advisory Committee to master-plan South Mountain Park back in '88, so I think that that makes me familiar with the area.

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Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Eastern Alternative Proposed 202 Route
Date: Tuesday, May 14, 2013 9:49:16 AM

-----Original Message-----
From: Nitrogenfixx [mailto:nitrogenfixx@cox.net]
Sent: Saturday, May 04, 2013 5:59 PM
To: Projects
Subject: Eastern Alternative Proposed 202 Route

Dear Mayor Stanton and Freeway Engineers;

I am a cyclist and utilize riding my bike on Pecos Rd. a couple times weekly, and have done since 2002..... It is wonderful! Wide bike lanes, very few stop lights, and goes from 49th St. west into the new housing development to about 27th avenue..... Yea!!!!! Nice long pretty safe road.

Arizona Senior Olympics anual events have been located there for years: Cycling, Inline roller blade, and running races all utilize Pecos Road for two mornings early in March. There is ample parking off 40th St., Phoenix police keep traffic off Pecos for the races duration, and it has been a wonderful attraction for both in and out-of-state competitors....

1 Question: What will happen to the Pecos Rd. bicycle lanes? How can cyclists be safe on traffic filled frontage roads? We don't need more cyclist's deaths, and we DO need all the safe roads with bike lanes we presently have.

2 3 Question: What will happen to the beautiful new homes on the western end of Pecos which may be mere feet from a noisy freeway????

4 Question: Could the 202 Eastern leg follow Riggs Road further south, and connect with I-10 on the western edge of South Mountain???? I have ridden that route many times, and there are essentially no homes to bother, and plenty of room to build.

Thank you in advance for your attention to my concerns (and those of MANY cyclists too).

Sincerely,
Ann Chadwick,
Phoenix Metro Bicycle Club
Strada Racing Club

_____

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Code	Issue	Response
1	**Traffic**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
4	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

Donna Chamberlain

Document Created: 7/24/2013 7:38:39 PM by Web Comment Form

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The proposed freeway should not be built. Have you thought of the impact on several schools on Liberty Lane up and down Pecos Rd. The lost lives of high school drivers using this to exit and enter the school will be on ADOT. You don't have to ramrod this idea down the throat of all who live out here. Not to mention the fact we don't have enough mountains in Phoenix and you want to destroy part of it. I never thought our own people that live in this state or county would even consider it. Think of something useful to waste 1.9 billion on. I would rather have my money and live peacefully.

Code	Issue	Response
1	**Traffic**	The study considered local travel for residents including those attending schools near the freeway. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement). Schools will continue to be accessed using the local street system.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Purpose and Need, Lack of Support**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:38:25 AM

From: Paul Chapman [mailto:pwchapman3@yahoo.com]
Sent: Saturday, May 11, 2013 11:22 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Build the 202 South Mountain freeway

Paul Chapman

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Adrien Chapman Document Created: 6/14/2013 6:01:11 PM by Web Comment Form The South Mountain Freeway is desperately needed. As a resident of Laveen, I fear without freeway access my neighborhood will not fully flourish. Easier access to other cities in the valley will bring more income to the area and better economic growth. With the growth in population projected, the freeway would help reduce commute times and decrease traffic congestion. Less cars on residential streets and reduced time on freeways would help decrease pollution in the valley as well.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:31 PM
CALLER: KIP CHARLTON	CALLER ADDRESS: 4040 N. 58TH STREET, PHOENIX, ARIZONA 85018
PHONE: 480-703-5919	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I'm calling in support of the South Mountain freeway. You can reach me at…Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 4:08 PM
CALLER MICHAEL CHARLTON	CALLER ADDRESS: 169011 W. DESERT MIRAGE DRIVE, SURPRISE, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I do support that freeway being built. Having lived on both sides of the valley, it will be a great help. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

MS. CHASE: I'll start out by saying I'm angry. I am angry because I came here to have something to say about this, to the State of Arizona and to the people. And now I find out, when I get here, I can't say anything.

Well, I'm just now pointing out that all I can talk to is a court reporter. I can't even talk -- And that's not what the paper said. The paper said that -- The paper said there was going to be another meeting here, for public -- for public opinion. Well, that's what I'm here for.

I'm not here to talk to a court reporter. I'm not here to talk to the State of Arizona. I'm here to talk about this issue to the people that are involved: community members; Pangaea, who wants to do this thing. What for? And to the State of Arizona.

The Government gave us this land, this reservation, for our benefit, for our use. The State of Arizona aren't Indians. Go on the other side of the boundary. Put your freeway on the other side of the boundary.

Yeah, well, you can just listen to what I've got to say here, being I can't talk to anybody.

That's wrong, doing it, because that's tyranny, that you're going to tell us what you're going to do but you don't want -- you don't want us to tell you what we think about it except to a court reporter?

I want to talk to the people. I want to be able to

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Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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get my ideas and what I think about this thing to the people. That's the whole purpose of the meeting, as to whether they're going to build the freeway or not. How are you going to build the freeway when you don't know what we think about it, except on paper?

I'm not here to talk to you.

And that's wrong. That's not Indian way. That's another thing that I'm talking about, wanting to talk about, is Indian way. We have our way, our traditions, our culture. And you people, you Americans, we call you Americans. You Americans, you don't know Indian way.

Well, I'm here to tell you what Indian way is. And Indian way is still here on the reservation. It's alive and kicking.

And Pangaea wants to build this freeway on there, and they're not even -- I called and found out, they don't even have any exit. What is it? 22 miles, that freeway is going to run? There aren't even any exits on the reservation.

And Pangaea wants to bring industry and business? How are they going to bring industry and business to the freeway when there's no exits?

The exit is going to be at 59th Avenue, off-reservation. All the State wants to do is put a road in here, for your convenience.

And the paper said that this is not going to be

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Code	Issue	Response
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives**	Federal law prohibits the denial of access to any community. Thus, traffic interchanges would be located along the freeway where it borders the Gila River Indian Community (see Final Environmental Impact Statement page 3-51). Roadway connections on Gila River Indian Community land to the traffic interchanges would be the responsibility of the Gila River Indian Community, in coordination with appropriate jurisdictions.
4	**Design**	The interchange locations for the proposed freeway are (see Figure 3-28, on Draft Environmental Impact Statement page 3-51): · Interstate 10 (Maricopa Freeway)/State Route 202L Traffic Interchange · 40th Street · 24th Street · Desert Foothills Parkway · 17th Avenue · 51st Avenue · Elliot Road · Dobbins Road · Baseline Road · Southern Avenue · Broadway Road · Lower Buckeye Road · Buckeye Road · Van Buren Street · Interstate 10 (Papago Freeway)/State Route 202L Traffic Interchange

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harmful to the City of Phoenix. Do I care about the City of Phoenix? No.

I live here on the reservation. I am concerned about the impact of this freeway, that's going to have on our environment. We've got South Mountain here. We've got Estrellas over here on the other side. Where is that smog going to go? Right here on the reservation.

And Phoenix, the State of Arizona, wants that smog here on the reservation, not in Phoenix.

From the very beginning, when Columbus came here and discovered -- to the Bahamas and to the United States of America, what it is now, they've been trying to destroy the Indian population, the Natives. They set out to kill us.

Germany, Hitler, they had their concentration camps where they annihilated the Jewish population. The United States is no different. The only thing is they don't call them concentration camps. They call them reservations.

They put us on reservations for why? To kill us off. But I've got news for you: We're still here. We're survivors.

They took -- The Government took our land, in Docket 228. And the attorney told me, we got 25 cents an acre for that land. That was $6 million to be split with Salt River, Ak-Chin, and Gila River. That's three -- $6 million. That came to 25 cents an acre. That's what we got for it.

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5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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And the Government argued: Because it was undeveloped land.

What do they mean, undeveloped land? The Pimas built canals all over this place. It was not undeveloped land. We had an irrigation system here that's doing well today. Those same irrigation canals that the Pimas built are being used right now. It was not undeveloped land.

We didn't have 20-foot -- or 20-story skyscrapers. But I'll tell you what: We still had a skyscraper. We had a four-story building near Coolidge, the Casa Grande ruins today. Four stories high, a massive building. There aren't even four-story buildings in Casa Grande, in Florence, or Coolidge today.

And they have the nerve to tell -- call us uncivilized? Heathens? They don't know Indian history. They don't know Indians like we know Indians.

I'm an Indian. I'm a Pima Indian. I was raised by Pimas. My first language was Pima. I was born on the reservation. I know what our history is.

I know what it is today: We're in a transition. And I don't like that transition.

This guy -- I wasn't going to say this, but I will now. This guy, what's his name? Joseph Perez. Pangaea. I said -- I was talking to some young people at the computer lab, some time ago, and I says, "Who is this guy, anyway?"

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And one of the young men there laughed, and he said, "I went to school with -- with Joey. He used to say, 'I'm not an Indian. I'm a Mexican.'"

And now, all of a sudden, it behooves him to become an Indian because he wants to make money? So now he's saying, "Oh, I'm a tribal member. My family this, and my family that."

What kind -- What kind of stuff is this? I mean, that's not Pima way. He wasn't raised as a Pima. He doesn't even speak Pima.

And that's what I'm saying, is now, what we've got, we're in a transition, where that we have people like me, who know Indian life, who know Indian tradition and Indian way. And we have the new generation, who don't even speak Pima and didn't even want to be associated as being an Indian. He's a Mexican.

Well, I'm glad to be a Pima because I know my heritage. I know my ancestors. I know their way of life. I know how they lived and what they did.

And I have something against those contractors that were at that last meeting, saying that they wanted -- that this meant 30,000 jobs for them and they wanted -- they wanted that freeway in there. Well, I'm sick and tired of them.

I've got news for them: I'm sick and tired of rescuing the American public, people, because we did that when the settlors came through. They had Indian scouts, Pima

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scouts, that went out in the desert and picked up the settlors because they were dying from lack of water, dehydration. And they rescued them, fed them, gave them water, took care of their animals.

And now these contractors are coming to the Pimas and saying, "Oh, help us. We want 30,000 jobs."

I've got news for them: They're barking up the wrong tree. Let them go to their Government.

It was the United States Government that was overseeing all this housing thing that went corrupt and bankrupt and put us into recession, put this country into recession. Hold those people responsible. Make them provide jobs for them. Don't come to the Pimas and ask the Pimas to provide jobs for them. We already did that. And I don't want to do it now.

Now all we've got is 373,000 acres. This land is for our children. It's for us to live on. The Government gave us this land for our use, for our benefit.

And those contractors and the State of Arizona, they're not Pimas. They're not Indians. Go on the other side of the freeway -- or the boundary. Go on the other side of the boundary and build your freeway over there.

They gave us 25 cents an acre for this land. Don't -- You don't need any more. We're not giving you another square inch. You go on the other side of the boundary and

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build your freeways.

These freeways are like snakes: a freeway here, a freeway there, a freeway here. Freeways all over the place.

We don't want any freeways on our reservation. Where is all that pollution going to go? Right here on the reservation.

Does Phoenix care? Does the State of Arizona care? Does Governor What's-Her-Name care? No.

We're survivors. And I'm here to tell you guys: Take your freeway and go on the other side of the boundary.

You've got Baseline over there. Put your freeway over there. And then don't put any exits on it for 22 miles, and see what those people, those business people, have to say about that.

A freeway with no exits? And these Pangaea people think they're going to get rich because they're going to put in a freeway with no exits and they're going to put businesses up alongside the freeway? That's disaster. That's failure because people off-reservation aren't going to come to the reservation, to their businesses, to do business, when they can go two blocks down there from their house and go to Bashas', go to Walmart, and Target, and all of those other places. They're not going to come to here.

Business is: Location, location, location.

Where is your location?

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And they want to put business out in the middle of the desert, by a freeway with no exits? How smart are these people at Pangaea? Who are they, anyway? We don't even know anything about Pangaea. Who is this Joey Perez? Has he done land development? How successful has -- What's his history? Where is his money coming from? Who is financing this Pangaea outfit?

They're paying -- They're paying people $50 a signature to sign those petitions. And where else is that done? Do off-reservation people get $50 when they sign a petition? They're doing it here.

And who is paying them that $50? Where is it coming from?

Joey Perez is just a front. I understand, his wife is a partner in this, too. He's just a front.

But who is behind it? Where is the money coming from? Who are the -- Where is the money?

And even those people aren't too smart if they want to put businesses out in the middle of the freeway with no traffic.

We're 22 percent unemployed here. And they expect us to go and buy from them? We're poor. We're poverty-stricken. And that's why those landowners want that freeway to go in there. They think it's going to be money for them. But it isn't.

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They're promised $2,000, that they're going to get $2,000. But those landowners don't stop to think that that land is fractionated land. What -- how that turn -- How that came about is that, when the Allotment Act was passed in 18-something -- '87, I think it was. When they passed that first Allotment Act, every Indian in the Gila River got ten acres. My grandfather got ten acres. His children got ten acres.

Then, when he died, then his children got a fraction of his allotment. And then his grandchildren -- who I'm a grandchild -- now I have interest in that land. So that's what this land is. That ten acres is fractionated.

When it's leased out, all the people, the allottees that have interest in that land, just get a fraction of the $2,000. But these people think they're going to get $2,000? Huh-uh. They're only going to get a portion of that $2,000, depending on how many people are in that land.

All of the landowners are -- They're not landowners because they don't own the land. They just have interest in the land. All of those people are going to get a portion of that $2,000.

So what are they going to end up with? We have hundreds of people that have interest in these fractions, one piece of fractionated land, so that some of them only get pennies when that land is leased out. So how far is $2,000

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going to go?

And this is why I'm here to tell the people, to bring out these things, so that they won't be taken in. They don't -- They don't think about this. All they see -- All they hear is: We're going to get $2,000.

And where is $2,000 going to go, anyway?

One lady told me she went to a meeting. They told her she was going to get $2,000. She said, "What am I going to do with $2,000? I can't fix my car, pay my electric bill. What am I going -- What good is $2,000 going to do me?"

She said, "I left. I wasn't interested."

She was a smart one. She had it figured out. But, unfortunately, there are people that don't figure it out. They don't think.

And that's what I'm here for, is to try to tell them: Look, this is what's happening. This is what's involved. These are -- These are all the things that are involved in this freeway thing.

(Ms. Chase speaks a brief phrase in Pima) Don't like it. Don't accept it.

And -- and Joey Perez, and he wants to -- He wants to have another election on this? We already said, "No." The people already had an election.

And here, here, I found this thing here. I didn't get a copy of that. But read that.

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See, that's a -- This is a picture of the reservation. There's Chandler and all these other places around it. And this is what it says here. It says -- I have to get my glasses.

This says: Shouldn't community members be able to decide what is -- what is appropriate for the community?

We already did. We already decided. No, we don't want the freeway.

But, you see, there's a -- There's a Indian way and an American way. We're in conflict. And Americans don't understand Indian way. Indian way, the people have already said what they -- what they wanted. Indian way, it shouldn't even come up again. It's been decided.

So how -- And I was talking to a friend about this. And I said, "Well, you know, this isn't like a court hearing and one side loses and they ask for an appeal. We had an election, not -- not a court hearing. This shouldn't be an appeal."

And she said, "Well, if I think of it, I think that there was a Martin Luther King election, and I think they -- the voters went to the polls three times before they made Martin Luther King a holiday."

I thought -- I said, "Oh, yeah, I didn't know that. I forgot about that."

So that's a difference, right there, between Indian

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way and the American way. American way, you can keep petitioning and petitioning and petitioning and petitioning. It's like a crying baby. The baby cries and cries and cries until momma comes and gives it some milk and shuts it up.

So then -- And that's what -- That's what Pangaea is doing: Crying and crying and crying, petition after petition, to get their way because legally they can do it.

But Indian way, Indian way, you can't, because we already decided. We already told you: No, we don't want it. Go away. Leave us alone.

That's Indian way.

And I said -- And that's the conflict that we're in. We're in one -- we're in one -- We're in one life and in another life. We're Indian way, living Indians -- living Indian way, and trying to be living American way. They're in conflict.

And we're getting this new generation of people who don't know Indian way. And Perez doesn't even want to admit he's an Indian, saying, "I'm a Mexican."

So what have we got here?

And I'm just here to say, to the people, that we need to -- we need to -- If we're Indians and this land is our land, we need to preserve it for our children. We need to be careful about the environment. We have the Sierra Club now and all kinds of other clubs that are concerned with the

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environment.

I've got news for them: We had Sierra Club long before they ever came along, because Indians didn't kill just to kill. It wasn't a sport.

The Indians up north, they hunted buffalo. And they used every bit of that buffalo for their -- for their livelihood or whatever. They used the -- They used the hides for tents, for clothing, for food. They used the whole buffalo. They didn't go out there and just destroy it.

They did the same thing with other life. Deer, they didn't go out there and kill Bambi's mother and kill Bambi, too. They were concerned with wildlife.

They called the earth "Mother Earth," because Indian way, Indian language, is expressive and they saw that the earth provided grain, berries, rabbits, buffalo, deer, for their food and for whatever they needed. The earth did that. So that's why they called it "Mother Earth."

And they lived in harmony with their environment.

When those settlors came west and they saw the buffalo and the beavers, all they saw were hides and money. And that's the difference between the Europeans and the Indians.

Our lives are different. We think different. We're Indians. And -- and we live, many of us, just like our ancestor did. And we've lost so much of -- of our way of life

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now.

My grandfather, when I was a little girl, our little dog, Tuffy -- I still remember his name. It was a little -- kind of, a little white dog with fluffy fur. That little dog was running in circles, yipping and yapping, and just wild. And we all stood there watching him, my brothers and sisters and I.

And my grandfather was close by, and he saw that little dog. He calmly walked over to the house and got a pitchfork standing up against the building. He took that pitchfork and he killed that little dog.

And I thought: Why are you doing this? Why are you killing our dog?

And it wasn't until I went to high school and had a science class and heard about rabies, then I knew why my grandfather killed that dog.

And that was the way the whole Indians were. They -- He didn't bat an eyelash. He saw the danger, and he moved. He didn't wait an hour, 15 minutes, or the next day. He took that pitchfork and he killed that little dog for the safety of us children.

And that's part of what I know Indian way is like. And that's why that I'm here, to say that there's still some of us that are traditional. There's still some of us that know Indian way.

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And I won't bat an eyelash to say, "Take your freeway and put it on the other side of the boundary."

That's what it's all about. Our Indian way is different. And -- and we're in conflict. And our children are not learning Indian way.

But there's some of us here that still -- we're still traditional. We still know our ways.

And I'll tell you another story about my grandfather. My father was in the United States Army. And he came home. He was in Hawaii, and he came home. And I guess my grandfather got his check and cashed it. And my dad found out about it. I was a little girl. I was standing right there, listening to all of this.

And my dad said to my grandfather, (Ms. Chase speaks a brief phrase in Pima), "I'm going to put you in jail."

And my grandfather looked at him and said, (Ms. Chase speaks a brief phrase in Pima), "Go ahead and do it."

But he said, "These children" -- he said all of this in Pima -- "these children are your children. It's your responsibility to take care of these children. But you haven't been doing it. I've been doing it. I've been taking care of your children. And, yes, I took that check and I cashed it, for your children, to buy them food, to buy them clothes, to buy them what they need. I did it. Go ahead. Put me in

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jail."

My dad, because he was an Indian, raised Indian way, put his head down, turned around, and walked away.

Yeah, American way, my grandfather could have gone to prison for forgery. But Indian way, he won. And my dad walked away and didn't do that.

So that's the way Indian way is. That's what I know about Indian way. It's different from the American way. And that's what I'm here, to remind these people that want to do this: No, don't do it. Do like my grandfather did. He killed that little dog for the safety of his children. Think about your children. Don't give away this land because what are your children going to have? Nothing.

I have -- I have interest in my grandfather's land now because he didn't give it away. He was poor. He didn't have money. They were poverty-stricken. But he didn't sell his land because in those days, those old people said, "Don't sell your land. If you do, you're going to be walking down the road with a bag of clothes. You're going to have nowhere to live. You're going to have nothing. You save this land."

That's what we were told. That's how we were raised. But some of our people don't know this.

This Joey Perez, he's not Indian way. All he's -- He's American way: Greed. Give me that money. Give me that money. That's the way -- That's the way it is.

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And I'm here to say, I don't want the freeway on -- on Indian land. I like our buzzards. I like our jackrabbits.

An elderly man at an elderly-concerns meeting said, "I saw -- I saw two eagles up there on South Mountain. What's going to happen to them once that freeway goes in?"

Because Indians live with their environment. They care about the roadrunners, the quail. They learn from it.

I used to go to the old-time Farmers Association meetings and hear the stories that they told. And the stories were about the animals, and they lived with the animals. They didn't -- They only took what they needed. They didn't just kill them. They didn't destroy them.

That's why I'm saying that they were here long before Sierra Club came along, and all of these other wildlife programs and projects.

We lived that life, and I don't want to see it destroyed. I want to save it for -- for our people and for our children.

And, as it is, we have all kinds of pollution now. We get asthma. My little great-grandson has asthma. I get asthma because of our environment and the -- and the pollution of the -- of the air.

But people don't think of that.

We're dying from diabetes. 80 percent of our population on Gila River have diabetes. In 1909 they only had

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Code	Issue	Response
6	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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one case of diabetes. Today, 80 percent of our population has diabetes.

Diabetes causes strokes, heart attacks, kidney failures, all kinds of failures in the bodies. Our legs are amputated. Our arms are amputated. And then we die.

And now they say that Alzheimer's is connected with diabetes.

So we're dying. We're becoming an extinct nation. And that's bad enough, that we -- Now they want to put a freeway through here and further pollute our air? No.

The people need -- Our people need to think about all these things and to think of what they're doing and not just be trying to grab that money because where is that money going to go, anyway? It's not going to go anywhere. You're not going to take it with you.

And you're just depriving -- These people are just depriving their children of land, of a place to live. So that -- that -- those are -- That was what I wanted to try to bring out, and these points to bring out to the people. And -- and to try, both sides.

And those -- Those contractors need to be ashamed of themselves because all they want is 30,000 jobs. They don't care about the people here.

And when those jobs and that freeway is completed and those 30,000 people are out of jobs, what are they going to

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do next?

It's just a temporary -- a temporary cure for their insatiable desire for TVs and, you know, those phones, all kinds of phones, and all kinds of computers and all kinds of stuff like that. It's never going to end, their desire for them, because that's the way that these Europeans are. They did it in Europe, fought over land over in Europe. From bible days, they fought over land.

But the Natives here in this country, we're different. We don't -- We didn't fight over land. We had our areas where we lived, but we didn't fight over land because they believed that land was to live on. It wasn't meant for personal ownership.

And this is one of the differences between the Indians and the Europeans. They want their name on a tract of land. And, when the West started being settled, the Government gave -- I didn't write that down, the statistics on that -- but gave a lot of land in the West, reserved for the Indians.

Then they passed -- I believe it was the Dawes Act. They passed that Act. And what that Act did was they took the land that they reserved for the Indians and sold it to the settlors for 50 cents an acre.

And so this Government has been -- they've -- Their intention, from the very beginning, was to kill all of the Natives off, get their land and their buffalo and everything

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else they could get. And that's been -- That's been the intent, all this time.

And they're -- And they're still doing it. They already got all our reservation land. I mean, not our reservation land but the -- what do you call it, the -- the Native lands where the Natives lived. They already took that. That's where we got the 25 cents an acre. They already got it. But they're not satisfied with that.

Now they're coming on the reservation and wanting our reservation land.

I fought more developers coming -- wanting to come on our reservation and take our land, because they've developed all of Chandler. They're up to our border now. Now our reservation land is looking pretty good to them because contractors, their mindset is: If they see a piece of land that doesn't have asphalt on it, they're going to put asphalt on it. They're going to put buildings on it. That's the nature of the beast.

But that's not our way. We like our jackrabbits. I live on a tribal home-site lot that's about an acre big. I have rabbits. I have cardinals, doves, quail, all kinds of birds, and owls that come to -- come to my lot because I provide water for them. And birds love water; I've found that out.

And they come to -- Even dogs, stray dogs, come to

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my house looking for water. And -- and I have trees. And they want the safety of my -- of my lot.

And I just found out we even have rattlesnakes. We had found a little tiny rattlesnake on the porch. So even rattlesnakes are coming to my house.

But -- but Indian way, these are all -- This is part of my heritage, to live in conformity with nature. They didn't -- They didn't kill animals just to kill them.

We had a -- We had a Gila monster one time by our house, and my dad took that Gila monster and took it out in the desert. He didn't kill it. And so but that's an example of -- of how Indian -- Indian way is, how Indian people thought and how they lived.

And it's so sad for me to see that we're losing it. For what? For money? For the greed of money?

And in the old days people didn't have money. They didn't care about money. They put holes in nickels and made necklaces out of them or put them on their shirts. You know, that's what money meant to them. It was just a decoration.

And they were happy. I remember, as a little girl, that we would go to Sacaton. And the church would take their tamales and sell tamales. And they had -- They had baseball teams playing against each other. They had rodeo. And people were happy. People laughed and visited, and they were happy.

But it wasn't money that made them happy. It

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was -- It was being social, getting together, relatives. We're all related. And it was people getting together. And they laughed and had fun.

I remember, as a little girl, that the girls used to hold hands, and they would walk around the rodeo arena in one direction. And the boys would walk around the arena in the opposite direction. And then, when they'd come together, they'd all giggle and laugh. The girls would giggle and laugh. And -- and you used to be able to -- Girls would hold hands, and nobody thought of them as being homosexuals. Now you don't dare walk down the street holding a girl's hand.

But so those are the -- Those are the differences.

And being 75 years old, I've lived in that generation. I know what it's like to be a Pima, what it's like to be an Indian, and what it's like to live in the -- in the Indian society, where that -- where that families, they live together and work together and help each other. If somebody needed a house, they all got together and built a house for them. Somebody needed their grain to be -- to be harvested; they all came and harvested the grain. They -- They lived together. That's the way Indian life was.

Today, it's different because Americans don't live like that. They put their grandparents in the nursing home somewhere so they won't be bothered by them. Now we're doing that.

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So we're changing, and I don't think it's for the good.

And all we've got -- If all we've got now is -- is to fight for this freeway not to go through here, then we've got to do.

And I'll just say, to that Pangaea, Joey Perez, and all those people that are -- that are trying to put this freeway in, that there's still some of us here, some of us traditionals, that we're still here. And we're still Indians. We're still Pimas.

And -- and those people that were at that Phoenix meeting, they're a block that were opposed to the 202 Freeway. They're a block. And, if Joey Perez and his cohorts want to put that freeway in, they're going to have to go through that block.

And we're still Pimas, like the old Pimas. We're a formidable bunch. And you better look out because we're not -- we don't want it.

And -- and, as they said in the Marine Corps -- My husband was in the Marine Corps. And there was a saying. It goes: You feel froggy? Jump.

Joey Perez feels froggy? Jump.

So that -- Yeah, he's going to have to reckon with some of us traditionals.

And that's all I've got to say.

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Pangaea got another petition. And so they brought it to the Council. And the enrollment or the secretary's office, they looked at these signatures, and they weren't right. And so I guess some of them were forged. They didn't really say.

But so they had a -- So the Council had a meeting on that. And Myron Scherers (phonetic) made a motion to clean up the petition, go through all the signatures and make sure they were all valid signatures. And the Council passed that motion.

But Annette Stewart, a councilwoman from District 5, didn't vote for it. And she gave her reason why. She said: They should just redo the whole petition, not just clean it up.

And -- and I'm in agreement with her on that, on account of the petition is one document. It isn't just this page and that page and all of the pages put together. It's all of the pages put together making one document. And, if any part of that document is fraudulent, then the whole document is fraudulent.

They need to retake that petition and redo it.

And I'll go one step further, to say that the people that carried those petitions and got those fraudulent signatures shouldn't be allowed to carry another petition. And in my anger I'll even say that those people should be excluded

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from the reservation. We have people that are excluded. What that means is that, when people are so bad, they're -- they're run off the reservation.

And that's what they should do to these people because they're confidence people. And I don't know if they're men or woman or who. But they take -- They get the confidence of the people.

These people that signed the petition are believing that everything is upright; everything is honest. And it isn't. And so they signed the petition, believing that everything is right when it isn't. And these people getting the petitions, signatures, they're -- They're confidence people.

And that -- What can be worse than to betray Indian way again is to betray people that have trusted you to do what's right. There's just no -- There's just no excuse for it.

There isn't even -- We don't even have a law, I think, about that because it's not our way. We don't have people that -- confidence men that come in here and gain the confidence of the people for their benefit and then turn around and stab them in the back. That's not Pima way. So we don't even have any laws that would cover that.

The only thing we have is exclusion. If -- if a family or a person is so bad, then exclude them from the

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reservation. Throw them off.

So and I think -- I would have a tendency to believe that, if we were living back in the seventeen, eighteen hundreds, they would do exactly that. I think that, if they found somebody that was so bad, and so immoral, so corrupt, I think they'd -- they'd tell them, "Leave the reservation. Get out of here."

I think that's what they -- that that would be the remedy that they would have for that. So I would -- being -- Being somebody from the old ways, that's -- that would be my opinion on that.

But, at least, what they should do is not allow these people who carry these petitions and got fraudulent signatures to go do it again. You -- When somebody robs your house, you don't open the door and say, "Come on in, do it again. You didn't -- You forgot my refrigerator."

So but okay. I guess that will be all.

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From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:36:45 AM

-----Original Message-----
From: Micaela Cheath [mailto:willlldcat80@aol.com]
Sent: Monday, May 13, 2013 6:55 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

I live in Laveen and traffic coming and going from here gets worse everyday. 51st Ave is downright hazardous with big trucks and casino traffic and people using Riggs to skip the city. It's madness and neither road is built to sustain much more traffic. During rush hour it's crazy, particularly on 51st and lower buckeye near the amazon building. There's a huge need for the 202, it's been on the plans for 30 years, not having it is delaying development in Laveen and the only hold up is a handful of awhatukee residents who don't want to be close to the reservation that they bought homes right next to. I have lived in Laveen my entire life as well and I'm very nervous about the change it will bring. Progress and change however is undeniable and while I have concerns I recognize that this freeway is a necessity for the improvement of all of Phoenix for safer more convinient road ways. So lets just build it already! Please and thank you.

1

Sent from my iPhone

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Code	Issue	Response
1	**Neighborhoods/ Communities**	The Laveen Village area is anticipated to have a built-out population of over 105,000 (see Final Environmental Impact Statement page 4-14). This proposed level of development places increasing demand on the road network. The City of Phoenix's General Plan for Laveen Village has designated areas along the proposed freeway for commercial development that cannot support the projected densities without implementation of the proposed freeway. Without the proposed freeway, the conversion of land from undeveloped and agricultural uses to residential, commercial, and industrial land uses would likely continue, placing a greater demand on surface streets (see Final Environmental Impact Statement page 4-14).

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From: Projects
To: ADOT
Subject: FW: Build the 202
Date: Monday, May 20, 2013 8:32:45 AM

-----Original Message-----
From: Walter E. Cheatham [mailto:wearlc1@concentric.net]
Sent: Saturday, May 18, 2013 1:19 AM
To: Projects
Subject: Build the 202

Hello,

I received an email from the "Build the 202 Group" that is requesting my support for this project. I DO NOT support it.

I live on 51st. Avenue in Laveen and have lived here most of my life. I am 70 years old and in fact helped my parents build the house (we finished it in 1957), which is now mine.

I repeat, I DO NOT support building the 202 though Laveen and specifically along 51st Avenue.

1 I do NOT understand why the route is NOT along the Pima Indian reservation line (the Laveen side) to about 83rd. Avenue and then North to join the I-10.

The route SHOULD NOT be through ANY residential areas.

2 IF the 202 MUST be built then it WOULD be much less expensive to purchase farm land rather than residential property.

The idea makes me think there are some individuals and maybe corporations that are SOLELY thinking of financial profit without any regard to homes and displacing families.

SO, PLEASE STOP this plan and reroute the proposed 202 alignment, like I already said, along the reservation line and then turn it North along 83rd Avenue to the I-10, THROUGH farm land ONLY!

I am NOT able to attend any meetings to discuss this project so I am relying on the Arizona DOT to hear my concerns and act accordingly and positively on my wishes.

Sincerely,

Walter Cheatham
PO Box 4
Laveen AZ 85339

My house is located at 8402 S. 51st Avenue in Laveen but there is NO mail delivery at my house.

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The alignment proposed in the comment is similar to the W71 Alternative. The W71 Alternative would affect over 800 single-family residences. The Preferred Alternative, W59 Alternative, is located almost entirely along farmland in Laveen Village and would affect only 46 single-family residences (see page 4-46 of the Final Environmental Impact Statement). It is not possible to route the proposed freeway entirely through farmland.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 10:59 AM
CALLER: VIRGINIA CHOISNARB	CALLER ADDRESS:
PHONE: 602-269-0285	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support South Mountain freeway. I don't really know too much about it but anything that will relieve the pressure, I think will be wonderful. [Unclear]. Thank you very much. [Unclear]. Bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Raj Christian Document Created: 5/21/2013 1:16:36 PM by Web Comment Form The proposed South Mountain Freeway will have huge impact on valley's transpotation system and environmental characteristics. It will provide a much needed alternative route to bypass Phoenix downtown reducing traffic congestion and drastically improving air quality. Traffic safety will be enhanced and crashes will be reduced by constructing this freeway. Semi-trucks and larger commercial vehicles will have an easier bypass route. It will allow I-10 commuters easier commuting especially during rush hours on Phoenix freeways including I-10 and I-17 truck route. The freeway construction is already funded through voter-approved transportation funds in the MAG regional transportation plan. The project will tremendously help state's economy by providing jobs and business opportunities to hundreds and thousands of construction workers, contractors, small businesses, manufacturers, suppliers and professionals.

Code	Issue	Response
1		Comment noted.

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From: Sierra Club on behalf of Karen Christian
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 12:15:00 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. (3) ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more (5) vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, (7) movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center. Encourage condensing & reducing our population, rather than continuing expansion.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Ms. Karen Christian
8435 S Tumbling X Ranch Pl
Vail, AZ 85641-8972
(520) 219-7287

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

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8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Sierra Club on behalf of Angela Christie
To: Projects
Subject: Opposition to the South Mountain Freeway
Date: Wednesday, July 24, 2013 5:34:57 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

3 While having a light-rail line is helpful, it only scratches the surface and needs to be greatly expanded to connect to all major areas of the city north, south, east, and west to encourage people to use it, taking many more cars off the road and helping people exercise by walking. Light-rail can work extremely well as in seen in other major cities in the U.S. and around the world, and having an improved, more extensive bus system would certainly help, as well, for many areas in the farther reaches of Metro Phoenix are still poorly served by public transport. That is the key: sustainable public transport must be "easy" for commuters and contribute to improved air quality, not worsen it. The negative impacts of a freeway, the resulting traffic, and the pollution and environmental degradation that would impose are hazardous both for nature and human health and do not address the larger problem for a Metro area that has been expanded over years without a wise plan for public transport to accommodate the growth.

4 South Mountain Freeway would have incredibly negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

5 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
8	The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.
1	Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you. Sincerely, Angela Christie 8902 E Via Linda # 110-170 Scottsdale, AZ 85258-5416

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Plans / Comments...
Date: Tuesday, May 14, 2013 9:35:40 AM

-----Original Message-----
From: cbsiv@cox.net [mailto:cbsiv@cox.net]
Sent: Tuesday, May 14, 2013 7:52 AM
To: Projects
Subject: South Mountain Freeway Plans / Comments...

HI:
Three things; Build it fast for it's overdue now; two, make it four lanes in each direction and finally, designate a " Trucker Lane " where 75 MPH
is ok and they can move the freight safely ! Thank You,

Chuck

1

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/19/13	INCOMING CALL TIME: 5:21 PM
CALLER: BILL CHUCKGROVE	CALLER ADDRESS:
PHONE: 480-922-4780	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Patricia Talcott
To: ADOT
Cc: Patricia Talcott
Subject: ENVOY #1314664103/Loop 202 South Mountain Freeway Darft EIS
Date: Tuesday, May 28, 2013 9:18:10 AM
Attachments: image001.png

The following was received on the ADOT ENVOY System:

Loop 202 South Mountain Freeway Darft EIS
5/26/2013 5:35:01 PM
It appears that the study is well done and comprehensive. I agree completely that this is the type of improvement we need. Just like the I-10 widening between Phoenix and Tucson, this project is well overdue. I think the 101 inter-connection would alleviate the most traffic on Interstate 10. I often travel between Avondale and Tucson. Being able to avoid all of the morning eastbound traffic that starts to slow at 83rd Avenue would be a great benefit in commute time and stress. If you bring it in at 59th Ave, commuters will still have to wait in traffic (from about 6:30 am until about 9 am) as they slowly make their way from the 101 to 59th Ave. Traffic gets crazy during these times. Same deal coming back into town from the south. You would be able to divert at Pecos, go west, but then be dumped into 59th Ave. At rush hour, I suspect intuitively that it would not be much better than what we have now, and the bottleneck at that interchange will be tough. That is a key item that I focus on; merging with heavy traffic. Peeling off at the 101 should be OK at most hours of commuting. I am surprised the study did not address merging at rush hour (it did address commute times, I realize.) I realize the study says that the 101 option is a bit more impactive to some aspects. It is still the better alternative in my mind as most of the area is open or agricultural, at least once you get past the Tolleson area or below Buckeye Rd. 59th is mostly industrial with some residential. I guess there is not a tremendous difference as some entities will be displaced. With the growth levels on the west side, this freeway is essential. If 59th Ave. vs. 101 is a deal breaker, I say go with 59th as the best alternative. I still prefer any of the 101 alignments. I think the freeway should proceed on schedule. Thanks for the chance to comment.
Clarillos, Robert - bleppo1@hotmail.com

1

Thank you.

Patricia A. Talcott
Program Project Specialist II
206 S. 17th Avenue, Room 101, MD118A
Phoenix, AZ 85007
602.712.7610
www.azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

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Code	Issue	Response

Code	Comment Document

Thom Clark

Document Created: 5/27/2013 11:39:54 AM by Web Comment Form

1 I am writing this e-mail in opposition to the proposed Loop 202 South Mountain Freeway. When is enough growth enough? When are we going to say the metro Phoenix area, Maricopa county, and yes, the state of Arizona has reached the point of of population saturation. Growth does not equal improved quality of life. Let's not pave over our heritage.

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4388

THE FACILITATOR: Thank you.

MR. ROWLEY: Good afternoon, it's good to be here with you today. My name is Cade Rowley, I've been here in the Valley for almost 15 years, and I want to show my support for the 202 freeway. This things's been studied for almost 20 years, I think that I've reviewed the draft EIS, I think the team has done a very thorough job of looking at all the issues, weighing in on the environmental consideration as a need to be taken and, you know, the freeway here's going to provide a lot of great things for the community. It's going to reduce air pollution; as you probably heard today, congestion is at a premium in this part of the Valley, it's very difficult to get from the west side of the Valley to the east side where I live and, you know, it's going to make a big impact on that.

In addition to that, we really need the jobs here in Arizona, so it has the potential to create 30,000 jobs. Our economy is struggling, now is the time to build the 202, and I want to issue my support for the build option of the 202. Thank you.

THE FACILITATOR: Thank you.

Don Clark.

MR. CLARK: Thank you. I want to just voice my appreciation for the study that has been done and voice

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www.drivernix.com

Code	Issue	Response

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1

my support for the 202 freeway. I happen to live in Ahwatukee just off of Chandler Boulevard and I know that there's been a lot of conversations in Ahwatukee about the impact to that part of Phoenix. I think it would actually be a boon to that portion of town for several reasons. If you travel from Ahwatukee up I-10 to get to I-17 going north to Prescott, you've experienced a lot of traffic delays on I-10, particularly through the Broadway curve. I think this freeway extension will help to relieve that traffic by bringing traffic off of I-10 that comes up from Tucson and has to get to the middle of Phoenix. This way you'll have a bypass that will actually put that traffic out to the west side of town and relieve the congestion and the delays that people from Ahwatukee experience getting to the airport and in the central business district of Phoenix.

So, again, I want to support my support -- or voice my support for this freeway project. I know that a lot of the information that you see here in the draft EIS shows the real benefits of that and in particular, further, I want to voice the support and in the area of relieving traffic from my area of town. Thank you.

THE FACILITATOR: Thank you.

Randy Frank.

MR. FRANK: I'm Randy Frank, I'm representing

Code	Issue	Response
1		Comment noted.

Code	Comment Document

* * *

MS. CLARK: I'm horribly frustrated with the fact that this freeway has been delayed again. When I bought my house in 2004, I was told the freeway was coming through, that a town center was going to be built over at 59th and Elliot, the infrastructure would be coming out here. And here we are almost ten years later and nothing has happened in this community.

The closest freeway access is at least 9 miles away. There's no shopping -- limited shopping. We don't have any -- we have a Wal-Mart. If you want to buy clothes, you go to Wal-Mart.

It's very frustrating to live in this community. Our home values have not really increased because nobody wants to live here. No businesses want to come out here because of the lack of access on the freeways. And now they're saying it's going to be 2015 before they start, and I would be surprised if it happened in 2015.

So, like I said, I'm extremely frustrated with the fact that when I bought my house in 2004, I was under the impression that the freeway was going to be coming through and that this community would be a viable community instead of what it is today, which is not very good.

I was going to add on the shopping. The nearest

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

malls are about 12 miles away in both directions. It's at least 20 minutes of a drive one way to go shopping. There's limited restaurants and services, like just getting a good haircut, because businesses have not seen this as a place to come and develop their business.

And a large part of that, I think, points to there's no highway, so there's no perception, of, you know, ease of access. We consistently see restaurants open and they're busy -- or they're packed because they're a new choice in the neighborhood.

MR. CLARK: I think we have three restaurants down here.

MS. CLARK: And a bunch of fast-food restaurants. It's frustrating.

I was going to say something else.

MR. CLARK: Well, how the highway would benefit -- have you talked about the flooding?

MS. CLARK: Yeah, that's another point. Right now, there's only three roads that go across the river: 51st Avenue, 67th Avenue and 99th Avenue.

MR. CLARK: Well, 51st Avenue is going west.

MS. CLARK: Right. If we have major rain and flooding -- 67th Avenue and 99th Avenue flood. It takes several months for those roads to open up again, so all of the people that live south of the river have to come to

(Comment codes begin on next page)

Code	Issue	Response

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51st Avenue south -- or west of the river -- have to come to 51st Avenue to access Phoenix. So we have a lot of traffic on 51st Avenue.

But, yeah, the benefits of getting that freeway in here is -- this community would be so much more vibrant. There's so many people that live out here, but there's just no infrastructure.

That's it.

THE COURT REPORTER: Did you want to leave your names?

MS. CLARK: Oh, Nancy Clark.

THE COURT REPORTER: C-l-a-r-k?

MS. CLARK: Yes.

MR. CLARK: And Michael Clark.

THE COURT REPORTER: Thank you.

MS. CLARK: I just wish they would get it done already. I might be selling my house. Seriously, I think I've had it with waiting and hoping things are going to change and get better. I think I'm at the point where my house is going on the market and, unfortunately, for not as much money as I would have hoped for because nobody wants to live out here -- I shouldn't say "nobody," but it sure is limited. It's like living in the boonies.

Thank you.

THE COURT REPORTER: You're welcome.

1

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Shonna Clifford Document Created: 7/23/2013 10:35:06 PM by Web Comment Form

I can only think of negative consequences to the Loop 202 South Mountain freeway being built on its current alignment, including, but not limited to, the following:

1 Decreased property values, my home is within 0.2 mile proximity

2 3 4 Increased noise and air pollution, especially since this will turn into a truck bypass

5 Increased crime rates

6 Increased exposure to toxic chemicals and airborne particulates, increasing disease

7 Increase in surface street traffic since there are fewer outlets

8 If a bypass route is needed, it should be further south

9 Cost is prohibitive

Code	Issue	Response
1	**Property Values**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Purpose and Need, Truck Bypass**	
5	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
6	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
8	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
9	**Costs**	The project is completely funded through federal sources and a local ½-cent sales tax, as programmed in the Arizona Department of Transportation 5-year Transportation Facilities Construction Program and the Maricopa Association of Governments *Regional Transportation Plan*.

Code	Comment Document

Emily Cobb Document Created: 6/10/2013 1:25:17 PM by Web Comment Form

1 2 3 4

Please, please, please stop the project to build the South Mountain freeway. As an avid South Mountain hiker it would be devastating to have a highway ruin this amazing park and destroy wildlife. I am incredibly concerned about the noise and air pollution impact on Ahwatukee.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants, and Wildlife**	
3	**Noise**	
4	**Air Quality**	

Code	Comment Document
1	Donna Cobos Document Created: 5/21/2013 12:40:19 PM by Web Comment Form We definitely need a freeway out here to alleviate some of the traffic on the 10. I have lived between Warner & Elliot east of 48th St. since 1983 and what used to be a 20 minute drive downtown is now more like 45 minutes to an hour during rush hour-talk about air quality-no one seems to worry about us folks that live along the 10 but with the traffic backed up every day and night, it can't be good so it just makes sense to keep that traffic moving and make it faster to get to downtown. I'm sorry for the people that will be displaced but this freeway really needs to be built thru.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

To: Arizona Department of Transportation
South Mountain Freeway Study
1655 West Jackson Street MD126F
Phoenix, Arizona 85007

Re: Environmental Impact Statement ("EIS")
Loop 202/South Mountain Freeway

Date: June 14, 2010

The purpose of this letter is to inform you that I am a property owner in the Laveen area of Phoenix. The property I own is located at 59th Avenue and Baseline Road.

1

I am supportive of the Loop 202/South Mountain freeway, with the alignment through Laveen known generally as the 59th Avenue Alignment.

I have many reasons for my support of the Loop 202 Freeway:

- **Access to the Region.** The Laveen area needs improved access to the Metro Phoenix Region. Currently, despite the recent growth in Laveen, there is no Freeway to provide access to the employment, service and entertainment centers in Downtown Phoenix, Sky Harbor Airport, the Loop 101 Corridor (West Valley), and/or the Loop 202 Corridor in the Southeast Valley. The Loop 202/South Mountain Freeway will connect the Laveen area to the Metro Phoenix Region.

- **Congestion/Bottleneck in Downtown Phoenix.** The I-10 Freeway has become a major bottleneck at many locations: in Downtown Phoenix (at the Deck Park Tunnel), on the I-10 West out to the 101 Stack, and certainly at the Broadway Curve and Superstition Freeway Interchange. The Loop 202/South Mountain Freeway will help relieve these major bottlenecks and also support future growth.

- **Long-Range Planning.** The Loop 202/South Mountain Freeway has been on all of the transportation plans from ADOT, MAG and the City of Phoenix dating back to the 1980s (or even earlier). The Loop 202 Freeway has been approved by the voters of Maricopa County on at least two separate occasions. Many long-range planning decisions have been put in place over the years based on the ultimate construction of the Loop 202 Freeway, including zoning and other land-use decisions by the City of Phoenix and property owners to provide commercial, industrial, multifamily and other appropriate land uses directly adjacent to the Loop 202 Freeway. The Loop 202 Freeway supports this approach to long-range planning.

- **Infrastructure/Investment.** The City of Phoenix and the private property owners have continued to work to bring the needed infrastructure to the Laveen area to support and add to the $2 Billion investment in the Loop 202 Freeway. This is a model for

Code	Issue	Response
1		Comment noted.

Code	Comment Document

public/public/private partnership—again, at all levels of government and with the strong support of private property owners. The Loop 202/South Mountain Freeway will be a major stimulus to significant local government investment and private development investment.

- **Jobs.** The Loop 202/South Mountain Freeway is a fully funded $2 Billion Freeway Infrastructure project that will bring an estimated 30,000 jobs to our region. These are much-needed jobs for our community and our families.

- **Laveen Community/Services.** The Loop 202/South Mountain Freeway will allow the Laveen area to obtain the development and services that are needed to support this growing community, including retail services, healthcare services, additional educational opportunities, and certainly enhanced municipal and other government al services. The Loop 202 Freeway will bring these vital services to Laveen.

- **Air Quality.** The Loop 202/South Mountain Freeway would reduce congestion on I-10, the Broadway Curve and the Deck Park Tunnel, and keep traffic moving. This will actually improve air quality in this region. The EIS has concluded that the No-Build Alternative would not meet the State of Arizona's air quality implementation plan.

Please contact me directly at 602-264-4411 or e-mail at rcochran@kitchell.com if you have any questions regarding my property or my support for the Loop 202/South Mountain Freeway.

Thank you.

Ryan Cochran
Director of Development

CC: **Governor Jan Brewer**
ADOT Director John Halikowski
MAG Director Dennis Smith
MAG Chair Marie Lopez Rogers, Mayor of Avondale
FHWA Administrator Victor Mendez
Congressman Ed Pastor
Congresswoman Ann Kirkpatrick
Congressman Raul Grijalva
Representative Ruben Gallego
Representative Catherine Miranda
Senator Leah Landrum-Taylor
Mayor Greg Stanton
Councilman Michael Nowakowski
Councilman Michael Johnson
Phoenix City Manager David Cavazos

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: A Vision for a better future
Date: Thursday, July 11, 2013 1:44:32 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Gail Cochrane [mailto:gcochrane@cox.net]
Sent: Thursday, July 11, 2013 1:44 PM
To: Projects
Subject: A Vision for a better future

I believe the community of Ahwatukee is better served without this proposed freeway. Thirty years ago there was nothing this side of South Mountain except big farms and ranches. What will it be like thirty years out?

1 2 3 Will Ahwatukee be encircled by eight lanes of freeway with the attendant billboards and quick stop exits featuring Subways, Dairy Queens, Chevrons and Love's truckstops? How many years will it be before the proposed South Mountain freeway suffers gridlock at rush hour? Will future generations really benefit from more vehicles idling on more miles of freeway?

4 I believe the transportation money should be invested in expanding our current light rail system, providing a network of speedy trains that whisk commuters and families around the mountain into downtown, the U-district and to entertainment and sporting venues around the Valley. This is the future of metropolitan areas.

Instead of freeway construction, the community of Ahwatukee should invest in retail spaces with shade and character so locals decide to stay here instead of driving to Scottsdale for dinner. We should encourage local small businesses as the community would grow richer and more integrated.

5 6 Slicing into South Mountain and upending sacred Native spaces is extremely shortsighted. Imagine if thirty years from now, our legacy was a decision by all involved to maximize the benefits of proximity to South Mountain Park. School kids would have the opportunity to learn about the habitat of the Sonoran Desert, our abundance of wildlife, the ancient geology of South Mountain and the Native American history on the land. Enhanced trailheads should better serve this scenic area's many hikers. These are investments in our future. I just don't see the benefits of a freeway to this community.

7 We've learned alot since the time the Valley's transportation plan was made, and every freeway we build is soon clogged and needing to be expanded. Where

Code	Issue	Response
1	**Visual Resources**	The State of Arizona (through the Arizona Department of Transportation) administers an Outdoor Advertising Program as mandated by the Federal Highway Beautification Act. Arizona's program provides regulations for the permitting, placement, and maintenance of outdoor advertising signs along Interstate highways as well as State highways within Arizona. The State statutes (Arizona Revised Statutes §§ 28-7901 through 28-7915) and the State rules (R17-3-701 and R17-3-701.01) provide that the Arizona Department of Transportation must regulate any sign that is within view of, directed at, and intended to be read from the main traveled way of a controlled highway. (A controlled highway is any highway that is part of the National Highway System along with specific State routes. The South Mountain Freeway would be both a State route and part of the National Highway System.) While the Arizona Court of Appeals did decide in November 2011 that electronic billboards violate the 1970 Arizona Highway Beautification Act, a new law was passed by the State Legislature that banned such billboards in much of the state but allowed them in most of Maricopa County and parts of Pinal, Yuma, and La Paz counties. Weeks later, the Phoenix City Council created a zoning ordinance to regulate such billboards on city streets and highways. Chapter 7, Section 705, of the Zoning Ordinance of the City of Phoenix does not permit billboards to occupy public property or to extend across a property line where such property line borders a public highway. Electronic messages are permitted only on land zoned as commercial or industrial or zoned as a nonresidential use in Residential Districts. Under current zoning, this eliminates most, if not all, of the land along the E1 Alternative. Such signs might be permissible along portions of the W59 Alternative. Such signs may not be illuminated between 11 p.m. and sunrise "when (1) located within one hundred fifty (150) feet of Single Family Residential zoned property and (2) visible from such development or property." Erection and operation of any billboards on Gila River Indian Community land would be subject to regulation by the Gila River Indian Community.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

does that stop? Must we reinvent Southern Cal and their transportation nightmares?
Thanks for your consideration. I hope you too can envision a better future.

Gail Cochrane

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Code	Issue	Response
3	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Alternatives, Nonfreeway Alternatives**	
5	**Section 4(f) and Section 6(f)**	
6	**Cultural Resources**	
7	**Alternatives**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Proposed freeway through the west end of South MTn
Date: Monday, May 20, 2013 8:37:24 AM

From: mayacoffey@cox.net [mailto:mayacoffey@cox.net]
Sent: Friday, May 17, 2013 8:40 PM
To: Projects
Subject: Proposed freeway through the west end of South MTn

ADOT,

1 2 3

I am voicing my opposition to the proposal of the freeway to the SE of South Mountain. It will disturb the pristine quiet beauty of this wonderful park that is so unique. It will not only be an eye sore but also will bring more noise to the area disturbing the wild life. I have lived in this valley for 30 years and South Mountain was the first park I have visited. I have hike all sections of this precious park and would be devastated if some sections were ruined.

4

I understand the need for better commuting routes but surely the government could spend a little more money to divert the freeway further west We need future generations to enjoy what many of us are enjoying today. Please realize that such a change to our park will be regretted by so many of residents for generations to come. Let's keep our park as it is to be enjoyed by future generations. It will recognized as a important step by people all over this country as well. Thanks,

A concerned citizen.

Maya Coffey

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-161 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
3	**Biology, Plants, and Wildlife**	Limited research has been conducted on the relationships of highways, traffic volume, noise, and impacts on wildlife. Some studies have alluded to noise as being harmful to wildlife populations, but most information to date has documented impacts on songbirds (Reijnen et al. 1995a, 1996) where densities next to highways were lower for 60 percent of the species, and species richness was a third lower. The "noise effect zone" adjacent to highways varied greatly by vegetative type (Reijnen et al. 1995b) as well as traffic volume (Reijnen et al. 1995a). These factors then relate to the noise impact distance on wildlife, extending 0.25 mile (1,320 feet) with 8,000 to 15,000 vehicles per day, 0.40 mile (2,112 feet) with 15,000 to 30,000 vehicles per day, and 0.75 mile (3,960 feet) with greater than 30,000 vehicles per day (Forman and Deblinger 2000; Forman et al. 1997). As such, with the projected high use of the corridor, noise impacts from traffic are anticipated to have a considerable effect on all species of wildlife, ranging from song birds to eagles to large mammals including mule deer, and may limit their use of adjacent habitats.
4	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 freeeway through Ahwatukee
Date: Monday, June 24, 2013 9:04:57 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Dan Coffey [mailto:aci2@cox.net]
Sent: Saturday, June 22, 2013 10:45 AM
To: Projects
Cc: aci2@cox.net
Subject: Loop 202 freeeway through Ahwatukee

Hi ADOT,

1 2 3 4

I am against building this freeway through my community. I like the small town atmosphere. I don't want noise, truckers disrupting this community. I don't feel you are listening to the community that you are effecting. It seems you are going to build this ancient, non-useful freeway through a mountain that we just don't need. This community will end up a commercial park and you will drive out residents. Please listen and don't build.

Sincerely,

Dan Coffey

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Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Truck Bypass**	
3	**Purpose and Need, Lack of Support**	
4	**Section 4(f) and Section 6(f)**	

Code	Comment Document

Document Created: 7/24/2013 12:37:55 PM by Web Comment Form

My name is Tamara Coffman and I live at 1308 W Deer Creek Road, Phoenix AZ. I am in opposition to the proposed South Mountain Freeway. I purchased my home in Ahwatukee July 2011, moving from NJ to AZ. At no time did the Real Estate agent or the Home Owner's Association disclose that a major freeway was under consideration with the potential to be built so close to my house. In talking with various neighbors, they have said they were all made aware when they made the original purchase for their house 14 years prior. They have also said that they were made aware that their homes were right in the line of the proposed freeway. I attended the ADOT session on May 21 and was told alignment with my home was still under consideration. (1)

I am a member of PARC and I oppose the freeway for the following reasons:

•The current proposed alignment through Ahwatukee will create a thoroughfare for the CANAMEX truck bypass. This will bring unregulated diesel trucks from Mexico into Phoenix and trucks will use it as a bypass for downtown Phoenix. I am greatly concerned about the amount of pollution they will put into the air. I am even more concerned about the amount of hazardous materials that they are carrying. There is no way out of Ahwatukee if there is an accident. This is too dangerous. (2) (3) (4) (5)

•Blasting through 3 ridges of South Mountain is an unnecessary and irresponsible action that would permanently disfigure South Mountain, destroying the integrity of the park, the mountain, and its ecosystem. Currently, there is little pollution in our area. Once the freeway goes through, the desert life will be destroyed. I don't believe the result of the EPA study either. I think it is outdated and doesn't take into consideration the amount of schools and people living so close to the freeway. What is Phoenix going to do when they lose freeway funding because the pollution levels exceed what is acceptable. The report also recorded acceptable levels of noise proposed by an 8-lane freeway. All you need is one night listening to the coyotes howl or owls calling and you realize how the sound travels in this area. The noise will be amplified. There is no proper plan to preserve the wells and water retention ponds in the area. There are no plans for bike paths. Basically this freeways blasts 8-lanes through a beautiful community just so people can get to work 10 minutes faster. (6) (7) (8) (2) (3) (9) (10) (11)

•I also believe that this is a significant waste of taxpayers' dollars to build this freeway. I travel frequently for work and am in a different city every week. Every city has issues with morning and evening rush hour traffic. The problem isn't the roads the problem is the ability to offer options outside of cars. Building transit hubs along the freeway, along with high speed rail would be money better spent. This would then need to be continued downtown so folks can easily walk to their office buildings. To make this freeway worthwhile, people would need to backtrack and go away from downtown as far up as the Broadway Curve. That will add close to 10 miles to each person's commute – 20 miles daily – 100 miles weekly – 400 miles monthly – 5,000 miles annually. It's not so much the gas bill that would be the problem ($570/est at $3.65) but the wear and tear on a car. Phoenicians won't use this freeway. That (12) (13)

Code	Issue	Response
1	**Neighborhood**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Hazardous Materials**	
6	**Section 4(f) and Section 6(f)**	
7	**Visual Resources**	Draft Environmental Impact Statement pages 4-157 and 4-158 state that construction of the proposed road cuts at the western end of the South Mountains would cause "severe visual impacts" and that these cuts "would be visually inconsistent with the natural setting of the surrounding area." These impacts would, however, be in a remote, seldom-used area of the Phoenix South Mountain Park/Preserve and not near any major trails. General mitigation measures to minimize these visual impacts are described on page 4-158. These measures would include the incorporation of newly exposed rock faces characteristic of the adjacent natural rock features. Contractors would respond to the faces' scale, shape, slope, and fracturing to the extent that could be practicable and feasible as identified through geotechnical testing and constructibility reviews. The Arizona Department of Transportation would require the contractor to round and blend new slopes to mimic the existing contours to highlight natural formations. The Arizona Department of Transportation would evaluate having the contractor adjust and warp slopes at intersections of cuts and natural grades to flow into each other or transition with the natural ground surfaces without noticeable breaks. A local example of such treatment would be the cuts associated with Dreamy Draw on State Route 51 in northern Phoenix.
8	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Noise**	

(Responses continue on next page)

Code	Comment Document
14	means the freeway won't be utilized as it was intended and it will be a $1B road to nowhere. The largest farce in the nation.
15	•Market value was mentioned in the report as remaining stable. There is already proof that this is an inaccurate statement. Goldman Ranch had homes purchased by ADOT when some homeowners claimed financial hardship. That option was not presented to all homeowners and those homes now make it difficult for other owners to sell at a reasonable price.
16	Business at 32nd street are unable to make decisions because there is no planned exits that lead to their business. You can see at the corner of Chandler/Desert Parkway the number of vacant tenants in the business malls that dot that intersection. There is no reason these shouldn't be booming with replacement business to support our area. The only reason is everyone is afraid of the potential impact of the freeway. If there are not appropriate exists, if this decision goes on forever….no one can move forward with decisions.
17	•ADOT, the City of Phoenix and everyone involved in this process owe the residents of Ahwatukee a no build option. Stop planning, stop wasting tax payer dollars, stop development of this road to nowhere. Put engineers minds, hearts and souls into a wide scale public transit system that is the first of its kind, that is the envy of the nation. We don't want to be known for the city that blasted into a nationally revered park, destroyed a beautiful community, let our children breathe polluted air, spent $1B on a road to nowhere and lost all freeway funding.

Tamara Coffman
tel: 609.610.6604 | tamaracoffman@yahoo.com

Code	Issue	Response
10	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See text box on Draft Environmental Impact Statement page 4-108.) The Arizona Department of Water Resources would undertake measures to improve surface water quality and maintain retention, detention, and stormwater facilities during construction through erosion and sediment control plans and through the municipal separate storm sewer systems program. Municipalities operating municipal separate storm sewer systems within local urbanized areas designated by the Arizona Department of Environmental Quality or U.S. Environmental Protection Agency are required to obtain individual discharge permits. This municipal separate storm sewer systems program includes monitoring activities and protection of facilities associated with the municipal separate storm sewer system operated by the Arizona Department of Transportation through its Stormwater Management Program. The program includes best management practices and monitoring outfalls. See Draft Environmental Impact Statement pages 4-95 and 4-96. If an action alternative were to become the Selected Alternative, during project implementation a Stormwater Pollution Prevention Plan that would establish best management practices for sediment and erosion control would be completed. These best management practices would be in place and maintained for the duration of construction to ensure that erosion and pollution from sediment and other pollutants running downstream would be minimized. The proposed project would require water quality certification under Section 401 of the Clean Water Act (see Draft Environmental Impact Statement pages 4-110 through 4-412).
11	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Draft Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
12	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
13	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
14	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
15	**Acquisitions and Relocations**	
16	**Design**	The interchange locations for the proposed freeway are (see Figure 3-28, on Draft Environmental Impact Statement page 3-51): · Interstate 10 (Maricopa Freeway)/State Route 202L Traffic Interchange · 40th Street · 24th Street · Desert Foothills Parkway · 17th Avenue · 51st Avenue · Elliot Road · Dobbins Road · Baseline Road · Southern Avenue · Broadway Road · Lower Buckeye Road · Buckeye Road · Van Buren Street · Interstate 10 (Papago Freeway)/State Route 202L Traffic Interchange The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange was eliminated based on undesirable residential displacements and cost. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
17	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Terry Cole Document Created: 5/21/2013 3:06:26 PM by Web Comment Form I live in Chandler, and I support the new South Mountain Freeway. The longer you wait the more expensive it gets!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 10:14 AM
CALLER: WARREN COLE	CALLER ADDRESS: 327 WEST SWAN DRIVE, CHANDLER, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in support of the South Mountain freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 15, 2013 2:26:26 PM

From: Raquel S. Collett [mailto:rscollett@sundt.com]
Sent: Wednesday, May 15, 2013 2:04 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1 This is an important project and needs to be started sooner than later. Please help our traffic by starting this project. It's a nightmare to drive in the mornings

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Kelly Collins Document Created: 5/21/2013 3:41:35 PM by Web Comment Form As a Laveen resident, it is my understanding that the loop 202 through the laveen area is part of a grand plan. I see the advantages of the project, and am anxious to get this project finally completed! This has been a "loose end" in need of tying for ten years since i moved to Laveen. It's time to tie it up and complete the loop. I opt for the preferred route (57 purple)

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Kelly Collins Document Created: 5/25/2013 11:14:25 PM by Web Comment Form I've anticipated the South Mountain Freeway project for ten years in Laveen! I'm in favor of the 59th Ave.(preferred)route.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:59 PM
CALLER: KENNETH COLLINS	CALLER ADDRESS: 1037 W. FARMDALE, MESA, AZ 85210
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Comments
Date: Tuesday, April 30, 2013 8:53:19 AM

From: Condon, Kevin [mailto:Kevin.Condon@Honeywell.com]
Sent: Friday, April 26, 2013 2:17 PM
To: Projects
Subject: South Mountain Freeway Comments

Thank you for allowing me to comment on the South Mountain Freeway Draft EIS.

I will address my first comments to specific sections of the EIS.

1. On page 3-16 Tunneling Under the South Mountain – ADOT did not consider either a double-decker tunnel or a cut & cover tunnel, both of which are being considered for the CA SR 710 project in Pasadena. So this EIS did not adequately address additional tunnel options.
2. On page 3-47 Figure 3-25 – The Profile A cross-section does not match the picture of the overall project at the bottom of the page. Profile A shows that the freeway will be above the existing grade throughout all of Profile A, and, therefore, should be red for an elevated section. However, the overall picture shows that Profile A only has 2 small sections of elevation above the existing ground.
3. Page 3-60 – All of the Traffic Analysis is FLAWED and NEEDS to be redone. The traffic analysis is ALL based on a "hypothetical" SR30 being built by 2035. However, the EIS and MAG admits there is no funding for SR30. Therefore, ALL traffic analysis should be done based on the current funding, which means without SR30 being built. One can't include in the traffic analysis a mythical freeway, unless that mythical freeway has a fully paid for and approved funding stream, which SR30 does not. According to MAG, "Construction of SR 30 has been shifted beyond FY 2026 but remains within the FY 2031 planning horizon". However, Proposition 400 funding ends in 2025, so there is NO approved funding for SR 30. So if the SR30 is never built, then the WHOLE design for the South Mountain Freeway is FLAWED and build to the WRONG traffic requirements. This is a MAJOR flaw in the EIS! This EIS SHOULD NOT be published until the traffic analysis is redone without SR30!
4. Page 3-61 Figure 3-37 I-10 – Again the Traffic Analysis is FLAWED! Your analysis shows that on I-10 between 83rd Ave and 75th Ave:
    a. The no-build option and W59 will have essentially the same traffic. So based on this analysis, NO ONE will travel on the W59 South Mountain Freeway on to the I-10 and continue on the Loop101! This is seriously flawed! Other cities with loop roads have shown that people DO travel around the city on the loop. So many people will travel on the South Mountain Freeway around the SW corner of Phoenix and continue on the I-10 to the Loop 101. It is obvious your traffic analysis neglected this group of vehicles. Figure 3-38 shows that 65k vehicles would take the L101 to W101 South Mountain Freeway, but these 65k vehicles magically disappear when the W59 route is chosen. How did these 65k vehicles magically disappear? These 65k vehicles were overlooked in your analysis and should be added to the I-10

Code	Issue	Response
1	**Design**	A cut-and-cover tunnel would not be feasible based on the geologic (hard rock) conditions of the South Mountains. A double deck tunnel would result in similar or even higher costs and impacts as the tunnels considered in the study. In the State Route 710 project in Pasadena, California, the freeway alternatives that include tunnels cost almost $4 billion more than the freeway alternative without tunnels.
2	**Design**	The vertical profile was exaggerated ten times to make it easier to identify differences in elevation. The definition of "at-grade" in these figures is within 10 feet of the existing ground, which allows for pipes and culverts to pass beneath. Sections greater than 10 feet above ground have been noted as "elevated." Figure 3-25 was revised in the Final Environmental Impact Statement (see page 3-47 in the Final Environmental Impact Statement) to display those sections of the profile that go over the multiuse crossings as elevated. Other sections were evaluated and adjusted as necessary.
3	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Draft Environmental Impact Statement page 3-27). Although the Maricopa Association of Governments half-cent sales tax will end in 2025, the region continues to receive substantial funding for freeway construction from state and federal funding sources. State Route 30 is included in Maricopa Association of Government's adopted *Regional Transportation Plan* and would be constructed prior to 2035.
4	**Traffic**	The traffic volumes in Figure 3-37 on Draft Environmental Impact Statement page 3-61 do not provide information related to origins and destinations of vehicles. The section of Interstate 10 between 83rd Avenue and 75th Avenue for the W59 Alternative would include vehicles destined to or coming from State Route 101 Loop. These same vehicles that without the W59 Alternative would use Interstate 10 to get to State Route 101 Loop would also be on this segment of Interstate 10. That is why the total values are approximately the same. Depending on the location of the connection to Interstate 10 (Papago Freeway), different motorists would choose to use the proposed freeway or another route to complete their trip. Therefore, there is not a one-to-one comparison among alternatives. While it seems that vehicles have been removed, they have decided to use an alternative route, including arterial streets or other freeways. A similar response explains the noted differences between the W71 and W101 Alternatives.

Code	Comment Document

traffic.

b. The W71 and W101 options will have essentially the same traffic. So based on this analysis, NO ONE will travel on the W71 South Mountain Freeway on the I-10 and continue on the Loop101! This is seriously flawed! Other cities with loop roads have shown that people DO travel around the city on the loop. So many people will travel on the South Mountain Freeway around the SW corner of Phoenix and continue on the I-10 to the Loop 101. It is obvious your traffic analysis neglected this group of vehicles. Figure 3-38 shows that 65k vehicles would take the L101 to W101 South Mountain Freeway, but these 65k vehicles magically disappear when the W71 route is chosen. How did these 65k vehicles magically disappear? These 65k vehicles were overlooked in your analysis and should be added to the I-10 traffic.

c. The analysis needs to be redone WITHOUT the SR30 being built.

5. Page 3-61 Figure 3-37 Chandler Blvd

(5)

a. No analysis was done on the NEW Chandler Blvd between 17th and 29th Ave. This needs to be done and presented.

b. The 3 western options will have NO impact on the traffic on Chandler Blvd, but your FLAWED analysis says the 3 western routes will impact traffic all the way over on Chandler Blvd at 48th St. In fact, your flawed traffic analysis shows the 3 western routes will impact traffic more at 48th St & Chandler Blvd than 48th St & Baseline Rd or 51st Ave & Buckeye Rd.

(6)

6. Page 3-62 Figure 3-38 – Again the traffic analysis is FLAWED. With W59, why did the traffic DROP from 155k at Van Buren to 120K at I-10? Also, this shows that your analysis estimates that 65k vehicles will take the L101 and continue on the South Mountain Freeway (just subtract W59 from W101), but this is NOT reflected in Figure3-37 in the I-10 traffic for routes W59 and W71. Where did these 65k vehicles go in W59 and W71?

Kevin Condon
Honeywell Aerospace
Principal Systems Engineer
111 S. 34th St. M/S 503-3K
Phoenix, AZ 85034
Phone: (602) 231-4379
Mobile: (480) 287-4174
Email: kevin.condon@honeywell.com

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Code	Issue	Response
5	**Traffic**	Figure 3-37 was revised in the Final Environmental Impact Statement to include traffic projections for the new section of Chandler Boulevard between 17th and 29th Avenues (see page 3-61 in the Final Environmental Impact Statement). There was no difference among the three action alternatives at the noted locations. However, any of the Western Section action alternatives, combined with the E1 Alternative, would reduce traffic along Chandler Boulevard.
6	**Traffic**	The traffic dropped from 155,000 vehicles at Van Buren Street to 120,000 at Interstate 10 because it is projected that 35,000 vehicles would exit or enter the South Mountain Freeway at Van Buren Street.

Code	Comment Document

Charles Conn Document Created: 5/22/2013 4:57:15 PM by Web Comment Form

1 It makes absolutely no sense why W71 or W59 would be used !! Apparently none of the people making the decision have to commute from 59th Ave. to the 101 Loop on I-10 or in the opposite direction. That commute is a weekday mess with MANY car wrecks. The W101 is the ONLY one that uses common sense.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/17/13	INCOMING CALL TIME: 3:42 PM
CALLER: ROBERT CONNELLY	CALLER ADDRESS: 16451 W. WILSHIRE DRIVE, GOODYEAR
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain freeway project. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I Support the S. Mtn. Freeway
Date: Wednesday, May 22, 2013 10:51:39 AM

From: Victor Jett Contreras [mailto:victorcontrerasaz@gmail.com]
Sent: Tuesday, May 21, 2013 1:42 PM
To: Projects
Subject: I Support the S. Mtn. Freeway

1

Hello, my name is Victor Contreras and my address is 1425 E. Baseline Rd. Phoenix, AZ 85042. Unfortunately, I can not make it to the public comment event, but wanted to express my support for the proposed South Mountain Freeway.

I'm not a resident of Laveen but I'm affected by the lack of a freeway. I am a resident of South Phoenix and live on Baseline Rd. which is the southernmost major arterial street in the city. Many of Laveen's residents have to use Baseline Rd. because it's the most accessible street in Laveen and he only east-west street that connects to the I-10 (East or West). This has created many traffic problems along the Baseline Corridor and increased drivetime for all residents south of the Salt River.

Also, because of the lack of the South Mountain Freeway, many amenities, restaurants, and important health and educational developments have not been built. This not only affects people in Laveen but also us in South Phoenix, since many of us have to travel out of our community (or neighboring community) in order to eat at nice restaurants, watch a movie with our families or go to a hospital emergency room.

The proposed freeway would help alleviate traffic, provide more amenities, and greater access to important community institutions like a hospital and community college.

One last point, as a real estate agent who also sells homes in Laveen, I have always informed my clients about the proposed freeway alignments. Some clients decided to look elsewhere, further from proposed alignments, and some decided to buy in the area knowing that they may have to move. For me it's unconscionable, for people in Laveen or Ahwatukee to feign surprise or anger that they may have to move because of the freeway alignment. Residents in all parts of town near the proposed freeway have had every opportunity and the responsibility to do their due diligence prior to buying a home in the proposed alignments.

Thank you,

Victor Contreras

--
All the best,

Victor Jett Contreras
Direct - (480) 766-0719

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Kathleen Conway
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 10:05:41 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

I LOVE hiking in South Mountain. I can recall how lovely Baseline Road was when the fragrance of orange blossoms permeated the air. it has been sad to watch the area fall prey to developers who construct ticky tacky houses and follow them up with standard issue chain stores and small malls. i understand how important it is to have a viable transport plan, but imply laying down miles of tar or macadam roads is a foolish, archaic, cheap for the moment but disastrous for the future option. We need a 21st century approach that includes mass transport (avoiding buses) -preferably trains, trolleys, light rail or some other option powered by solar and alternative energies.

2

3 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4

5 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6

7 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terribleprecedent by demolishing what should remain a protected area.

8

9 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	
7	**Section 4(f) and Section 6(f)**	
8	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
1	Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you. Sincerely, Ms. Kathleen Conway 909 W Harvard Dr Tempe, AZ 85283-1791

Code	Issue	Response
9	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Sierra Club on behalf of M A Cook
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, June 03, 2013 4:11:53 PM

Jun 3, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(5) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(6) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

(7) Phoenix must maintain some of our state's amazing beauty and support our need to enjoy it in this lovely preserve. Its accessibility alone merits us keeping as a haven for future generations.

Please maintain the integrity of this natural and vital place.

Sincerely,

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	Ms. M A Cook 4220 E Patricia Jane Dr Phoenix, AZ 85018-3758 (602) 957-8312

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 1:54 PM
CALLER: DAN COOK	CALLER ADDRESS: 55240 N. QUAIL RUN ROAD, PARADISE VALLEY, AZ 85253
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the freeway and the traffic alleviation that it would create and also the jobs and so I would like you to consider supporting that also. Thanks. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Bob Cook Document Created: 7/17/2013 4:17:15 PM by Web Comment Form

Looking forward on seeing the air quality report and noise studies.

1 Also looking forward on getting this project started.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 6:12 PM
CALLER: DAVE COOK	CALLER ADDRESS: 12742 WEST SOLA COURT, SUN CITY WEST, ARIZONA 85375
PHONE: 623-322-3449	EMAIL:
CALLER REMARKS/QUESTIONS: I support the idea of the South Mountain freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 extension
Date: Wednesday, May 22, 2013 10:54:18 AM

-----Original Message-----
From: Mike Cooley [mailto:leftypar@cox.net]
Sent: Tuesday, May 21, 2013 5:34 AM
To: Projects
Subject: 202 extension

To whom it may concern,

1 I would like to see the 202 extension run south of South Mountain.

As someone who travels down Baseline road many times a year, I know it would relieve a lot of congestion, certainly many accidents and assuredly fatalities that occur in the road.

There are many people in SW Phoenix and Laveen that would be helped greatly in their travels to I-10E and to the southeast valley if this stretch was extended.

2 This would also relieve I-10 truck traffic from L.A. to Tucson on I-10E through town and vice versa.

It would be a great extension to our valley freeways!

Thank you for your time.

Sincerely,

Mike Cooley

_____

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
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Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignments**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:01 PM
CALLER: LOWELL COONAN	ADDRESS: 1071 S. OAK COURT, GILBERT, AZ 85233
PHONE: 480-507-8189	EMAIL:
CALLER REMARKS/QUESTIONS: I support the Loop 202 South Mountain Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 11:44 AM
CALLER: BOB COOPER	CALLER ADDRESS: 19255 N. 88TH AVE.,
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in total support of the Loop 202 freeway around South Mountain. In fact it has gone on too long, it should have been finished a long time ago. Please move forward quickly with this freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Charles Corbin Document Created: 7/24/2013 7:12:28 PM by Web Comment Form I am a thirty year resident. It is time to build the loop for our convenience and security. Move on! The study lays to rest concerns.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

RECEIVED June 7/2013

JUN 10 2013

AZ Dept of Transportation
Director's Office

Personel at A.D.O.T.

I am a concerned citizen of Ahwatukee voicing my opinion against building the South Mt. Freeway on Pecos Rd. or anywhere near Ahwatukee.

1 This is an outdated plan and needs
2 to be revised as to not be such a bad impact on our health for all who call this our home.

3 This freeway - truck by pass - needs
4 to be built further east and south.

I stand with P.A.R.C. in full opposition to South Mt. Freeway.

I am a legal citizen and taxpayer of this state. I am also a purple heart veteran and I am someone who belives our goverment should serve the citizens of our country and not there own private interests, paid for by private trucking companies and others who stand to gain financialy.

If PARC stages a protest against this freeway, I will be there along with several other hundred concerned citizens.

"Please" reconsider this bad and outdated plan for this area.

Sincerly
Floyd Corbitt
Floyd Corbitt
4220 E. Cedarwood Ln.
Phx., AZ.
85048

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data,**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	
3	**Alternatives, Gila River Indian Community Alignment**	
4	**Purpose and Need, Truck Bypass**	

Code	Comment Document

From: Sierra Club on behalf of Valerie O Cornelius
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 2:44:43 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

I highly recommend and strongly encourage you to choose long-term transit solutions!

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.
As a respiratory therapist and mother of two asthmatics I have experienced this consequence of pollution!

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.
Thus setting in motion a domino affect across the nation. I have read of numerous other protected areas already fighting to stay protected.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center. This would increase the water shortage problem.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	Sincerely, Mrs. Valerie O Cornelius 1470 S Palo Verde Ave Apt J209 Tucson, AZ 85713-2370

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region(see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Unger, Audrey C.
To: Bailly, Becky
Subject: FW: Article for Phoenix Magazine
Date: Thursday, July 25, 2013 7:15:49 AM

Please upload into iRealm. Thanks.

From: Honsberger, Heather [mailto:Heather.Honsberger@jacobs.com]
Sent: Wednesday, July 24, 2013 6:08 PM
To: Unger, Audrey C.
Subject: Fwd: Article for Phoenix Magazine

Tim would like the comment provided thru his email with Phoenix Magazine writer included in the formal record. Essentially recommending commute times on the SMF be included in the document.

Thanks,
Heather

Sent from my iPhone

Begin forwarded message:

> **From:** Timothy Tait <TTait@azdot.gov>
> **Date:** July 22, 2013, 3:59:32 PM MST
> **To:** "Honsberger, Heather" <Heather.Honsberger@jacobs.com>
> **Subject: FW: Article for Phoenix Magazine**
>
> I guess we need to log this as a formal public comment.
>
> **Timothy Tait, Ed.D.**
> **Assistant Communication Director**
> Arizona Department of Transportation
> 602.712.7070 (office)
> 602.501.5038 (mobile)
> news@azdot.gov (media)
> azdot.gov
> ADOT Communications
>
> **From:** Keridwen Cornelius [mailto:kcornelius@citieswestpub.com]
> **Sent:** Monday, July 22, 2013 3:49 PM
> **To:** Timothy Tait
> **Subject:** Re: Article for Phoenix Magazine
>
> OK, great, thanks. So, to confirm, there are no estimated commute times for travel on the South Mountain Freeway? If not, and if I may make a suggestion (since we're in a public comment period), that information would really improve the current Draft EIS.

(Comment codes begin on later page)

Code	Issue	Response

Code	Comment Document

On 7/22/13 3:32 PM, Timothy Tait wrote:
I had to go back to the team to get an answer – you posed a great question. Here's what I learned:

For the Laveen trip, travel time was modeled along 51st Avenue and I-10 (Papago Freeway) for both 2010 and 2035. For the Ahwatukee trip, travel time was modeled and calculated along I-10 (Maricopa Freeway) for both 2010 and 2035. Essentially this allows an apples to apples comparison, as opposed to comparing arterial street to freeway travel times for each segment.

-Tim

Timothy Tait, Ed.D.
Assistant Communication Director
Arizona Department of Transportation
602.712.7070 (office)
602.501.5038 (mobile)
news@azdot.gov (media)
azdot.gov
ADOT Communications

From: Keridwen Cornelius [mailto:kcornelius@citieswestpub.com]
Sent: Monday, July 22, 2013 2:07 PM
To: Timothy Tait
Subject: Re: Article for Phoenix Magazine

In the second graphic where it talks about commute times with the freeway in 2035, are those numbers based on the estimated time it would take to drive from Laveen and Ahwatukee *on the actual South Mountain Freeway*, or on the same routes as you show in the non-freeway scenario (surface streets/the I-10), which would be faster thanks to the fact that the South Mountain Freeway would be lessening traffic on those roadways?

On 7/22/13 1:51 PM, Timothy Tait wrote:
Keridwen,

The attached graphic should help to answer your question. Let me know if this makes sense.

Thanks,
-Tim

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

Timothy Tait, Ed.D.
Assistant Communication Director
Arizona Department of Transportation
602.712.7070 (office)
602.501.5038 (mobile)
news@azdot.gov (media)
azdot.gov
ADOT Communications

From: Keridwen Cornelius [mailto:kcornelius@citieswestpub.com]
Sent: Monday, July 22, 2013 12:18 PM
To: Timothy Tait
Subject: Re: Article for Phoenix Magazine

Hi Tim,

1

Just following up with a quick question. I had asked if there was an estimate of commute times from Laveen/Ahwatukee to downtown Phoenix with the South Mountain Freeway. I still couldn't find that info over the weekend. Do you have that info? If you could get back to me as quickly as possible, that would be great, as we are shipping the issue in the next couple days.

Thanks!

Keridwen

On 7/13/13 6:57 PM, Timothy Tait wrote:

ADOT is located at 206 South 17th Avenue in downtown Phoenix, south of the state capitol (northeast corner of 18th Avenue and Jackson). Park in any available spot; the main entry is at the flagpoles.

-tim.

Timothy Tait, Ed.D.
Assistant Communication Director
Arizona Department of Transportation
602.712.7070 (office)
602.501.5038 (mobile)
news@azdot.gov (media)

----- Original Message -----
From: Keridwen Cornelius [mailto:kcornelius@citieswestpub.com]
Sent: Friday, July 12, 2013 04:24 PM
To: Timothy Tait
Subject: Re: Article for Phoenix Magazine

That sounds great to me. Where is your office? Thanks!

On 7/12/13 3:41 PM, Timothy Tait wrote:

> We are looking at 3:30 p.m. on Wednesday. Would that work for you? We could meet in my office, if that's OK?

Code	Issue	Response
1	**Alternatives**	Travel times for trips throughout the region, including those that would include use of the proposed freeway are shown in Table 3-8 on Final Environmental Impact Statement page 3-34. The table compares conditions in 2035 with and without the proposed freeway in place.

Code	Comment Document

Timothy Tait, Ed.D.
Assistant Communication Director
Arizona Department of Transportation
602.712.7070 (office)
602.501.5038 (mobile)
news@azdot.gov (media)

From: Keridwen Cornelius [kcornelius@citieswestpub.com]
Sent: Thursday, July 11, 2013 4:50 PM
To: Timothy Tait
Subject: Re: Article for Phoenix Magazine

Hi Tim,

Sorry about this, but my meeting on Monday just got moved to the afternoon rather than the morning, so if you were thinking of Monday as the day for an interview, then the morning would actually be better that day. My Tuesday and Wednesday schedules remain the same.

Thanks!

Keridwen

On 7/11/13 12:40 PM, Timothy Tait wrote:
Keridwen,

I can arrange something - either in person or via phone - with the project manager and myself for early next week, if that works for you. Which days/times work best?

Thanks,
-Tim

Timothy Tait, Ed.D.
Assistant Communication Director
Arizona Department of Transportation
602.712.7070 (office)
602.501.5038 (mobile)
news@azdot.gov<mailto:news@azdot.gov> (media)
azdot.gov

[http://adotnet/divisions/communications/graphic_standards/Logos/Comm
]

From: Keridwen Cornelius
[mailto:kcornelius@citieswestpub.com]
Sent: Thursday, July 11, 2013 10:56 AM
To: ADOT News
Subject: Article for Phoenix Magazine

Hello,

My name is Keridwen Cornelius, and I am the editor-in-chief of Phoenix Magazine. I am writing a feature-length article about the South Mountain Freeway for our Hot Topics section, in which we interview people on both sides of a topical or controversial subject. I would like to speak with someone regarding the freeway, either by phone or in person, this week or early next week. Please feel free to contact me by email or phone at your earliest convenience.

Thank you very much,

Keridwen Cornelius
Editor

Phoenix Magazine
15169 N. Scottsdale Rd., Ste. C310
Scottsdale, AZ 85254

Code	Issue	Response

Code	Comment Document

Office: 480-664-3960 Ext. 202
Fax: 480-664-3962
Email:
kcornelius@citieswestpub.com
<mailto:xxxxx@citieswestpub.com>

[cid:part2.03010005.08080401@citieswestpub.com]

http://www.phoenixmag.com

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Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Draft Environmental Impact Study for the South Mountain Freeway
Date: Tuesday, July 23, 2013 3:42:30 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

From: Sandra Smith [mailto:SSmith@aamaz.com]
Sent: Tuesday, July 23, 2013 3:40 PM
To: Barbara Russell; Projects
Cc: SMF@aol.com
Subject: RE: Draft Environmental Impact Study for the South Mountain Freeway

Wonderful email - thank you Zacc and Barbara.
Please be advised that I have also forwarded to the Lakewood Board of Directors for their information.
We appreciate your written support and concern for the Lakewood Community!
Thank you

Sandra L. Smith, CMCA(r), AMS(tm), CAAM(r)
Community Manager
AAM, LLC
(602) 674-4343 (direct line)
(602) 480-821-2334
(602) 957-9191 (main line)

-----Original Message-----
From: Barbara Russell [mailto:bsuerussell@cox.net]
Sent: Tuesday, July 23, 2013 3:30 PM
To: projects@azdot.gov
Cc: SMF@aol.com
Subject: Draft Environmental Impact Study for the South Mountain Freeway

To Whom It May Concern:

1

My husband and I have been residents for ten years in the Lakewood Community in Ahwatukee. As you are aware, the Lakewood Community was established in June 1985. The lakes are fed by a "well" or "spring". Our grave concern is the protection of these existing wells or springs to continue as the source for the two lakes in our community.

We respectfully request that ADOT protect these existing wells as they review the route for construction of South Mountain Loop 202 Freeway. We recognize the importance of the freeway to the city of Phoenix and State of Arizona. We also recognize the importance of our community lakes and their existing properties including the wells that feed and sustain the lakes in this vital Phoenix community. Any negative change to the lakes would have a devastating impact on our community, residents and their future children.

We are proud citizens of our community and will be long term residents well into our retirement in Lakewood Community.

Sincerely,
Zacc & Barbara Russell
3421 E Wildwood Dr
Phoenix, AZ 85048
AssociatedAsset.com | HomeownerResources.com

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Code	Issue	Response
1	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.) The well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Water Resources to effectively mitigate well impacts associated with its projects throughout the region.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 2:11 PM
CALLER: ELIZABETH [UNCLEAR] CORVILLE	CALLER ADDRESS: 833 E. CHERYL DRIVE, PHOENIX, AZ 85020
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I'm in favor of expanding the freeway. Thank you. Bye	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Mark Coryell
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, June 03, 2013 7:11:58 PM

Jun 3, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) I have commented repeatedly about this issue. I also attended the 21 May 2013 hearing at the Phoenix Convention Center and presented both oral and written testimony on the South Mountain Freeway. Your agency, ADOT, has already acknowledged that there will be a negative environmental impact on my neighborhood. I live within 300 yards of the proposed overpass at South 17th Avenue in the Ahwatukee Foothills.

Sincerely,

Mr. Mark Coryell

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	1334 E Chandler Blvd # 5613 Phoenix, AZ 85048-6267 (480) 219-8673

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

1 THE FACILITATOR: Thank you, Mr. Demerritt.
2 Mark Coryell. Is that the correct
3 pronunciation, sir?
4 MR. CORYELL: That's good enough.
5 Hello -- oh, it works. Well, I just got off the
6 bus from Ahwatukee, so I jumped in to make a comment.
7 I'm opposed to the South Mountain freeway because it's
8 going to put a freeway in my front yard and I don't think
9 it's the best alternative for the community as a whole.
10 It's going to destroy the character of my neighborhood,
11 it's going to add more traffic into my neighborhood, and
12 the total character of my -- where I live is actually
13 going to be destroyed, and I don't want to see that
14 happen. I don't know what else to say. I feel like kind
15 of, you know, David here standing up before Goliath,
16 because I know that my voice means very little to any of
17 you that are standing here today.
18 I've lived in Arizona for 20 years, I love
19 living here; I had planned to spend the rest of my life
20 here, but because of the freeway, I'm looking at
21 alternatives, including moving to Tucson, and I also have
22 a couple of teaching opportunities outside the United
23 States, looks likely where I'm going to end up someday.
24 I feel really sad that I have to come here and defend
25 everything that means so much to me. Basically, all my

1
2

Page 13

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
2	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

Code	Comment Document

savings and everything I own is tied up in my house, and I realize that's going to be done and I realize I don't think a lot of people really care.

I was almost killed on Pecos Road in January of 2008 in a serious auto accident where a hit-and-run driver about 9:30 at night went straight through the intersection, totaled my car, and if it hadn't been for the grace of God, I would not be here today. My car jumped off the curb and into a ditch and it just happened to sit on a set of brush and that's why I'm here and still alive, which I'm thankful for.

There's just a lot better alternatives. It's such a beautiful community, you can bike, if you spent your time here it's probably the last place -- the last place in the city of Phoenix, and I've lived in Glendale and I've lived in Avondale, that you can ride a bike without getting killed, so that's the conclusion of my remarks.

THE FACILITATOR: Thank you.

Please refrain from applause with respect to both build and no-build discussions today. This is a hearing, and we appreciate your patience.

Those of you whose names have been registered to speak, if you would make your way up to the front, that will help speed this up a little bit. Thank you.

Code	Issue	Response

Code	Comment Document

1

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

- We are destroying very heritage most
people Arizona unique. I moved here and
stayed because I love Arizona. Not
some amorphous sprawling community
that looks like Southern California
or somewhere else for that matter.
Soon Phoenix, Tucson will be damaged
- no more flower farms, agricultural
use. Soon Arizona may lose its
capacity to grow its own food and
will solely be importing everything
from out-of-state, and worse yet
overseas, particularly Mexico and
beyond.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-158

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Agriculture**	The current analysis of impacts on prime and unique farmland—the land most suitable for growing food—indicates that loss of this type of farmland would be negligible. Urbanization in the Study Area is steadily moving in a westward direction. If an action alternative were selected—and by the time it were to be constructed—it is likely that more land will have already been converted from agricultural use to residential, commercial, and/or industrial uses, and that the proposed South Mountain Freeway would have even less of an impact. Urbanization will continue with or without implementation of the proposed freeway (see Final Environmental Impact Statement pages 4-153 and 4-154).

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

2 – Own home directly in path of South Mountain Freeway at 55th Ave and Pecos Rd
– Will sit on 2 lane road with a stop sign replaced by interchange on 6 lane Freeway
3 – Prominently see green replaced by permanent that will be unsightly
– Last opportunity to create a permanent corridor only take place once can ride bicycles in Phoenix metro area
4 – Serves the purposes of the real estate construction industrial complex
5 – Elevated freeway will likely amplify noise in neighborhood

Optional

Name Mark & Coreyell Email mxmpa730@earthlink.net
Address 1676 West Eastwood Drive
City Peoria State Arizona Zip 85345
Phone 480-219-8673 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-180

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Design**	The study has considered concepts for parallel multiuse paths, however the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
4	**Planning**	Cities' and towns' adopted land use plans were evaluated as part of the environmental impact statement process. The effect of a freeway corridor on these plans was considered (see Final Environmental Impact Statement pages 1-21, 4-18, and 4-19). The City of Phoenix's General Plan land use map shows the freeway alignment as "Future Transportation," generally matching the W59 (Preferred) Alternative alignment. The City of Phoenix's plans for both Laveen and Estrella Villages identify "cores" along the W59 Alternative, surrounded by commercial/ mixed-commercial uses for each planning area clearly intended to benefit from proximity to the proposed freeway.
5	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Noise modeling is used to determine the most appropriate and effective location for noise barriers. All noise-sensitive land uses are included in the noise analysis and noise abatement considerations.

Code	Comment Document
1	Richard Costa Document Created: 5/21/2013 8:53:40 PM by Web Comment Form Living in Laveen since 2004 has shown me how important this project is to the residents. Comuting daily to I-10 from Baseline Rd has always been the worst part of the commute. It is obvious County and multiple jurisdictions serving the community between Baseline Rd and I-10 with lack of capital improvement funds (or desire) contribute to the problem. This project is way overdue. One that I have been hoping for 8 years now and that is just a fraction of how long ADOT has been working on it. This project should not have followed the L303 corridor but rather preceded it. Just get it done.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Wednesday, May 29, 2013 4:50:41 PM

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Nick Coury
Sent: Wednesday, May 29, 2013 4:49 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

May 29, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

I am the race director of Aravaipa Running, organizing over a dozen trail running events in the mountains around Phoenix, providing recreational opportunities for thousands every year. I see the positive effects of outdoor recreation on the health of Phoenix residents every day. Many of my runners are seeking an escape from the congestion and pollution of the city, and the mountain trails offer a bit of solace and fresh air in an accessible way. Most of the mountains around Phoenix are out of the way, requiring an hour drive or more. Others, like the Phoenix Mountain Preserve or Camelback Mountain are so close to the city that the air, noise, and visual pollution can't be avoided. South Mountain is unique in that it is not engulfed by the city, yet is still easily accessible to Phoenix area residents. Surrounding South Mountain with a new freeway would quickly encroach on this unique accessibility, and compromise it's appeal. This comes at a time when our cities and country face undeniable health problems and need outdoor recreation more than ever.

2 3 4

On a personal level, I moved near the base of South Mountain in January 2012 for all that it offers. I spend 1-3 hours nearly every day running and enjoying the trail system, crossing back and forth all of it's trails. The west end of the range is the true gem of the Preserve, and to disrupt it's natural beauty and secluded wilderness with a freeway would be a tragedy.

4

Building any of the proposed alternatives would do little or nothing to relieve congestion in the Phoenix area. Intelligent growth is what Phoenix needs, and part of this intelligence includes preserving our natural landscapes that will become more and more valuable to future generations as growth increases. Compromising the South Mountain Preserve to place a major freeway through a remote area will offer little benefit to drivers, and major destruction to one of Phoenix's greatest treasures. I urge you to choose the No-Build Alternative and seek other, more effective, less destructive solutions.

5 6 1

Sincerely,

Mr. Nick Coury
7504 S 28th Ter
Phoenix, AZ 85042-6047
(602) 828-6629

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	
4	**Visual Resources**	The Final Environmental Impact Statement on pages 4-158 and 4-160 states that construction of the proposed road cuts at the western end of the South Mountains would cause "severe visual impacts" and that these cuts "would be visually inconsistent with the natural setting of the surrounding area." These impacts would, however, be in a remote, seldom-used area of Phoenix South Mountain Park/Preserve and not near any major trails. General mitigation measures to minimize these visual impacts are described on page 4-161. These measures would include the incorporation of newly exposed rock faces characteristic of the adjacent natural rock features. Contractors would respond to the faces' scale, shape, slope, and fracturing to the extent that could be practicable and feasible as identified through geotechnical testing and constructibility reviews. The Arizona Department of Transportation would require the contractor to round and blend new slopes to mimic the existing contours to highlight natural formations. The Arizona Department of Transportation would evaluate having the contractor adjust and warp slopes at intersections of cuts and natural grades to flow into each other or transition with the natural ground surfaces without noticeable breaks. A local example of such treatment would be the cuts associated with Dreamy Draw on State Route 51 in northern Phoenix.
5	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
6	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 4:50 PM
CALLER: CRAIG COWEN	CALLER ADDRESS: 9001 W. IRONWOOD DRIVE, PEORIA, AZ 85345
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway. This is something that should have been done many years ago. The valley is far behind in improving the infrastructure in the valley, so yes, put in the freeway. I fully support this new system. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain 202
Date: Monday, May 20, 2013 1:57:08 PM

From: Gene Cox [mailto:xocgk@aol.com]
Sent: Monday, May 20, 2013 1:55 PM
To: Projects
Subject: South Mountain 202

1

Please take action to complete the South Mountain portion of Loop 202. The loud mouthed cry babies have stalled this project long enough. I live in area code 85048 and want to see this project completed. I have lived here since 1987 and most of the opposition is from new comers who have a personal axe to grind. It is time to "git er done".

Gene Cox

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 SM freeway
Date: Wednesday, May 22, 2013 4:14:30 PM

From: Cox, David [mailto:David.Cox@usfoods.com]
Sent: Wednesday, May 22, 2013 4:01 PM
To: Projects
Subject: 202 SM freeway

Hello, My name is David Cox,
I live in the area of the proposed 202 South Mountain Freeway and will be impacted by what ever is decided. The ultimate decision will impact me regardless what is decided, so I wanted to take this opportunity to make a comment. I have a large economic investment and interest in the decision and want to voice my opinion.

1

As I see it, the most economical and logical route which would have the least impact to home owners, businesses and the environment would be to utilize the existing Chandler/Pecos road "highway": progressing south where it currently tapers to two lanes, progressing south a half a mile or more, onto the Indian Reservation. This would minimize any impact the residences and commercial buildings along Pecos road on and off the reservation. It then could swing north approximately at 59th - 63rd avenue, missing most if not all the residences along 51st avenue: utilizing the W59 alternative to tie into I10 freeway.

This alignment would minimize impact to existing residences, businesses both on and off the reservation. It would also bypassing existing infrastructure, such as High tension power lines, gas lines and water mains, which curretly run along the border between private/public and reservation. This alignment would swing clear of the mountains and thus would not require expensive and damaging blasting into the sacred and beautiful South Mountains.
I would like to propose some of the saving be utilized to create an off ramp for the Vee Quiva Casino and also suggest a highway be created with an exit that would to tie into SR238 near Mobile. This would provide an alternative route for traffic to and from Phoenix, access to Vee Quiva and tribal lands as well as opening up traffic to Mexico. I believe the Indians may agree with this idea if proposed as a package deal with the proposed freeway and current access limitations on 51st ave.

2

There is a lingering dangerous unaddressed traffic issue coming up quickly with the opening of this New Vee Quiva in July.
Currently the only access to Vee Quiva is off 51st avenue. Already the majority of traffic on 51st avenue are going to the casino and this traffic is non-stop 24X7. One could easily determine when the New Vee Quiva Casino opens there will be an exponential increase in the volume of traffic: the new casino is much larger, has a 90 + room hotel and numerous restaurants. I have noticed considerable advertising for the New Casino on radio, TV, printed and outdoor billboards. I'm certain this campaign will continue as the casino is vying for patrons. I can easily foresee with the additional traffic which will include special events; 51st ave may become a virtual parking lot. We have already experienced this when there has been a serious accident. There is no other way out of the area other than 51st ave, with one lane each way, no turn lanes or pullouts this is putting all of us, casino patrons and residents, native American and non-natives in jeopardy. This road was not designed to handle this projected volume and I'm sure the tribe is aware of this, however nothing has been done to remedy this situation by them or DOT. I certainly hope this gets addressed before there are any deaths attributed to this situation.

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Design**	The proposed freeway includes an interchange at 51st Avenue. The interchange at 51st Avenue would be located in close proximity to the Vee Quiva Casino. The design of the turning lanes and intersections would be completed in coordination with the City of Phoenix and Gila River Indian Community and include projected casino traffic. Concerns related to current traffic conditions along 51st Avenue are within the jurisdiction of the City of Phoenix.

Code	Comment Document

We need this freeway and need it ASAP to ensure the safety of all. I want to see this casino traffic routed to an alternate road designed for the volume and get 51st ave back to being utilized as it was built, as a rural isolated road.

Thank You for reading this and considering the residents concerns.

Regards,
David and Brenda Cox
4307 W. Ivanhoe St
Laveen, AZ 85339
480-226-5075

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.

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 3:42 PM
CALLER: REBA CRAIG	CALLER ADDRESS: 1821 E. MARYLAND UNIT#5, PHOENIX, ARIZONA 85016
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I'm a registered voter in Phoenix and I do support the South Mountain Freeway and feel it should be built. And I do support the freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, May 20, 2013 1:06:53 PM

From: Craig Darlene-RDRV30 [mailto:rdrv30@freescale.com]
Sent: Monday, May 20, 2013 12:55 PM
To: Projects
Subject: South Mountain Freeway

To Whom it Concerns:

1

We need this freeway in the South Mountain area it currently takes me 45 mins to commute to Chandler where I work one way.

Sincerely,
Darlene Craig-Wilson

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 3:39 PM
CALLER: MICHAEL CRANDELL	CALLER ADDRESS: 2345 EAST BECKER LANE
PHONE: 602-595-6275	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I do and I travel I-10 all the time and it's, definitely need that freeway. Definitely need that freeway, 'cause sitting in traffic is not real fun. But anyway that's it.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Shannon Crane
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 3:14:09 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 The proposed South mountain Freeway would negatively effect our environment and the lands of the Native American people who are residents there.

3 This project would set a terrible precedent by demolishing what should remain a protected area.

4 The South Mountain Park is the largest city park in our nation. This was due to the wonderful foresight of our forefathers for the benefit the Phoenix Valley. Dividing the reserve with a freeway would be devastating to wildlife, because much of their habitat would be destroyed.

5 Wildlife movement corridors would be cut off. If the South Mountain Freeway is constructed, it must include wildlife corridors to allow wildlife to continue their seasonal migrations. This would also allow people to hike or walk without restriction-- especially the Native Americans who consider South Mountain sacred.

6 Please save tax-payers money and help protect our communities, our beautiful park, our health, and our environment, by selecting the No Action Alternative.

1 Thank you.

Sincerely,

Shannon Crane
8221 E Garfield St Unit L19
Scottsdale, AZ 85257-3884

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Section 4(f) and Section 6(f)**	
4	**Biology, Plants, and Wildlife**	
5	**Cultural Resources**	
6	**Health Effects**	

Code	Comment Document

From: Sierra Club on behalf of Marian Crane
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 11:05:51 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

As a resident of Ahwatukee and the 32nd Street & Pecos area, I urge ADOT to reconsider the current alignment of the proposed Loop 202 extension.

(2) (3) (4) (5) (6) (7) (8) (9) (10) While a bypass around the great Phoenix area will be necessary, the current alignment does not adequately address that issue and runs the risk of being outdated and ineffective before it is even finished. The proposed freeway will permanently damage the Gila River Indian Community (GRIC), Ahwatukee, and Laveen areas through property and business destruction. It will harm a treasured city park and tourism destination. It will damage culturally-valuable GRIC sites, increase air pollution, increase crime access, and increase exposure to hazardous materials (through truck transport bypassing Phoenix on a proposed Canamex route). Nor is it completely necessary, since a safer route already exists which only needs to be properly developed.

ADOT and the City of Phoenix have already shown a lack of public responsibility over this proposed extension:

(11) 1. Stonewalling and judicial bullying of the GIRC's earliest proposals to situate the extension on their land. These efforts were chronicled as far back as the late 1980s, so ADOT has no business claiming the GRIC never intended to work with ADOT or MAG.

(12) 2. Inadequate oversight during the Loop 202's initial planning phases in the mid-1980s. The cities of Gilbert and Chandler looked ahead and zoned land near their freeway routes for commercial development. The City of Phoenix, courting short-term gain through developers' fees and homeowners' taxes, allowed developers to build residential communities on land already slated for freeway or near-freeway conditions.

(13) (14) (15) 3. Misinformation spread by ADOT representatives at local community meetings, about their inadequate research on environmental, health, and quality-of-life impacts on both the GRIC and the residents of Ahwatukee. Numerous recent studies have shown the high health costs of even moderate air pollution. The Ahwatukee area locked between South Mountain and the Estrella Mountains is a prime candidate for becoming smog-bound from the projected heavy traffic on the Loop 202 extension.

The financial and time cost to ADOT will undoubtedly be exacerbated by eminent domain legal challenges from the GRIC, from homeowners and

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Economics, Socioeconomics**	Businesses directly and adversely affected by implementation of an action alternative would be mitigated through relocation or site purchase at fair market value. The construction of the proposed facility would likely generate additional business and jobs in the corridor upon construction because of the improved access it will provide.
5	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Cultural Resources**	
7	**Air Quality**	
8	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
9	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Trucks**	
11	**Alternatives, Gila River Indian Community**	
12	**Acquisitions and Relocations**	It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the

(Response 12 continues on next page)

Code	Comment Document
5	businesses, and from environmental watchdog groups seeking to protect the western end of South Mountain Park. In a time when Arizona is still facing budget shortfalls and rebuilding its economy, there are wiser public-transportation projects that would show greater benefit to Arizona citizens. I submit that, should negotiations to build the extension farther south on GRIC completely break down, the best option is No-Build on either GRIC or Ahwatukee land. Long-haul truckers already use the dangerous and undeveloped Interstate 8 / Highway 85 route to bypass the greater Phoenix area. This route should be safely developed and commercialized, to fit with projected population expansion of the far southwest Phoenix area. The current western terminus of the extension in Laveen is too far east to safely route heavy commercial traffic far enough around the city, and it is too far west to prove an effective connection between the East Valley and Central Phoenix. Sincerely, Ms. Marian Crane 3145 E Chandler Blvd Ste 110 Phoenix, AZ 85048-8702
16	
17	

Code	Issue	Response
12 (cont.)		Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).
13	**Neighborhoods/ Communities**	While the E1 Alternative would be adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation's policy (see Final Environmental Impact Statement beginning on page 4-91).
14	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
15	**Air Quality**	The air quality impacts of the proposed action are discussed in the Final Environmental Impact Statement, beginning on page 4-68. Meteorological information was considered in the air quality analyses [*Air Quality Assessment: South Mountain Freeway (SR 202L)*, dated March 1, 2013] conducted for the proposed action. Data from Maricopa County Air Quality Department and from the Gila River Indian Community monitoring station were compared with two, 1-month studies conducted during the winter of 2006 and the spring of 2007 along Pecos Road in the Study Area. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Reservation Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows winds and stable atmospheric conditions, the wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns will tend to have a flow from the easterly component as the air flows from the east to the lower elevations along the Gila River. During the warmer hours with improved mixing, the flows typically follow the river channel and come from the north and northwest toward the south and southeast.
16	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
17	**Alternatives**	There is an existing route (Interstate 8 and State Route 85) that provides a bypass of the Phoenix metropolitan area. Signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. This route continues to be available for interstate and interregional travel.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Monday, May 20, 2013 8:42:10 AM

From: Dan Cripe [mailto:danandcherylcripe@yahoo.com]
Sent: Friday, May 17, 2013 6:54 PM
To: Projects
Subject:

1

please build the south 202 asap

Dan Cripe

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 10:21 AM
CALLER: PHYLLIS CRIPPEN	CALLER ADDRESS: 2220 E. SARATOGA STREET, GILBERT, AZ 85296
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I would like to register my vote for the Loop 202 South Mountain Freeway to be built.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Project
Date: Tuesday, April 30, 2013 8:52:23 AM

From: Pat Cruse [mailto:pcruse@azsfb.gov]
Sent: Monday, April 29, 2013 9:50 AM
To: Projects
Subject: South Mountain Freeway Project

To Whom It May Concern:

1 **I have been living in the west valley for 20 years and drive the I-10 freeway traffic every day to work. It originally was a 15 min drive from Avondale Blvd and now it is 40-50 mins. every day from 7 – 8:30. It is unimaginable why the State cannot plan a freeway system that intersects with the current 101 going south or connect the west end to the 303 south to the South Mountain freeway that is planned. This current plan only reduces some of the traffic from downtown to east bound but will not prevent the backup/delay in traffic from 75th Ave to 51st Ave. How does the State plan on that reduction.**

Thanks,

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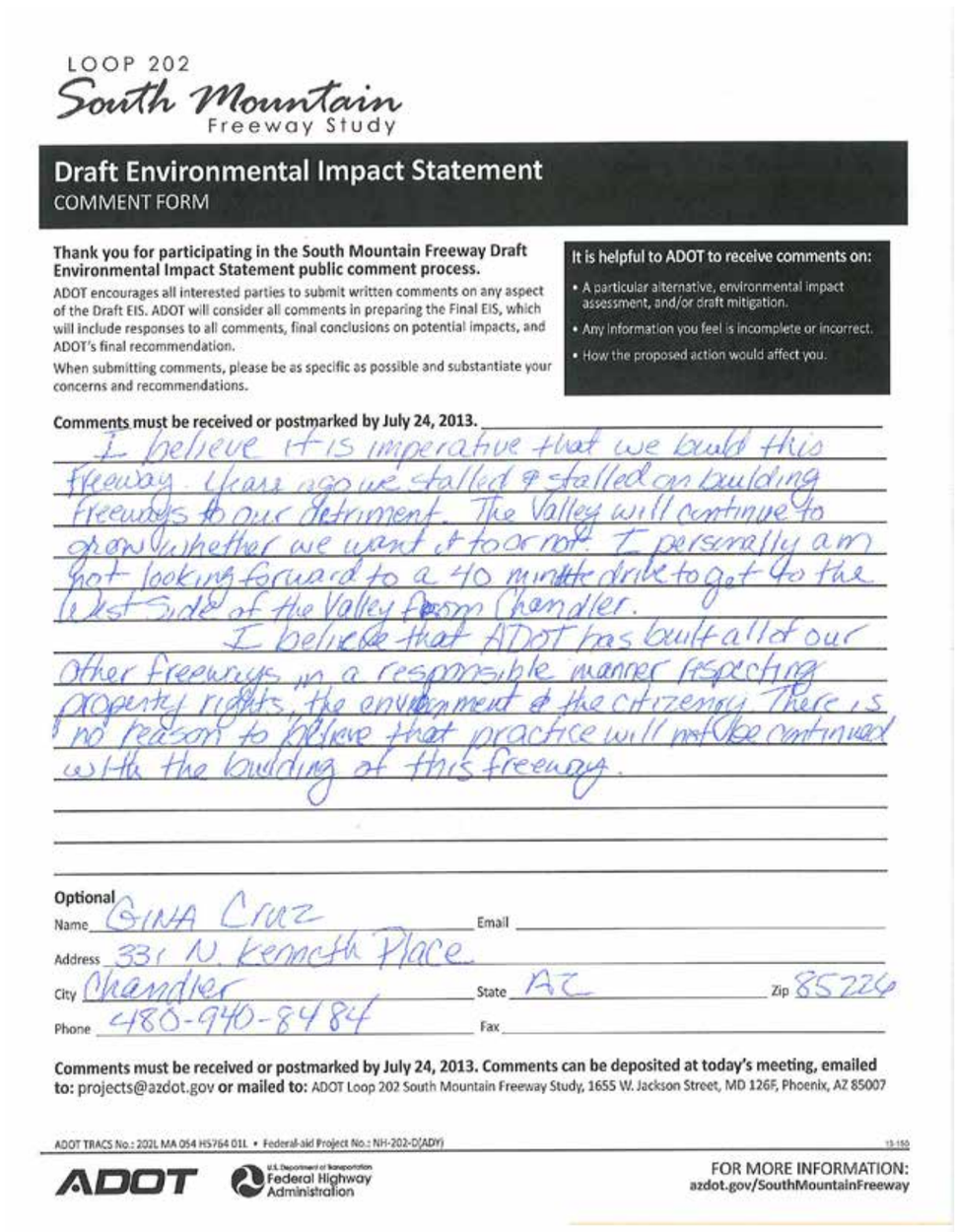
Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I believe it is imperative that we build this freeway. Years ago we stalled & stalled on building freeways to our detriment. The Valley will continue to grow whether we want it to or not. I personally am not looking forward to a 40 minute drive to get to the West Side of the Valley from Chandler.

I believe that ADOT has built all of our other freeways in a responsible manner respecting property rights, the environment & the citizenry. There is no reason to believe that practice will not be continued with the building of this freeway.

Optional

Name GINA Cruz Email

Address 331 N. Kenneth Place

City Chandler State AZ Zip 85226

Phone 480-940-8484 Fax

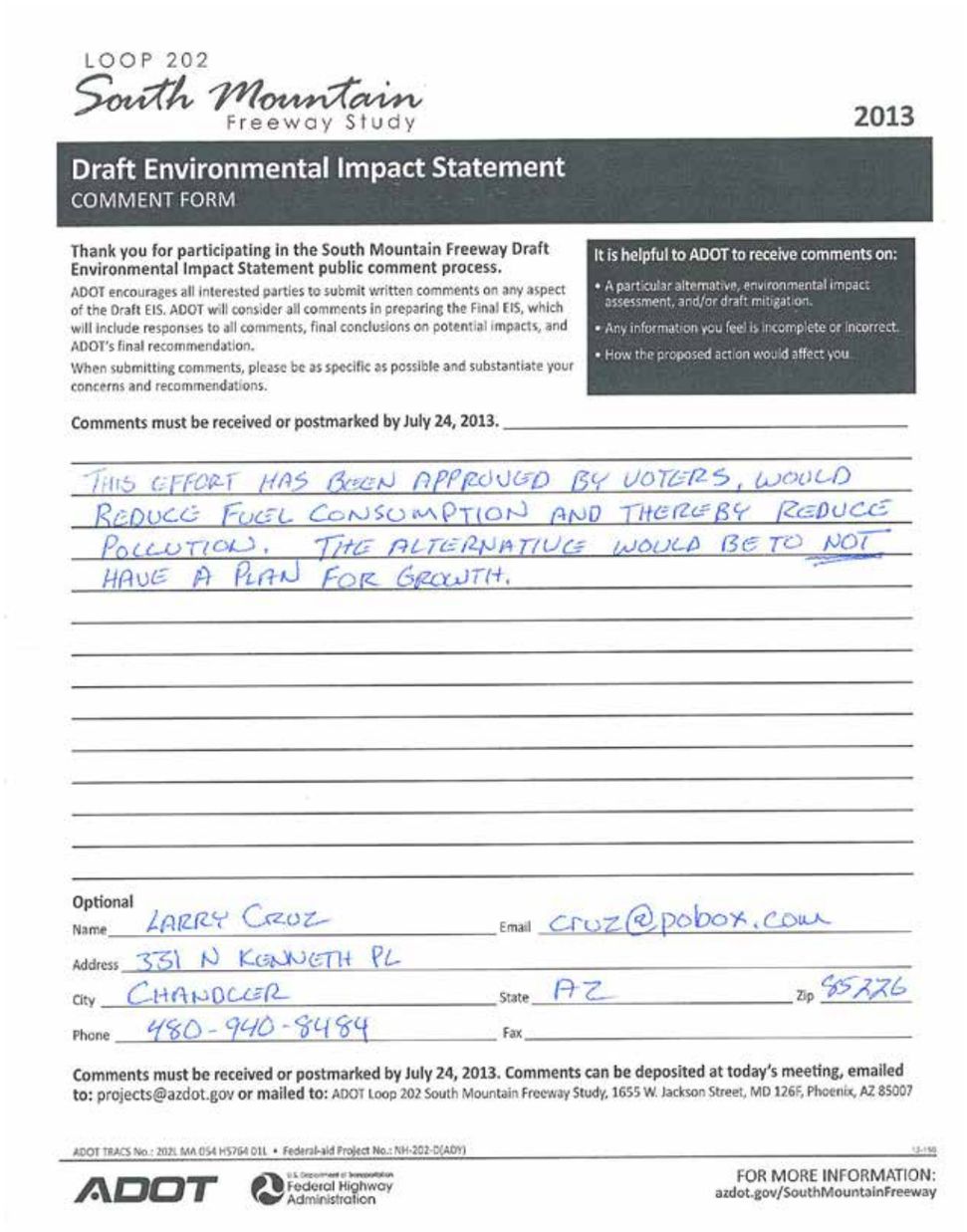
Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

THIS EFFORT HAS BEEN APPROVED BY VOTERS, WOULD REDUCE FUEL CONSUMPTION AND THEREBY REDUCE POLLUTION. THE ALTERNATIVE WOULD BE TO NOT HAVE A PLAN FOR GROWTH.

Optional

Name LARRY CRUZ Email cruz@pobox.com

Address 331 N KENNETH PL

City CHANDLER State AZ Zip 85226

Phone 480-940-8484 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 12-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Michael Cummins

Document Created: 6/11/2013 12:44:31 PM by Web Comment Form

I say build it, and build it now!

1

My wife and I moved to the Ahwatukee Foothills from Tempe in 1989 in part because of the proposed alignment of the the Loop 202 South Mountain Freeway along Pecos Road. We have been patiently waiting for construction to start since that time. The residents of the Phoenix metro area badly need a bypass route for traffic passing through Phoenix as well as a western ingress/egress gateway to the Ahwatukee Foothills area.

The native American/ activist's claims that the western portion of the freeway will "impact" South Mountain, supposedly sacred to the Pima is so outrageous as to be laughable. If the mountain is so sacred then where is the hue and cry to remove the transmission towers and obliterate all trace of roads, trails and other improvements from the mountain. No, the activists will only use this ploy when it suits their purposes. After all, where would they go to urban hike and bike if the mountain was closed to all their activities. And lets not forget how everyone living south of the mountain would be impacted by no cell phone service or broadcast TV reception.

Unfortunately, some homes and businesses may have to be removed do to the fact that they were built in the proposed right of way. However, all those who will be impacted should have known that where they were electing to build or purchase was in the right of way for this freeway alignment which has been on the books since before 1989.

We can continue to argue about who let builders develop in the right of way, but the fact remains that the end user, be it business or homeowner, had the responsibility to know about future freeway alignments, and to then make their purchasing decisions based on the knowledge that their property may have to be repurposed in the future. For these people to assume that you can negatively impact the greater community for the short-sighted selfishness of a few is ludicrous.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Kay Cummins
To: Projects
Subject: Loop 202 South Mountain Freeway
Date: Tuesday, June 11, 2013 10:46:39 AM

I say build it, and build it now!

1

My husband and I moved to the Ahwatukee Foothills from Tempe in 1989 in part because of the proposed alignment of the the Loop 202 South Mountain Freeway along Pecos Road. We have been patiently waiting for construction to start since that time. The residents of the Phoenix metro area badly need a bypass route for traffic passing through Phoenix as well as a western ingress/egress gateway to the Ahwatukee Foothills area.

The activist's claims that the western portion of the freeway will "impact" South Mountain, supposedly sacred to the Pima is so outrageous as to be laughable. If the mountain is so sacred then where is the hue and cry to remove the transmission towers and obliterate all trace of roads, trails and other improvements from the mountain. No, the activists will only use this ploy when it suits their purposes. After all, where would they go to urban hike and bike if the mountain was closed to all their activities. And lets not forget how everyone living south of the mountain would be impacted by no cell phone service or broadcast TV reception.

Unfortunately, some homes and businesses may have to be removed do to the fact that they were built in the proposed right of way. However, all those who will be impacted should have known that where they were electing to build or purchase was in the right of way for this freeway alignment which has been on the books since before 1989.

We can continue to argue about who let builders develop in the right of way, but the fact remains that the end user, be it business or homeowner, had the responsibility to know about future freeway alignments, and to then make their purchasing decisions based on the knowledge that their property may have to be repurposed in the future. For these people to assume that you can negatively impact the greater community for the short-sighted selfishness of a few is ludicrous.

Kay Cummins

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Tuesday, June 11, 2013 2:18:07 PM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov

-----Original Message-----
From: Mike Cummins [mailto:cumminsmike@q.com]
Sent: Tuesday, June 11, 2013 11:30 AM
To: Projects
Subject: Loop 202 South Mountain Freeway

1

I say build it now! It is long overdue.

My wife and I moved to the Ahwatukee Foothills in 1989 in part due to the Loop 2002 alignment along Pecos road. As the years have passed we have waited patiently for construction to begin, but now the need is more critical than ever. The city needs a bypass route for traffic passing through the Phoenix metro area, and residents of the Ahwatukee Foothills badly need a second western ingress/egress roadway for the community.

Activist claims regarding the sacredness of South Mountain to the Native Americans is outrageous. Unfortunately, they have managed to get a few members of the tribe to support this preposterous position. If the mountain was truly sacred then why not a battle to remove all of the transmission towers, roads, trails and other improvements from the mountain. The bottom line is that the activists will only use the "sacred" claim to promote their agenda, but would not want to negatively impact their ability to hike and bike close to their homes, lose cell phone and wireless service, and broadcast TV service.

They know that the community would not support such a radical plan, but using the freeway as a scapegoat makes it seem like they have an idealist viewpoint, while at the same time hijacks the community for their own selfish ends. They want hiking, biking, cell, wireless, and TV service, but somehow see the freeway as something to be feared. Their rhetoric would have the uninformed believe that the freeway will desecrate South Mountain. Nothing could be further from the truth. Looking at the project maps clearly shows that the proposed freeway alignment will impact a small un-used corner of the the South Mountain Park/Preserve boundary and not the mountain itself. Can you say hypocrite?

Claims that residents didn't know that they were building in a freeway alignment should fall on deaf ears as well. The freeway alignment has been well documented since before 1989, and disclosure of the alignment is a requirement for sale and purchased of any residential or commercial property. For these vocal few to to hold the balance of our community hostage is wrong on every level.

Now along comes Sal DiCiccio showing his true political colors by supporting to this vocal minority rather than supporting the majority in the community that supports the freeway construction. Sal has evidently forgotten that he is an elected official here to serve the entire community that elected him to office. Sal has put his personal interests ahead of those he serves. I expected more from him, but he is now irrelevant in my mind. He continues to put forth the idea that we can build on Indian land if we just put enough pressure on the tribe. His "anywhere but Pecos" organization is all about his agenda

Code	Issue	Response
1		Comment noted.

Code	Comment Document

and his personal freedoms, but it comes at the expense of the tribe's wishes and freedom to choose what is best for them.

Thank you for your time,

Mike Cummins

_____

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Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:34 PM
CALLER: KATHLEEN CUNNINGHAM	CALLER ADDRESS: CHANDLER, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway system. I am a voter and I voted for this and I still expect it to be done. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 3:14 PM
CALLER: SAM CUNNINGHAM	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:02 PM
CALLER: JUSTIN CURRENT	CALLER ADDRESS: 2722 W. HIDDEN VIEW DRIVE, PHOENIX AZ 85045
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

So thank you.

THE FACILITATOR: Thank you.

If you'd like to speak, please register up front.

If you'd like to speak, please go to the registration desk out front.

Please feel free to use either microphone when you come up.

Thank you. Eric Cylwik.

Eric, could I ask you to use this mic over here, please.

MR. CYLWIK: Good morning. My name is Eric Cylwik. I first of all want to thank you so much to voice my opinion to you guys here that are here to listen to us today. I just wanted to say also, great job on pronouncing the name. That is correct.

So I grew up in Phoenix, kind of at the top of what is now the 51, and I remember growing up there, and my dad would have to fly out of town every single weekend, and the commute to the airport was awful. But then after the 51 was built, it made the rest of the town so much more accessible and it just made living up there a so much nicer place.

I've now moved to Tempe after graduating from ASU, and a lot of my friends are now moving away

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

from Tempe and farther away from different parts of the Valley. And as a result, I end up commuting a lot more than I originally thought I would. There's parts of the West Valley where I just can't make it out there to see friends and go over to their houses, and things like that.

And just life over there kind of isn't available for me right now. By the time I get off work and have to travel over there, there's really not much to do. But there's parts of the East Valley that are still very accessible and parts of the North Valley. So even though I live in the middle of this huge area, part of it is inaccessible just due to the amount of traffic that's in these areas that at times I would like to be traveling.

So even though we have a giant freeway that might go directly from Tempe west, it's not necessarily a viable option during the time that I would like to travel. And I think that this would reduce that. And I think ADOT has led a great study, and FHWA, and it seems like all the signs say that this would be a good thing to do, and I'm here to voice my opinion in support of that. And I trust them that they've done an excellent job.

Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 12:51 PM
CALLER: GREGORY DABIJA	CALLER ADDRESS: 12676 W. [UNCLEAR]LOCK TRAIL, PEORIA, ARIZONA 85383
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I do support the freeway, the new freeway. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

location and also at the same time enhances the amenities within the City of Phoenix, keeps tax dollars here, keeps people able to stay within the lesser range for seeking out employment or shopping.

And I think that's about all that I can muster at this point, so I will probably be back if that's okay.

MS. DAD: I'm in favor of the acquisition for the freeway. I think it will be a benefit for the west side of the -- of the -- of the area, for people to be able to travel from the west side to the east side, avoiding the midtown congestion. I think they have studied every stick and stone and that they can now move forward and pick the 59 route. I think that is the best one for the freeway. That's it. I'm in favor of it.

MR. CARRILLO: I've been a resident of South Phoenix, in Laveen, all my life, which is 38 years old. I mean, I'm 38 years old now. And, absolutely, there's no question, the freeway being built would be the absolute best for that community in Laveen. And I did hold back in putting in my opinion, to study more concerning the South Mountain, the Gila River. A lot of them are my friends, and I understand their -- their dissatisfaction with everything.

But I do understand that they also had a problem with the casino first coming in there, a lot of these friends of mine. And, now that the casino has become something

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202
Date: Monday, May 20, 2013 8:25:04 AM

-----Original Message-----
From: Airdaley [mailto:airdaley@aol.com]
Sent: Sunday, May 19, 2013 5:54 AM
To: Projects
Subject: Loop 202

1

As a resident of Ahwatukee we wish to express our views on building the 202 through our area. We oppose the Pecos alignment. We support moving the 202 south on to the Gila River Reservation. We would rather have no 202 than seeing it placed on the Pecos alignment.

Thank you,

Michael and Alisa Daley

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Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: J Bond & J Danilovs
To: Projects
Subject: comments from public re: South Mountain Freeway
Date: Wednesday, July 24, 2013 5:57:26 PM

To Whom It May Concern:

I have lived in the Ahwatukee Foothills about 1 mile from Pecos Road for over 22 years. As you no doubt know, this is a lovely, family oriented community. However, if the freeway is built along Pecos, I am concerned that the quality of life here will change drastically.

1 2 I still find it difficult to understand how, in good faith, city officials could issue building permits knowing that homes, churches and businesses would need to be torn down to accommodate a freeway. And, I have yet to talk with a resident here who knew that a freeway was planned when they purchased their home. Had we known, I believe many would have chosen to live elsewhere. Pollution is a major concern.

3 4 5 6 Yes, there are reasons to build another loop around the city. But removing part of an established community, cutting through a section of mountain sacred to a Native American tribe, and adding polluting exhaust from passing trucks and vehicles to do so seems irresponsible. The additional money (tax dollars) that has been, and will need to be, spent could have been avoided had the community not been built right up to the Pecos line in the first place.

7 Now that there is a community here, and the Native tribe has informed ADOT of their concerns, I would hope that reason would prevail.

Thank you for considering my plea against the building of the freeway along Pecos Road.

Most sincerely,

Judy Bond Danilovs
1532 Silverwood Dr, Shadow Rock
jbjd@cox.net

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Cultural Resources**	
6	**Air Quality**	
7	**Alternatives, E1 Alternative**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Thursday, July 18, 2013 9:18:00 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Rudy Dankwort
Sent: Wednesday, July 17, 2013 6:30 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

Jul 17, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

Hasn't this metropolis been torn up enough?

2 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.
3 ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 5 South Mountain Freeway would have tragic negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6 7 The freeway would also negatively affect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
1	Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you. Sincerely, Rudy Dankwort 8121 N 8th Ave Phoenix, AZ 85021-5634 (602) 943-2949 _____ Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments. .

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: loop 202 South Moutain Freeway
Date: Wednesday, May 29, 2013 11:28:43 AM

From: Darzi, Khalil [mailto:khalil.darzi@usairways.com]
Sent: Wednesday, May 29, 2013 11:27 AM
To: Projects
Subject: loop 202 South Moutain Freeway

Question;

1 Will there be any bike lane built along the side or parallel to the freeway at all?

Thank you,

Khalil Darzi

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Code	Issue	Response
1	**Traffic**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway project
Date: Monday, May 20, 2013 8:46:36 AM

From: Neel Das [mailto:neeldas98@yahoo.com]
Sent: Friday, May 17, 2013 4:15 PM
To: Projects
Subject: South Mountain Freeway project

Hello,

1 I am a resident of Chandler and work in Ahwatukee. I would like to express my support for the South Mountain Freeway project.
Please let me know if you need more information from me on this.

regards,
-Neel Das

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 2 We will be left with noise, pollution + and it is going to be miserable for us to live in our home so close to the wall. We would rather be bought out than have to stay with the freeway so close to us. We are against this freeway and hope for a different route so that so many homes would not be torn down.

3

Optional

Name Diane + Tom Davidson Email davidson2760@gmail.com

Address 2760 W. Redwood Ln

City Phx State Az. Zip 85045

Phone 480-759-3447 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments on South Mountain Freeway EIS
Date: Monday, July 08, 2013 8:49:10 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Maureen Davies [mailto:modavies24@hotmail.com]
Sent: Saturday, July 06, 2013 6:26 PM
To: Projects
Subject: Comments on South Mountain Freeway EIS

1. I don't believe there will be such a huge increase in Valley traffic as I don't believe that with climate change we will get such a large population increase and hopefully we will be able to use more Mass Transit to move people around the Valley. It will be too hot here and there won't be enough water. There are so many factors that could change the whole equation such as more expensive gasoline or the urgency of reducing the current rate of carbon fuel usage to reduce climate change that would render the South Mountain Freeway obsolete. (1)
2. The destruction of part of South Mountain is unjustifiable and not mitigated enough under the current plans. Also nobody mentioned the chuckwallas that are unique to South Mountain at the meetings. Or the migration of the Hawk Moth caterpillars. I'm surprised that under the deeding of the land to the City of Phoenix that such destruction would be legal. (2, 3)
3. The increased pollution between the Pecos alignment of the freeway and the mountain due to the winds that prevail in this area would ruin the air quality and building it on the reservation would not solve that problem. We have many schools in this area and the children but also the elderly would suffer greatly especially as contrary to what you say trucks would use the freeway to by-pass the city of Phoenix. (4)
The completion of the Canamex Highway on US 85 to I 8 west of Phoenix would reduce traffic in Phoenix and on I 10. That would remove a large part of the perceived need for the South Mountain Freeway and would be less costly in every way. (5)
4. There isn't enough money for an outdated project such as this in these times of reduced budgets. The State and Federal Governments need to concentrate their spending on things that benefit the people such as education and healthcare not potentially damaging or obsolete freeways. (6)
This an example of the kind of fossilized thinking that is ruining the economies of the western nations. Using a plan that was made in 1986 for building in 2013 is ludicrous! (7)
Sincerely,
Maureen Davies

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The coloring of the male common chuckwalla is unique to the South Mountains; however, it is one of two color patterns and does not indicate a separate species or subspecies (see the Arizona Game and Fish Department's abstract for the common chuckwalla). Information related to the coloring of the common chuckwalla and the migration of hawk moth caterpillars was not mentioned in the Draft Environmental Impact Statement because it was not relevant to the study.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Meteorological information was considered in the air quality analyses [*Air Quality Assessment: South Mountain Freeway (SR 202L)*, dated March 1, 2013] conducted for the proposed action. Data from Maricopa County Air Quality Department and from the Gila River Indian Community monitoring station were compared with two, 1-month studies conducted during the winter of 2006 and the spring of 2007 along Pecos Road in the Study Area. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Reservation Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows winds and stable atmospheric conditions, the wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns will tend to have a flow from the easterly component as the air flows from the east to the lower elevations along the Gila River. During the warmer hours with improved mixing, the flows typically follow the river channel and come from the north and northwest toward the south and southeast.
5	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
6	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Draft Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
7	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

David Davies Document Created: 7/15/2013 11:06:54 AM by Web Comment Form

1 The decision to not recess the planned highway appears to be based purely on cost and not on a detailed analysis of the environmental benefit of doing that.

2 The decisions on the west end of the proposed route look flawed at best. Some of these date back to the decisions for the 101 and 10 interchange, which now appears to be in the wrong place. The current proposal for the 202 and 10 connection to be at 59th Ave should receive much more study on the disruption this would have on the the people living near there during construction.

3 The continued assertion by ADOT that this will not be a truck route is totally unbelievable and does not give one much confidence in other statements that are made in the study. The study should include the effect of this being a truck route as well as the current version.

4 A serious incident emergency plan should be included in the study, given the very limited exit routes available from Ahwatukee.

Code	Issue	Response
1	**Design**	Depressing the proposed Pecos Road sections would entail installation of pump stations to drain the main line freeway. A depressed freeway would also need a drainage channel to capture the off-site flows to prevent their entering the freeway. Pump stations were not used because of the high cost of construction and maintenance needed for their operation. The preferred freeway configuration would have the E1 Alternative aboveground and the existing culverts extending to pass the drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Depressing the freeway in this area would eliminate the existing culvert crossings and potentially have adverse flooding impacts on adjacent properties. Extending the existing culverts or upsizing the culverts would maintain or improve drainage flows. This would ensure that there would be no adverse flooding impacts on adjacent properties. (See Final Environmental Impact Statement pages 3-15 and 3-18.) To reduce impacts by depressing the proposed freeway in the Eastern Section, the Arizona Department of Transportation would: · need to spend an additional $400 million for right-of-way acquisition and construction · displace an additional 300 residences · maintain additional pump stations and detention basins for the life of the freeway · observe noise-related impacts requiring mitigation (i.e., noise barriers and their associated costs and visual impacts) Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need, Truck Bypass**	
4	**Hazardous Materials**	

Code	Comment Document

From: Sierra Club on behalf of Christina Davis
To: Projects
Subject: Please No South Mountain Freeway
Date: Wednesday, May 29, 2013 6:48:02 PM

May 29, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) This is so important! The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(5) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(6) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

(7) Sincerely,

Mrs. Christina Davis
22431 N 77th Pl
Scottsdale, AZ 85255-4850

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

Deborah Davis

Document Created: 7/22/2013 9:43:55 PM by Web Comment Form

1
2
3
4 1
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I am totally against this truck bypass which absolutely will NOT improve the region's air pollution as stated in the DEIS. I worked with Maricopa County's clean air laws and major employers to reduce air pollution for 7 years, and know that building freeways ALWAYS increases traffic beyond projections, ALWAYS increases attendant air pollution due to development following freeways. In this case, Ahwatukee will lose its geographic advantages by being surrounded by freeways, with increased noise and pollutants from our community being used as a truck bypass. Residents of Ahwatukee will get no benefits, only pay with health consequences of increased particulate pollution besides slicing up South Mountain Park. The DEIS assumptions are biased and contradict decades of traffic studies. I am a Phoenix native and resident of Ahwatukee since 1986 when I moved here to escape the worst air pollution in the Valley. We fought many projects downwind that would have brought air pollution to our community, and now this is another one. Do not build!! Do not slice up South Mountain Park! Do not ruin the health and peace of our community. If you desperately need a truck bypass, run it much farther away from the metro area. Maricopa County is already an non-attainment area and this freeway will ensure air pollution gets even worse.

7

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

From: Sierra Club on behalf of Norman & Shirley Davis
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 10:35:18 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

South Mountain Park is a very important part of the metro setting. Used daily by many residents.

2 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.

3 ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more

5 vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a

7 freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Norman & Shirley Davis
6021 E Avenida Arriba
Tucson, AZ 85750-1869

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Extension
Date: Tuesday, July 09, 2013 1:44:51 PM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Linda Davison [mailto:linda.davison66@gmail.com]
Sent: Tuesday, July 09, 2013 11:46 AM
To: Projects
Subject: 202 Extension

1

I am a homeowner on S. Desert Foothills Pathway, and I vote "no" for the extension of 202. Please consider the drastic consequences of making Pecos Road a major thoroughfare. It will cause major pollution and noise in the SW corner of the city - an area I found to have some peace and relative quiet. Thank you.

1 2 3

Linda Davison
Homeowner in San Simeon Complex

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:33:26 AM

-----Original Message-----
From: David R de la Rosa [mailto:ddelar62@yahoo.com]
Sent: Friday, May 17, 2013 11:29 PM
To: Projects
Subject: 202

1

Please complete the 202 Loop as it's a necessary road for the good of the Phoenix area

Sent from my iPad

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: common sense
Date: Monday, May 20, 2013 8:41:20 AM

From: Peter debrie [mailto:peterdebrie@yahoo.com]
Sent: Friday, May 17, 2013 7:40 PM
To: Projects
Subject: common sense

1

We all want the State to make progress but their are all ways a few who want to stop progress. We Need to expand the freeway system but lets not make the same mistakes as the other freeways. Better to make them big enough so we don't have to make the roads or bridges wider in a few years.

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Code	Issue	Response
1	**Design**	The proposed freeway at one point featured a ten-lane freeway cross section, with three general purpose lanes in each direction and sufficient right-of-way to add a high-occupancy vehicle lane and a general purpose lane in each direction in the median in the future (when warranted by travel demand). The Maricopa Association of Governments, in association with the Arizona Department of Transportation, later examined an eight-lane freeway cross section, with three general purpose lanes and one high-occupancy vehicle lane in each direction (see Final Environmental Impact Statement pages 3-19 and 3-20). Such a configuration would reduce the right-of-way needed for the freeway without jeopardizing its ability to meet the purpose and need criteria. Additionally, the eight-lane freeway would cost about $200 million less than the ten-lane freeway (see the Final Environmental Impact Statement, beginning on page 3-23). Because the eight-lane freeway would meet the project's purpose and need and would do so with lower costs, less right-of-way acquisition, and fewer impacts than the ten-lane freeway, it was carried forward for further study. All eight lanes would be constructed at the same time.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:32:13 AM

From: Karen Dees [mailto:deesfam@yahoo.com]
Sent: Saturday, May 18, 2013 7:08 AM
To: Projects
Subject: 202

18 May 2013

Dear ADOT,

1 My husband is in the highway construction business as a truck driver. PLEASE help us continue our just above the poverty line life by giving the go ahead on this vital project. Maybe he'll get more work. Please. We are both Arizona natives and don't want to have to chase work in another state.

Karen Tucker Dees

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	**From:** Projects **To:** ADOT **Subject:** FW: Loop 202 **Date:** Thursday, May 23, 2013 9:15:12 AM **From:** deirdre degagne [mailto:deirdredegagne@gmail.com] **Sent:** Thursday, May 23, 2013 8:49 AM **To:** Projects **Subject:** Loop 202 We would like to register our agreement with the Loop 202 extension-South Mountain Freeway. Our home is at: 7322 West Alta Vista Road in Laveen, and it would be very beneficial. Sincerely, Deirdre & Hubert Degagne Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Jonae DeLong
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 1:44:11 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Maricopa County and the State of Arizona does so little now to protect our environment, I don't think we need another freeway to add to our air pollution problem. Please do not build this freeway, rather consider investing more in mass transit.

Sincerely,

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	Mrs. Jonae DeLong 5868 E Sanna St Paradise Valley, AZ 85253-1762

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

Okay, we'll go to the next name, Steve Trussell. Is Steve Trussell in the auditorium? Here he comes.

If there's anyone else in the auditorium that would like to speak today, please make sure that you register first so we can get your name into the list.

THE FACILITATOR: Daniel Demerritt. Did I pronounce the name correctly?

MR. DEMERRITT: Yes, you did.

I'm not going to go over all of the stuff that that gentleman went over, because he pretty much did a lot of the work for me in the beginning. I'm a Laveen resident, we have lived in the area for seven years, and we have long seen many developments that were needed by the community; specifically, hospitals, major retail developments. We have to drive 20 minutes to go anywhere to spend our money, and that money is now linking into -- you know, that tax money is now linking into neighboring municipalities. The community has needed this, you know, now more than ever, but has needed it for a long time and we are, you know, very far along and we -- you know, there's just no reason why we should not do the freeway. I don't see -- I mean, I understand the environmental impacts when it comes to the mountain, I'm sorry that there's no other, you know, real route to that, because no one is cooperating with us on, you know, other areas.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

I look at the Dreamy Draw, it was the same situation, I'm sure there was a lot of contention with it then and, you know, I drive through this, you know, pretty much three and four times a week and it's beautiful. I mean, it's something that I enjoy driving through. You know, it's something that ADOT did a good job with and I believe that they can do the same with the South Mountain freeway.

I do want to point out that, you know, I do live fairly close to where the freeway is supposed to go through within, you know, half a mile, I believe that they have a lot of things that they can do to keep the sound to a minimum. I know that, you know, yeah, it will increase traffic truck-wise because it's an easy alternative, but that's something that's going to relieve the traffic that is basically causing the I-10 to back up every morning.

The other part of it or, you know, more on the sound, I mean, they have rubberized asphalt, you know, the sound wall barriers. Hopefully, you know, we can think about doing some more walkability and bikeability type situations, but I don't see that in the plan currently, but it looks like it could be easily done. Thank you for hearing my comments, and I hope they build the 202.

2

3

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

From: Sierra Club on behalf of Lynn Demuth
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, June 03, 2013 7:14:01 PM

Jun 3, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit.

(4) (5) South Mountain Freeway would have extreme negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, and valuable public spaces will be lost. I am a frequent hiker in South Mountain Park and cannot imagine what a freeway on the west end would do the experience. The beauty and relative solitude of the park would be destoryed.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Dr. Lynn Demuth
2961 W Comstock Dr
Chandler, AZ 85224-5708
(480) 699-0237

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
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4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 11:31 AM
CALLER: ROBYN DERKS	CALLER ADDRESS: 2724 WEST FLINT STREET, CHANDLER, ARIZONA 85224
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I am in support of the freeway. I wanted it for many years as my husband travels that way and I do support the freeway. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of James Derrig
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Tuesday, June 04, 2013 8:38:01 AM

Jun 4, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. James Derrig
19006 N 76th Ave
Glendale, AZ 85308-8300
(623) 561-1545

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document
1	Mukesh Desai Document Created: 6/18/2013 11:55:08 PM by Web Comment Form Very useful presentation, gives citizens overview quickly. I personally support project. I live in Fishkill Reserve community and some homes in our community are going to be impacted. However,I believe, for vast majority of residents this highway will be beneficial as it will improve access. I still do not know, if proposed highway will be elevated , or only be elevated throughout or only at certain places. I still do not know, how our view of Estrella mountains and South Mountain will remain ?

Code	Issue	Response
1	**Design**	The freeway profile, or elevation, is determined by a number of engineering factors including geology, drainage, and cost, among others. Like most freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would maintain a rolling profile, being elevated above most major cross streets and dropping to near ground level between interchanges (see Figure s 3-20 to 3-25 beginning on Final Environmental Impact Statement page 3-42).

Code	Comment Document

From: Michelle
To: Projects
Subject: against freeway expansion in Ahwatukee
Date: Tuesday, June 04, 2013 9:37:41 PM

I've been a resident of Ahwatukee since 2001, and I originally worked here as a teacher starting in 1995. I do not know, nor have I ever known, one person who is in favor of this freeway. Everyone I know opposes it.

(1) (2) (3) (4)

We are concerned about air pollution, noise pollution, and safety. We moved here because this is a quiet and safe bedroom community. Tearing away people's homes and a local place of worship to build yet another freeway is unconscionable.

Please listen to local residents' wishes and halt this project.

(5)

If you must move forward and continue to pollute this city even more with yet another freeway, then there are miles of Indian reservation that can be built upon which will avoid the senseless destruction of taxpayers' properties.

Thank you.

Best,
Michelle DeSpain
Ahwatukee Resident -- 85048

(6)

P.S. Allergies, asthma, and respiratory issues have skyrocketed in Maricopa County in recent years. As educated citizens, we are all very much aware of the link between pollution and these health issues. Shouldn't the health and wellbeing of citizens be the #1 priority of our city?

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
4	**Neighborhoods/ Communities**	A freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-1 and 4-21). Homes and the church were built after freeway was conceived and per state law should have been informed of the proposed facility (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.).
5	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	

Code	Comment Document
1	Susan Detwiler Document Created: 7/14/2013 5:32:41 PM by Web Comment Form This project is an important part of the regional transportation system in Maricopa County. Funding has been approved through Proposition 400 and it is paramount that the project move forward while funding is in place. I fully support this project and look forward to it's completion.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Why I oppose the South Mountain Freeway

I grew up in Chicago, moved to Phoenix in 1974 and South Mountain Park was one of the first places I hiked. I still rave about this wonderful place to out-of-town visitors. We have the largest city park in the U.S., 11 mile trail east to west, and no matter how full the parking lot in Ahwatukee, the trails always feel like wilderness (if you don't look at the valley below). When I worked in South Phoenix, I organized and led hikes for low income South Phoenix families, showed them petroglyphs and talked of native peoples who had passed through here for thousands of years. It is awe-inspiring to consider how we remain connected to our past; it is indeed sacred and an important lesson to teach our children.

Three reasons I oppose the proposed freeway:

1 2

1. **We must respect the people who lived here first and for generations since**. Native peoples from the Gila River Indian Community voted against allowing the freeway through their lands and sacred places. When European-Americans first came to these lands, we did not respect their beliefs. We were wrong then and must not repeat these errors. If Native Americans do not want this highway, then we must not violate their wishes.

3 4 5

2. **Division and destruction of land creates pollution** – noise and carbon monoxide don't stop at the side of a highway. **Animals native to this land** - pumas, coyotes, javelinas, birds, reptiles – belong here and we have the responsibility to protect their habitats. During my lifetime, we have come a long way in learning the importance of environment and inter-connectivity. Do not break this growing respect for our environment.

3. **Home owners have the responsibility to consider transportation <u>before</u> they buy**. I have owned 5 homes during my life; I believe it is outrageous and arrogant to move into an area, then try to change its very essence for our own personal comfort. It's the attitude – "Now I'm here, so now you do what I want." What a terrible message to send our children!

6

I love this park and ask you to send our children a message of the importance of respect and protection of our heritage and natural environment by saying no to building a freeway through South Mountain Park.

Jeanne Devine, retired senior and environmental activist
3323 S. McAllister Ave
Tempe, Arizona, 85282
Maricopa County

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, No-Action (No-Build) Alternative**	
3	**Noise**	
4	**Air Quality**	
5	**Biology, Plants, and Wildlife**	
6	**Section 4(f) and Section 6(f)**	

Code	Comment Document

And the Gila River Indian Community for years has been opposed to the build and the people and the state have bent over backwards to accommodate their wishes. The proposed build of the freeway now does not encroach on their land, and because of the painstaking efforts of so many people, I would ask now that they respect our wishes and needs, so that we can build this much-needed thoroughfare so the west side of the Valley can prosper in the same way as the east side of the Valley. Thank you very much.

THE FACILITATOR: Thank you.

If you'd like to speak, please go out to the registration table and get registered. Your name will appear on our list and we'll call you up. Thank you.

Jeane Devine. Could you come over to this microphone, we're going to switch you guys.

MS. DEVINE: Am I -- can you hear me? Thank you very much for having these hearings also. I wrote just from my heart like why I'm here and why I'm opposed to the South Mountain freeway. I grew up in Chicago, I moved to the Phoenix area in 1974 and South Mountain Park was one of the first places that I hiked, I'm still hiking today; I'm 71 years old. I still rave about this wonderful place of South Mountain Park to out-of-town visitors. And we have the largest city park in the

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

United States, 11-mile trail from east to west, and no matter how full the parking lot in Ahwatukee, which is where I usually park, the trails always feels like wilderness, if you don't look down into the Valley.

But when I worked in South Phoenix also, I organized and led hikes for low-income South Phoenix families and I showed them petroglyphs and talked of native peoples who passed through here for thousands of years. This is awe-inspiring to consider how we remain connected our past. It's indeed sacred and an important lesson to teach our children.

So I have three reasons why I'm really opposed to this freeway. The first one is we must respect the people who lived here first and have for generations since. Native people from the Gila River Indian Community voted against allowing the freeway through their lands and sacred places. When European Americans first came to these lands, we did not respect their beliefs. We were wrong then and we must not repeat these errors. If Native Americans do not want this highway, then we must not violate their wishes.

Number two, division and destruction of land causes pollution. Noise and carbon monoxide don't stop at the side of a highway. Animals native to this land, pumas, coyotes, javelinas, birds, reptiles belong here

(1) (2) (3) (4) (5)

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, No-Action (No-Build) Alternative**	
3	**Noise**	
4	**Air Quality**	
5	**Biology, Plants, and Wildlife**	

Code	Comment Document

and we have the responsibility to protect their habitats. During my lifetime we have come a long ways in learning the importance of environment and interconnectivity, so do not break this growing respect for our environment.

And the third reason I have is that homeowners have the responsibility to consider transportation before they buy a home. I have owned five homes during my life, I know what it means to look at your home and where you're going to live, and I believe it's outrageous and arrogant to move into an area and then try to change its very essence for our personal comfort. It's the attitude of now I'm here, so you need to change things for me. It's a terrible message to send our children.

I love this park and I ask you to send our children a message of the importance of respect and protection of our heritage and natural environment by saying no to building a freeway through South Mountain Park. Thank you.

6

THE FACILITATOR: Thank you.

Anybody who would like to speak, please go out to the registration table, get registered, we'll be happy to hear you.

Mike Franklin. Could you come to this mic over here, please.

MR. FRANKLIN: Must be on. Okay. My name is

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
6	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Do the 202
Date: Monday, May 20, 2013 8:42:05 AM

From: Sean Dhaemers [mailto:badraptor@aol.com]
Sent: Friday, May 17, 2013 7:15 PM
To: Projects
Subject: Do the 202

1

This must be done please consider

From my Android phone on T-Mobile. The first nationwide 4G network.

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Comment For Record
Date: Monday, July 15, 2013 11:12:00 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Keith Diamanti [mailto:kjdiamanti@yahoo.com]
Sent: Monday, July 15, 2013 11:08 AM
To: Projects
Subject: South Mountain Freeway Comment For Record

1 Keith, Patricia, Alex and Thomas Diamanti of 16208 S. Reserve Drive are strictly against the freeway being placed on Pecos Blvd due to various environmental and health issues.

Sent from my iPhone

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:07 PM
CALLER: DIANE	CALLER ADDRESS: 3303 SOUTH 22ND AVENUE, PHOENIX, AZ
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the 202 Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Jesus Diaz Document Created: 4/27/2013 8:42:54 AM by Web Comment Form

1 I live on 55th Ave and Southern Ave in Laveen. My concern is the increase in noise this freeway would cause for the area. Also, is Southern Ave going to be an exit for this freeway..If so, will ADOT add more traffic lights for residents that live on 55th Ave and Southern due to the increase of traffic this would cause.

2

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Traffic**	Traffic interchanges (on- and off-ramps) would be located at Van Buren Street, Buckeye Road, Lower Buckeye Road, Broadway Road, Southern Avenue, Baseline Road, Dobbins Road, Elliot Road, 51st Avenue, 17th Avenue, Desert Foothills Parkway, 24th Street, and 40th Street. In the immediate area of the interchanges, the crossroads would be widened to their ultimate lane configuration based on the City of Phoenix General Plan. Adjacent improvements such as signals and road widening would be the responsibility of the City of Phoenix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/11/13	INCOMING CALL TIME: 10:16 AM
CALLER: MARIA DIAZ	CALLER ADDRESS: 6413 W. SOUTHERN AVE.
PHONE:	EMAIL: 602-330-3890

CALLER REMARKS/QUESTIONS:

1

My name is Maria Diaz. I live at 6413 West Southern. I am not pleased with what is going to happen with 59th Avenue because it will affect my house. Thank you very much.

RESPONSE:

Mi nombre es Maria Diaz. Yo vivo en el 6413 West Southern Avenue. No estoy satisfecho con lo que va a pasar con la avenida 59 ª, ya que afecta a mi casa. ¡muchas gracias

RESPONSE DATE:	RESPONSE TIME:	HDR STAFF INITIAL:

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Sierra Club on behalf of Ben Dibell
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 6:14:23 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(5) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(6) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

(7) Sincerely,

Mr. Ben Dibell
948 S Alma School Rd
Mesa, AZ 85210-2048

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Sierra Club on behalf of Ben Dibell
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 6:14:23 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 3 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 5 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6 7 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Ben Dibell
948 S Alma School Rd
Mesa, AZ 85210-2048

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Freeway Extension-202
Date: Monday, July 08, 2013 8:49:44 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Jessica DiGiacomo [mailto:jessiejoy.jd@gmail.com]
Sent: Sunday, July 07, 2013 3:02 PM
To: Projects
Subject: Freeway Extension-202

I am an owner at San Simeon Condominium in Ahwatukee and I spend half the year in that home.I choose to buy in that location because its a quiet area. My home in the city of West Sacramento California is next to HWY 5 and is 1/2 mile away and it is disgusting with the dust that ends up in my home as well as the constant swishing noise from the cars. I do not support the 202 freeway project because it will bring noise, and pollution to our neighborhood. (1) (2)
Jessica DiGiacomo
16013 South Desert Foothills Parkway #1159

Sent from my iPad

_____

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	

Code	Comment Document

Michael DiGioia Document Created: 6/12/2013 4:25:55 PM by Web Comment Form

1 As a resident of Ahwatukee for over 35 yrs. I believe it's about time we start construction of the SMF All these delays have been instituted by nothing more then self interest groups. Example is of So Mtn. being being desicrated. I always thought all Indian land was sacred. Lets face it. It's all about the money. Put the freeway on the res. and you have more people going to the casino and the outlet stores, as well as the resort and golf course and other attractions. Lets be real, this freeway is long over due. Pecos Rd is owned by the state, it sure doesn't make sense to spend more money and put it on the res. As far as pollution goes thats another stalling tactic. I live off 51street, should we reroute all of I-10 so my neighborhood is smog free? of course not . When I came to Arizona I-10 was only two lanes each way. There was no complaining when it turned to 8&10 lanes. That was progress. If you didn't like it you moved. If people don't like the SMF you to can move. Now that home prices are climbing I haven't heard to much from that group of people. Use common sense an let ADOT do it's job. This is progress, weve spent enough time and money for this project.

t

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 1:13 PM
CALLER: MAYNARD DILLIMER, ARCHITECT	CALLER ADDRESS:
PHONE: 480-948-6632	EMAIL:

CALLER REMARKS/QUESTIONS:

I support building the South Mountain Freeway. I do not believe there ought to be a toll road in any form. I am a retired Architect and (Unintelligible) planning and very knowledgeable on this type of thing. This highway is long overdue. Should be done as quickly as possible. But no toll roads involved. Thank you for asking.

1

Code	Issue	Response
1	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa County region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects, including the proposed freeway. Tolls would not be involved.

Code	Comment Document

From: Harry Dobell
To: Projects
Subject: South Mountain Freeway
Date: Wednesday, June 05, 2013 4:03:26 PM

1 2 I went to the first meeting that was held several years ago for the Foothills area and we were told that the freeway would be dug down 14 feet with a 10 foot sound wall. Recently I heard that the freeway was not going to be dug down 14 feet because of the water runoff from South Mountain. We feel that is totally un-acceptable. You did it for Scottsdale and I think that it should be done for the foothills area. The sound reaches my house, 804 feet from the proposed freeway and the sound from a 10 lane freeway will be much worse.

3 4 The second issue that I am concerned is with the increase cancer rates from all the particulate from all the cars and trucks exhausts being blown up against South Mountain with no-where to go. What are the expected cancer rate increases?
How will this affect all the children in the three schools that are within 800-1,000 feet from the freeway?
How will this affect the older residents with lung problems?
5 What will happen if there is an inversion layer and the exhaust gases build up? What then???

6 Lastly, I don't recall any comments on the crime rates increases for areas that are between exits and entrances doubling with pass thru criminals looking for an easy score.

I would like an answer to these questions and so far I have been unable to get any.

Code	Issue	Response
1	**Design**	A depressed freeway option was evaluated in the Final Environmental Impact Statement and is described on pages 3-15 and 4-91. Although depressing the freeway would reduce noise levels, noise walls would still be needed to further reduce noise to meet the Arizona Department of Transportation noise policy. Whether the freeway is built aboveground with tall walls or belowground with shorter walls, the final mitigated noise levels would be nearly the same at nearby residences. The major disadvantage of building a depressed freeway would be the increased construction cost and the possible acquisition of additional right-of-way for pump stations and retention basins.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Health Effects**	
4	**Air Quality**	Meteorological information was considered in the air quality analyses [*Air Quality Assessment: South Mountain Freeway (SR 202L)*, dated March 1, 2013] conducted for the proposed action. Data from Maricopa County Air Quality Department and from the Gila River Indian Community monitoring station were compared with two, 1-month studies conducted during the winter of 2006 and the spring of 2007 along Pecos Road in the Study Area. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Reservation Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, the wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns will tend to have a flow from the easterly component as the air flows from the east to the lower elevations along the Gila River. During the warmer hours with improved mixing, the flows typically follow the river channel and come from the north and northwest toward the south and southeast.
5	**Air Quality**	During the winter, temperature inversions can inhibit the dispersal of pollution (see Final Environmental Impact Statement page 4-70). In the morning, wind flows typically follow the terrain to lower elevations. As the day progresses and heating occurs, the pollution begins to disperse. Wind flow in the afternoon typically goes upward along the terrain.
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. WHAT DO YOUR STUDIES SHOW

1, ABOUT 150,000 CARS AND DIESAL TRUCK EXHAUST BEING TRAPPED AGAINST SOUTH MOUNTAIN? DIESEL EXHAUST HAS CANCENOGENS AND A 3-4 TIMES THE EXHAUST TRAPPED BY SOUTH MOUNTAIN COULD HAVE CATASTROPIC RESULTS OF AIR QUALITY. OLDER PEOPLE AND THOSE THAT HAVE RESPIRATORY PROBLEMS WILL BE AT RISK. I HAVE NOT SEEN ANY STUDIES IN REGARDS TO SMOG BUILD-UP AGAINST SOUTH MOUNTAIN. HAVE THEIR BEEN ANY TEMPATURE INVERSION LAYER STUDIES?

2. HOW DO YOU JUSTIFY HAVING THE EXHAUST OF 150,000 CARS AND DIESEL TRUCKS PASSING BY TWO SCHOOLS FULL OF YOUNG CHILDREN? IS THAT THE ENVIORNMENT YOU WOULD WANT FOR YOUR CHILDREN?

Optional

Name HARRY DoBELL Email dobell@cox.net

Address 1664 E. GLENHAVEN DR.

City PHOENIX, AZ 85048 State AZ Zip 85048

Phone 480 460 8148 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Meteorological information was considered in the air quality analyses [*Air Quality Assessment: South Mountain Freeway (SR 202L)*, dated March 1, 2013] conducted for the proposed action. Data from Maricopa County Air Quality Department and from the Gila River Indian Community monitoring station were compared with two, 1-month studies conducted during the winter of 2006 and the spring of 2007 along Pecos Road in the Study Area. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Reservation Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows winds and stable atmospheric conditions, the wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns will tend to have a flow from the easterly component as the air flows from the east to the lower elevations along the Gila River. During the warmer hours with improved mixing, the flows typically follow the river channel and come from the north and northwest toward the south and southeast.
2	**Air Quality**	During the winter, temperature inversions can inhibit the dispersal of pollution (see Final Environmental Impact Statement page 4-70). In the morning, wind flows typically follow the terrain to lower elevations. As the day progresses and heating occurs, the pollution begins to disperse. Wind flow in the afternoon typically goes upward along the terrain.
3	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1. WE ARE BEING TOLD THAT THERE WILL BE NOISE ABATEMENT INSTALLED. WHAT HAPPENS IF YOU ARE WRONG? (1)

2. WE HAVE BEEN TOLD THAT IF YOU LIVE BETWEEN TWO ON-OFF INTERSTATE FREEWAY, THE CRIME RATE WILL DOUBLE. WHO WILL TAKE CARE OF THAT? (2)

Optional

Name HARRY DOBELL Email DOBELL@COX.NET

Address

City State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

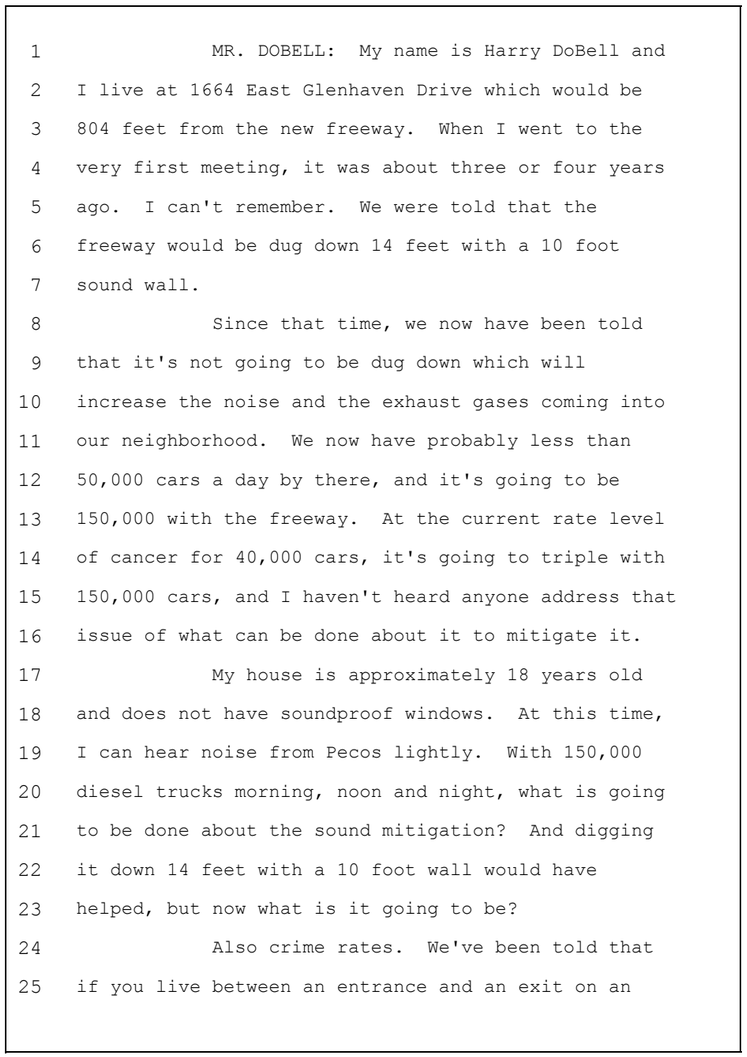
ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The Federal Highway Administration developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The regulation, 23 Code of Federal Regulations 772 Procedures for Abatement of Highway Traffic Noise and Construction Noise, applies to highway construction projects where a State department of transportation has requested Federal funding for participation in the project. The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the noise regulations is a prerequisite for the granting of Federal-aid highway funds for construction or reconstruction of a highway. In 1998, the Federal Highway Administration released the Traffic Noise Model, which has been upgraded several times since its release. It was developed as a means for aiding compliance with policies and procedures under Federal Highway Administration regulations. The model is a state-of-the-art computer program used for predicting noise impacts in the vicinity of highways. It uses advances in personal computer hardware and software to improve upon the accuracy and ease of modeling highway noise, including the design of effective, cost-efficient highway noise barriers. These components are supported by a scientifically founded and experimentally calibrated acoustic computation methodology, as well as an entirely new, and more flexible data base, than the former model. The database consists of over 6000 measurements at forty sites across the country.
2	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document



MR. DOBELL: My name is Harry DoBell and I live at 1664 East Glenhaven Drive which would be 804 feet from the new freeway. When I went to the very first meeting, it was about three or four years ago. I can't remember. We were told that the freeway would be dug down 14 feet with a 10 foot sound wall.

Since that time, we now have been told that it's not going to be dug down which will increase the noise and the exhaust gases coming into our neighborhood. We now have probably less than 50,000 cars a day by there, and it's going to be 150,000 with the freeway. At the current rate level of cancer for 40,000 cars, it's going to triple with 150,000 cars, and I haven't heard anyone address that issue of what can be done about it to mitigate it.

My house is approximately 18 years old and does not have soundproof windows. At this time, I can hear noise from Pecos lightly. With 150,000 diesel trucks morning, noon and night, what is going to be done about the sound mitigation? And digging it down 14 feet with a 10 foot wall would have helped, but now what is it going to be?

Also crime rates. We've been told that if you live between an entrance and an exit on an

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Design**	A depressed freeway option was evaluated in the Final Environmental Impact Statement and is described on pages 3-15 and 4-91. Although depressing the freeway would reduce noise levels, noise walls would still be needed to further reduce noise to meet the Arizona Department of Transportation noise policy. Whether the freeway is built aboveground with tall walls or belowground with shorter walls, the final mitigated noise levels would be nearly the same at nearby residences. The major disadvantage of building a depressed freeway would be the increased construction cost and the possible acquisition of additional right-of-way for pump stations and retention basins.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Health Effects**	
4	**Noise**	Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered "acceptable" by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.
5	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

interstate freeway, your crime rates will go up 100 percent. Has anybody addressed that? That's all I've got to say.

Code	Issue	Response

Code	Comment Document

1 MR. DOBELL: My name is Harry DoBell. My
2 concern is with 150,000 cars a day going by there and
3 a lot of them being trucks, diesel trucks, diesel is
4 known for carcinogens, and all that buildup is going
5 to be blown up against South Mountain and stuck
6 there. What are the conditions going to be? How are
7 people with breathing problems and older people going
8 to -- how are they going to handle it? And has any
9 tests been done? Has any things been done to see
10 what it would be with a buildup? Because I haven't
11 heard of any.
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Page 5

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www.drivernix.com

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Meteorological information was considered in the air quality analyses [*Air Quality Assessment: South Mountain Freeway (SR 202L)*, dated March 1, 2013] conducted for the proposed action. Data from Maricopa County Air Quality Department and from the Gila River Indian Community monitoring station were compared with two, 1-month studies conducted during the winter of 2006 and the spring of 2007 along Pecos Road in the Study Area. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Reservation Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows winds and stable atmospheric conditions, the wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns will tend to have a flow from the easterly component as the air flows from the east to the lower elevations along the Gila River. During the warmer hours with improved mixing, the flows typically follow the river channel and come from the north and northwest toward the south and southeast.
2	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Paul Dodson
To: Projects
Subject: south mountain freeway
Date: Monday, May 27, 2013 1:52:58 PM

1 As a resident of the 51 st, ave. Mc dowell rd. area for the past 40 + years . It is my experience that the congestion on I -10 from 27 th. To 83 rd. avenues has reached it's max. you can not get on or off the freeway with any measure of safety. As a trucker with over 50 years of driving the roads it would be safer to hook into the 303 . as most truckers that don't need to be in the city take buckeye or cut down to I -80. The Indian nation would be happier if the truckers did not take 51st. ave. to get to Tucson. The outer loop off 303 and I-10 would benefit all the truckers, Indian nation and travlers. Our city traffic is maxed out too much now. As an added benefit the Indians would have another area to build another casino. Thank you

2

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. State Route 30 is planned to connect the South Mountain Freeway to State Route 303L (see Figure 1-2 on page 1-6 of the Final Environmental Impact Statement).

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 12:04 PM
CALLER: DAVID DOIRON	CALLER ADDRESS: 332 AEPLI DRIVE, TEMPE, AZ S85282
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in favor of the Loop 202 South Mountain Freeway in the southwest valley. Thanks.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 11:57 AM
CALLER: WILLIAM DOLAN	CALLER ADDRESS: SUN CITY WEST, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in favor of the new South Mountain freeway. Goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F Phoenix, AZ 85007

Dear ADOT,

Your DEIS did not include concerns I and others raised as there are many deficiencies with this DEIS. I am a member of PARC and I am concerned about the many issues not sufficiently addressed or omitted in the recent DEIS. Please have these items addressed and entered into the public comment section of the process:

1 **A) More Air Quality Issues to Increase in Foothills Reserve Community's**
The Phoenix metro area has had problems for decades meeting the air quality standards for particulate matter (PM) and other criteria pollutants. (Ozone levels are too high in the East Valley and Fountain Hills, for example.) There have been several exceedances of the standards for PM set by EPA under the authorities given the agency by the Clean Air Act (CAA). The problem has been so bad over the years that currently, EPA is examining sanctions that include blocking a billion dollars in highway funds.

2 3 **B) New Health Findings from Studies in Boston, MA and Los Angeles, CA 2011 – 2013 not incorporated in DEIS**
Documented proof submitted to the EPA in studies found health risks from living within 1 mile of 6 lane highways which create fine and ultrafine particulate matter. Impact of living so close to the highway causes: child hood leukemia, asthma, autism, increase of coronary disease, cancer and lung disease. This impact to thousands of nearby school children, adults and elderly needs to be studied and put in DEIS. Past studies from 2005, 2011, 2012 and 2013 facts have not been included in DEIS as requested. Impacts to the families who will remain after the highway is built in Ahwatukee's Foothills Reserve have clearly not been addressed. In addition sound decibel studies of the SMF"s impact to our community and its wild life, including constant compounded sound echo's off the 2 nearby mountain ranges in this unique micro climate have not been addressed in the DEIS as requested. Facts on ultra-fine and fine particulates caused by the project have not been reported nor its health impacts reported with current scientific facts from those experts throughout the United States. All serious health impacts have to take a priority over shorter commutes and business development.

4 **C) Traffic Congestion Issues at West I-10 Junction**
The junction of the South Mountain Freeway on its west end with Interstate 10 may have been an idea conceived many years ago, but the traffic congestion that exists at the area between 59th and 51st Avenues on that freeway during morning and evening rush hours in 2013 is more than extreme. Yet there is no mention in the DEIS of the cumulative impacts and effects of traffic congestion at that proposed junction

5 **D) High-Sulfur Diesel and added benzene increase; Truck Bypass Negated due to added Truck Traffic from Mexico**
The modeling of air pollution impacts in the DEIS do not include the additional air pollution from truck traffic from Mexico. The DEIS briefly mentions the issue, but it claims it has no way to know what impact this would be. Patently absurd. This bypass is also now the designated route of the Canamex Highway, and it is Interstate 8 (south of Casa Grande) to State Highway 85, to Interstate 10, west of the Phoenix metro area. Further, trucks originating in Mexico will be fueled with diesel that doesn't meet the CARB diesel standards adopted by Arizona over a decade ago. In Mexico, there is no regulation about the sulfur in diesel fuel. Once this additional pollution is honestly quantified and factored in, there would be a huge net increase in air pollution from the SMF, and associated increases in asthma, heart disease, premature death, and other adverse health impacts. Truck restriction laws need to be written.

6 2 **E) Air Toxics Already a Crisis but Not Mentioned and Local Specific Data not Gathered nor Updated since 2006**
In 2005, there was an extensive air monitoring of certain toxic chemicals (air toxics) conducted by EPA and ADEQ in a joint effort named the Joint Air Toxics Assessment Program (JATAP). The monitoring sites included a site near St. Johns on the GRIC, and some in west Phoenix and South Phoenix. The JATAP monitoring results were reported in 2006, during a time the data for the DEIS was being gathered, and it found levels of certain toxic chemicals associated with vehicular emissions were above the standard of a one in a million chance of cancer in a lifetime of exposure in the west Phoenix, south Phoenix, and GRIC sites. The JATAP monitoring found in the high end of the monitoring levels, formaldehyde at 34 times this standard; benzene at 8 times this standard, 1,3 butadiene at 7.5 times this standard, acetaldehyde at 3.4 times this standard. And, remember, citizens are being subjected to all of these carcinogens, not just one. Some o chemicals are attributed to "mobile sources," or vehicular traffic burning hydrocarbons. Adding more vehicular traffic emissions by building a freeway where there had not been one would add to this toxic burden. The JATAP results are not included in the DEIS, but instead there is a strange missive about the uncertainty of the risk from these air toxics standards, which is not true. The cancer risk standards have been promulgated and published by EPA after extensive research, and are well-known. See Point B)

7 **F) Risks from Hazardous Materials Transportation Incidents Due to the SMF**
There are no industries using and emitting toxic chemicals in Ahwatukee Foothills, and no hazardous materials (hazmat) transportation issues and risks because none of these chemicals, other than gasoline and diesel, are being shipped into the area, other than incidentally adjacent on Interstate 10, which is east of the area. Since the NEPA process started, Ahwatukee Foothills residents and others have consistently raised concerns about the added risks from the transportation of hazmat on the new NEPA requires examination of cultural, social, and economic impacts, and the new hazmat traffic and risks caused by the SMF would affect all of these topic areas.

8 **G) Blasting South Mountain: Religious, Racial Discrimination of Civil Rights Violations in DEIS**
The DEIS clearly discriminates on the basis of religion and race. ADOT plans for blasting *Muhadagi Doog* (South Mountain) are ongoing civil rights violations .Throughout the DEIS, it is acknowledged that the GRIC and other native American tribes hold *Muhadagi Doog* as a sacred site. From the actual language of the DEIS: "The South Mountains are highly valued and considered sacred by some Native American communities. Building SMF will constitute a violation of the 14th Amendment to the Constitution and a violation of the American Indian Religious Freedom Act as any freeway alternative proposed in the DEIS of the South Mountain Freeway requires blasting away part of *Muhadagi Doog*. New wind patterns caused by cutting thru mountains have not been studied and will cause pollution to be trapped.

Sincerely concerned,
Mrs Nancie Donegan
9 Resident of Foothills Reserve
Also Please save our Church on Pecos. Don't tear it down. Thank

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the U.S. Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).
2	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Operation of the freeway would cause an increase in noise levels that would vary in intensity depending on factors such as amount of traffic, travel speeds, time of day, and day of the week. Nighttime noise levels would be less than daytime noise levels. Some species rely on hearing to avoid predators, communicate, and find food (Noise Pollution Clearinghouse 2004). As noted in the Final Environmental Impact Statement on page 4-136, an increase in traffic noise may affect the ability of some animals to hear at a level necessary for survival when near the proposed action. In addition, hearing loss resulting from vehicle noise has been shown to occur in some desert animals (Bondello and Brattstrom 1979). As discussed in the Noise Analysis Technical Report in support of the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, surrounding topography, and any mitigation measures such as barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
4	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Analysis of impacts in future conditions accounted for cumulative effects of the planned 2035 roadway network including the proposed freeway. 40 Code of Federal Regulations § 1508.7 defines cumulative impacts as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions." The future conditions with and without the proposed freeway are presented in Figure 3-40 on page 3-66 of the Final Environmental Impact Statement. As noted on page 1-13 of the Final Environmental Impact Statement, the 2035 transportation network includes all improvements from the Maricopa Association of Governments *Regional Transportation Plan* except for the proposed freeway in the Study Area. The traffic projections also included Maricopa Association of Governments' projected growth in population, housing, and employment in the Maricopa Association of Governments region, which can result from public or private actions.
5	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
6	**Air Quality**	Assessment of mobile source air toxics is presented in the Draft Environmental Impact Statement beginning on page 4-68 and the summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause significant adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement. Air quality depends on several factors such as the area itself (size and topography), the prevailing weather patterns (meteorology and climate), and the pollutants released into the air. Cuts through the South Mountains would be expected to produce microclimate differences similar to those produced by a series of buildings in a large city that produce localized wind tunnel effects. The mountain cuts, however, would not affect regional air quality or cause air to be trapped.
9	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:33 PM
CALLER: JAUNITA DONALDSON	CALLER ADDRESS: 2909 WEST PALOMINO DRIVE, CHANDLER, AZ 85224
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am very much in support of the South Mountain Freeway. I think it would help everyone get from one point to another point on the south end of town from east to west. I approve it. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Steve Dondanville Document Created: 7/14/2013 7:44:11 PM by Web Comment Form I am completely in favor of this project. The sooner it can be completed the better for all of south Phoenix.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Alex Dondanville Document Created: 7/17/2013 10:08:08 PM by Web Comment Form

To whom it may concern,

As a resident in Laveen Village, I can certainly appreciate the positive impact the SR 202 will have in my immediate community. I'm already experiencing a good amount of traffic and congestion that's exists along 51st Avenue and Southern. While I welcome the new freeway and access point, I do share concerns about the noise pollution. In the nicely illustrated video, it mentions sound barriers will exist wherever applicable and I'd like to ask or request that there be an extensive evaluation to ensure similar or reduced levels of noise. Also, has there been or will there be a study with regards to light pollution stemming from this project? (1) (2)

Thank you for your initiatives and consideration to those within the community.

Alex

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Visual Resources**	Light from the freeway would be produced from vehicle headlights and taillights and from fixed light poles at interchanges along the freeway. Nighttime users of the park and residents of Ahwatukee Foothills Village may see lines of seemingly crawling vehicles, each with lights front and back. Fixed freeway lighting would be provided for safety reasons only at interchange exit and entrance points. Freeway lighting at these locations would be designed to reduce illumination spillover onto sensitive light receptors such as residential areas (see page 3-58 of the Final Environmental Impact Statement).

Code	Comment Document

Michael Doromal

Document Created: 5/21/2013 2:20:56 PM by Web Comment Form

I am for the loop 202. My family and I moved to Laveen in 2004 and we love our community. Laveen is an underserved community with no hospitals, retail and food establishemnts to serve our community. Not having a freeway increases drive times to other parts of the valley and with all the growth projected for Laveen in the coming years, the situation will only get worse.

1

In addition, this is a shovel ready project that will add hundreds of construction jobs immediately as well as provide more jobs in the area once companies start coming to Laveen. (i.e. the hospital, retail etc).

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Michael Doromal Document Created: 5/24/2013 2:23:49 PM by Web Comment Form I am for the building of the loop 202. Laveen us underserved and we are in need of healthcare facilities as well as retail establishments. This has been voter approved 2 times and is already budgeted for. This will create jobs immediately and for the long term. In addition, this will make the access from the west valley to the south east valley so much easier and convenient.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4372

1 MS. DOROMAL: Hi, good afternoon. My name is
2 Lisa Doromal and I am a resident of Laveen and I am for
3 the Loop 202 to bring sustainability to our community and
4 have the hospital brought in, it is all contingent with
5 the 202 being built. Thank you.
6 THE FACILITATOR: Thank you.
7 Mike Doromal.
8 MR. DOROMAL: Good afternoon. My name is
9 Michael Doromal, I'm also for the Loop 202. Laveen is an
10 underserved community, there's a lot of services and
11 businesses that will come into Laveen once the 202 is
12 built. The residents are looking for it. It's been an
13 option since the '80s, so let's get this freeway built.
14 Thank you.
15 THE FACILITATOR: Thank you.
16 Brian Stadnick.
17 MR. STADNICK: Yes, good afternoon. I'm Brian
18 Stadnick, I'm a resident of Glendale, but I use the West
19 Valley freeways extensively and I think it's with the
20 help to aid the traffic congestion in the I-10, plus I
21 think that now is the perfect time to build this freeway.
22 The contracting environment and the economy the way it
23 is, I think there's no time like the present to be able
24 to build this thing for the cost savings of the public,
25 so let's get this thing built. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4373

MS. DOROMAL: Hi, good afternoon. My name is Lisa Doromal and I am a resident of Laveen and I am for the Loop 202 to bring sustainability to our community and have the hospital brought in, it is all contingent with the 202 being built. Thank you.

THE FACILITATOR: Thank you.

Mike Doromal.

MR. DOROMAL: Good afternoon. My name is Michael Doromal, I'm also for the Loop 202. Laveen is an underserved community, there's a lot of services and businesses that will come into Laveen once the 202 is built. The residents are looking for it. It's been an option since the '80s, so let's get this freeway built. Thank you.

1

THE FACILITATOR: Thank you.

Brian Stadnick.

MR. STADNICK: Yes, good afternoon. I'm Brian Stadnick, I'm a resident of Glendale, but I use the West Valley freeways extensively and I think it's with the help to aid the traffic congestion in the I-10, plus I think that now is the perfect time to build this freeway. The contracting environment and the economy the way it is, I think there's no time like the present to be able to build this thing for the cost savings of the public, so let's get this thing built. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Friday, July 12, 2013 12:26:44 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: ROBERT DOTSON [mailto:rjd1@flash.net]
Sent: Friday, July 12, 2013 10:44 AM
To: Projects
Subject: South Mountain Freeway

South Mountain Freeway Study Team:

Attached please find my comment letter concerning the Draft Environmental Impact Study.

It's my understanding that these comments will be included in the Final Environmental Impact Study.

Very truly yours,

Robert J. Dotson

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

16041 S. 7th Drive
Phoenix, AZ 85045

July 12, 2013

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD 126F
Phoenix, AZ 85007

VIA EMAIL

To: South Mountain Study Team

(1) I am opposed to the proposed route of the South Mountain Freeway (SMF) along Pecos Road and through South Mountain Park for the reasons set forth below. Overall, the proposed route along Pecos Road will bring great harm to the adjacent neighborhoods, homes, residents, businesses, churches, and schools, as well as to South Mountain itself.

(2) (3) (4) 1. The proposed route will serve to encourage increased truck traffic through the area, which will no doubt include thousands of trucks from Mexico, which have higher sulphur emissions and are not bound by U.S. emissions regulations, resulting in huge increases in air pollution in the adjacent residential areas. The SMF will amount to little more than a by-pass of the Phoenix metropolitan area by interstate traffic along I-10 and will not significantly improve traffic conditions for the local population. Indeed, during construction local vehicular traffic will be forced off Pecos Road, for several years, and onto the only other two east-west roadways in the vicinity (Ray Road and Chandler Boulevard), resulting in traffic delays and higher levels of air and noise pollution on the surface streets in the area.

(5) (6) (7) (8) (9) 2. Unlike many other highways in the Phoenix area which the Draft Environmental Impact Study (DEIS) compares to the SMF, this new stretch of interstate highway will not facilitate movement of traffic in the Phoenix area itself, but will simply relieve some congestion in the center of the city that now results from the use of I-10 as a route to California for heavy trucks and other cross-country vehicular traffic. Unlike many portions of the other highways that transverse Phoenix and its surrounding communities the SMF will not be built below grade. For this reason alone, the air and noise pollution from the SMF will have a far greater impact on the residential areas that are located between the SMF and South Mountain Park. The air pollution will be trapped by South Mountain itself, so that it will be concentrated in the adjacent residential areas, particularly in the summer months when the winds are predominantly from the south. Furthermore, because the SMF is designed and intended to attract interstate traffic, the concentration of large trucks on the SMF will result in substantially more air and noise pollution than is the case on other highways in Phoenix.

Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need, Lack of Support**	
4	**Noise**	During construction of the proposed South Mountain Freeway, traffic would be maintained along Pecos Road to the greatest extent practicable, similar to the construction process on other highways, such as Price Freeway. However, there would be necessary restrictions and periodic closures that would force east–west traffic to use alternative routes other than Pecos Road. While this detoured traffic would increase noise and air pollution along the alternative routes, this would be a short-term and temporary condition that would end when the freeway construction is completed (see Final Environmental Impact Statement page 4-90).
5	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
6	**Design**	The project team analyzed the belowground option, also called the depressed freeway option. The analysis indicated that depressing the freeway would increase the cost of construction and right-of-way acquisition, displace additional residences, create the need for additional pump stations and detention basins, and still need the installation of noise barriers. Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study (see Final Environmental Impact Statement pages 3-15 and 3-18).

(Responses continue on next page)

Code	Comment Document

3. The substantial increase in truck traffic that will result from the construction of the SMF will increase the risk to residents of the area of accidents involving the release of hazardous materials. With only two major roadways available, evacuation of the residential areas adjacent to the SMF presents an extremely difficult problem that needs to be addressed and planned for. The DEIS does not even address this kind of potentially catastrophic event. (10)

4. The DEIS fails to address other possible routes for the I-10 Bypass, such as a route along property under the control of the Gila River Indian Community (GRIC), or any other alternative route. One viable alternative that has been completely ignored by the DEIS would be to re-route I-10 south of Casa Grande, west along I-8 to SR 85. SR-85 is already a highway, and could more easily be upgraded as a part of I-10 from I-8 to the point west of Goodyear where it could rejoin I-10 again. Not only would construction of this route be far less disruptive, it avoids the destruction of a large portion of South Mountain Park and would not substantially contribute to the air and noise pollution of the Phoenix metropolitan area. In failing to evaluate other possible alternatives, the DEIS does not comply with applicable law. (11) (12)

5. The proposed route along Pecos Road will result in great harm to South Mountain Park as a recreational area, not to mention disturbing and destroying plant and animal life in the vicinity. It is also noteworthy that South Mountain itself is considered sacred by the GRIC, a fact which has been widely reported but is apparently of no concern to those in charge of making decisions about the SMF. (13) (14) (15)

6. Construction of the SMF along the proposed route carries significant risks to water resources in the area. South Mountain obviously plays a significant role in water runoff, yet the DEIS does not address this issue. Once South Mountain has been dynamited to make way for the new highway, how will runoff be affected? No one knows, and the question is not resolved in the DEIS. In addition, there is a risk to unknown numbers of water wells in the area. What impact will damage to these wells have for residents, businesses, lakes, and golf courses in the area? The DEIS provides no insight. (16) (17)

The proposed alignment ignores much of the development that has occurred in the Ahwatukee area over the past 30 years, which now renders the planned route not only obsolete but potentially catastrophic for residents of the area. For all of these reasons, the DEIS should be rejected as inadequate, incomplete, and contrary to the requirements of law. (18)

Respectfully submitted,

Robert J. Dotson

cc: Protecting Arizona's Resources and Children (PARC)

Code	Issue	Response
7	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Meteorological information was considered in the air quality analyses [*Air Quality Assessment: South Mountain Freeway (SR 202L)*, dated March 1, 2013] conducted for the proposed action. Data from Maricopa County Air Quality Department and from the Gila River Indian Community monitoring station were compared with two, 1-month studies conducted during the winter of 2006 and the spring of 2007 along Pecos Road in the Study Area. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Reservation Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows winds and stable atmospheric conditions, the wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns will tend to have a flow from the easterly component as the air flows from the east to the lower elevations along the Gila River. During the warmer hours with improved mixing, the flows typically follow the river channel and come from the north and northwest toward the south and southeast.
8	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Noise modeling for the Draft and Final Environmental Impact Statements used this forecast truck traffic, with the model accounting for greater noise generation by trucks in the future (see Final Environmental Impact Statement page 4-88). Noise mitigation is designed for this predicted noise level, including the noise from trucks.
9	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Hazardous Materials**	
11	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being

(Response 11 continues on next page)

Code	Comment Document

Code	Issue	Response
11 (cont.)		reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
12	**Alternatives**	In accordance with the National Environmental Policy Act, a range of reasonable action alternatives to carry forward for further analysis was determined through application of multidisciplinary criteria in a logical, step-wise progression. Alternatives were not disposed of or dismissed without a thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process presented in Chapter 3 of the Draft Environmental Impact Statement. The Preferred Alternative was the outcome to this process.
13	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
14	**Cultural Resources**	
15	**Biology, Plants, and Wildlife**	
16	**Surface Water**	Drainage studies have been conducted; culverts would be maintained, and new culverts would be installed to maintain flows under the freeway (see Draft Environmental Impact Statement pages 3-58 and 4-101). Surface water could be altered from runoff drainage; seeding the disturbed soils with native vegetative species would help to minimize runoff and erosion. Best management practices associated with the project Stormwater Pollution Protection Plan would also help minimize runoff. To control construction-related pollution discharges to waters of the United States as defined in the Clean Water Act, the Arizona Department of Transportation would prepare erosion and sediment control plans, details, and specifications using best management practices from the Arizona Department of Transportation Erosion and Pollution Control Manual for Highway Design and Construction and the Arizona Department of Transportation Post-Construction Best Management Practices Manual for Highway Design and Construction.
17	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Draft Environmental Impact Statement page 4-108.)
18	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comment on Loop 202 South Mountain
Date: Thursday, May 16, 2013 8:12:01 AM

From: Dianne Douglas [mailto:Dianne.Douglas@asu.edu]
Sent: Wednesday, May 15, 2013 10:34 PM
To: Projects
Subject: Comment on Loop 202 South Mountain

(1) (2) Absolutely **not** on the Loop 202 South Mountain Freeway. I moved into the South Mountain community to enjoy the South Mountain Park and do not want this natural habitat ruined by vehicles, exhaust fumes, and accidents with the wildlife that live on the mountains. This is the last natural habitat in the city that you can go to get away from people and vehicles. If you take this away from us, then we will be forced to go outside of the city. This is a sanctuary away from the busy world and it's home to many wildlife that have a purpose.

(3) I'm not seeing very much concern for the wildlife that call South Mountain their home. How will this freeway benefit them? We have taken and take from the wildlife and the environment and it's time that we stop being so greedy and leave well enough alone. This decision can't be all about humans taking more away from the wildlife. All animals are individuals and they have feelings and thoughts and they suffer the pain and the joy that we do. They are entitled and they deserve an opportunity to live. We must stop kicking animals out of their habitat or killing them because we perceive them to be in our way, and learn to co-exist with them.

(4) NO on the Loop 202 South Mountain Freeway. I looked at homes on the south side of South Mountain and considered those because they were isolated from traffic. People who moved into that community did so because of the isolation. If they wanted to live by a freeway, they would have moved closer to it.

"The greatness of a nation and its moral progress can be judged by the way its animals are treated." Mahatma Gandhi

Dianne Douglas
2723 E Valencia Drive
Phoenix, AZ 85042
602-268-7065
dddouglas7@juno.com

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Biology, Plants, and Wildlife**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comment on Loop 202 South Mountain
Date: Tuesday, May 14, 2013 9:47:22 AM

From: Dianne Douglas [mailto:Dianne.Douglas@asu.edu]
Sent: Wednesday, May 08, 2013 7:09 AM
To: Projects
Subject: Comment on Loop 202 South Mountain

1 2

Absolutely **not** on the Loop 202 South Mountain Freeway. I moved into the South Mountain community to enjoy the South Mountain Park and do not want this natural habitat ruined by vehicles, exhaust fumes, and accidents with the wildlife that live on the mountains. This is the last natural habitat in the city that you can go to get away from people and vehicles. If you take this away from us, then we will be forced to go outside of the city. This is a sanctuary away from the busy world and it's home to many wildlife that have a purpose.

3

I'm not seeing very much concern for the wildlife that call South Mountain their home. How will this freeway benefit them? We have taken and take from the wildlife and the environment and it's time that we stop being so greedy and leave well enough alone. This decision can't be all about humans taking more away from the wildlife. All animals are individuals and they have feelings and thoughts and they suffer the pain and the joy that we do. They are entitled and they deserve an opportunity to live. We must stop kicking animals out of their habitat or killing them because we perceive them to be in our way, and learn to co-exist with them.

4

NO on the Loop 202 South Mountain Freeway. I looked at homes on the south side of South Mountain and considered those because they were isolated from traffic. People who moved into that community did so because of the isolation. If they wanted to live by a freeway, they would have moved closer to it.

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Code	Issue	Response
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4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comment on Loop 202 South Mountain
Date: Tuesday, April 30, 2013 8:53:13 AM

From: Dianne Douglas [mailto:Dianne.Douglas@asu.edu]
Sent: Friday, April 26, 2013 8:11 PM
To: Projects
Subject: Comment on Loop 202 South Mountain

I've tried several times on 2 different computers to submit comments on the Loop 202 South Mountain project and cannot get my comments to go through. When I hit submit, I get a message asking for me to fill in 'country'. I have selected the United States every time and still it will not let me submit.

This is my comment and information.

1 2

Absolutely not on the Loop 202 South Mountain Freeway. I moved into the South Mountain community to enjoy the South Mountain Park and do not want this natural habitat ruined by vehicles, exhaust fumes, and accidents with the wildlife that live on the mountains. This is the last natural habitat in the city that you can go to get away from people and vehicles. If you take this away from us, then we will be forced to go outside of the city. This is a sanctuary away from the busy world and it's home to many wildlife that have a purpose. All animals are individuals and they have feelings and thoughts and they suffer the pain and the joy that we do. They are entitled and they deserve an opportunity to live. We must stop kicking animals out of their habitat or killing them because we perceive them to be in our way, and learn to co-exist with them.

4

NO on the Loop 202 South Mountain Freeway. I looked at homes on the south side of South Mountain and considered those because they were isolated from traffic. People who moved into that community did so because of the isolation. If they wanted to live by a freeway, they would have moved closer to it.

5

"The greatness of a nation and its moral progress can be judged by the way its animals are treated." Mahatma Gandhi

Dianne Douglas
2723 E Valencia Drive
Phoenix, AZ 85042
602-268-7065
dddouglas7@juno.com

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Biology, Plants, and Wildlife**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comment on Loop 202 South Mountain
Date: Friday, May 24, 2013 9:17:13 AM

From: Dianne Douglas [mailto:Dianne.Douglas@asu.edu]
Sent: Friday, May 24, 2013 9:14 AM
To: Projects
Subject: Comment on Loop 202 South Mountain

1 2

Absolutely **not** on the Loop 202 South Mountain Freeway. I moved into the South Mountain community to enjoy the South Mountain Park and do not want this natural habitat ruined by vehicles, exhaust fumes, and accidents with the wildlife that live on the mountains. This is the last natural habitat in the city that you can go to get away from people and vehicles. If you take this away from us, then we will be forced to go outside of the city. This is a sanctuary away from the busy world and it's home to many wildlife that have a purpose.

3

I'm not seeing very much concern for the wildlife that call South Mountain their home. How will this freeway benefit them? We have taken and take from the wildlife and the environment and it's time that we stop being so greedy and leave well enough alone. This decision can't be all about humans taking more away from the wildlife. All animals are individuals and they have feelings and thoughts and they suffer the pain and the joy that we do. They are entitled and they deserve an opportunity to live. We must stop kicking animals out of their habitat or killing them because we perceive them to be in our way, and learn to co-exist with them.

4

NO on the Loop 202 South Mountain Freeway. I looked at homes on the south side of South Mountain and considered those because they were isolated from traffic. People who moved into that community did so because of the isolation. If they wanted to live by a freeway, they would have moved closer to it.

"The greatness of a nation and its moral progress can be judged by the way its animals are treated." Mahatma Gandhi

Dianne Douglas
2723 E Valencia Drive
Phoenix, AZ 85042
602-268-7065
dddouglas7@juno.com

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Code	Issue	Response
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2	**Air Quality**	
3	**Biology, Plants, and Wildlife**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comment on South Mountain
Date: Thursday, June 27, 2013 1:20:20 PM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Dianne Douglas [mailto:Dianne.Douglas@asu.edu]
Sent: Thursday, June 27, 2013 10:56 AM
To: Projects
Subject: Comment on South Mountain

1 2

Absolutely not on the Loop 202 South Mountain Freeway. I moved into the South Mountain community to enjoy the South Mountain Park and do not want this natural habitat ruined by vehicles, exhaust fumes, and accidents with the wildlife that live on the mountains. This is the last natural habitat in the city that you can go to get away from people and vehicles. If you take this away from us, then we will be forced to go outside of the city. This is a sanctuary away from the busy world and it's home to many wildlife that have a purpose. All animals are individuals and they have feelings and thoughts and they suffer the pain and the joy that we do. They are entitled and they deserve an opportunity to live. We must stop kicking animals out of their habitat or killing them because we perceive them to be in our way, and learn to co-exist with them.

3

4

NO on the Loop 202 South Mountain Freeway. I looked at homes on the south side of South Mountain and considered those because they were isolated from traffic. People who moved into that community did so because of the isolation. If they wanted to live by a freeway, they would have moved closer to it.

"The greatness of a nation and its moral progress can be judged by the way its animals are treated." Mahatma Gandhi

Sincerely,
Dianne Douglas
2723 E Valencia Drive
Phoenix, AZ 85042

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Biology, Plants, and Wildlife**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comment on South Mountain
Date: Monday, June 24, 2013 8:47:29 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Dianne Douglas [mailto:Dianne.Douglas@asu.edu]
Sent: Monday, June 24, 2013 8:30 AM
To: Projects
Subject: Comment on South Mountain

1 2

Absolutely not on the Loop 202 South Mountain Freeway. I moved into the South Mountain community to enjoy the South Mountain Park and do not want this natural habitat ruined by vehicles, exhaust fumes, and accidents with the wildlife that live on the mountains. This is the last natural habitat in the city that you can go to get away from people and vehicles. If you take this away from us, then we will be forced to go outside of the city. This is a sanctuary away from the busy world and it's home to many wildlife that have a purpose. All animals are individuals and they have feelings and thoughts and they suffer the pain and the joy that we do. They are entitled and they deserve an opportunity to live. We must stop kicking animals out of their habitat or killing them because we perceive them to be in our way, and learn to co-exist with them.

3

4

NO on the Loop 202 South Mountain Freeway. I looked at homes on the south side of South Mountain and considered those because they were isolated from traffic. People who moved into that community did so because of the isolation. If they wanted to live by a freeway, they would have moved closer to it.

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Sincerely,
Dianne Douglas
2723 E Valencia Drive
Phoenix, AZ 85042

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Biology, Plants, and Wildlife**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: John Dowd
To: Projects
Subject: Opposition to DEIS/SMF
Date: Wednesday, July 24, 2013 11:30:41 PM

To Whom it may concern,
I need to voice my family's strong opposition to the South Mountain Freeway. My wife and I have both grown up in and around the Ahwatukee area and Pecos Road has played a large role in our staying in this small community. We use Pecos in its current form regularly for running and biking . It is one on the reasons we are drawn to this area. A freeway will keep us from doing those things and damage the seclusion many in our community sought out in this area.

Besides our personal reasons we believe it is an ill conceived and outdated plan for the whole area. The proposed plan will create undue stress on the smaller streets and direct high volumes of traffic through school zones and residential areas (ex, Desert Vista/no 32nd street entrance)The plan is outdated and needs to be somewhere else. I don't doubt Phoenix could benefit from a bypass freeway, but not where Pecos stands. It needs to be on GRIC land or further south. It is time Phoenix put together a new plan that isn't based on drawings from 1985.

Thank You,
John and Kate Dowd
(members of PARC)

Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Traffic**	The study has considered concepts for parallel multiuse paths, however the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
3	**Alternatives**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Draft Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
4	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

Michael Dowodzenka Document Created: 6/4/2013 9:10:00 AM by Web Comment Form

I have lived in the valley since 1974 and have seen a lot of highway construction over the time. I have also seen a lot of re-doing the freeway construction to make it wider, add ramps, etc. Wouldnt it make sense to go out to connect to Loop w101? Then at a later date, build an addition to 71st ave or 59th ave? You know the east bound cars, semis going towards Tucson will use it no matter where it is located, so why not get them in the direction sooner and it would be nice to have less semis in the city limits on our roads. Also people in the east, south valley needing to go to sporting events, etc in the west valley will have a easier, less congested trip. Should be a toll road so that tax payers who do not use it dont have to pay for it.

1
2
3

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa County region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects, including the proposed freeway. Tolls would not be involved.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:15 PM
CALLER: BERNIE DOYAL	CALLER ADDRESS: 9486 E. MONTEBELLO, SCOTTSDALE, AZ 85250
PHONE: 480-362-3847	EMAIL:
CALLER REMARKS/QUESTIONS: I approve of the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:36:10 AM

From: Stephen Drake [mailto:sdrake@optimafr.com]
Sent: Friday, May 17, 2013 9:16 PM
To: Projects
Subject: 202

1

We support the 202 and on tribal land if possible!

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Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 10:42 AM
CALLER: GARY DRAKE	CALLER ADDRESS: CHANDLER, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I live in Cooper Commons in Chandler and I approve, I support the South Mountain Freeway project. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Alice Driscoll Document Created: 7/17/2013 7:16:53 PM by Web Comment Form

1 2 3 4

Please don't build the highway on Pecos road it will ruin our value of homes and the air will HAVE TOXINS IN IT FROM THE TRAFFIC! WE DON'T NEED TRUCKS TRAVELING THRU CARRYING DANDEROUS MATERIALS!

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Hazardous Materials**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: vote
Date: Monday, May 20, 2013 8:22:13 AM

From: Erika Driver-Dunckley [mailto:erika_travis@cox.net]
Sent: Monday, May 20, 2013 5:58 AM
To: Projects
Subject: vote

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F
Phoenix, AZ 85007

Attention to: study team panel

I am writing in support and vote YES to the Loop 202 South Mountain Freeway, specifically the W59 alternative.

As a Laveen resident I am forced to deal with congested traffic along on the Baseline corridor from 99th Ave to I10 . The severe lack of retail shopping, restaurants, medical facilities, and entertainment forces revenue and tax dollars to be driven outside of Phoenix as residents frequent Avondale, Tolleson, Chandler, Scottsdale, and Tempe to shop, dine, etc. This freeway and the socio-economic infrastructure it will bring to our community is desperately needed!

After researching this issue, allow me to share some of the reasons I urge you to approve this freeway expansion:

- 64.3% of likely voters in Maricopa County support construction of this freeway
- In a separate study, also commissioned by We Build Arizona, 59% of likely voters in Ahwatukee and Laveen Support this freeway as well.

- It is time to end the commuter traffic jams and congestion we experience not having easy access to the freeway and connection of the East/West Valley.
- If we don't build the South Mountain freeway, traffic in the region will get much worse over the next two decades. According to ADOT's own study:
- Traffic on the I-10 between Ahwatukee and Goodyear will grow 28%
- Another 103,000 cars will use Broadway Curve each day
- Another 38,000 cars will jam the Tunnel every day
- Morning and evening commute times will increase 39% to 82%
- Traffic congestion on city streets will increase 46%
- The same report indicates the project will also reduce air pollution by reducing the time vehicles spend stuck in traffic
- The project will create 30,000 jobs during the five to six year construction period and result

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

in a $2Billion investment in the Phoenix-area economy.

- The money to the build the freeway is in the budget, it was voted on and approved TWICE (1985 & 2004 respectively),we voted for the 1/2cent tax increase in 2004 to support the build.
- There is no more important project to the area's commuters and workers than the South Mountain Freeway project. Please vote to Build It NOW!

Please consider the following request when making your YES vote:

1 2

- Design and construction of community value additions such as attractive sound barriers and a bike/running/pedestrian pathalong the length of the freeway as well as the use of Rubberized asphalt as per the ADOT's "Quiet Pavement Pilot Program" initiated in 2002.
- We have award winning examples in Tucson, AZ which received an excellence award in 2002 by the Federal Highway Administration (FHWA) for the Diamondback bicycle/pedestrian bridge as well as it's Intelligent Transportation Systems excellence award for ITS public-private partnership.
- Other examples are the Schuylkill Expressway in Philadelphia, the Rockville Parkway in DC, and the San Antonio,TX Freeway systems ranked best among largest US urban areas.

Thank you in advance for your vote of YES to support of this freeway!

Sincerely,

Erika

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Code	Issue	Response
1	**Design**	The study has considered concepts for parallel multiuse paths, however the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
2	**Noise**	The Arizona Department of Transportation plans to use rubberized asphalt on the proposed South Mountain Freeway. Rubberized asphalt would be used as the top level of paving; it is discussed on Final Environmental Impact Statement page 4-99 and in the sidebar on page 4-100. Studies show that rubberized asphalt, on average, reduces noise levels by about 4 A-weighted decibels, which is a noticeable reduction. The noise analysis completed for the Final Environmental Impact Statement does not include a reduction for rubberized asphalt because the Federal Highway Administration does not currently allow such a reduction. So, the actual noise levels along the freeway may be as much as 4 A-weighted decibels lower than the mitigated noise levels shown in the Final Environmental Impact Statement because of the additional reduction provided by the rubberized asphalt.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 5:26 PM
CALLER: GARY DROWN	CALLER ADDRESS: 12816 N. 15TH AVENUE, PHOENIX, AZ 85029
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support…I support the South Mountain Freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 6:27 PM
CALLER: MELBY DU BACH	CALLER ADDRESS: 14441 WEST WINWARD AVENUE, GOOD YEAR, ARIZONA 85395
PHONE: 623-535-4046	EMAIL:
CALLER REMARKS/QUESTIONS: Yes, I'm calling to support the freeway that goes along Pecos by Ahwatukee and then connects to I-10. It's been voted on and agreed to and I think it should get started. Again, I support this freeway being built. Feel free to give me a call if you have any questions. Bye, bye.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Letter Commenting on DEIS for South Mountain Truck Bypass
Date: Monday, May 20, 2013 8:47:40 AM
Attachments: ADOT Letter.doc

-----Original Message-----
From: gdugan2@netzero.net [mailto:gdugan2@netzero.net]
Sent: Friday, May 17, 2013 3:19 PM
To: Projects
Cc: PARCtheSMF@aol.com
Subject: Letter Commenting on DEIS for South Mountain Truck Bypass

ADOT,

As I am unable to attend the public meeting scheduled for May 21st, I have attached my letter commenting on the proposed South Mountain Truck Bypass.

George R. Duganz
PARC
Phoenix, Az.

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

ADOT

RE: South Mountain Diesel Truck Bypass DEIS

I arrived in Phoenix in August, 1964 to attend Arizona State University. Besides living in southern California for 6 months in 1971, I have lived in Phoenix since then. In 1964, things were very different in terms of transportation corridors. The Black Canyon Freeway (I-17) was the only existing freeway. There was an underpass built under I-17 at the Durango curve to accommodate the coming extension of I-10. It should have remained there. By moving it through central Phoenix and having the loop 202 and highway 51 inter change, ADOT/MAG have created one of the worst bottlenecks in America.

As metropolitan Maricopa County grew, the first new freeway opened was I-10 from the Sky Harbor Airport area south towards Tucson. State route 60 going east through Tempe was next. At that point, ADOT created the first traffic nightmare in the making – what is commonly referred to as the Broadway curve, as if the curve in the road is what is creating the terrible rush hour congestion. It was about then that the public noticed that we could have a coming congestion problem similar to what was occurring in southern California. What was said by ADOT then was "don't worry – we will learn from their mistakes and that will not happen here". Really?

By now, anyone who drives on urban freeways understands that besides sheer volume, two biggest causes of congestion are interchanges and lane changing. A half interchange is just as bad as a full interchange. The engineering at the I-10, State 60, and the State 143, with entrances and exits at Baseline and Broadway roads is abysmal. Nothing will ever fix this mess, including building the South Mountain Truck Bypass. On the western side of this truck bypass, ADOT/MAG wants to build another half interchange halfway between the I-10/101 half interchange and the I17/I10 interchange just about 5 miles in each direction. During rush hour the congestion on the I-10 from the I17 to the 101 is terrible already. ADOT's own study group recommended that the western leg of this truck bypass should meet at the I10/101 half interchange. This simple commonsense recommendation has been ignored. Why? Perhaps because of the desire to accommodate a Phoenix city councilman's demands for a hospital and additional business development in Laveen? I do not remember anything about a hospital and business development when voting to increase sales taxes to improve transportation in Arizona.

In the mid 1980's, the citizens of Arizona were told that we need to spend more money to fix these problems – a 20 year increase in sales taxes. MAG then became involved. Years later, a second request was made for even more money to fix the transportation problems. Twice now the citizens of Arizona have voted to give ADOT/MAG BILLIONS of dollars to improve the transportation issues in Maricopa County and what do we have? A foolish proposal to spend $100 million PER MILE to build a truck bypass south of the Phoenix metro area that they say will perhaps make the congestion and pollution problems better. At least 2 BILLION DOLLARS for twenty two miles of truck bypass. There aren't words to describe this proposal.

ADOT has already spent over $20 million creating the recently released Draft EIS. This is criminal. Now they are spending untold amounts of taxpayer dollars advertising their meetings to sell this proposal to the public, providing free transportation and parking and

1

2

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	

Code	Comment Document

who knows what else, full well knowing that technically the Draft EIS can not support itself.

They say that this truck bypass will reduce air pollution in the Broadway curve area. They then say that they don't know what it will do to the pollution in the Ahwatukee foothills area since the truck bypass is not there yet. They say that they don't know about the volume of trucks burning high sulfur Mexican diesel fuel that will pass by Ahwatukee and through west central Phoenix, even though the number of trucks passing through the Nogales port of entry are counted every day. All this truck bypass will do is possibly shift the air pollution from one area to two other areas. The possibility of a hazmat disaster right next to Ahwatukee is not even considered in this DEIS. How would the thousands of residents get out in time with something like a chlorine spill? They would not be able to escape.

When ADOT built I-10 through the middle of the Gila River Nation's reservation years ago, many promises were made, but not kept. This is one reason that the GRIC does not trust working with ADOT at this point in time. The South Mountain has tremendous cultural and religious meaning to the Gila nation – it is called Muhadagi Doog. Yet ADOT/MAG sees no problem blasting away the western end of the mountain for its truck bypass. There are laws protecting the Phoenix North Mountain preserve, but I guess the Gila Nation's religious site does not matter when it comes to building a truck bypass.

This South Mountain Truck Bypass is a total disaster in the making, from the sheer financial cost to the increased pollution problems to the trampling of the Gila Nation's culture. It is nothing more than ADOT listening to the trucking industry instead of watching out for the best interests of the citizens of Phoenix and Maricopa County. It should be immediately scrapped and the money spent on a truck bypass along the I-8/State route 85 corridor well west of metro Phoenix.

George R. Duganz
PARC
Phoenix, Az.

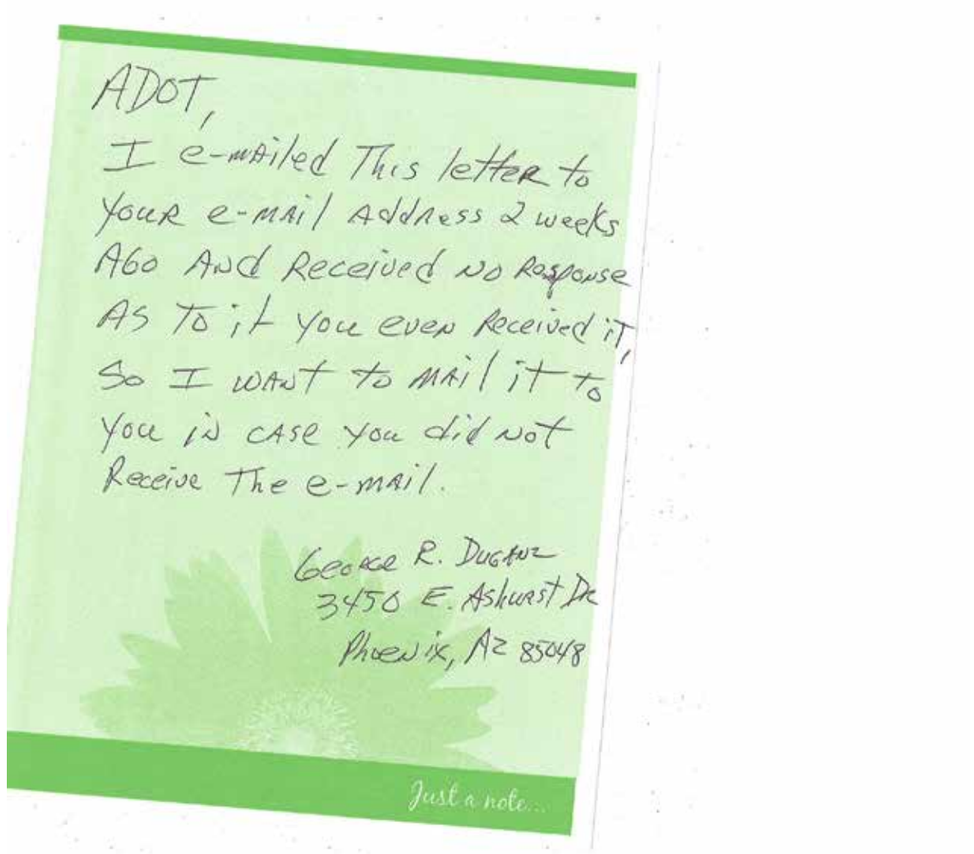
Code	Issue	Response
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Trucks**	
5	**Hazardous Materials**	
6	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Purpose and Need, Truck Bypass**	
9	**Cultural Resources**	
10	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

Code	Comment Document



Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

ADOT

RE: South Mountain Diesel Truck Bypass

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2	**Alternatives, W59 Alternative Versus W101 Alternative**	

(Comment codes continue on next page)

Code	Comment Document

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3 They say that this truck bypass will reduce air pollution in the Broadway curve area.
4 They then say that they don't know what it will do to the pollution in the Ahwatukee foothills area since the truck bypass is not there yet. They say that they don't know about the volume of trucks burning high sulfur Mexican diesel fuel that will pass by Ahwatukee and through west central Phoenix, even though the number of trucks passing through the Nogales port of entry are counted every day. All this truck bypass will do is possibly shift the air pollution from one area to two other areas.
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6 The South Mountain has tremendous cultural and religious meaning to the Gila nation – it is called Muhadagi Doog. Yet ADOT/MAG sees no problem blasting away the western end of the mountain for its truck bypass.
7 1 There are laws protecting the Phoenix North Mountain preserve, but I guess the Gila Nation's religious site does not matter when it comes to building a truck bypass.
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George R. Duganz
PARC
Phoenix, Az.

Code	Issue	Response
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(Responses continue on next page)

Code	Comment Document

GOVERNOR'S OFFICE
AGENCY ACTION FORM # 87372

ROUTED TO
TRANSPORTATION DEPT
DIRECTOR

CORRESPONDENCE FROM
George R Duganz
3450 E. Ashurst Dr.
Phoenix, AZ 85048

SUBJECT
AGENCY REFERRALS
Please respond on behalf of the Governor's Office.

SENT DATE
Tuesday, June 04, 2013

RECEIVED
JUN - 5 2013
AZ Dept of Transportation
Director's Office

REPLY BY DATE
Thursday, July 04, 2013

ACTION TO BE TAKEN:

Respond directly on behalf of the governor and return a copy of your response to the Governor's Office of Constituent Services with control number.

Special comments or instructions:

PLEASE RESPOND TO THE GOVERNOR'S OFFICE
Keep this form and the attached letter for your agency files
Address any questions to the Office of Constituent Services at (602) 542-1318
FAX: (602) 542-1381

6/4/2013 11:39:04 AM Lydia Cruz

Code	Issue	Response
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Cultural Resources**	
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Code	Comment Document

From: Projects
To: ADOT
Subject: FW: HEAT ISLAND CREATION IN PHOENIX
Date: Tuesday, July 09, 2013 3:55:15 PM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: gdugan2@netzero.net [mailto:gdugan2@netzero.net]
Sent: Tuesday, July 09, 2013 3:20 PM
To: Projects
Cc: PARCtheSMF@aol.com
Subject: HEAT ISLAND CREATION IN PHOENIX

ADOT,

1 Much has be said about the heat island that all of the concrete and steel has created in the Phoenix Metro area in the last decade. The result is nighttime temperatures that stay in the 90 + degree range all summer. As a result, we get more dust storms than rain storms anymore. When a real monsoon rainstorm finally manages to force itself into the metro area, it is so severe that extreme damage from micro bursts occurs. Building a concrete and steel band a couple of hundred feet wide that runs 20 miles along the entire south side of our metropolitan area will be the final straw that will cause the monsoon storms to never enter our area - the rain will continue to stop just north of Casa Grande and our low temperatures will soon remain over 100 degrees overnight all summer long. How do you plan to "mitigate" for that in building your diesel truck bypass freeway?

2

George R. Duganz
PARC
Lakewood

_____

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Code	Issue	Response
1	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

1 MR. DUGANZ: Regarding the Draft Environmental
2 Impact Statement, the original plan, over 30 years ago,
3 envisioned this freeway as a four-lane commuter freeway, below
4 grade, minimizing noise and air pollution. The original
5 developer, Charles Keating, donated land for this when Lakewood
6 was built.
7 ADOT changed, as recently as four years ago, to a
8 eight-lane super diesel truck bypass freeway for the trucking
9 industry, not for the residents.
10 This DEIS, that ADOT has spent over $20 million
11 for, is a fraudulent study to justify this, not analyze it,
12 analyze the impact.
13 It will be destroying over 200 homes, a church,
14 wellheads, and the lifestyle of Ahwatukee Foothills and
15 Lakewood. The proof is ADOT always planned this by offering,
16 over three years ago, before this DES was even released, to buy
17 a church and buying up homes and properties.
18 The cost of this fiasco will be over $100 million
19 per mile. And that is minimal, before ADOT has to mitigate
20 problems not even yet encountered. It's the most expensive
21 freeway ever built in America.
22 It will do nothing more than move air pollution,
23 not reduce it.
24 ADOT engineering, over the past 30 years, has been
25 awful, blowing billions of dollars of taxpayer money. Their

1 2 3 4 5

Page 3

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www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See the text box on Final Environmental Impact Statement page 4-108.)
4	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The Arizona Department of Transportation purchased some right-of-way along Pecos Road when it was adopted as the freeway alignment in 1988 (see Draft Environmental Impact Statement page 3-53). Should another alternative be adopted as a result of this study, the Arizona Department of Transportation would dispose of the land that has been acquired. Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

planning on freeways such as the I-10, 61, 43 interchange and the I-10, 202, 51 freeways in downtown Phoenix are witness to this fact.

Thank you.

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 11:11 AM
CALLER: VALERIE DUGGAN & WILFRED BELLEVILLE	CALLER ADDRESS: 3115 WEST BELMONT, PHOENIX, ARIZONA 85051
PHONE: 602-864-1212	EMAIL:

1

CALLER REMARKS/QUESTIONS:

Two voters in our family live here. We both would like to see the freeway go through. It's a yes vote for us. Thank you very much.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

eight lanes of traffic.

Also, I think economically it would be bad for Phoenix, because when you create more and more large interstates going in and out of a major city, you encourage urban sprawl, which takes a lot of money outside of the center of Phoenix and distributes it to make it wider and wider and wider urban sprawl, which Phoenix already has quite a bit. And that's all I wanted to say. Thank you.

THE FACILITATOR: Thank you.

For those of you who may not have heard, the last bus is leaving in about three minutes for all destinations out there.

Cheryl Dumpert.

Cheryl, could I ask you to use this microphone, please. Thank you.

MS. DUMPERT: Hello, my name is Cheryl Dumpert and I'm a member -- I live in Ahwatukee, I've lived there since 1990. I'm an avid hiker and I helped extend the parking at the Telegraph Pass parking lot. I'm a member of several hiking groups with thousands of members that hike South Mountain regularly.

Have you ever had a slice of pie, maybe just a sliver, but oh, it's so good, you want another and then another, and before you know it, you've eaten the whole

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

pie? Well, think of South Mountain like that. Just one sliver today and maybe another sliver tomorrow and before you know it, the whole park is eaten up by miles and miles of freeways. (1)

You know, you never hear of the City of New York cutting into the Central Park, do you? Not at all. As you can tell, I'm rather upset about this. Have you ever hiked South Mountain? It's quiet, you hear the coyotes, you see the cacti, and you hear the lizards -- excuse me, you see the lizards. We can't experience that on a freeway. Why don't we demand other alternates like light-rail expansion; gridlocked cities do and they do it really well. When can you take the light rail to a baseball game from South Mountain? Never. You have to drive miles to actually get on the light rail. (2)

Arizona destroys and builds. What will be left for future generations? I ask you, have you ever hiked or experienced South Mountain trails? To be a part of this decision, you must make it a point to experience the beauty, to hear the quietness. Have you been there when there's a no-drive Sunday, when there are no cars allowed on South Mountain trails? It's quiet, it's peaceful, and it's even more incredible than any other day of the week. (3)

And honestly, as a member of the Ahwatukee community, I have heard very little about this. I live

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www.drivernix.com

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Noise impacts on Phoenix South Mountain Park/Preserve were considered; however, the type of adjacent land uses and proximity of sensitive areas within the park did not qualify for mitigation based on the Arizona Department of Transportation Noise Abatement Policy (see page 4-88 in the Final Environmental Impact Statement for more information on the policy).

(Responses continue on next page)

Code	Comment Document

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within a mile of the I-10, I read about it today in the newspaper, very last-minute notice. I think you need to give more people an opportunity to hear about this. Obviously, there's more meetings that will be held for more speaking opportunities, and I'm going to be back and I'm going to bring friends.

As far as the polling, I haven't been polled, I haven't seen signs on the hiking trails to notify my other hiking friends about these changes. South Mountain, like other people have said, it's a beautiful place and it's very passionate to us hikers, so please don't cut into it. It's not a piece of pie. Thank you.

THE FACILITATOR: Thank you.

It is now 8:00 p.m. This concludes the Loop 202 South Mountain public hearing. Thanks to everyone for your participation and your support throughout the day. Have a good evening.

(The proceedings concluded at 8:00 p.m.)

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www.drivernix.com

Code	Issue	Response
4	**Public Involvement**	Given the complexity, importance, and level of public interest in the Draft Environmental Impact Statement, a key component of the public outreach process was providing detailed information to members of the public—before release of the Draft Environmental Impact Statement—about how they could participate in the Draft Environmental Impact Statement review and comment process. This campaign began 30 days prior to the Draft Environmental Impact Statement release and focused on informing the public of the upcoming Draft Environmental Impact Statement release and described opportunities for participation and input (see text beginning on page 6-23 of the Final Environmental Impact Statement). The public hearing for the Draft Environmental Impact Statement was held on May 21, 2013, at the Phoenix Convention Center from 10 a.m. to 8 p.m. The public hearing's main purposes were to present findings of the Draft Environmental Impact Statement and to obtain public testimony or comment on the Draft Environmental Impact Statement. Notification for this event was distributed in the following ways: · media alert · press releases · direct mail to approximately 87,000 residences and businesses in the Study Area · newspaper display notices in the *Ahwatukee Foothills News*, *Arizona Informant*, *Arizona Republic*, *East Valley Tribune*, *La Voz*, and *West Valley View* · Web site banner ads displayed by the *Ahwatukee Foothills News*, *Arizona Republic*, *West Valley View*, and the *East Valley Tribune* · radio advertising with 25 spots each on KESZ-FM, KMXP-FM, KNIX-FM, KGME-AM, and KFYI-AM
5	**Public Involvement**	No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period. The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400.

Code	Comment Document

you to reconsider the plan to build a freeway with so much impact on South Mountain Park.

THE FACILITATOR: Thank you.

Max Dunlap.

MASTER DUNLAP: Hello, my name is Max Dunlap and this freeway would help us because we could travel a lot faster, because probably now it would take about 30 minutes to get around the mountain. We would have a lot more things and wildlife, even though it could lose some space. It would have -- we could just move all the extra we have from the mountain, and just put it on another side and all the animals would have all the space they already did have.

And, well, it's also that we have so much traffic that a lot of extra smog goes into the air and with this freeway less smog would go into the air, which means less pollution. And a lot of more happy people that can just travel from place to place.

THE FACILITATOR: Thank you.

Julie Dunlap.

MS. DUNLAP: Thank you for listening to our concerns. I live in Laveen, and we've lived there for going on eight years. And we purchased our home

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

with the intention that the freeway had been approved. So we really struggle with being able to get to the places that we need to get to, particularly having a, you know, young son. We don't have the resources that we need. So we just really want to stay in Laveen. We want Phoenix and the Laveen area to stay liveable, but without the freeway, we're stuck in traffic. We can't get the hospital, the resources and things that we need without it.

So we just encourage moving forward with the plan for the freeway. Thank you.

THE FACILITATOR: Thank you.

Lindsay Bateman.

An announcement, please. The last bus will be running in about five minutes, at 7:30, for all destinations, orange, green, and blue, routes 1, 2, and 3.

MS. BATEMAN: Just talk? All right.

THE FACILITATOR: Are you Lindsay?

MS. BATEMAN: I'm Lindsay Bateman. I'm just here to support the South Mountain Freeway. I'm a resident of Laveen. And I'm just looking forward the economic development open to our area, and really relieve the congestion on the surface streets. And

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

you to reconsider the plan to build a freeway with so much impact on South Mountain Park.

THE FACILITATOR: Thank you.

Max Dunlap.

MASTER DUNLAP: Hello, my name is Max Dunlap and this freeway would help us because we could travel a lot faster, because probably now it would take about 30 minutes to get around the mountain. We would have a lot more things and wildlife, even though it could lose some space. It would have -- we could just move all the extra we have from the mountain, and just put it on another side and all the animals would have all the space they already did have.

And, well, it's also that we have so much traffic that a lot of extra smog goes into the air and with this freeway less smog would go into the air, which means less pollution. And a lot of more happy people that can just travel from place to place.

THE FACILITATOR: Thank you.

Julie Dunlap.

MS. DUNLAP: Thank you for listening to our concerns. I live in Laveen, and we've lived there for going on eight years. And we purchased our home

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:38 PM
CALLER: MICHAEL DUNN	CALLER ADDRESS: 299 E. PHELPS STREET, GILBERT, AZ 85295
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in support of the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, July 23, 2013 8:15:28 AM

F.Y.I.

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT
Communications

From: Rusty Duplessis [mailto:rusty@bobpooch.com]
Sent: Monday, July 22, 2013 8:16 PM
To: Projects
Subject: South Mountain Freeway

Here are my comments regarding the freeway. I read a good portion of the draft plan, but may have missed some of the points, so if they were addressed, some of these comments may not be relevent.

- This freeway is sorely needed. As John McCain might say, "build the dang freeway."
- Cutting through some of the ridges of South Mountain may actually be a benefit. This could make the drive more scenic. I actually like the idea of driving through bluffs to get to the other side of the metro area. Freeways and highways all over the country are like this. As for it being sacred to the Indians, they could make that claim for every square mile of the country, but the fact of the matter is that they don't own that land.
- For those of us connecting to Loop 101 on the west side, I think it would be beneficial for this freeway to connect directly to Loop 101 rather than having to travel on I-10. I also think that trucks using this route as a bypass should connect to I-10 as far west as possible. To me, it makes more sense, even though it is a few additional miles of freeway. (1)
- I know there are projections of future volume, but I don't recall anything indicated that additional lanes could be added at a later date. Three lanes plus HOV in each direction will not be enough within a few years after the freeway's construction (see the Santan Freeway as an example). (2)
- Building I-11 from Casa Grande to Las Vegas could further divert truck traffic, perhaps forestalling congestion on this freeway.
- The Gila River Indians have finally indicated that no further votes will occur. Fortunately, you had already disregarded any route through their reservation. To me, everything that has occurred appears to be stall tactics.

Thank you,
Rusty Duplessis

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The proposed freeway at one point featured a ten-lane freeway cross section, with three general purpose lanes in each direction and sufficient right-of-way to add a high-occupancy vehicle lane and a general purpose lane in each direction in the median in the future (when warranted by travel demand). The Maricopa Association of Governments, in association with the Arizona Department of Transportation, later examined an eight-lane freeway cross section, with three general purpose lanes and one high-occupancy vehicle lane in each direction (see Draft Environmental Impact Statement pages 3-19 and 3-20). Such a configuration would reduce the right-of-way needed for the freeway without jeopardizing its ability to meet the purpose and need criteria. Additionally, the eight-lane freeway would cost about $200 million less than the ten-lane freeway (see the Draft Environmental Impact Statement, beginning on page 3-23). Because the eight-lane freeway would meet the project's purpose and need and would do so with lower costs, less right-of-way acquisition, and fewer impacts than the ten-lane freeway, it was carried forward for further consideration.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 2:32 PM
CALLER: ANTHONY DURAN	CALLER ADDRESS: 7922 WEST GLOBE AVENUE, PHOENIX, AZ 85043
PHONE: 623-505-7264	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain Freeway being built. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 4:24 PM
CALLER LISA DURAN	CALLER ADDRESS: EL MIRAGE, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, and I just want to say that I'm in support of the freeway that you're proposing. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Additional comment on the South Mountain Freeway
Date: Monday, July 15, 2013 3:30:24 PM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Durham [mailto:zdurham@cox.net]
Sent: Monday, July 15, 2013 3:18 PM
To: Projects
Subject: Additional comment on the South Mountain Freeway

Additional comment on the South Mountain Freeway:

A response to a columnist in the East Valley Tribune:

Real estate was sold along that path for years with the signed agreement by the buyer that the property was in a transportation path. For the cost of destroying and building a freeway through that area, a truck route could be developed through Gila Bend to I10. The developing plan for rail service between Phoenix and Tucson needs additional comment. (1)
Car wrecks backup traffic daily. Alternative lanes for trucks only are not being developed. The bottom line is hold fast on signed agreements, develop cheaper cross state routes, develop rail alternatives, and tell greedy developers we have enough housing, gas distributors, mini marts, etc., south of South Mountain. Destroying beautiful areas in trade for inefficient transportation routes and leeching developments just doesn't fly. Was the melon truck driver cited? (2) (3)

Mike Durham
7-15-2013

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Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
3	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/10/13	INCOMING CALL TIME: 3:42 PM
CALLER: DUSTIN	CALLER ADDRESS:
PHONE: 602-475-6057	EMAIL:

CALLER REMARKS/QUESTIONS:

Hello, the construction on the 202 to the 67th Avenue and 63rd Avenue I'm just calling to oppose it. To let you know if this goes through I will lose my job, my house, my kids won't have food. I just really would not allow this to go through so if you get this message please call me back so I can talk to somebody. I do not want this to happen so give me a call back. Bye.

RESPONSE:

I spoke with Dustin on Friday, July 19 at 12:30 p.m. Dustin works for the Country Garden Charter School and has serious concerns about the future of the school given the proposed plans for the South Mountain Freeway. Dustin had attended one of the public meetings where the design staff reassured him that the preferred alignments do not put the Country Gardens Charter School in jeopardy. Dustin did not trust this response and requested a letter in writing from ADOT stating that Country Gardens will not be acquired and demolished for the freeway. I spoke with Reggie Ronaldo from ADOT Right-of-Way and although Reggie said he did not have the authority to approve such a letter, Reggie felt that it would not be appropriate at this time because we are not in the design phase yet. Reggie explained that current plans show that the school will not be affected, although a small portion of their land may be needed (at this time he couldn't elaborate on how much or where). I explained this to Dustin on Monday, July 22 at 12 p.m. and Dustin reiterated his frustration and that his interpretation of this response means there is no guarantee his school won't be bulldozed to the ground. I encouraged him to continue to stay engaged in the process and reminded him we still had a ways to go before any design is finalized and construction begins.

Jessica Amend
HDR/InfraConsult

1

Code	Issue	Response
1	**Acquisitions and Relocations**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations

Code	Comment Document

Fanie Duvenhage Document Created: 5/8/2013 5:42:38 PM by Web Comment Form

Thanks for the opportunity to submit comments. I have one concern that are not address in the study:

1 Pecos Road is a primary path for cycling in the Phoenix area. The South Mountain Freeway's Eastern path (E1 alternative) destroys the current wide cycling lane and leaves only Chandler Rd. as an option. The cycling path on Chandler is not adequate for the current volume and I did not see any mention of this issue or a proposed replacement cycling paths or lanes in the current plan. Were any of the cycling clubs approached or consulted on this issue?

2

Code	Issue	Response
1	**Traffic**	The study has considered concepts for parallel multiuse paths, however the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
2	**Public Involvement**	This study, which began in July 2001, is expected to be completed in 2014. During the study process, community members have had and will continue to have various opportunities to ask questions, express opinions, and provide comments about the proposed action. Specific communication and outreach opportunities are presented in Chapter 6 of the Final Environmental Impact Statement. The project team has not been formally approached by any cycling clubs regarding concerns related to the loss of Pecos Road as a bicycle route.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:03 PM
CALLER: ALLEN DYERLY	CALLER ADDRESS: 2124 E. BARTLETT PLACE, CHANDLER, AZ 85249
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in support of that highway. It would be of big help to us as we commute to the other side and I know that I have friends in Ahwatukee who would also support that, but I do support that and wanted to leave this message. Thank you for listening.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:52 PM
CALLER: JUSTINE DYKES PHONE:	CALLER ADDRESS: EMAIL:
CALLER REMARKS/QUESTIONS: Yes, I support the freeway being built. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Doug & Linda Dynes
To: Projects
Subject: Stop South Mountain Freeway
Date: Wednesday, July 24, 2013 2:13:40 PM

Hello,

Please use my email to help not having the South Mountain Freeway built here in Ahwatukee or the South Mountain Park areas. As residents here in Ahwatukee for 18 years, my husband and I have enjoyed the quietness and beauty of South Mountain and the area. We live in Lakewood, which would be very close to the new freeway location, and the noise and dirty particulates would create issues that we do not believe would enhance the quality of life and health that we have here. The freeway would allow for easy access for us, but it also would allow the same for burglary and other crime to come in to our area. So far, we feel safe here and the thought that a freeway could allow for crime to come into our neighborhoods just adds to our belief that this freeway should not be built here.

Please do not build the South Mountain Freeway and change the Ahwatukee community and life forever. Keep it the beautiful neighborhood that it is to raise a family here as we have.

Thank you for your time.
Sincerely,
Linda (and Doug) Dynes
16439 South 34th Way
Phoenix, Arizona 85048

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).

Code	Comment Document

From: Sierra Club on behalf of Linda Eaton
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 10:44:31 AM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(5) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(6) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you. How about repairing the existing crumbling roads instead of building new ones in Maricopa County as usual. Have you drove on the roads in Northern Arizona lately, hope no one wrecks in one of those 3 foot pot holes and sues the hell out of you. Give back the Counties their monies so we can fix our roads.

(7) Sincerely,

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	Ms. Linda Eaton 1450 E Calle Charcas Kingman, AZ 86409-9386 (928) 757-9828

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 It is clear that ADOT has never considered Alternatives. It is shameful the amount of money spent on this study when some very obvious Alternatives should have been considered.

For example the 2+ Billion $ being spent could buy A LOT of express busses for the entire region to go from major residential areas to major employment areas. More people are working from home, tele commuting, AND taking the express busses (Pecos rd. express station is packed!!!)

You are ADOT Transportation Not ADO Construction. This is a seriously flawed study for many other reasons as well, but lack of public transport is a epic fail.

Optional

Name John Edmondson Email john@theheadoffice.net

Address 15828 S. 35th Way

City Phx State Zip 85048

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

Code	Comment Document
1	Phillip Edwards Document Created: 5/21/2013 3:36:05 PM by Web Comment Form I fully support the constuction of the South Mountain Loop 202

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 10:34 AM
CALLER: DEBBIE & MICHAEL EISNOGLE	CALLER ADDRESS: 12222 W. CAMBRIDGE AVENUE, AVONDALE, AZ 85392
PHONE: 623-328-9496	EMAIL:

CALLER REMARKS/QUESTIONS:

1 We support the bypass, it needs to be put in, too many people and not enough roads.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Michael Ellegood Document Created: 5/13/2013 11:33:30 AM by Web Comment Form The South Mountain Freeway has been on the books for 28 years. Meanwhile the Valley has grown as has traffic and resultant congestion. Trans-continental truck traffic has grown as well. It is time to build this project! We have studied it to death, we have examined all of the alternatives, we have spent millions of taxpayer dollars examining, re-examining, considering, meeting, discussing - we need to build it! Several years ago, in my role as Maricopa County Transportation Director, I received a complaint from the St. Johns community on the GRIC concerning truck traffic through this small community on 51st Avenue. I personally went to the community to witness the issue. The concern was indeed valid. This small, quiet, native american community was the recipient of dozens of trucks, seeking a bypass around central Phoenix. In spite of a 25 mile per hour speed limit, these trucks were traveling at speeds nearing 50 mph! No residential community deserves this. The South Mountain Freeway will relieve this problem. The time is now, let's build it!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments on Loop 202 Sount Mountain freedway
Date: Thursday, June 20, 2013 3:51:19 PM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Vicky Elleray [mailto:velleray@yahoo.com]
Sent: Thursday, June 20, 2013 3:10 PM
To: Projects
Subject: Comments on Loop 202 Sount Mountain freedway

I attended the Foothills Golf course open meeting on June 18 and I would like to submit the following comments.

I am OPPOSED to the new freeway for the following reasons.

1. Environment impact.

Pollution.
(1) Fact - with increased traffic will come increased pollution behind South Mountain impacting 75,000 people. I understand your study states you have met the federal standards. Regardless of the federal standards, pollution is pollution no matter what number you assign it. I am not comforted by some federal standard. Federal government doesn't have the best track record with much they are involved with. I don't trust your study or the federal standards you propose it meets. I lived in Denver and I know first hand what the brown cloud of pollution is and does to humans when bumped up to a mountain.

Hazard materials.
(2) Fact - trucks will hazard material be allowed to flow through that area. Along the way are schools and peoples homes. That is simply not acceptable to expose 75,000 to that type of risk.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Meteorological information was considered in the air quality analyses [*Air Quality Assessment: South Mountain Freeway (SR 202L)*, dated March 1, 2013] conducted for the proposed action. Data from Maricopa County Air Quality Department and from the Gila River Indian Community monitoring station were compared with two, 1-month studies conducted during the winter of 2006 and the spring of 2007 along Pecos Road in the Study Area. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Reservation Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows winds and stable atmospheric conditions, the wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns will tend to have a flow from the easterly component as the air flows from the east to the lower elevations along the Gila River. During the warmer hours with improved mixing, the flows typically follow the river channel and come from the north and northwest toward the south and southeast.
2	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
3	Noise. Fact - I now live 1 mile from I-10. I can hear I-10 from my yard. If you add another freeway, that noise just doubled because I am also 1 mile from the 40th/202 intersection. Walls will not protect me from the additional noise.
4 5	Destroy South Mountain terrain. By cutting through the mountain it destroys the land, a mountain, animals and nature. For what trade off?
6	2. Crime. Fact - 51st avenue is a crime ridden area. Fact - no one at the meeting on Tuesday could speak to the potential increased crime because no study was done. Common sense will tell you that if you open 51st avenue to Ahwatukee crime will increase. Crime will now come from the west. The new road will invite new crime and provide for an additional escape route. It will provide the criminals new homes to rob and steal from which were otherwise not easily accessed and not worth their time. That will translate into higher homeowners insurance premiums - increased risk means increase premiums. Ahwatukee is known for low crime because it is protected naturally by South Mountain and the Gila River community. Don't want it!
	3. Coyote/Illegals new route. As if we don't already have problems with coyotes/illegals passing through Phoenix. This gives them another route and another pathway for our police to monitor. Our police are already stretched thin. Why would you want to add this additional burden? Not acceptable.
7	4. Gila River Community. They got it right - no build. If they can have such a strong voice, also should Ahwatukee. Put it to vote for the Ahwatukee people just like Gila River did.
8	5. Who benefits? I question who really benefits from this road. The truth isn't fully disclosed. For truckers, it adds another route - no benefit to

Code	Issue	Response
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered "acceptable" by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Biology, Plants, and Wildlife**	
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
7	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period. The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400.
8	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

Code	Comment Document
9	Ahwatukee. For developers - opens up new land options on the west side to build because now undesirable land becomes valuable due to quicker access to either side - no benefit to Ahwatukee. Time savings was 6 minutes to downtown. For the damage incurred, that is not a trade off for Ahwatukee. I am not one of 138 of those who will lose their home - there isn't enough money to compensate for that loss. That impacts peoples lives forever - no benefit to Ahwatukee.
10 1 6	6. Community feel. Ahwatukee is known for it's quite, low crime and small committee feel. That is why I bought here. A new freeway will destroy the very quality that Ahwatukee was built on. For what trade off? More pollution and crime.
11	7. Window of opportunity is closed. ADOT had years to make this happen when the number of people in Ahwatukee were a handful and before this became home to 75,000 people and schools. I understand all the laws limiting ADOT from stopping developers building. In life that is called "too bad". I had a lengthy discussion with the ADOT man at the meeting about this topic. So now because ADOT can, they want to disrupt a community because they can. I say your window of opportunity is lost, so too bad, no build in Ahwatukee.
7	8. I did my own poll. I asked this question to each of the ADOT people at the meeting I spoke with - 5 in total. I asked them if they lived in Ahwatukee. Each one said "no". I then asked if they would move their family, grandkids, parents, sisters/brothers and cousins to this area if there was a freeway built? 1 said - he couldn't answer that. 4 said - no. That says a lot.
12	Progress isn't always the right answer if you destroy land and people in the way. You can't undo the damage once done. When are we going to learn from past mistakes? Please do NOT build Loop 202 South Mountain freeway....because it is the right thing to do for Ahwatukee as a whole.

Code	Issue	Response
9	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
11	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Alternatives, Lack of Support**	

Code	Comment Document

Jeanne Elliott

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The environmental impact of the proposed Loop 202 freeway goes way beyond the biological and chemical issues that will ensue, in that the entire environment of a quiet and beautiful area will be ruined. The truck traffic (which is rarely mentioned in any discussions) that will use this route will ensure that.

This route should have been, or should BE, planned much farther south in an area that will not impact the residents from whom the state and city have been glad to reap taxes.

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Noise modeling for the Final Environmental Impact Statement used this forecast truck traffic, with the model accounting for greater noise generation by trucks in the future (see Final Environmental Impact Statement page 4-88). Noise mitigation is designed for this predicted noise level, including the noise from trucks.
4	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
5	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

1 2 3 4 5 6 7 8 1

MS. ELLIS: Christine Ellis. My address is 1520 West Glenhaven Drive, Phoenix, 85045. I'm definitely not in support of the 202 coming in through Ahwatukee. I don't see the reason that it would come in and destroy our neighborhoods. I see that we really need to work with Gila River Indian community in hopes that they can put it down on their land and find a way to make that work. Otherwise, I don't really see why we even need this. I don't think it's become really clear.

I don't feel -- I don't see why Interstate 8 isn't a viable option, why they don't use it now. I don't see the need for the damaged air quality. I have not seen anything that has made me feel like this is a great idea for Ahwatukee or the community in general, and especially the Gila River community taking down South Mountain and cultural icons that are just -- it's religious.

I don't feel that it's fair for the Gila River Indian community to give up such a spiritual part of their land, and so that's just my opinion. I do not agree to follow through with this 202 taking all these families and churches and schools. Ahwatukee is such a -- we're here for that reason. We are closed off. It's quiet, it's nice and I don't

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Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).
2	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need, Lack of Support**	
4	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Alternatives, E1 Alternative**	
7	**Cultural Resources**	
8	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

want that destroyed.

Code	Issue	Response

Code	Comment Document

David Elms Document Created: 7/24/2013 7:22:17 PM by Web Comment Form

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NO WAY ADOT is shoving this freeway down our throat and we do not want it in Ahwatukee. The only benefit we get is Air Pollution, Noise Pollution, and Truck traffic. If the goverment is For the People by the People why are you not listening to the people of Ahwatukee. Or is it a greed thing only to benefit the few who will profit from the freeway.

4

South Mountain is why I live in Ahwatukee I hike there, I walk my dogs there, I ride my mountain bike there, and I spend time there to get away from the bustle of the city and you want to destroy a piece of it also. Please do not destroy my mountain. If the goal it to reroute I-10 truck traffic around Phoenix why not use I-8 to around Gila Bend then build a freeway along the AZ 85 alignment. Do Not destroy our community and Mountain with a freeway we do not want.

5

6

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Purpose and Need, Lack of Support**	
4	**Section 4(f) and Section 6(f)**	
5	**Trucks**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement beginning on page 4-91).

Code	Comment Document

Ahwatukee -- southeastern portion of Ahwatukee.

That's all I have to say.

* * *

MR. ELTERS: My name is Bassam Elters, B-a-s-s-a-m E-l-t-e-r-s.

My comments are that I support the Loop 202. I've lived in Arizona for 30 years and in the Valley for nearly 10 years. The traffic congestion in the area needs a practical solution. This corridor has been a part of the regional plan for years. The voters approved it twice, and it's time to build it.

1

That's it.

* * *

MR. NOVAK: My name is Will Novak, N-o-v-a-k.

I just wanted to put in a comment that I hope they don't build anything and save the billion-and-a-half dollars and do something else with it, like build some light rail trains or plant 15 million trees or build a commuter rail, any of the number of things we need in Phoenix.

This is a city that is really -- we've got our

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202- South Mountain Freeway
Date: Tuesday, April 30, 2013 8:53:46 AM

From: David D Englehart [mailto:carguy42503@gmail.com]
Sent: Friday, April 26, 2013 1:30 PM
To: Projects
Subject: Loop 202- South Mountain Freeway

Hello,

1 I am very happy to see the Draft EIS completed. This freeway was a big part of my decision to move to Laveen 6 years ago and seeing the process move so slowly has been very frustrating. Many of us here are very anxious for the ease of travel and the new development that the freeway will bring. I hope the project will move as swiftly as possible from this point to it's completion. Thank you for taking my comments.

--
Peace to you and grace from God our Father and the Lord Jesus Christ,
David Englehart

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 11:34 AM
CALLER: CHRIS ENGLISH	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hello, I support the South Mountain freeway. My phone number is 602 – ahh – I'll do it online.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 11:25 AM
CALLER: ENGQUIST	CALLER ADDRESS: 8011 SOUTH 47TH AVENUE, LAVEEN, ARIZONA 85339
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am very, very much in favor of the South Mountain freeway going through and I hope you will consider that. It would help with the traffic and if would give a better route through the area and actually take the cars around and lessen the congestion. Thank you very much and have a wonderful day. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of John & Juanita Enkoji
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, June 03, 2013 6:13:01 PM

Jun 3, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 3 The proposed freeway would cause more problems than it would solve. It is at best only a short term approach to a long term problem. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 5 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6 7 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. John & Juanita Enkoji
26804 N 79th St
Scottsdale, AZ 85266-9059
(480) 515-1087

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

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THE REPORTER: Please state your name.

MR. ENOS: Darius Enos.

"Traffic presents a unique public health threat due to the toxicity of its emissions and its extensive integration into our lives and communities. The stakes are high, including excess cancers and children's asthma rates occurring at epidemic proportions. This threat can no longer be ignored; it must be clearly understood and addressed." And that's a quote from Associate Professor Tim Buckley, from the Bloomberg School of Public Health at Johns Hopkins University. That quote was cited in the Sierra Club's Highway Health Hazards Report on how highways and the roads cause health problems in our communities.

The report cites several different research reports, including a Johns Hopkins study showing the association between traffic and curbside concentrations of cancer-causing pollutants; the Journal of the American Medical Association study linking soot and diesel exhaust to lung cancer, cardiopulmonary diseases, and other causes of death; a Denver study showing children living near busy roads, that they are six to eight times more likely

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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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to develop leukemia and other forms of cancer; a Journal of The American Medical Association study finds that increasing public transportation, along with other traffic control measures, and that was during the 1996 Atlantic Olympics, which reduced acute asthma. A California South Coast Air Quality Management District did a multiple air toxic exposure study, too, the most comprehensive study of urban toxic air pollutions showing that vehicle exhaust is the source of cancer-causing air pollutants in Southern California.

The community the potential freeway would affect is the Gila River Indian Community, which was little mentioned in the Environmental Impact Statement. Whatever political lines that may have been drawn, the health effects cannot be ignored in any way. And that is something that the Environmental Impact Statement does not take into account.

2

And furthermore, the community is already susceptible to volatile health problems, including high rates of diabetes. The story is, in the 1800s our river, our namesake, was taken away from us, dammed up for the development of Phoenix and the State of Arizona, and the development of Phoenix was

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Code	Issue	Response
2	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

put on the backs of our health for many generations, including today. What the Arizona Department of Transportation is asking for is to have another generation of health effects, which is not only for the Gila River Indian Community, but also minority communities within south and west Phoenix.

Furthermore, the potential freeway impedes on the spiritual practice of my community. It is where our creator is said to have been shown, and where a large part of our stories, songs, and dances revolve around. Furthermore, there are remains of our ancestors within the mountain and around the mountain. It is not common for non-native people to have their ancestors dug up. It is a violation of human rights and human dignity to have that happen to us, since the arrival of Europeans in this country.

3

With that in mind, the Arizona Department of Transportation continues colonial practices on the indigenous people of the area. History is being repeated, sadly.

I am a graduate of ASU, and I majored in American Indian studies, minor in global studies. With that, furthermore, within a global context, the United States is very behind in environmentally safe

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Code	Issue	Response
3	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

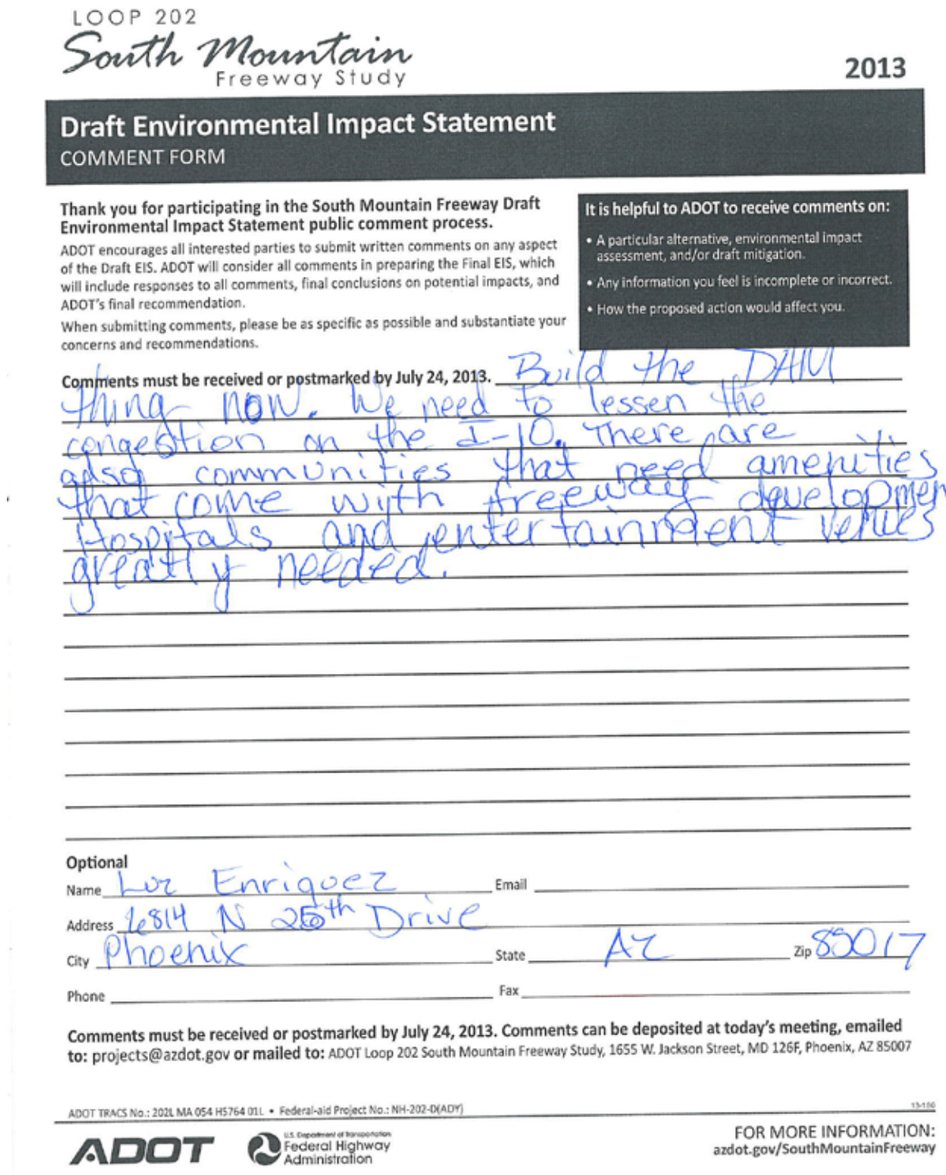
Code	Comment Document

and sound public transportation. If you look at Sweden or any other European country, the route of transportation is made sure to be provided to be environmentally sound. The freeway does not guarantee the safety and health of the Gila River Indian Community. And furthermore, as a citizen of Arizona, to look at the education levels in comparison to our state budget, where we have the lowest reading levels in the United States and transportation is the biggest issue.

I'm going to do everything in my power to fight this freeway and I hope you see it through my eyes. Thank you.

THE REPORTER: Thank you very much.

Code	Issue	Response

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. Build the DAM thing NOW. We need to lessen the congestion on the I-10. There are also communities that need amenities that come with freeway development: hospitals and entertainment venues greatly needed.

Optional

Name Luz Enriquez Email

Address 1814 N 25th Drive

City Phoenix State AZ Zip 85017

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/14/13	INCOMING CALL TIME: 2:17 PM
CALLER: MAGGIE ENRIQUEZ	CALLER ADDRESS: 7350 W. CAMERON DRIVE, PEORIA, ARIZONA 85342
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I approve and agree with the building of the South Mountain freeway. Thanks very much. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:07 PM
CALLER: ERAIM ERAIM	CALLER ADDRESS: 7145 S. 37 DRIVE, PHOENIX, ARIZONA 85041
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain freeway. Again, I support the freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 2:47 PM
CALLER: STEVE ERMO	CALLER ADDRESS: 3325 EAST MARCO POLO ROAD, PHOENIX, ARIZONA 85050
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Hi, I'm calling in support of the South Mountain freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Janice Ertl

Document Created: 5/21/2013 9:05:53 PM by Web Comment Form

1 2 3 4 5 6

I have lived here for 30yrs and every time a freeway is built it is totally clogged with traffic within 2 yrs. Freeways fuel urban sprawl and do nothing to change the habits of people to bus, carpool, work from home-- and even make it more difficult to bike to work. Building a freeway is doing more of the same, plus forever changing South Mountain....better to put the money into a train from Phoenix to Tucson. By the way, where is that bike lane that was supposed to parallel the freeway??

Code	Issue	Response
1	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
2	**Social Conditions**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
3	**Social Conditions**	The proposed freeway is a response to existing and anticipated travel demand in the metropolitan Phoenix area. It is not meant to increase travel beyond that expected to be generated from existing and anticipated population and employment growth and related land development. It is important to consider that improvements proposed for any type of transportation system (e.g., a new bus route, rail transit line, commuter rail service) would likely lead to changes in travel behavior, which, in turn, would lead to increased use of the particular system. Improvements made to a given transportation system are meant to attract new users (see Final Environmental Impact Statement pages 4-170 through 4-174). If this were not a primary goal, the improvements would be neither effective nor warranted. For the proposed action, a goal is to attract users of other segments of the Regional Freeway and Highway System and the local arterial street network, now and in the future, to the proposed action to optimize, in part, the entire regional transportation system (as outlined in the proposed action's purpose and need in Chapter 1).
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives, Nonfreeway Alignments**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
6	**Design**	The study has considered concepts for parallel multiuse paths, however the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

MR. ERWIN: So, as far as the different pieces of this, I actually have been involved in listening to the discussions, and so forth, since this was going on in the central area. And it was like, kind of, a community -- a community college area. And there were 37 different groups there that were -- formed the homeowners' association that would be affected by this, that was going through different sections.

And at the end they actually did, going through, doing the voting section. And ADOT provided different information along the way, and they went and voted. The community gave a vote on this, of what their -- their assessment of a build/no build, which is kind of what was on the video. And they gave that a vote.

And I haven't seen that information published anywhere. And I was -- had been going, doing this for about a year. So I was kind of wondering why that information isn't available, why that part isn't being communicated along the way. I feel like that's a disservice to the people who've been involved in this process all along.

In fact, there was a -- the -- Doug, who does the Ahwatukee Foothills newspaper was there, as well. And he wrote different articles about it, including talking about the Great Wall of Pecos, which ADOT said was going to have to be built, the entire stretch of Pecos. So the lack of information makes

1

Code	Issue	Response
1	**Public Involvement**	Since 2002, the Arizona Department of Transportation has worked with a South Mountain Citizens Advisory Team, whose members represented various stakeholder groups in the South Mountain Freeway Study Area. The group met regularly to review environmental and technical data, to discuss the interests and concerns of their respective organizations, and to help find a consensus solution for meeting transportation needs in the Study Area. The general public was welcome to attend each of these meetings. There also have been various community meetings through the course of the environmental impact statement process. For a listing of the past South Mountain Citizens Advisory Team and community meetings, please see <azdot.gov/southmountainfreeway/meeting_notices.asp#communitypast>. Additionally, individual members of the community had an opportunity to review the Draft Environmental Impact Statement, attend a public hearing, and provide comments to be included in the Final Environmental Impact Statement.

Code	Comment Document

2

it extremely difficult for the public to give informed decision, even though we know the information is there and it had been presented.

The other piece is that, when the information was being put through, about the assessment for the traffic that would go through -- And even recently, in downtown, the guy who kind of knows everything, and has been with this the entire project, said the assessment for the traffic was based off of forecasted traffic for the entire Phoenix area. So they took all of the traffic in all of Phoenix and said: Here's what's going to happen on this loop.

And it was 92 percent residential and 8 percent commercial.

But the reality of the situation is that there is a very limited number of people that live in the south that would need to do something in the west. There is a very -- There is a very limited number of people who live in the west that would need to do something in the south that would use that thoroughfare on a regular basis.

So, again, the information -- There is misinformation that is being provided to not just the people in this community but all of the voters, at large, about what this really means from a traffic assessments -- or a traffic-modeling standpoint.

3

The fact is that anything that comes from the west

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www.drivernix.com

Code	Issue	Response
2	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Draft Environmental Impact Statement page 3-27). Traffic projections are regularly updated by the Maricopa Association of Governments. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011. When the Maricopa Association of Governments adopts new socioeconomic projections and traffic projections, it will be reflected in the study documents. Key model inputs used to forecast travel demand included (see Table 3-7 on Draft Environmental Impact Statement page 3-27): · socioeconomic data based on the adopted general plans of Maricopa Association of Governments members, which includes projected growth in population, housing, and employment (including proposed commercial centers), along with economic forecasts and the existing and planned transportation infrastructure as identified by Maricopa Association of Governments members · the anticipated average number of vehicle trips within the region (including those to and from the region's households) on a daily basis (this number is tracked regularly by the Maricopa Association of Governments) · the distribution of transportation modes used by travelers in the Maricopa Association of Governments region (also tracked regularly by the Maricopa Association of Governments) · the capacity of the transportation infrastructure to accommodate regional travel · the future transportation infrastructure established using *Regional Transportation Plan*-planned projects and improvements and from known arterial street network improvements assumed to be made by the County, Cities, and private developers The Maricopa Association of Governments approved new socioeconomic projections in June 2013. The new data are presented in the Final Environmental Impact Statement (see page 1-11). Although slower growth in total vehicle miles traveled was noted, the need for the freeway did not change. The revised traffic analysis validated that the proposed project is needed today.
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

and goes south and anything from the south that goes west is typically commercial traffic. If you go ask people in this -- in the community who live south, none of them on a routine basis are going to use their residential vehicles to go west. And -- and I talked to a variety of people who live in the west. And I know of two people that live in the west, out of the 25 people that I'm associated with, who would come here to the south to work. And it's just because we happen to work, you know, in the same -- in the same location.

The majority of traffic through is going to be commercial. So the -- the forecasting information does not align with the actual numbers which are going to occur. And that sort of information has -- was not presented. I don't think it was actually provided in the -- the initial voting. And it's not being provided accurately as of two weeks ago, when they said, "Well, it's going to be this breakdown of residential and this breakdown of commercial," when we all know, because we're all intelligent people here, that the majority of traffic will be trucks that, thank goodness -- because they have all said to me, "Thank goodness, I don't have to drive through downtown Phoenix anymore when I'm going from Southern California, working my way through Phoenix, to continue east for my travels."

So, again, the majority of traffic that will be coming through is residential -- sorry, is commercial and not

4

Code	Issue	Response
4	**Trucks**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the proposed freeway in 2035 (see Final Environmental impact Statement pages 3-64 and 4-66). The forecast truck traffic is based on existing traffic studies and projected socioeconomic data. This percentage is similar to current traffic conditions on Interstate 10 between State Route 101L and Interstate 17 and on US 60. Commercial trucks would use the proposed freeway. As with all other freeways in the region, trucks would use it for the through transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary users of the proposed freeway would be automobiles. Vehicle classification counts (2007) from the Arizona Department of Transportation for Maricopa County show passenger vehicles and other nontruck vehicles make up over 90 percent of all traffic on the regional freeway system, and it is expected these percentages would not vary with the proposed freeway. Further, it is not expected that the entire 21 percent of through truck traffic (by tonnage) using Interstate 10 would divert from Interstate 10 to use the proposed freeway (see Final Environmental Impact Statement page 3-64). Trucking destinations in the Phoenix metropolitan area would still prompt trucks to enter congested areas. Choosing to travel on the proposed freeway versus Interstate 10 would not produce substantial travel time benefits. Therefore, it is expected that “true” through truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.

Code	Comment Document

5

residential.

Lastly, the thing I just noticed is if that video is accurate -- So the video that was shown here, and it was stated, in the beginning of the video, that they are going to show what the traffic looks like in 2035. If that is the fact, the video shows a very limited number of cars and no commercial vehicles, which is misleading. And there's very few vehicles, in general. So, if that few number of vehicles actually is using the freeway, why do we need it?

So those are just the different -- the one observation and the other parts that I've been, you know, coming through, as well.

And those are, again, just kind of what I've come up with so far. So that's my community comments.

Again, the misinformation is staggering about it. So I don't think that people can make an informed decision -- or, sorry.

I don't think ADOT should be allowed to push the agenda through, knowing that the misinformation that is being provided to the community is based on an assessment of what they think as opposed to what the reality of the traffic flow is going to be, because, again, it just -- Just talking to different people who travel this on a regular basis.

So, again, instead of forecast the actual, you need to talk to people about what's actually -- When I would

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Code	Issue	Response
5	**Traffic**	While it was the intent, the traffic depicted in the video did not replicate peak traffic conditions. The traffic data and analysis used to support the purpose and need for the project are presented in Chapter 1 of the Final Environmental Impact Statement. The data and analysis supporting the evaluation of alternatives are presented in Chapter 3 of the Final Environmental Impact Statement.

(Comment codes continue on next page)

Code	Comment Document

6

actually use this freeway, you see residents kind of say, "Well, I guess I might, every once in awhile."

And you see a huge smile come across people who do commercial vehicles because, again, their whole point is: Good, I don't have to go through downtown Phoenix anymore. That's perfect. I love it.

So, again, it kind of makes me wonder, you know, who -- Who and why is pushing this through? You know, is it really the residents who want it? I don't know anyone who, number one, cares enough to have a strong opinion about it, unless you're directly affected, like the residents here, or if your livelihood depends on getting through the traffic.

So if I have anything more, I'll let you know. Thank you.

7

Can I finish one more thought? I apologize for interrupting.

So, just as a final -- The reason I'm here is because I had a -- I had a strong opinion about it anyway. But, when I started explaining just the facts about this to my daughter, I had to spend 30 minutes calming her down, to -- because she was having such a meltdown about the fact that the school that she attends, the church that she goes to and actually has gotten closer to her understanding of religion and spirituality -- And she asked: Is KeeKee going to -- Is KeeKee's house going to be removed?

Code	Issue	Response
6	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.) No schools would be displaced.

Code	Comment Document

And the answer was: Yes, after we looked at this.

And she -- I had to spend 30 minutes holding on to her while she was having a meltdown. And that sort of thing really strikes home.

I appreciate your time.

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 1:19 PM
CALLER: ANGELINA ESPARZA	CALLER ADDRESS: 126334 35TH STREET, PHOENIX, ARIZONA 850323
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I do support the Loop 202 South Mountain freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Question
Date: Tuesday, May 14, 2013 9:47:17 AM

From: billesson [mailto:billesson@cox.net]
Sent: Wednesday, May 08, 2013 7:57 AM
To: Projects
Cc: council.district.6@phoenix.gov
Subject: Re: South Mountain Freeway Question

Folks,

Good morning.

I haven't seen a response to this. Soon please ??

Thanks,

Bill Esson

----- Original Message -----
From: billesson
To: projects@azdot.gov
Sent: Friday, May 03, 2013 8:55 AM
Subject: South Mountain Freeway Question

Folks,

Good morning.

I have started looking through the DEIS document.

I see the current traffic volumes and the projected traffic if nothing is done in figure 1-8 Chapter 1 b.

1 Where would I find the projected reductions in traffic if the freeway is built ??

Thanks,

Bill Esson

Ahwatukee

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Code	Issue	Response
1	**Traffic**	An assessment of conditions with and without the freeway in 2035 is presented beginning on Final Environmental Impact Statement page 3-27. The results of the assessment, supporting the need for the proposed freeway, are summarized in Final Environmental Impact Statement Table 3-9 on page 3-38.

Code	Comment Document

From: Michelle Thompson
To: ADOT
Subject: FW: South Mountain Freeway Question
Date: Friday, May 03, 2013 9:40:41 AM

Michelle Thompson
Senior Community Relations Officer
1655 W. Jackson St. MD: 126F
Phoenix, AZ 85007
602.316.4057
azdot.gov

From: billesson [mailto:billesson@cox.net]
Sent: Friday, May 03, 2013 8:56 AM
To: Projects
Subject: South Mountain Freeway Question

Folks,

Good morning.

I have started looking through the DEIS document.

I see the current traffic volumes and the projected traffic if nothing is done in figure 1-8 Chapter 1 b.

1 Where would I find the projected reductions in traffic if the freeway is built ??

Thanks,

Bill Esson

Ahwatukee

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.

Code	Issue	Response
1	**Traffic**	An assessment of conditions with and without the freeway in 2035 is presented beginning on Final Environmental Impact Statement page 3-27. The results of the assessment, supporting the need for the proposed freeway, are summarized in Final Environmental Impact Statement Table 3-9 on page 3-38.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 6:05 PM
CALLER: ESTELE ESTRADA	CALLER ADDRESS: 111TH AVENUE AND INDIANA, YOUNGTOWN, AZ
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway. Bye.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN PUBLIC HEARING
(Public comments to reporter)
May 21, 2013
10:00 a.m.
REPORTED BY:
April Lassiter, CSR #1521

FRANK EVEN: We need the highway badly. The only question we have is, can it be sooner rather than later. I mean, seriously. No, I mean, just in time to work, my commute on Baseline is miserable. Too much stop and go. It takes anywhere from 20 to 30 minutes to travel 14 miles, whereas with the new highway, I'll be able to do that in 10 to 15 minutes and probably use less gas in the process. The end. Please start it in 2013 instead of 2014 or I'll have to move out of the area. Now, the end.

1

Code	Issue	Response
1	**Alternatives**	Upon completion of the environmental impact statement process, and if the Selected Alternative were to be an action alternative, the Arizona Department of Transportation would begin the design phase, which would be followed by the final right-of-way acquisition process. Then other early construction tasks such as utility relocations would begin. The corridor would be divided into multiple final design segments. Construction sequencing and duration could change based on several factors, including funding availability, traffic volumes, coordination with other major freeway projects, earthwork balancing, utility relocation schedules, and regional priorities.

Code	Comment Document

From: Five Year Program
To: ADOT
Subject: FW: COMMENTS RE SOUTH MOUNTAIN and Roadway Extension
Date: Tuesday, May 14, 2013 10:04:25 AM

From: Dr. Gayle [mailto:simply4health@yahoo.com]
Sent: Monday, May 13, 2013 9:31 PM
To: Five Year Program
Subject: COMMENTS RE SOUTH MOUNTAIN and Roadway Extension

I am writing to oppose any construction of the South Mountain Extension as part of AZDOT's Five Year Plan.

1 As a health care provider I can think of no better way to harm the health of those living in and nearby the proposed roadway. Those who would work or travel in that are would also be at risk.

I recall in 2002 when I was involved in a similar issue in another state the US government health agencies released a document at that time supporting the health hazards of diesel fuel used by trucks. We have come no further down this road in improving the effects of this fuel on lung and heart health. The newest reports from 2013 continue to support the health risks of diesel fuel.

While I am a new resident of Arizona I chose to become involved in this issue prior to relocating. Now as a resident my view against this road is strengthened. I see and feel heat. I see and feel dust. I see and feel pollution.

2 Arizona is facing major environmental issues in addition to health problems. A temperature issue is the concern over the rising temperatures and this is reported to be directly associated with an increase in freeways and increased vehicular traffic.

Daily the accident reports are jolting.

Concrete is a heat sink. Baking in the valley sunshine leads only to higher overnight temperatures and limited cooling. These increasing temperatures are discussed on local news programs and in other media venues. Is anyone at AZDOT listening or is this just the typical bureaucratic way, "we made up our mind and we are going to do what we want and we don't care what the people think or even about the outcome in 1,3,5, or 10 years.

What if you took it upon your self to consider this from the point of view associated with the precautionary principle?

Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.

Code	Comment Document

3

There is really a lot more I could say but I believe this is enough to support the NO BUILD option.

4

I will close, as a person of Native American heritage, and advise you to be considerate of protected and Sacred land.

Thank you for the opportunity to comment,

Dr Gayle Eversole

The greatest enemy of knowledge is not ignorance, it is the illusion of knowledge. Stephen Hawking

HEALTH FORENSICS
the road to new health

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Code	Issue	Response
3	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Cultural Resources**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Expansion Through South Mountain
Date: Thursday, July 11, 2013 8:28:44 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Jennifer Face [mailto:jface@asu.edu]
Sent: Wednesday, July 10, 2013 7:14 PM
To: Projects
Subject: Re: 202 Expansion Through South Mountain

>
> To Whom it may concern,
>
> I am a Laveen resident who has many concerns for the 202 expansion through
> South Mountain. My main concern is that DEIS has not identified possible
> effects of The loss of agriculturally allocated land in the Laveen area.
> The agricultural land surrounding the area of the 202 expansion has helped
> offset the heat island effect caused by development in the Phoenix area.
> Has DEIS identified the possible effects on Phoenix's weather? Will South
> Phoenix and West Phoenix residents have to continue to be subject to dust
> storms or haboobs without rainfall? Will low pressure systems continue to
> pass over the greater Phoenix area causing further drought and high
> temperatures?
>
> I appreciate any information that can be provided for me.
>
> Sincerely,
> Jennifer Face
>
> --
> Jennifer Michelle Face
> Mary Lou Fulton College of Education
> (951) 809-5819
>

--
Jennifer Michelle Face
Mary Lou Fulton College of Education

Code	Issue	Response
1	**Agriculture**	Congress enacted the Farmland Protection Policy Act to minimize the extent to which federal programs contribute to unnecessary and irreversible conversion of farmland to nonagricultural uses and to ensure that federal programs are administered in a manner that, to the extent practicable, is compatible with State and local governments and with private programs and policies to protect farmland. The environmental impact statement process has adhered to the stipulation set forth in this Act (see page 4-161 of the Final Environmental Impact Statement). Urbanization in the Maricopa Association of Governments region has been occurring for years and will continue to do so with or without the proposed freeway (compare Final Environmental Impact Statement Table 4-2, on page 4-3, with Table 4-4, on page 4-7; see also Final Environmental Impact Statement page 4-152). For instance, much of the land along the Preferred Alternative in the Western Section is already slated for commercial and industrial uses.
2	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
3	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].

Code	Comment Document

(951) 809-5819

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Code	Issue	Response

Code	Comment Document

5588

***

THE REPORTER: Please state your name.

MS. FACE: My name is Jennifer Face, and I am a teacher at Country Gardens Charter School, and I oppose the 202 because it will displace many of our families that attend the school, and also the construction during expansion will greatly affect our school, and just the operations of the school in general.

Even if it is on 59th Avenue, just the area of the off-ramp would -- the construction, we'd have to reroute bus routes, and also we've had that area shut down before, and there's only one way in and one way out, so it's difficult for the logistics of getting students to school.

I mean, that's pretty much it. If the off-ramp, if at all possible, can be more towards the north, as opposed to the south of Southern, because of the area that it might cut into. There's a lot of wildlife within that area of our school. Right along Southern.

So that's it.

(Proceedings concluded at 2:00 p.m.)

Page 11

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www.drivernix.com

Code	Issue	Response
1	**Neighborhoods/ Communities**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Construction activities associated with a project the size and magnitude of the proposed project would create temporary impacts on human and natural environments. Throughout the Phoenix metropolitan area, the Arizona Department of Transportation and Federal Highway Administration have demonstrated experience in the construction of major transportation projects and mitigating construction-related impacts (see page 4-164 of the Final Environmental Impact Statement).
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Construction**	Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 4:58 PM
CALLER: SUSAN FATHAUER	CALLER ADDRESS: 13051 S. 35TH STREET, PHOENIX, AZ 85044
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I support the South Mountain Freeway. I have been waiting for it to be built for a long time and I think it will help cut down on pollution and congestion, traffic congestion. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support for SMF
Date: Monday, July 15, 2013 2:22:45 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Susi Fathauer [mailto:azsusi@cox.net]
Sent: Monday, July 15, 2013 2:21 PM
To: Projects
Subject: Support for SMF

1

I **support** the proposed South Mountain Freeway on Pecos Road. I have been waiting years for it to be built and can't wait.

I think it will be so cool to drive back behind South Mountain and through a 'pass' that is proposed to be cut in near the farthest western edge. I have never been able to see the "view" there and am looking forward to it!

Thank you for allowing the input.

Susi Fathauer
13051 S. 35th St.
Phoneix, AZ 85044
489.893.6689

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Julie Favila Document Created: 5/21/2013 2:02:10 PM by Web Comment Form In support of the freeway. Let's connect Laveen to the rest of Phoenix. It will bring in businesses and revenue. It will reduce time people spend in vehicles. It will allow people to get to the casino quicker and allow them to avoid 51st ave, North of Baseline.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:01 PM
CALLER: LIUBOV FEATHERSTON	CALLER ADDRESS: 2221 W. ST. CATHERINE AVENUE, PHOENIX, AZ 85041
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Richard Fedrick Document Created: 5/21/2013 2:36:03 PM by Web Comment Form The 202 loop would be a welcomed solution to the valley's traffic congestion. The plan has been talked about for far too long. It's time for action. The city of Laveen and its economic growth would also greatly benefit from the building of the loop. The amount of jobs that this project would create would also greatly benefit the community.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Ashleigh Feiring Document Created: 5/21/2013 2:04:36 PM by Web Comment Form

1 The South Mountain Freeway would be an big driver to improve and support Phoenix's economy. It would create jobs for 30,000 people and the money would feed directly back into the Phoenix area. It would also ease the flow of traffic and traffic accidents along the I-10 Broadway Stack.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	**TELEPHONE CONVERSATION RECORD** **SOUTH MOUNTAIN FREEWAY INFORMATION LINE** INCOMING CALL DATE: 5/18/13 — INCOMING CALL TIME: 3:02 PM CALLER: MARCIA FELINE — CALLER ADDRESS: 3914 W. GLENVIEW ROAD, PHOENIX, AZ PHONE: — EMAIL: **CALLER REMARKS/QUESTIONS:** Yes, hi, I am in support of establishing and building the South Mountain Highway. I be supported and fully supported a road that will definitely help create quite a few jobs and it will help the Phoenix economy in this area or Arizona economy. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 6:32 PM
CALLER: LOUIS FELIX	CALLER ADDRESS:
PHONE: 602-268-6941	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain Freeway. Thank you. Bye-bye.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway Study
Date: Monday, May 20, 2013 3:58:28 PM

From: Chris Fenner [mailto:csfenner@gmail.com]
Sent: Monday, May 20, 2013 3:13 PM
To: Projects
Subject: Loop 202 South Mountain Freeway Study

1

My vote is YES to the 202/South Mountain Freeway and specifically YES to the W59 Alternative option.

Thanks and best regards,
Chris Fenner

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 12:21 PM
CALLER: DENNY FERRIS	CALLER ADDRESS: 8932 W. DEER VALLEY ROAD
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, I think that the completion of the freeway on the south end down there is a good idea. Thank you. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:21 PM
CALLER: MR. AND MRS. JAMES FETTERMAN	CALLER ADDRESS: CHANDLER, AZ
PHONE: 480-895-5135	EMAIL:

1

CALLER REMARKS/QUESTIONS:

Support the freeway around South Mountain to I-10 as long it connects at the 101. We don't want to connect at the 51 or 69 or 73, we want to connect at the 101 so it actually means something not getting into the traffic just outside of downtown Phoenix just west of downtown Phoenix. Thank you very much. Bye.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Carolyn Fiedler
To: Projects
Subject: Loop 202 Proposed Freeway
Date: Tuesday, July 23, 2013 5:40:17 PM

To Whom it may concern,
Please do not build this freeway, as it is in fact, a truck bypass, not only for trucks on I-10 east and west, but ALSO for your proposed Canamex freeway from Mexico. If you must have a bypass AND the Canamex, go over to SR 85, which includes the areas of the far west valley for which you are "predicting" massive future growth.
Why would anyone want to take a community of mostly upper scale homes and destroy it with a freeway? We love our culdesac, and the privacy and security it has provided for over 20 years from Mountain Park Ranch to Club West. A giant sound wall blocking views of the desert to the south is not what I want to see out my back door. I also don't want to breath diesel and gasoline fumes and never open a window again. I may plan to die in my home, but I don't think my life's end needs to be sooner than the average person.
Noise and air pollution, along with hazardous materials passing by hundreds of homes and at least five schools in close proximity to the freeway ought to have been enough to stop this project long ago. The possibility of a hazardous disaster with big rig accidents, huge power lines and an underground gasoline pipeline is terrifying to those of us that live along this route.
I strongly support a "do not build it here". Build it on SR 85 from Gila Bend.
Carolyn Fiedler

1 2 3 4 5 6 7 8 9 10

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
6	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As mentioned in the sidebar on page 4-91, the Final Environmental Impact Statement is based on preliminary design and traffic information. As the design progresses to the Final Design phase, confirmation of public desire for noise mitigation would occur and if desired, noise barrier locations and heights would be refined and finalized. During Final Design, more detailed information on the location, actual height, and distance from the property line of each noise barrier will become available.
7	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Health Effects**	
9	**Hazardous Materials**	
10	**Alternatives, E1 Alternative**	

Code	Comment Document

From: danieltfiedler@cox.net
To: Projects
Subject: Loop 202 comments
Date: Wednesday, July 24, 2013 12:23:13 PM

To whom it may concern,
I would like to echo my wife's comments sent yesterday, and included here below.
It will be an irreversible and costly mistake to build this freeway. We know we are just the "little guys" standing against all kinds of people with "big power" to get what they want, and we are sick and tired of them.
If the GRIC does not want to allow ADOT to use their land, but they want to use the current route and make their own development plans, then why do we want to destroy their sacred mountain and still give them great access to develop the land along this route? It makes no sense. There seems to be no concern on their part for our well being, and there is a double standard of what is considered respectful.
Daniel Fiedler

To Whom it may concern,
Please do not build this freeway, as it is in fact, a truck bypass, not only for trucks on I-10 east and west, but ALSO for your proposed Canamex freeway from Mexico. If you must have a bypass AND the Canamex, go over to SR 85, which includes the areas of the far west valley for which you are "predicting" massive future growth.
Why would anyone want to take a community of mostly upper scale homes and destroy it with a freeway? We love our culdesac, and the privacy and security (crime in the area will undoubtedly increase) it
has provided for over 20 years from Mountain Park Ranch to Club West. A giant sound wall blocking views of the desert to the south is not what I want to see out my back door. I also don't want to breath diesel and gasoline fumes and never open a window again. I may plan to die in my home, but I don't think my life's end needs to be sooner than the average person.
Noise and air pollution, along with hazardous materials passing by hundreds of homes and at least five schools in close proximity to the freeway ought to have been enough to stop this project long ago. The possibility of a hazardous disaster with big rig accidents, huge power lines and an underground gasoline pipeline is terrifying to those of us that live along this route.
I strongly support a "do not build it here". Build it on SR 85 from Gila Bend.
Carolyn Fiedler

Code	Issue	Response
1	**Alternatives**	Federal law prohibits the denial of access to any community. Thus, traffic interchanges would be located along the freeway where it borders the Gila River Indian Community (see Final Environmental Impact Statement page 3-51). Roadway connections on Gila River Indian Community land to the traffic interchanges would be the responsibility of the Gila River Indian Community, in coordination with appropriate jurisdictions.
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Trucks**	
4	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other “loop” freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
5	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As mentioned in the sidebar on page 4-91, the Final Environmental Impact Statement is based on preliminary design and traffic information. As the design progresses to the Final Design phase, confirmation of public desire for noise mitigation would occur and if desired, noise barrier locations and heights would be refined and finalized. During Final Design, more detailed information on the location, actual height, and distance from the property line of each noise barrier will become available.
8	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
9	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Hazardous Materials**	
11	**Alternatives, E1 Alternative**	

Code	Comment Document

From: Sierra Club on behalf of Randy Filipic
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Saturday, June 08, 2013 8:35:51 AM

Jun 8, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.

3 ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more

5 vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Randy Filipic
5650 S Kyrene Rd Apt 1247
Tempe, AZ 85283-1732
(480) 775-6914

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Monday, July 22, 2013 8:39:43 AM

FYI

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Randy Filipic
Sent: Saturday, July 20, 2013 10:05 AM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

Jul 20, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.
(3) ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Randy Filipic
5650 S Kyrene Rd Apt 1247
Tempe, AZ 85283-1732
(480) 775-6914

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
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Code	Comment Document

4369

much worse on the citizens who live in Ahwatukee. Thank you very much for your time.

THE FACILITATOR: Thank you, sir.

Jacob Findlay.

MR. FINDLAY: Hello, my name is Jacob Findlay. Thank you for listening to my comments. I would just encourage the committee, as it's obvious to know the not-in-my-backyard arguments, they are typical of a project like this, but they shouldn't carry weight, given that they come with every project regardless of the time, place, contacts, whatever.

This is an infill project from the City of Phoenix, and I'm exited to see it finally come to fruition. Driving out on the 303 in the middle of the desert is a little baffling when I consider that the 202 is something which we need much more desperately, it hasn't been constructed and it looks great, but there's nothing around it. And the 303 out there, it's another issue but encourages additional sprawl, that kind of thing. The 202 as an infill project that encourages more development closer to downtown, people living close to downtown living, etc.

I live in Laveen and live there because of the proximity to downtown. This freeway will enable me to get downtown more quickly, to the services, that kind of

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

thing, but despite the proximity, we're still about a half an hour from the nearest hospital; this freeway will bring a hospital to Laveen. So in terms of health impact, the children and families, the environmental impact statement addresses the health impacts I think pretty thoroughly and mitigates the concerns that are raised here. An overarching health impact is not -- and so it's contemplated that we will have a hospital and emergency room where we don't currently have one. It will save lives and make a big impact on the community.

1

I also encourage the Gila River Indian Community to work with the project to avoid having to blast through the South Mountain. If somebody uses South Mountain frequently for recreation it's the last thing I want to see, but given the current realities and the unwillingness of the Gila River Indian Community to work with this project, it's unavoidable.

And finally, I would encourage the project to consider including bucolic elements on the freeway, consider the context of where it's being built near the mountain, include passages for wildlife, that kind of thing for the javelina, the coyotes that live where this freeway is passing, especially close to South Mountain. Thank you for your time.

2

THE FACILITATOR: Thank you.

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants, and Wildlife**	

Code	Comment Document

supposed to regulate that, and they're not doing anything to stop the council from what they're doing. So I just -- I just wanted to make that comment that I would like to see it go on the reservation. And it would save a lot of the people in Ahwatukee to go through what they have to go through. And it would also save that mountain that they wouldn't have to go through if they built it on the reservation.

So that's the comment that I have, and something that I have in my heart, and hope that in one way or the other, that it will go to the reservation. Thank you.

THE FACILITATOR: Thank you.

Sharon Finell. Finell. Which one is it?

MS. FINELL: Perfect.

THE FACILITATOR: Okay, thanks.

MS. FINELL: Hi, good morning. My name is Sharon Finell. I am a resident of Laveen. And I live just about a mile from where this proposed freeway would be. I am in support of the freeway. I am very excited. I don't have a problem with us having to cut through South Mountain. I love South Mountain as a form of recreation, and I think the pass through South Mountain will provide more recreation opportunities for people, as it will be

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

more accessible, and anticipate other trailheads and other things that could encourage our community to appreciate that more.

I also would love the opportunities that the freeway would bring to our community. Right now I have three children that aren't at working age, but at someday my kids are very excited to get a job, but jobs are very minimum right now, because we have a lack of businesses there. I do believe the freeway would bring in a lot of businesses and provide work opportunities for a lot of the youth in our community, who right now don't have that opportunity. They would have to travel. And I think it would allow us to spend our money in our own community and build our own community rather than right now we travel to a distance to find places that would fit the needs of our family.

So I am in support, and thank you very much.

THE FACILITATOR: Thank you. Luther Allen. Luther Allen. Luther Allen.

While we're waiting, just a reminder, if anyone wishes to speak at the hearing, please make sure you register at the registration desk.

At this point, we've exhausted the people

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I approve of the 202
Date: Tuesday, July 02, 2013 10:44:41 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Mike Fink [mailto:Mike.Fink@isagenixcorp.com]
Sent: Tuesday, July 02, 2013 10:39 AM
To: Projects
Subject: I approve of the 202

1

I just wanted to say that me and may others approve of the 202 coming into Laveen. I have been a resident for 4 years and have seen the rise in traffic congestion. I believe that this will more than help alleviate these concerns and bring some business to the area to help continue to drive forward movement of Laveen.

-Michael Fink

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

4281

* * *

MS. FINNER: My name is Jill Finner, F-i-n-n-e-r.

I would like to voice my support of building the 202 freeway, specifically the West 59th alternative. I'm a mother of small children. I've been a leader of a moms' group of over 70 moms which represent over 70 families, and we are constantly driving almost 30 minutes to other cities to find entertainment and dining options for family get-togethers and outings and play dates.

I would also like to request an attractive sound barrier and bike/running/pedestrian paths along the length of the freeway, such as the San Antonio, Texas, freeway system.

I'm in opposition to building a new casino and hotel that our current infrastructure cannot support.

We would like to bring the Ahwatukee and Laveen communities together, and the longer we wait to build, the more the cost of construction will increase. I would like to build it.

Thank you.

* * *

MR. ISLAUB: My name is Lynwood Islaub,

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www.drivernix.com

Code	Issue	Response
1	**Visual Resources**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation standard applications. The process municipalities might take to achieve the desired aesthetic treatment of for noise barriers or other structures is explained on pages 4-158 and 4-162 of the Final Environmental Impact Statement.
2	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain 202 - Support statement
Date: Wednesday, May 29, 2013 12:44:17 PM

From: Marla Finnigan [mailto:marla.finnigan@gmail.com]
Sent: Wednesday, May 29, 2013 12:35 PM
To: Projects
Subject: South Mountain 202 - Support statement

1

We have had frequent mulch fire breaks out along the proposed routes around Dobbins and 59th Ave. This causes Health Advisories to be issued and the property and well being of the citizens to be jeopardized. I support the South Mountain 202 project. It will personally provide me greater access to other areas of the Valley and will ensure that many of the acres not currently being maintained will be utilized for helpful and purposeful reasons.

Sincerely,

Marla Finnigan

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Lorie Fisher Document Created: 5/10/2013 7:52:09 PM by Web Comment Form

A route south of Pecos Road must be found. It is far too late to use Pecos Rd. the City of Phoenix should have denied those building permits in the path of the future freeway. They should be held accountable for that. Also, as the song goes, "they paved paradise" applies to this freeway blasting off a corner of the beautiful South Mountain Park! That is a crime against nature, and cannot be allowed. It is far too late for the Pecos Road option to be considered. Who in their right mind would think it is ok to bulldoze homes, churches, school, and the corner of South Mountain?!! You must find another path, or go with the "no build" option.

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Acquisitions and Relocations**	It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway opinion
Date: Tuesday, April 30, 2013 8:52:47 AM

-----Original Message-----
From: Lorie Fisher [mailto:morejava@cox.net]
Sent: Friday, April 26, 2013 4:44 PM
To: Projects
Subject: South Mountain Freeway opinion

1 2 3 4 5

It is too late to align the South Mountain Freeway along Pecos Road without much destruction and devastation. It seems that the communication between ADOT and the department within the City of Phoenix that issues building permits should have done a better job denying building the homes, churches and schools in the path of the freeway. Live and learn. Also, it is unacceptable to cut through any portion of South Mountain. We are literally "paving paradise!", just like the song says. Stop the Pecos Road plan, and work diligently with the Gila River reservation for a route to the south of Pecos.
Sincerely,
Lorie Fisher
morejava@cox.net

_____

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Acquisitions and Relocations**	It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 6:58 PM
CALLER DOUGLAS FISHER	CALLER ADDRESS: 18872 N. 93RD AVE., PEORIA, ARIZONA 85372
PHONE: 623-546-3938	EMAIL:

CALLER REMARKS/QUESTIONS:

1

I would like to leave a message in support of the South bound freeway. I drive in and around the city often and in my business this would be very helpful. Bypassing a bottle-neck in the middle of the city. If you have any questions, contact me. Thank you. Bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:00 PM
CALLER: MARIANE FISHER	ADDRESS: 930 SOUTH DOBSON ROAD, MESA, AZ 85202
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am calling to support the new freeway that's being built, the South Mountain Freeway. I would like to have this built because I believe this it would save on traffic congestion. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. I am certainly against the proposed South Mountain Freeway. It would be an environmental nightmare. Already urban sprawl has taken over much wildlife habitat. This freeway would make it even worse while contributing more carbon towards Climate Change. People with Tuberculosis used to come to Arizona to breathe easier. Now the air quality is so bad, you can see it. My niece has asthma so bad, she sleeps hooked up to a machine. My co-worker keeps going to the doctor. He does not smoke, yet he cannot breathe. In addition to gross harm on the Environment, this highway would desecrate Native American lands. If ADOT truly wanted to help people commute, they would use funds for new roads to invest in mass transit. The lite rail is a pleasure to ride, and helps the local economy. I only wish it went closer to my home + work.

Optional

Name James Fishgold Email jmangoes@hotmail.com

Address 2446 E PIERSON ST.

City PHOENIX State ARIZONA Zip 85016

Phone 480-299-4680 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

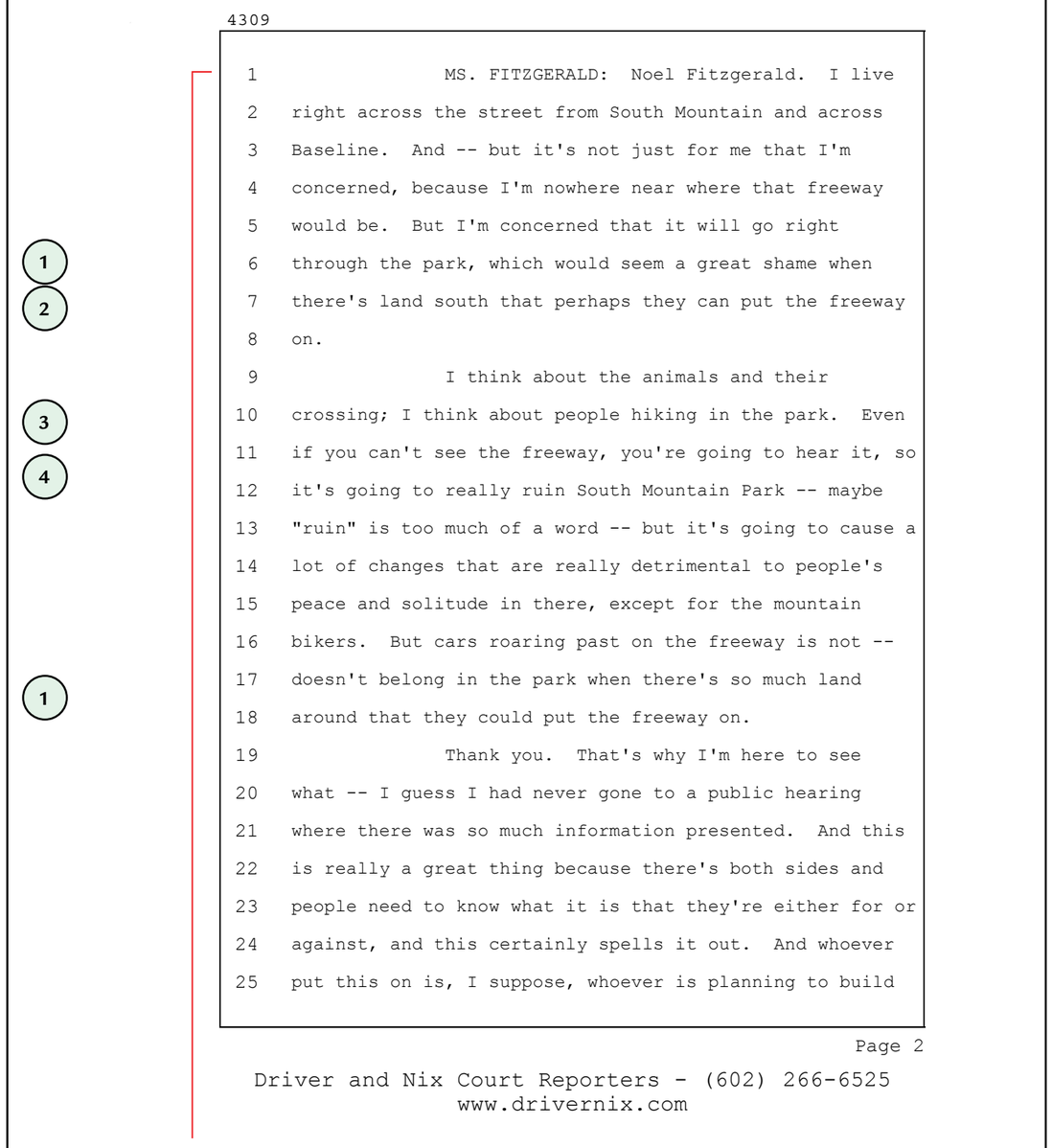
ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Secondary and Cumulative**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Health Effects**	
4	**Air Quality**	
5	**Cultural Resources**	
6	**Purpose and Need, Lack of Support**	

(Responses continue on next page)

Code	Comment Document



4309

1 MS. FITZGERALD: Noel Fitzgerald. I live
2 right across the street from South Mountain and across
3 Baseline. And -- but it's not just for me that I'm
4 concerned, because I'm nowhere near where that freeway
5 would be. But I'm concerned that it will go right
6 through the park, which would seem a great shame when
7 there's land south that perhaps they can put the freeway
8 on.
9 I think about the animals and their
10 crossing; I think about people hiking in the park. Even
11 if you can't see the freeway, you're going to hear it, so
12 it's going to really ruin South Mountain Park -- maybe
13 "ruin" is too much of a word -- but it's going to cause a
14 lot of changes that are really detrimental to people's
15 peace and solitude in there, except for the mountain
16 bikers. But cars roaring past on the freeway is not --
17 doesn't belong in the park when there's so much land
18 around that they could put the freeway on.
19 Thank you. That's why I'm here to see
20 what -- I guess I had never gone to a public hearing
21 where there was so much information presented. And this
22 is really a great thing because there's both sides and
23 people need to know what it is that they're either for or
24 against, and this certainly spells it out. And whoever
25 put this on is, I suppose, whoever is planning to build

Page 2

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www.drivernix.com

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community Alignment**	
3	**Biology, Plants, and Wildlife**	
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Noise impacts on Phoenix South Mountain Park/Preserve were considered; however, the type of adjacent land uses and proximity of sensitive areas within the park did not qualify for mitigation based on the Arizona Department of Transportation Noise Abatement Policy (see page 4-88 in the Final Environmental Impact Statement for more information on the policy). Although recreation uses are considered in the noise analysis as noise-sensitive land uses, another consideration is the reasonableness of providing noise mitigation for a particular land use. For recreational land uses, typical considerations include the number of people using the facility and the amount of time the facility is in use throughout the day. Many of the recreational uses in the western portion of Phoenix South Mountain Park/Preserve receive infrequent use, and noise mitigation would not be reasonable given the high cost of construction.

Code	Comment Document

the freeway -- the city or whatever. But anyway, thank you.

* * *

MR. PALERMO: My name is Joe Palermo. I'm in favor of the Loop 202 South Mountain Freeway. I commute daily for work on the I-10 through downtown, and I believe that the Loop 202 will significantly help the flow of traffic through downtown.

Additionally, I believe that the traffic that is stuck in idling in downtown contributes significantly to the poor air quality of our metropolitan area. And I believe that traffic will inevitably increase over the coming years. And while we have this opportunity to build the 202 freeway, we should proceed forward, rather than be behind the curve and potentially find ourselves in a gridlock situation.

Additionally, I am an environmental consultant as my career. And I believe that this will help me and my family with opportunity to potentially be part of this important infrastructure project. And so additionally I'm in favor of it, not only for reasons for the city, but also for myself personally. Thank you.

* * *

MR. MARINO: Christopher Marino, and I'm for the freeway. I have lived in Ahwatukee for since

Code	Issue	Response

Code	Comment Document

From: Sierra Club on behalf of Robin Flack
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 12:14:52 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

Please select no-build alternatives to the proposed freeway going through South Mt. Park. Since I moved to Phoenix nearly 10 years ago, I have been proud knowing that I live in a city that has the largest park in the nation. The consequences of building a major highway through a large part of it are many and of serious consequences for both the people and wildlife.

2 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.
3 ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more
5 vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside
7 to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	Sincerely, Ms. Robin Flack 21630 N 44th Pl Phoenix, AZ 85050-6936 (480) 636-8331

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway - Loop 202 extension
Date: Monday, June 24, 2013 8:54:35 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Judy Flanagan [mailto:j.flanagan@jfimmigration.com]
Sent: Sunday, June 23, 2013 10:08 AM
To: Projects
Subject: South Mountain Freeway - Loop 202 extension

Dear AZDOT,

(1) I am writing to express my strong opposition to the Loop 202 extension. What a bad idea. I love South Mountain Park, a desert oasis (and one of the largest city parks in the U.S.)! We're going to run a freeway through it? No, no, no.

(2) Not only will it harm us, as city dwellers, who need open space (without traffic!), this extension will destroy habitat for animals, birds, and vegetation.

(3) Let's encourage people to use public transit or to car pool! Or maybe live in the city center so they don't have to have such a long commute. What a waste of energy to be running a freeway through a desert park. Just say no.

(4) (5) (6) What evidence is there that this is going to reduce traffic and congestion? I don't buy it. In fact, I think the evidence is out there that new freeways encourage more vehicle use, and we end up with even more congestion. We already have a huge air pollution problem; let's not compound it by adding a new freeway that bisects a park!

Just say no.

Judy Flanagan

--
Judy Flanagan, Esq.
JUDY C. FLANAGAN, P.C.
1802 E. Thomas Rd. Ste. 18
Phoenix, Arizona 85016-8134
Phone: 602.667.6200
Fax: 602.667.6301

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants, and Wildlife**	
3	**Purpose and Need, Lack of Support**	
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Traffic**	The responsiveness of the proposed freeway to purpose and need criteria is presented in the Final Environmental Impact Statement, beginning on page 3-27. Information related to total daily traffic on other regional freeways, including Interstate 10, with and without the proposed freeway is presented in Figure 3-12. Information related to traffic distribution on Study Area freeways and arterial streets, with and without the proposed freeway, is presented in Figure 3-13. Information showing hours of congestion on the region's freeways, with and without the proposed freeway, are shown in Final Environmental Impact Statement Figure s 3-15 and 3-16.
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

j.flanagan@jfimmigration.com
www.jfimmigration.com

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Code	Issue	Response

Code	Comment Document

no ways to get to a hospital if there's a emergency. So having a freeway will bring a hospital closer to individuals. Instead of driving at least 20 minutes away, you'll have a hospital within five to ten minutes. You'll just have people with disabilities that have no way of getting to a hospital also, and this will bring a hospital for that. So for low income people, people from disability, and for minorities, it'll bring not only a hospital but good paying jobs also. That's it. Just build that damn freeway.

* * *

PAULA FLECK: Paula Fleck. I just wanted to add that I heard a woman get up and speak and mention that she believed that adding the 202 would cause emphysema. And I'm a respiratory therapist, and I can tell you that emphysema is not caused by pollution from the 202. Over 90 percent of it is caused by smoke like cigarettes or any kind of thing you would smoke. About, I'd say, five percent would be from secondhand smoke or working in a job where you're around a lot of chemicals, directly exposed and not protecting yourself with the mask, and about one percent of it is caused by alpha 1-antitrypsin. Those are rough numbers.

But I'll tell you this is from my schooling, as well as what I've seen working in a

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1 hospital 40 hours a week, and this is from my own
2 experience. And it is not caused by cars driving on the
3 202. In fact, having the 202 will reduce the stop-and-go
4 traffic that you have on the surface streets and reduce
5 pollution in that way, I believe. So that's all I had to
6 add.
7 * * *
8 UNIDENTIFIED SPEAKER: I'm very much for
9 the highway for Laveen, I feel that it would bring in
10 jobs, especially for the youth and the community; and I
11 think that that will assist with some of the crime and
12 the graffiti if we had the highway, which would bring
13 more businesses.
14 The hospital, we have a lot of senior
15 citizens that live in the area, and unfortunately, the
16 nearest hospital is -- I think it's Maricopa Integrated,
17 and that is a long way when it's an emergency.
18 So that is my comment, and my reasons for
19 supporting the I-10 highway -- Loop 202 South Mountain
20 Freeway.
21 * * *
22 MR. HERNANDEZ: David Hernandez. I live in
23 the preferred route, 59th Avenue south of I-10, and they
24 need to build the freeway. Yes, I agree with it.
25 However, the route that they are taking is shortsighted.

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

average household income than the City of Phoenix --

THE FACILITATOR: Excuse me.

MS. KEENAN: -- Paradise Valley, and the greater national average. Thank you.

There aren't that many people here to speak; I don't know why you can't let people speak a couple more seconds.

THE FACILITATOR: Paula Fleck.

Before you begin, ma'am, keep in mind the three-minute time limit.

Also, please be respectful of all the speakers. Your comments need to be kept to yourself so we can honor the comments and opinions of each speaker, regardless of your side of the issue.

Yes, ma'am, go ahead.

MS. FLECK: Okay. I think it is time to build the South Mountain freeway. Valley commuters have waited in traffic jams long enough. The freeway will cut congestion across the metro area, reduce the air pollution, and save drivers time and money; 64.3 percent of likely voters in Maricopa County support construction of the freeway, according to the results of a new poll commissioned by We Build Arizona. Just 19.6 percent said they were opposed or likely to oppose the project.

In a separate survey also commissioned by We

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Code	Issue	Response

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Build Arizona, 59 percent of likely voters living in Ahwatukee and Laveen support the freeway as well. If we don't built South Mountain freeway, traffic from the region will get much worse over the next two decades, according to ADOT's own study. According to the study, traffic on I-10 between Ahwatukee and Goodyear will grow 28 percent. Another 103,000 cars will use the Broadway curve each day, and then 38,000 cars will jam the tunnel each day. Morning and evening commute times will increase from 39 percent to 82 percent. Traffic congestion on city streets will increase 46 percent. The same report indicates the project also will reduce air pollution by reducing the time people spend stuck in traffic.

The project will create 30,000 jobs during the five- to six-year construction period and result in a $2 billion investment in the Phoenix area economy. The money to build the freeway is in the budget. It was approved by voters twice, first in 1985 and again in 2004. There is no more important project to the area commuters and workers than the South Mountain freeway project. We must build it now.

Also, I would like to add that when we do this project, we should include a multiuse path alongside the freeway so citizens have the choice of how they want to

1

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Code	Issue	Response
1	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

commute. Thank you.

THE FACILITATOR: Thank you.

The next speaker, could you use this microphone, please. Thank you, ma'am.

Raven Barehand.

As we're waiting for the next speaker, I'd like to remind you to refrain from clapping or making comments regarding any speaker's position on any of this out of respect for their position.

Ms. Barehand, you can use this microphone here. You have three minutes, the timer is here in front of you. You may begin.

MS. BAREHAND: Okay. Hi, my name is Raven Barehand, I live over there in Laveen and Komatke in the Hillcrest area. One thing I'd like to say is that that freeway would steal the blue from the Estrella Mountain range. It's a brilliant blue, it's a brilliant, cobalt blue or very bright blue. There's no other mountain around here that is that blue as that mountain, and on days when there is a lot of smog that comes in from Phoenix, that mountain turns gray. And so I know that it would cause more emphysema, a lot of people don't want it but the thing is it would cause a lot more sicknesses to come to that area.

I know that the people who were pushing to have

Code	Issue	Response

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: Loop 202 S. Mt. #1320263232
Date: Monday, July 22, 2013 7:53:47 AM
Attachments: image001.png

7/21/2013 5:28:35 PM
Hello,

1 **I am writing to state my strong opposition to any kind of freeway running through the South Mountain preserve. PLEASE do not approve of such a project - it would be a travesty to destroy ANY of the South Mountain landscape for a new freeway.**

Regards,
Devin Fleenor
Lifetime AZ resident

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

country. And to make our air better, to make the lives of the people living in their communities better. And I am one that believes that the people living in the state of Arizona and Maricopa County are a priority. And that if our air is circulating by our cars moving faster, it's not idling and staying stagnant in one location. So that's what I'm here to say today.

And I, obviously, love the state of Arizona, but more importantly, I love Laveen.

THE FACILITATOR: Thank you. Just a note, remember there are two microphones, one on either side. So if you would please feel free to use either one.

Shelley Fletcher.

MS. FLETCHER: Thanks. My name is Shelley Rogers Fletcher, and I live at 5039 West Olney Avenue in Laveen, which puts me right on 51st Avenue, which is the affected 202 at this point for all the truck bypass traffic, which travels through Laveen.

We have watched over the past 20 years, as this freeway first started being discussed, the increase in traffic on 51st Avenue. The truck traffic is phenomenal, considering all the truck

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

terminals that are being built on the west side of Phoenix. And most of them will come through Laveen to avoid having to go through the congestion on the freeways in Phoenix.

I obviously am pro 202. I don't believe we can stand still and pretend that the growth in Laveen hasn't happened, and that the houses haven't been built and that the houses all over the Valley haven't been built. It's time to complete our bypass system and our loop system has been approved a long time. I've been going to these hearings for 20 years. I hope this is perhaps the last opportunity I have to speak on this particular subject. It's time we built the 202, those of us that live with the traffic that's being created anyway would prefer to have it in a more orderly fashion going through our community. Thank you.

1

THE FACILITATOR: Thank you. If anyone else has not registered would like to speak at the hearing, please make sure you register at the registration desk and then come before us.

I believe we have a preregistered speaker, Jennifer Nelson; are you here? Jennifer Nelson in the auditorium? She's coming? Thank you. Jennifer Nelson, please.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 expansion
Date: Wednesday, June 26, 2013 8:10:53 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Lisa Flodin [mailto:pflodin1@cox.net]
Sent: Tuesday, June 25, 2013 6:16 PM
To: Projects
Subject: 202 expansion

To whom it may concern,

1

The 202 expansion has been voted on twice and passed to be built so what is there to revote on. Many of us bought houses in regions with the belief that because it passed that it would be built and are finding that the local governments lack of follow through rather troubling. I am starting to think of moving from this state all together recently and this is part of the reason. That and your horrible schools. Please get something right soon!

Thank you,

Lisa M. Flodin

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 22, 2013 10:53:21 AM

From: Terri Flood [mailto:terri@escapesunlimited.com]
Sent: Tuesday, May 21, 2013 6:28 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

As a resident of Laveen, I urge you to pass and build the 202. It is something that is needed in our area, and with the growth that we are currently seeing, it will help with traffic, and infrastructure.

I have gone social, please like my facebook page at
http://www.facebook.com/EscapesUnlimitedIncAZ

Warmest Regards,
Terri Flood, Owner
Escapes Unlimited
www.escapesunlimitedAZ.com
602~466~2444 ~ Phoenix
800~594~7084 ext 1 ~ Toll free

2012 Recipient of the Sandals Lifetime Achievement Award

Recipient of Sandals Chairman's Royal Club Award 2011 & 2012

Sandals & Beaches Best of the Best Award 2005 thru 2012

ARIZONA'S #1 HONEYMOON & DESTINATION

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 7:15 PM
CALLER BEATRICE FLORES	CALLER ADDRESS:
PHONE: 623-388-4491	EMAIL:

CALLER REMARKS/QUESTIONS:

I am a Peoria resident and I'm in favor of the South Mountain freeway bypass. Please contact me if you need to verify. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: No freeway near Pecos
Date: Monday, July 08, 2013 8:49:32 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Aimee Flores [mailto:eemiatregge@hotmail.com]
Sent: Saturday, July 06, 2013 11:15 PM
To: Projects
Subject: No freeway near Pecos

My family and I do NOT want the freeway built near Pecos Road or anywhere near Ahwatukee. This freeway will destroy our area!

1

We moved to Ahwatukee because the area was pristine and safe. Building this freeway will bring more traffic, pollution, and crime to our area.

2 3 4

Downtown Phoenix's air quality is horrible. The only clean air is outside of the city. Do not bring this pollution to the outskirts of town.

Ahwatukee is safe because of the limited access. It's known as the big cul de sac and we like it that way.

5

The proposed freeway will destroy our lifestyle and the lifestyle of the many animals and birds that live in our desert areas.

6

Thank you for your time,

Aimee M. Flores and family

Code	Issue	Response
1	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
6	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:25 PM
CALLER: CHERYL FLYNN	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain freeway. Thank you. Bye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 10:07 AM
CALLER: FLORA FONG	CALLER ADDRESS: 4102 E. SCUPTURE PLACE, CHANDLER, AZ 85249
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway. It is very important for the traffic.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 1:48 PM
CALLER: ANTOINETTE FORCINE	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I'm for the South Mountain Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Peggy Ford
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 10:14:37 AM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 It is almost impossible to regain a healthy ecology once it has been interrupted. South Mountain Park was established to preserve the unique desert ecology of the area. A freeway through there would defeat the purpose of the Park.

3 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.

4 ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

5 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more

6 vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

2 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a

7 freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	Ms. Peggy Ford 1053 W District St Tucson, AZ 85714-1103 (520) 889-1963

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 1:03 PM
CALLER: KATE FORD	CALLER ADDRESS: 5706 N. CENTRAL AVENUE, PHOENIX, AZ
PHONE: 480-948-6632	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the building of the freeway. Thank you very much.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Opposition to S. Mountain Freeway
Date: Friday, June 28, 2013 10:00:25 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Kathy Forger [mailto:kathy.forger@russlyon.com]
Sent: Friday, June 28, 2013 9:38 AM
To: Projects
Subject: Opposition to S. Mountain Freeway

1
2 3
4
5 6

As a local real estate Agent selling and listing homes in the Ahwatukee area, I am STRONGLY opposed to building the 202 Freeway along the Pecos Rd. alignment. I can attest to the fact the the freeway being built so close to residential areas will have a negative impact on homes selling near by, not to mention the affects of pollution, road noise, etc.

.It has taken a number of years for this area to recover from the last road construction on Pecos and the everlasting reputation of the "largest cul-de-sac" in the nation. This reputation has influenced potential homeowners to choose NOT to move to Ahwatukee because it was so difficult to access when Pecos was under construction. I can't imagine having to go through that yet again!

As a member of PARC we implore you to find another option. This is not a wise way to spend the Public's tax dollar and will not improve the quality of life in our community.

Kathy Forger, GRI, CNE
Mobile (602) 430-1199
E-Fax (480) 283-2031
"Committed to earning your repeat & referral business."

Code	Issue	Response
1	**Acquisitions and Relocations**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	
4	**Construction**	The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)
5	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document
1	Janet Forgy Document Created: 5/21/2013 2:53:18 PM by Web Comment Form South Mountain Freeway is desperately needed and the sooner the better. I reside in the Laveen Meadows subdivision. At that time I puchased my home in November 2007, the South Mountain Freeway was being discussed and assurances were made to me of the potential of not only the Freeway but of substantial economic development in the area. As you know this has not happened and the area is isolated with very little business development. It is vital that the South Mountain Freeway be started and completed without further delay. Let's stop talking and start building!!!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4178

though we're right next door until we and our kids and our people realize that we can make bigger strides if we apply ourselves and our children and not be afraid to stand in places where we need to stand up. That's about it.

Thank you very much.

MS. FORGY: My name is Janet Forgy. I have lived in Laveen area, the 67th Avenue and Baseline subdivision, Laveen Meadows, for about six years in November. And I can tell you we desperately need to have this 202. It's imperative. It's like we're out in the boondocks. Businesses are not developing. We have to go five miles to get to I-10, that's the shortest distance, five or 13 miles to get to an interstate.

I-10 is like a parking lot sometimes. There's no development of businesses. I mean, there's nothing. We need that desperately, and so I strongly encourage the 202 to be developed as soon as possible without any delays cause we definitely need it.

1

UNIDENTIFIED SPEAKER: One of the things I want to stress is that when I purchased my house in November of 2007 I saw the possibilities of development and I was assured that it was going to be developed. It subsequently has not. As a matter of fact I understand because of the economic situations, things had a way of

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:41 PM
CALLER: JANET FORNEY	CALLER ADDRESS: 3897 E. SCOPIO PLACE, CHANDER, AZ 85249
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am calling in support of the South Mountain Freeway to take the congestion off of Interstate 10 and make it easier for me, and my family, and my children to get to where we need to go living out here. So, please support the building of this freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 4:01 PM
CALLER MARY FOSTER	CALLER ADDRESS: 10138 W. CAMDEN AVENUE, SUN CITY, ARIZONA 85351
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Hello, I am in favor of the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 4:32 PM
CALLER: JOHN & BARBARA FOSTER	CALLER ADDRESS: 4008 N. 40TH PLACE, PHOENIX, ARIZONA 85018
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 We support the South Mountain freeway. Please build it. Ok, thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Freeway
Date: Monday, May 20, 2013 8:29:45 AM

From: Dennis Fox [mailto:dennis_f12@yahoo.com]
Sent: Saturday, May 18, 2013 10:39 AM
To: Projects
Subject: 202 Freeway

1

Please build it. We've wasted enough taxpayer money.

Sent from Yahoo! Mail on Android

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 2:54 PM
CALLER: SAMI FOX	CALLER ADDRESS: 1058 E. GARNET AVENUE, MESA, AZ 85204
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I approve of the loop from South Mountain to I-10. I would just like to make sure there is a time frame involved. I don't want to see anymore heavy duty equipment sitting on the side of the road not doing anything for a number of hours. I would hope we would have a contract in order to have at least two shifts during the day – possibly late at night, possibly early in the morning in order to facilitate the building of this access road and to alleviate traffic problems that we are currently experiencing in the valley. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 4:36 PM
CALLER DON & HENRIETTA FOX	CALLER ADDRESS: 15203 W. PAPAGO STREET, GOODYEAR, ARIZONA 85338
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Yes, we'd like to support the South Mountain freeway to connect to I-10. You have our support.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:20 PM
CALLER: JESSIE FRABAYZEGA	CALLER ADDRESS: 8823 W. CYPRESS STREET, PHOENIX, AZ 85037
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1

I support the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 freeway completion
Date: Monday, May 20, 2013 8:27:17 AM

From: david fraire [mailto:fraire13@yahoo.com]
Sent: Sunday, May 19, 2013 1:04 AM
To: Projects
Subject: 202 freeway completion

1

What are you waiting for? build that damn freeway!!! It's been in the books since early 80's when I was planning on moving to awhautukee foothils new development. We were advised on the freeway route way back then,. All these persons that claimed not to be knowledgeable on the subject are playing ignorance. You know what they say "ignorance is a bliss".

Thanks and best regards

fraire

David Fraire
2875 W. Highland St.#1100
Chandler, Arizona 85224
Cell: 480.772.0054
fraire13@yahoo.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Ivan Fraire Document Created: 5/21/2013 8:52:31 PM by Web Comment Form My comment comes from miles and hours spent on the urban roads stopping and going, yelling and screaming, slowing down for school zones and stopping for road construction. I strongly agree to go forth on the W59 Alternative, as a commuter who travels from 67th Ave and Baseline to 16th and Camelback, I feel that this alternative would have great impact on my commute from home but also for the commute of many other drivers that I happen follow in and out of the Laveen neighborhoods. I don't agree with this alternative only for my benefit but for the benefit of all commuters that travel into Downtown Phoenix or the East Valley. It is also my opinion that the W59 Alternative is a median point for Laveen commuters to go WEST or EAST at the I-10 TI. I also feel that the W59 Alternative will have a better economic turnaround. You have easier and faster commute to downtown activities, work opportunities in the City of Phoenix and a better way for West and East Phoenix Community to visit Laveen. The Bequiva Casino will also get a great way to get Casino goers to visit and help built the Native communities that recieve no support from neighboring cities. My opinion is also that the W101 Alternatives will have no benefit to the majority of the Laveen Community and will ultimately be a waste of Tax payer money and we all know that wasting Tax payer money needs to stop.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:55 PM
CALLER: FRANCIS	CALLER ADDRESS:
PHONE: 602-437-2337	EMAIL:
CALLER REMARKS/QUESTIONS: Hello, I support the South Mountain Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4389

my support for the 202 freeway. I happen to live in Ahwatukee just off of Chandler Boulevard and I know that there's been a lot of conversations in Ahwatukee about the impact to that part of Phoenix. I think it would actually be a boon to that portion of town for several reasons. If you travel from Ahwatukee up I-10 to get to I-17 going north to Prescott, you've experienced a lot of traffic delays on I-10, particularly through the Broadway curve. I think this freeway extension will help to relieve that traffic by bringing traffic off of I-10 that comes up from Tucson and has to get to the middle of Phoenix. This way you'll have a bypass that will actually put that traffic out to the west side of town and relieve the congestion and the delays that people from Ahwatukee experience getting to the airport and in the central business district of Phoenix.

So, again, I want to support my support -- or voice my support for this freeway project. I know that a lot of the information that you see here in the draft EIS shows the real benefits of that and in particular, further, I want to voice the support and in the area of relieving traffic from my area of town. Thank you.

THE FACILITATOR: Thank you.

Randy Frank.

MR. FRANK: I'm Randy Frank, I'm representing

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www.drivernix.com

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Code	Comment Document

1

Bay State Milling Company, 421 South 99the Avenue. I want to go on record fully supporting the South Mountain corridor freeway with the alignment, recommended alignment going down 59th Avenue. Thank you.

THE FACILITATOR: Thank you.

Reyes Medrano.

MR. MEDRANO: Good afternoon. Reyes Medrano, I'm the City manager of the City of Tolleson at 9555 West Van Buren. Mr. Burdick, good to see you, sir, it's been too long.

We're here to accompany Mr. Frank, who is one of our primary business partners and employers in Tolleson, and also to issue our support for the 59th Avenue alignment to intersect with the South Mountain freeway. Thank you.

THE FACILITATOR: Thank you.

If you'd like to speak, please go to the registration desk out front.

Joe Palermo.

MR. PALERMO: Good afternoon, gentlemen. My name is Joe Palermo, I want to speak on behalf of support for the Loop 202 freeway project. In my opinion, I travel the I-10 corridor daily to work and it's often very much a burden to me to see traffic at a complete standstill and gridlock in downtown. And in my opinion,

Code	Issue	Response
1		Comment noted.

Code	Comment Document

and we have the responsibility to protect their habitats. During my lifetime we have come a long ways in learning the importance of environment and interconnectivity, so do not break this growing respect for our environment.

And the third reason I have is that homeowners have the responsibility to consider transportation before they buy a home. I have owned five homes during my life, I know what it means to look at your home and where you're going to live, and I believe it's outrageous and arrogant to move into an area and then try to change its very essence for our personal comfort. It's the attitude of now I'm here, so you need to change things for me. It's a terrible message to send our children.

I love this park and I ask you to send our children a message of the importance of respect and protection of our heritage and natural environment by saying no to building a freeway through South Mountain Park. Thank you.

THE FACILITATOR: Thank you.

Anybody who would like to speak, please go out to the registration table, get registered, we'll be happy to hear you.

Mike Franklin. Could you come to this mic over here, please.

MR. FRANKLIN: Must be on. Okay. My name is

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www.drivernix.com

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Mike Franklin, I live in South Tempe. South Mountain is the place I go hiking most, because it takes less gasoline for me to get there. There are parts of South Mountain that kind of take you out of the city, and there aren't too many places you can go to around here like that. It's always interesting to find new discoveries, there's lots of petroglyphs, it's unique. It won't be unique if the west end is chopped off with eight lanes of traffic, polluting the air, making it noisy, totally destroying the natural experience of being up in the mountains. To do this, to take about five percent of the traffic or whatever it is off of the interstate just doesn't seem worth it to me.

I think once you've -- the oil production gets down we're going to have to find better ways of transportation or we're going to get stuck with this expanse of asphalt there forever, at least during my life. And I vociferously disagree with that tact of moving traffic, it's kind of a 20th-century solution to a 21st-century problem. That's what I have to say.

THE FACILITATOR: Thank you.

Patricia Weeks.

MS. WEEKS: Hello. Actually, I just want to expound upon what my husband said. Can you guys hear me? Can you hear me?

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Noise impacts on Phoenix South Mountain Park/Preserve were considered; however, the type of adjacent land uses and proximity of sensitive areas within the park did not qualify for mitigation based on the Arizona Department of Transportation Noise Abatement Policy (see page 4-88 in the Final Environmental Impact Statement for more information on the policy). Although recreation uses are considered in the noise analysis as noise-sensitive land uses, another consideration is the reasonableness of providing noise mitigation for a particular land use. For recreational land uses, typical considerations include the number of people using the facility and the amount of time the facility is in use throughout the day. Many of the recreational uses in the western portion of Phoenix South Mountain Park/Preserve receive infrequent use, and noise mitigation would not be reasonable given the high cost of construction.
4	**Purpose and Need**	According to the project team's traffic analysis, without the proposed freeway, existing roads and planned road improvements would accommodate about 76 percent of the transportation demand projected for 2035, leaving 24 percent of the anticipated demand unmet. If one assumes better-than-expected performance of nonfreeway aspects of the transportation system, 13 additional percentage points of the 24 percent deficiency would be accommodated. This means that the transportation network would still have an 11 percent capacity deficiency. The same analysis with the proposed freeway in operation in 2035 concluded that the met demand would increase to 82 percent; better-than-planned scenarios noted above, if achieved, would reduce network deficiency to 5 percent. The proposed freeway would handle about half of the capacity deficiency not captured by other modes. (See Figure 3-14 on Draft Environmental Impact Statement page 3-31).
5	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

school. I didn't need a car. I could use the bus. And people all over this country that have many advantages that we don't have here for our average middle class citizen. And this particular road will deprive us of a road and light rail where it's really needed, where it would really help.

And I appreciate this opportunity. It was difficult, in my condition, to come down here. But I'm glad I did, and I appreciate the young lady being so patient. Thank you.

Can I put this with my material?

MR. FRANKLIN: All right. Now, this is a speech that I was going to have for the room, but I just -- I have to go and run, so...

Good afternoon, Panel. My name is Ross Franklin. That's R-o-s-s, F-r-a-n-k-l-i-n. And I'm a resident of Laveen, Arizona. I appreciate you letting us all speak in front of you today. You will hear much emotional testimony today regarding the impact of building the Loop 202 western loop connector. I will stick to the facts and leave the emotion to others.

Over the past 15 years, the population of Laveen and Southwest Phoenix has doubled. The EIS projects that number to more than double again over the next 25 years. While new highways like the Eastern

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Loop 202, the Loop 101, and even projects like the Loop 303 have been built and completed or are well under way on construction and nearing completion, the much-needed Loop 202 western loop connector has been mired in political and environmental tug-of-war for years. Only the Loop 202 western connector can ease the traffic nightmare that is the I-10, which is clogged with rush hour traffic and heavy trucking and shipping traffic.

The traffic is so bad that many days you can find heavy trucking and shipping traffic on Riggs Road, R-i-g-g-s, 51st Avenue, through the GRIC, the Gila River Indian Community, Laveen, the town I live in, and other surface streets in Southwest Phoenix. These surface streets were not made for such traffic. Like it or not, this population and the traffic that goes along with it is only going to increase exponentially. In 25 years, when it's too late, we'll be suffering from complete gridlock.

Many opponents of this project just don't want to see any change. They want Laveen to stay just the same as it was. That's emotional. That horse has already left the barn.

The population of the Laveen area is 40,000 and growing. It is no longer the sleepy village of less than 10,000 not so long ago. As one of the few communities left to expand in population in the Phoenix

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metro area, it is due to more than double in size in the not-too-distant future. What are we going to do then? Baseline Road and Dobbins Road are already clogged with traffic. The pavement is already collapsing due to overuse from the use of heavy trucking traffic. When traffic doubles, what are we going to do then? All the hoping and avoiding in the world will not stop the fact that this is going to happen.

I am 100 percent behind the building of the Loop 202 western connecter. But I also realize that we must not simply slap a new highway connecting Pecos Road side of the I-10 and the 59th Avenue side of the I-10. We must make sure the new Loop 202 build is a model to be followed by other highway building projects. This includes making sure that there are biking paths and hiking paths built in conjunction with the project, parallel and/or intersecting this highway project. An HOV lane or bus lane must also be considered. And of course tastefully done sound barriers must also be built to minimize the sound the vehicles on the highway will make.

I know opponents will attempt to demonize people in favor of the Loop 202 western connector using all sorts of inflammatory, accusatory, and frankly offensive language. The force by intimidation will not work.

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Code	Issue	Response
1	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
2	**Design**	High-occupancy vehicle lanes are included in the project (see Final Environmental Impact Statement page 3-58).
3	**Visual Resources**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation's standard applications. As an example, for State Route 101 Loop (Pima Freeway) in Scottsdale, the City of Scottsdale chose to add public art to the noise barriers. The City's intent went above and beyond the Arizona Department of Transportation's guidelines of reasonable aesthetic treatment and, therefore, the Arizona Department of Transportation did not fund the aesthetic portion of the project. The Arizona Department of Transportation and the City of Scottsdale entered into an intergovernmental agreement for the purposes of allowing Scottsdale rights to design and construct artistic embellishment on the Arizona Department of Transportation-supplied noise barrier. The Arizona Department of Transportation provided the funds for construction of the noise barriers themselves, but the City of Scottsdale provided the funds to cover the aesthetic portion of the walls. Final Environmental Impact Statement page 4-162 explains the process municipalities might take to achieve the desired aesthetic treatment for noise barriers or other structures.

Code	Comment Document

We're just regular folks here in Laveen. We work hard, many of us taking our lunch hours, like I'm doing now, working our 40, 50, and 60 hours of work a week to let our individual voices be heard. We are highly educated, highly motivated, and have been promised this Loop 202 since the 1980s. This highway should not be a shock or a surprise to anyone.

We want to desperately -- we want and desperately need a hospital in our area. Currently there are none south of the Salt River in metro Phoenix. We want and desperately need another bridge crossing the Salt River on the west side of Phoenix. Currently, there are no bridge crossings over the river west of 51st Avenue. The current street level crossing of the 67th Avenue and 91st Avenue are impassable and are closed for many weeks during the monsoon season and the rainy months during the winter.

I know it may not seem important to opponents of this project, but vital tax dollars are spent elsewhere and not in Laveen and Phoenix when our commercial infrastructure is so limited that residents have to go miles from Laveen to get medical treatment, shop, eat, and spend money in general. Those vital tax dollars go to Tempe, Chandler, Mesa, Gilbert, Scottsdale, Avondale, Glendale, and Litchfield Park. We're talking

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about millions of tax dollars that are just going away. No big deal? Those vital tax dollars go to improving schools, improving green energy, infrastructure for streets, sidewalks, libraries, community centers, police staffing, fire department staffing, just to name a few.

I know air pollution is also a common argument for not building this new highway. Consider for a moment the no-build argument. What happens when population doubles and traffic doubles along with it? Which is projected by the EIS. When traffic is idling on clogged and gridlocked surface streets, what are we to do then?

We cannot force people to do what they do not want to do. We cannot force people to ride the bus to work, ride a bike to work, or take the light rail. We cannot pour billions of dollars -- tax dollars into projects that a tiny percentage of the population will use. Like it or not, the facts are just that.

Opponents do not want things to change, and yet in a new multi-thousand-square-foot-expansion of the Vee Quiva Casino -- that's V-e-e, Q-u-i-v-a -- complete with 1,000-space parking lot under way. What are we going to do with the added traffic to our surface streets from that project? No Phoenix transportation infrastructure was added to help alleviate the traffic that project will

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certainly bring.

Unemployment is still a huge problem in Laveen and South Phoenix. Construction jobs are nice, which the 202 will bring. But the highway will bring commercial and professional jobs to our area as well. Not important, you say? Many of us drive 30 minutes or more to get to our jobs. Imagine if we had quality professional and high-paying jobs just five minutes from our homes.

When Laveen first -- when we -- when my wife and I first moved to Laveen in 2005, there were great plans for the area, with the Loop 202 on the cusp of being built and a hospital, professional buildings, and even a community college all but certain. When the economy went sour and the sure thing of the Loop 202 stopped, we were left distressed.

We cannot afford to wait any longer. We are at a crossroads, literally. I want the very best for this community that is my home. I am not willing to accept average or mediocre for my family or this community. I want the very best education for the children of this community. I want quality medical care here in Laveen. I want quality job opportunities for all of us here in Laveen. I want quality infrastructure here in Laveen, and I want quality safety and service from our city. Without

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the build of Loop 202, we get none of that. Shame on us if we bury our heads in the sand.

MR. STONE: Tim Stone, S-t-o-n-e.

I'm a member of the South Mountain CAT Team that undertook part of the study of the Loop 202. In our April meeting we were provided with the results of the Sonoma Technology, Inc., presentation on State Route 95 near Las Vegas and its effects on two schools in that area as they were producing and building the road and then using it afterward. The study concentrated on black carbon impact on the schools. What the school -- what the study indicated was that there was significant downwind effects that would occur if the school was in close proximity to the highway, but it would mitigate as it comes further away, more remote from the highway.

This is of concern because along the Loop 202 route, Betty Fairfax High School is not all that remote from it. It's close. And there's another elementary school down near the Pecos Road. And these downwind effects would be adverse to the children there.

In their study they indicated that with proper filters, the classrooms could remain safe, but outdoor activities would be at hazard, especially as it -- if it occurred near peak traffic transit; in other words, the rush hour time for morning or afternoon, with the kids

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 4:32 PM
CALLER: RON FRANZILLO	CALLER ADDRESS: 14951 W. WINGED FOOT COURT, SURPRISE, AZ 85374
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain project. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway - Environmental Impact Statement imput
Date: Tuesday, July 16, 2013 11:18:56 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Geraldine Frazier [mailto:addictbook22@cox.net]
Sent: Tuesday, July 16, 2013 11:11 AM
To: Projects
Subject: South Mountain Freeway - Environmental Impact Statement imput

1 As previously indicated, I consider the South Mountain Freeway implementation to be a priority. It should be built using the Pecos road scenario from the I10 S around South Mountain and utilizing the connection with the W101 alternative option.

Thank you for considering this input.

Geraldine Frazier

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, July 23, 2013 8:17:07 AM

F.Y.I.

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

-----Original Message-----
From: Rick Freas [mailto:rick-n-carolyn@cox.net]
Sent: Monday, July 22, 2013 8:52 PM
To: Projects
Subject: South Mountain Freeway

1 2 I am writing to oppose the proposed South Mountain Freeway. I believe this freeway is unnecessary, will result in higher density development - which will increase air pollution, and will be a poor use of public funds.

3 We should use the funding intended for this freeway to instead be sure we have adequate funding for the fastest and most advanced commuter rail line between Phoenix and Tucson.

Sincerely,

Rick Freas
1326 E. Harwell Rd.
Phoenix, AZ 85042

_____

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 5:36 PM
CALLER: GAYLE FREEDLING	CALLER ADDRESS: 9620 WEST RIMROCK DRIVE, PEORIA, ARIZONA 85382
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the project for the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Wednesday, May 22, 2013 10:50:29 AM

From: Freer, Laura [mailto:LFreer@courts.az.gov]
Sent: Tuesday, May 21, 2013 1:04 PM
To: Projects
Subject: South Mountain Freeway

1

I live in the unincorporated Dusty Lane neighborhood wedged between Laveen and the reservation. I fully support the extension of the Loop 202, South Mountain Freeway.

Even though it will spoil a bit of my view and be pretty close to my house, the area needs the freeway. It is a growing community close to downtown that is very under served. And beyond the fact that Laveen needs the services the freeway would bring, the valley as a whole needs an alternate way to get from one side to another. Too much traffic bottlenecks on the I-10 tunnel area, causing massive delays.

Laura Freer
14011 S 43rd Dr
Laveen, AZ 85339

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Corinna Fritsch
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 2:44:26 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

My life depends on maintaining my asthma which I only got since the South Mountain air quality has worsened. In 2009 when I started walking for my health on south mountain next to my home for 14 years I got a brand new asthma condition in my 40's!, I almost died from this in 2009. For this and many other reasons, the proposed freeway would cause more problems than it would solve. The lower standard of gasoline allowed by the state to be used in the name of economy plus a freeway such as this will push the air quality over safe limits.

2 In addition, the freeway would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and 3 investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more 5 vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a 7 freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	This freeway and all related to it will definetely kill me by worseneing my asthma. Thank you. Sincerely, Ms. Corinna Fritsch 8639 S 49th St Unit 2 Phoenix, AZ 85044 (602) 458-9660

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 2 3 4 5 U.S. 85 should be the preferred alternative. The negative impact caused by EI outweighs the good. EI will become a truck bypass with increased noise pollution, air pollution, and hazardous materials. Commuters on the West side do not work in Chandler or Gilbert (at least not enough to warrant such a negative impact on the Foothills-Ahwatukee community) and there are not enough commuters to warrant this bypass. This is simply a truck bypass and an expansion for the Gila Indian Community - not a benefit to the citizens of Phoenix, and not necessary. The refusal to consider U.S 85 simply because it does not complete the 202 loop is not a good enough reason. Take EI out of the mix and put U.S. 85 back in the mix. (over)

6

Optional

Name Carolyn Fritz Email fritzca@q.com

Address

City State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	
4	**Air Quality**	
5	**Hazardous Materials**	
6	**Purpose and Need, Lack of Support**	

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: Not enough study has been conducted regarding impact on ground water, air quality, or noise pollution. The need for this project and the negative impact it will cause has not been demonstrated. What about increased crime to the area? This project is not a solution to a problem but a veritable font of problems!

7 4 3 6 8

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
7	**Groundwater**	Impacts on water are addressed in the *Water Resources* Section of the Final Environmental Impact Statement, beginning on page 4-101, including groundwater and surface waters.
8	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

LOOP 202
South Mountain Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

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- How the proposed action would affect you.

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1 I am not sure the population increase anticipated by DOT and consequently, the additional impact on traffic will come to fruition. There are no jobs here. What will this increased population do to be employed? There is no manufacturing. Do everyone going to work in the Service industry. How can the service industry survive when there are ~~not~~ few middle income & high paying jobs. Intel is not large enough to take up the slack. Intel could leave tomorrow. So no population increase.

2 3 Interstate 8 and SR85 is the logical alternative to a truck by-pass. The 202 will become the truck by-pass and all of the noise & pollution will impact life for this community. Schools, school children & residents will die back

4 5

Optional

Name CARLYN S. FRITZ Email FRITZCA@Q.COM

Address 3162 E. DRY CREEK RD

City PHX State AZ Zip 85048

Phone 480-759-4382 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	
5	**Air Quality**	

Code	Comment Document

LOOP 202
South Mountain
Freeway Study
2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: Have to endure all these bad effects.
Why does the DOT want to foist all these bad outcomes on this lovely community?
The draft EIS didn't cover the problem of mines in the area, didn't address the water impacts, the electrical lines as well as few others not covered.
(9 represent 3 waters in my household)
In addition the Gila River Indian Community is building large retail and entertainment facilities to increase traffic to the area. What have they done to mitigate the problems acc this traffic will bring to this area. The western alignments only benefit them not the rest of us who live in this community. I understand at one time they wanted this freeway on their land and, in fact, begged for it. Why wasn't it decided then?
Do not build the freeway here. Find a better alternative !!!

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11
12

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-169

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Geology**	A search of the Arizona Mineral Industry Location System database, examination of aerial photographs and topographic maps, and field investigation were completed to identify mineral resources and mines in the Study Area. These efforts identified one gold mining claim, six unknown mining claims, and several mining features in the vicinity of the South Mountains. None of these mining claims or features are located within the proposed freeway alignment.
8	**Groundwater**	Impacts on water are addressed in the *Water Resources* Section of the Draft Environmental Impact Statement, beginning on page 4-93, including groundwater and surface waters. Water impacts are also addressed in the *Waters of the United States* Section of the Draft Environmental Impact Statement, beginning on page 4-108, which focuses on the Salt River, washes, and canals.
9	**Surface Water**	Impacts on water are addressed in the *Water Resources* Section of the Draft Environmental Impact Statement, beginning on page 4-93, including groundwater and surface waters. Water impacts are also addressed in the *Waters of the United States* Section of the Draft Environmental Impact Statement, beginning on page 4-108, which focuses on the Salt River, washes, and canals.
10	**Utilities**	Utilities are discussed beginning on page 4-162 of the Draft Environmental Impact Statement, and a summary of major impacts is provided in Table 4-53 on page 4-163. The high-voltage power lines located just south of Pecos Road that run east–west would not be adversely affected by the proposed freeway. They would remain as-is.
11	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

5007

MS. FRITZ: Carolyn S. Fritz, 3162 East Dry Creek Road, and that's in Phoenix, 85048. What I am concerned about is that the alternative using the 885 corridor for trucks was not examined closely enough or broadly enough to -- because this -- this section on -- along Pecos Road and at 10 will become a truck bypass. That's what concerns me. The traffic, the pollution, the noise, and this is a bedlam community here. I mean, this is all residences with schools and churches, and that will impact every person who lives here, every person who goes to school here, every person who worships here at the churches.

That's my -- I think it will decimate, you know, this community. It's a beautiful community. What were they thinking? They just didn't think it through. There are other better alternatives, and the 885 is a better alternative. I really don't see a need for the -- for the extension of the 202.

Page 16

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www.drivernix.com

Code	Issue	Response
1	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
2	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Noise**	
7	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
8	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. No on the South Mountain Freeway:

1 Ahwatukee-Foothills community is a quiet, bedroom community which will be adversely impacted by the construction of the freeway. Below are the negative impacts:

2 1) Reconfiguration of 202/Pecos Rd. because Pecos Rd. not constructed for 8 lanes causing traffic congestion during construction + costing millions.

3 4 2) Trucks will use as a Phoenix bypass carrying hazardous materials, increasing pollution, increasing Mexican trucks without pollution controls putting Ahwatukee residents at a health risk.

5 3) Affects nearby schools with dangerous pollution + hazards.

6 4) Provides easier access + edit for criminal activity.

7 8 5) Increased traffic on residential streets

9 6) Use of outdated (2005) data regarding population increase

10 7) Removal of Park + Ride bus lot for downtown buses which would increase traffic on I-10 + residential streets.

Optional

Name Carolyn A. Fritz Email

Address 3162 E. Dry Creek Rd.

City Phoenix State AZ Zip 85048

Phone Fax

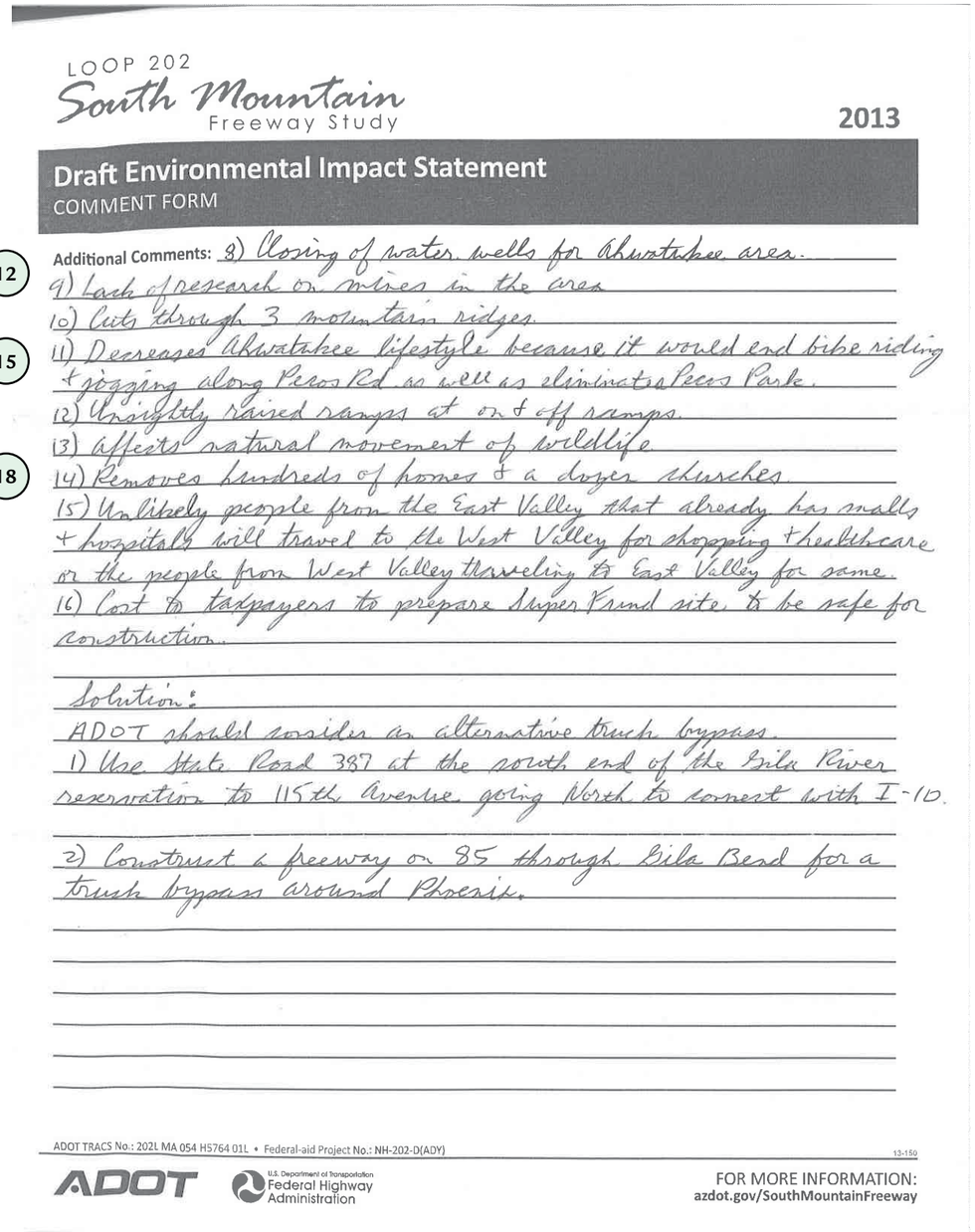
Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Traffic**	The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)
3	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Hazardous Materials**	
5	**Trucks**	
6	**Health Effects**	
7	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
8	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
9	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Traffic**	The existing park-and-ride lot at 40th Street and Pecos Road would not be adversely affected by the proposed project. In fact, a direct access point would be provided from the westbound on-ramp to the lot for buses. The proposed freeway would provide greater opportunities for bus rapid transit (express and rapid) routes because of the planned high-occupancy vehicle lanes.

Code	Comment Document
11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22	

LOOP 202 South Mountain Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

8) Closing of water wells for Akwatukee area.
9) Lack of research on mines in the area
10) Cuts through 3 mountain ridges.
11) Decreases Akwatukee lifestyle because it would end bike riding + jogging along Pecos Rd as well as eliminates Pecos Park.
12) Unsightly raised ramps at on & off ramps.
13) Affects natural movement of wildlife.
14) Removes hundreds of homes & a dozen churches.
15) Unlikely people from the East Valley that already has malls + hospitals will travel to the West Valley for shopping + healthcare or the people from West Valley traveling to East Valley for same.
16) Cost to taxpayers to prepare Super Fund site to be safe for construction.

Solution:
ADOT should consider an alternative truck bypass.
1) Use State Road 387 at the south end of the Gila River reservation to 115th Avenue going North to connect with I-10.

2) Construct a freeway on 85 through Gila Bend for a truck bypass around Phoenix.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

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Code	Issue	Response
11	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)
12	**Geology**	A search of the Arizona Mineral Industry Location System database, examination of aerial photographs and topographic maps, and field investigation were completed to identify mineral resources and mines in the Study Area. These efforts identified one gold mining claim, six unknown mining claims, and several mining features in the vicinity of the South Mountains. None of these mining claims or features are located within the proposed freeway alignment.
13	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
14	**Design**	The study has considered concepts for parallel multiuse paths, however the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
15	**Section 4(f) and Section 6(f)**	There would be no impacts on Pecos Park (see Final Environmental Impact Statement pages 5-12 and 5-13).
16	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
17	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
18	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
19	**Traffic**	Information related to origins and destinations of motorists that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Final Environmental Impact Statement. The definition of freeway users considers only those motorists who travel through the South Mountains; so, motorists who begin their trips in Ahwatukee Foothills Village and travel east to Interstate 10 (Maricopa Freeway) or motorists who begin in Laveen Village and travel north to Interstate 10 (Papago Freeway) are not counted in the analysis. The analysis of origins and destinations shows that 73 percent of travelers would be involved in trips beginning or ending in the Study Area or areas immediately surrounding it. Seven percent of the trips would begin, end, or begin and end outside of the Maricopa Association of Governments region; ten percent would either begin or end in Pinal County.
20	**Hazardous Materials**	The corridor analysis revealed sites that would need further assessment during the property acquisition phase of the project, if an action alternative were to become the Selected Alternative. The Arizona Department of Transportation employs a phased approach to site assessment that allows time for cleanup of any sites found to have hazardous waste issues. The project team concluded from the level of analysis conducted during the environmental impact statement process that the types of sites likely to be acquired contain common hazardous waste issues like underground storage tanks, asbestos and lead paint in buildings, and other commonly found issues (see Final Environmental Impact Statement page 4-156). The Arizona Department of Transportation maintains a process for addressing these issues in accordance with all applicable environmental laws and regulations. Both the Van Buren Tank Farm and the West Van Buren Water Quality Assurance Revolving Fund site were identified and considered during development of the Draft Environmental Impact Statement (see pages 4-97 and 4-153 and the Draft Initial Site Assessment prepared for the proposed project.) These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected media (groundwater) and the construction zone (near surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165.
21	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
22	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. NO BUILD ON THE 202

1) The GRIC and Ahwatukee communities most affected by the Pecos alignment of the 202 are opposed to it. Those two communities would bear the brunt of the pollution, the hazardous waste and the lifestyle destruction. (1) (2) (3)

2) Communities already in existence should not be destroyed in order to build up another community (Lovers). (4)

3) ADOT should respect the Cerpoia taxpayers who would be adversely affected by this construction. Not only would the construction (CONT'D)

Optional

Name [illegible] Email

Address 3162 E. Dry Creek Rd

City Phoenix State AZ Zip 85048

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Hazardous Materials**	
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

(Comment codes continue on next page)

Code	Comment Document

LOOP 202
South Mountain
Freeway Study
2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: of this freeway harm businesses but it would entail reconfiguration of the egress and ingress to the I-10 and 202 to accommodate 8 lanes, causing terrible traffic congestion and costing millions of dollars.

4) What would happen to Pecos Park already in existence and highly used by the community?

5) Of course, this would become a truck bypass with trucks, many of them from Mexico which lack pollution controls, polluting the air in the Ahwatukee and GRIC communities.

6) ADOT should consider an alternative truck bypass extending State Road 387 at the south end of the GRIC reservation to 115th Ave going north to connect with I-10. Another solution would be to construct a freeway on the State Road 85 alignment through Gila Bend for a truck bypass around Phoenix.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)
13-159

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
5	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Construction of the proposed facility would likely generate additional business and jobs in the corridor upon implementation because of the improved access it would provide.
6	**Design**	The Interstate 10/State Route 202 Loop (Santan Freeway) system traffic interchange was designed to accommodate the future connection of the South Mountain Freeway. No major reconstruction would be necessary at that location. The freeway construction staging plan for the area along Pecos Road would allow for keeping east-west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)
7	**Section 4(f) and Section 6(f)**	There would be no impacts on Pecos Park (see Final Environmental Impact Statement pages 5-12 and 5-13).
8	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Trucks**	
10	**Purpose and Need, Truck Bypass**	
11	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Red Mountain
Date: Monday, May 20, 2013 8:34:04 AM

From: MAGGIE O'DONNELL [mailto:maggiellen@msn.com]
Sent: Friday, May 17, 2013 9:52 PM
To: Projects
Subject: 202 Red Mountain

To whom it may concern,

1

I BEG you to call it something other that than another 202! Traffic reporters on the radio already can't seem to manage to call the Red Mountain and San Tan portions of the 202 by their names..."an accident on the 202 at _____" Come on! Give us a break. Many streets enter and exit both of them!

Thanks for reading.
Maggie Froncek

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
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Code	Issue	Response
1	**Design**	The designation of State Route 202L has been determined by the State Transportation Board. Radio announcers would have the option of referring to the proposed freeway as the South Mountain Freeway to differentiate it from the Santan and Red Mountain freeways.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 4:42 PM
CALLER: MARY KAE FRONHEISER	CALLER ADDRESS: 1851 E. OXFORD DRIVE, TEMPE, AZ 85283
PHONE: 480-775-6077	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the construction of the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: All in
Date: Monday, May 20, 2013 8:33:36 AM

From: david frost [mailto:frosty85234@yahoo.com]
Sent: Friday, May 17, 2013 9:56 PM
To: Projects
Subject: All in

1

Thanks

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Stop south Mountain Pecos alignment!
Date: Thursday, May 30, 2013 8:09:58 AM

From: M Frost [mailto:frostyaz@hotmail.com]
Sent: Wednesday, May 29, 2013 7:08 PM
To: Projects
Subject: Stop south Mountain Pecos alignment!

Comment from citizens without any responsible action on the part of ADOT, makes this a download of information to the public there is no upward communication that commands respect and reaction from ADOT this is a just a complacent reply to public disapproval of this project. ADOT will do whatever it deems necessary. These meetings are also a waste of public monies as there is no one truly listening to the public opinion. It is a waste of time as this process is flawed!!! Please don't present it as an opportunity to change the process. You have not listened to the most cost effective plan. Following Riggs Road alignment. Geometrical symmetry is the only concern, well that and the waste of public funds paying for property that has been paid for before then sold and then bought again. (investigation into who profited is called for!) Schools, parks, homes, and destruction of environment will cost more because it was purchased at more than three times the cost of using existing easements and alignments previously paid for. Riggs is the only and most economical alignment Face the truth there are not that many trucks coming from the east valley. or those would travel existing West bound traffic. Again the Pecos Roads is merely a trucking rout, use Riggs road. double decker it. Stop the Pecos alignment!!That and other alternative routes cost less than a no build option. The engineers have gone political!!!! They are wasting tax money on symetry. This is truly a waste of public funds!

M. Frost

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1	**Public Involvement**	Public comments are a vital component in the decision-making process. Public comments have been solicited from project inception and through key milestones in the environmental impact statement process. The interests and needs of the public, along with all other social, economic, and environmental issues and impacts, must be fully analyzed and included in the Draft and Final Environmental Impact Statements. Comments made during development of the Draft Environmental Impact Statement have been used to adjust plans, explore new questions, or make changes—all within the scope of the National Environmental Policy Act. Public comments received on the Draft Environmental Impact Statement were reviewed and addressed in the Final Environmental Impact Statement. Public comments received on the Final Environmental Impact Statement will also be considered and addressed as appropriate. More information about the entire public involvement process is available in Chapter 6, *Comments and Coordination*, of the Final Environmental Impact Statement.
2	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
3	**Alternatives**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land despite the risk that the freeway would eventually be built. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
4	**Alternatives**	Information related to origins and destinations of motorists that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Final Environmental Impact Statement. The definition of freeway users considers only those motorists who travel through the South Mountains; so, motorists who begin their trips in Ahwatukee Foothills Village and travel east to Interstate 10 (Maricopa Freeway) or motorists who begin in Laveen Village and travel north to Interstate 10 (Papago Freeway) are not counted in the analysis. The analysis of origins and destinations shows that 75 percent of travelers would be involved in trips beginning or ending in the Study Area or areas immediately surrounding it. Nine percent of the trips would begin, end, or begin and end outside of the Maricopa Association of Governments region; seven percent would either begin or end in Pinal County.
5	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Alternatives**	The double-deck option suggested in the comment would have similar benefits and impacts as the Bridge Alternatives evaluated in the Final Environmental Impact Statement (see pages 3-13 and 5-20). Options to build a bridge through or over the South Mountains were eliminated from further study because of incident management, constructibility and maintenance issues, future expansion limitations, substantially higher estimated construction costs, and undesirable intrusion-related impacts.
7	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Scout Frost
To: Projects
Subject: Stop south moutaon freeway!
Date: Wednesday, May 29, 2013 6:26:33 PM

1 2 3 4

Wasting public funds and sacred lands. Smog in schools RIGGS ROAD alignment IS THE ONLY RESPONSIBLE SOLUTION!

Sent from my iPhone

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Air Quality**	
4	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

From: Scout Frost
To: Projects
Date: Wednesday, May 29, 2013 6:22:23 PM

1 2 3 4

Stop this waste of public funds. NO ONE ADOT LISTENS TO THE OBJECTIONS FROM THIS COMMUNITY! Or at least no action comes of it. THIS IS A WASTE OF PUBLIC FUNDS AND TIME. The Riggs Road alignment is the compromised solution. Alignment is paid for double decker roadway is the most economical solution, more land will not have to be purchased or destroyed, smog will be removed from over schools and homes. Stop this travesty! Stop symmetry for symmetry sake
M Frost
Sent from my iPhone.

Code	Issue	Response
1	**Public Involvement**	Public comments are a vital component in the decision-making process. Public comments have been solicited from project inception and through key milestones in the environmental impact statement process. The interests and needs of the public, along with all other social, economic, and environmental issues and impacts, must be fully analyzed and included in the Draft and Final Environmental Impact Statements. Comments made during development of the Draft Environmental Impact Statement have been used to adjust plans, explore new questions, or make changes—all within the scope of the National Environmental Policy Act. Public comments received on the Draft Environmental Impact Statement were reviewed and addressed in the Final Environmental Impact Statement. Public comments received on the Final Environmental Impact Statement will also be considered and addressed as appropriate. More information about the entire public involvement process is available in Chapter 6, *Comments and Coordination*, of the Final Environmental Impact Statement.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
4	**Design**	A double deck freeway would cost more to construct and maintain than a freeway alternative that would be at grade.

Code	Comment Document

Bailly, Becky

From: Scout Frost <frostyaz@hotmail.com>
Sent: Wednesday, May 29, 2013 6:56 PM
To: Projects
Subject: No south mountain freeway!

1 2 3 4

Comment from citizens without any responsible action on the part of ADOT, this this a download of information to the public there is no upward communication that commands respect and reaction from ADOT this is a just a complacent reply to public disapproval of this project. ADOT will do whatever it deems necessary. These meetings are also a waste of public monies as there is no one truly listening to the public opinion. It is a waste of time as this process is flawed!!! Please don't present it as an opportunity to change the process. You have not listened to the most cost effective plan. Following Riggs Road alignment. Geometrical symmetry is the only concern , well that and the waste of public funds paying for property that ! has been paid for before then sold and then bought again. Schools, parks, homes, and destruction of environment, will cost more because it was purchased at more than three times the cost of using existing easements and alignments previously paid for and more economical That and other alternative routes cost less than a no build option. The engineers have gone political!!!! This is truly a waste of public funds!

M. Fro
Sent from my iPhone

Code	Issue	Response
1	**Public Involvement**	Public comments are a vital component in the decision-making process. Public comments have been solicited from project inception and through key milestones in the environmental impact statement process. The interests and needs of the public, along with all other social, economic, and environmental issues and impacts, must be fully analyzed and included in the Draft and Final Environmental Impact Statements. Comments made during development of the Draft Environmental Impact Statement have been used to adjust plans, explore new questions, or make changes—all within the scope of the National Environmental Policy Act. Public comments received on the Draft Environmental Impact Statement were reviewed and addressed in the Final Environmental Impact Statement. Public comments received on the Final Environmental Impact Statement will also be considered and addressed as appropriate. More information about the entire public involvement process is available in Chapter 6, *Comments and Coordination*, of the Final Environmental Impact Statement.
2	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
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4	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Bailly, Becky

From: Scout Frost <frostyaz@hotmail.com>
Sent: Wednesday, May 29, 2013 6:26 PM
To: Projects
Subject: Stop south moutaon freeway!

1 2 3 4

Wasting public funds and sacred lands. Smog in schools RIGGS ROAD alignment IS THE ONLY RESPONSIBLE SOLUTION!

Sent from my iPhone

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Air Quality**	
4	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

Bailly, Becky

From: Scout Frost <frostyaz@hotmail.com>
Sent: Wednesday, May 29, 2013 6:22 PM
To: Projects

1 2 3 4

Stop this waste of public funds. NO ONE ADOT LISTENS TO THE OBJECTIONS FROM THIS COMMUNITY! Or at least no action comes of it. THIS IS A WASTE OF PUBLIC FUNDS AND TIME. The Riggs Road alignment is the compromised solution. Alignment is paid for double decker roadway is the most economical solution, more land will not have to be purchased or destroyed, smog will be removed from over schools and homes. Stop this travesty! Stop symmetry for symmetry sake
M Frost
Sent from my iPhone.

Code	Issue	Response
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3	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
4	**Design**	A double deck freeway would cost more to construct and maintain than a freeway alternative that would be at grade.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Friday, May 24, 2013 3:04:38 PM

From: Fujino, Mario [mailto:MFujino@azdes.gov]
Sent: Friday, May 24, 2013 2:59 PM
To: Projects
Subject: South Mountain Freeway

1

The south mountain freeway needs to be built to improve the development of the valley. I live in the Southwest area of Phoenix and think the only way that this area can grow like the other parts of the valley is through building this freeway. Currently, there are no major shopping malls or car dealerships in the area. Building this freeway will be the only way these will come to the area and help the economy of Phoenix in the process.

Mario Fujino
Arizona Department of Economic Security
Department of Aging and Adult Services
Phone: (602) 542-3268
Fax: (602) 542-6655

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South mountain freeway
Date: Friday, May 24, 2013 2:58:02 PM

-----Original Message-----
From: Mario Fujino [mailto:mario56562@yahoo.com]
Sent: Friday, May 24, 2013 2:49 PM
To: Projects
Subject: South mountain freeway

1 The south mountain freeway needs to be built

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 extension
Date: Tuesday, July 23, 2013 8:15:21 AM

F.Y.I.

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

-----Original Message-----
From: Donald Fuller [mailto:donjaneazco@gmail.com]
Sent: Monday, July 22, 2013 7:42 PM
To: Projects
Subject: 202 extension

I agree that 202 should be extended to create access to the west side, and relieve traffic thru downtown Phoenix.

I disagree that it should replace Pecos Road. Laying a freeway over Pecos road will demolish over 300 private homes, ruin South Mountain, sacred to the tribe, plus Mountain Park Community Church, home to hundreds of good Christians. The church could not be replaced within 10-20 miles (where is the vacant land that would allow a church that size to be built?). The church's spacious auditorium is also a venue for entertainers and other non-church activities, best for miles around.

A freeway that is built this close to residences, schools, and churches will infest it will noise, pollution, and displace 1,000 or more citizens who moved to Ahwatukee because they loved the location. How many years would the residents endure noise, dust, and roadblocks and detours during construction?

Who approved the construction of homes, schools, and churches along Pecos when plans were in place to build a freeway?

I vote for having discussions with the Gila Rive Indian Community. Negotiate with them and offer generous monetary compensation for their land. Offer to build an urgent care center, community center; landscape with native trees and cactus. Perhaps the road could be recessed to provide relief from noise and sight pollution.

Give some consideration for the thousands of people living and worshiping along Pecos road.

I vote for pushing negotiations with the GRIC.

Donald Fuller, Ahwatukee

_____

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1 2 3 4 5 6 7 8 9 10 11 12 13 14

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Neighborhoods/ Communities**	Final Environmental Impact Statement page 4-40, Table 4-12, shows that, at this stage of the design process, 112 single-family homes would be displaced, not 300, and that is for all of the E1 Alternative, not just along Pecos Road.
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Cultural Resources**	
6	**Noise**	
7	**Air Quality**	
8	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
9	**Construction**	The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would accelerate the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method, breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years, and the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period.
10	**Construction**	It is difficult to estimate construction-related noise levels because they depend on numerous factors, such as construction phasing, staging of equipment and materials, and work schedules. As reported on page 4-90 of the Final Environmental Impact Statement, construction noise levels during certain phases could be as high as 85 A-weighted decibels for short periods. As equipment would move on to other areas, noise levels would be lower. Where feasible, noise barriers would be constructed as early as possible during construction to shield adjacent properties from construction-related noise.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
11	**Construction**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit would describe measures to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
12	**Construction**	The traffic projections for Chandler Boulevard (see Figure 3-12 on page 3-29 of the Final Environmental Impact Statement) do show a reduction with the proposed freeway when compared with conditions without the proposed freeway. The freeway construction staging plan for the area along Pecos Road would allow for keeping east-west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)
13	**Acquisitions and Relocations**	It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).
14	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Yes vote on loop 202
Date: Wednesday, May 22, 2013 10:52:37 AM

From: Kari Fumusa [mailto:karifumusa@cox.net]
Sent: Tuesday, May 21, 2013 9:07 AM
To: Projects
Subject: Yes vote on loop 202

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F
Phoenix, AZ 85007

Attention to: study team panel

I am writing in support and vote YES to the Loop 202 South Mountain Freeway, specifically the W59 alternative.

As a Laveen resident I am forced to deal with congested traffic along on the Baseline corridor from 99th Ave to I10 . The severe lack of retail shopping, restaurants, medical facilities, and entertainment forces revenue and tax dollars to be driven outside of Phoenix as residents frequent Avondale, Tolleson, Chandler, Scottsdale, and Tempe to shop, dine, etc. This freeway and the socio-economic infrastructure it will bring to our community is desperately needed!

After researching this issue, allow me to share some of the reasons I urge you to approve this freeway expansion:

- 64.3% of likely voters in Maricopa County support construction of this freeway
- In a separate study, also commissioned by We Build Arizona, 59% of likely voters in Ahwatukee and Laveen Support this freeway as well.
- It is time to end the commuter traffic jams and congestion we experience not having easy access to the freeway and connection of the East/West Valley.

(Comment codes begin on next page)

Code	Issue	Response

Code	Comment Document

- If we don't build the South Mountain freeway, traffic in the region will get much worse over the next two decades. According to ADOT's own study:
- Traffic on the I-10 between Ahwatukee and Goodyear will grow 28%
- Another 103,000 cars will use Broadway Curve each day
- Another 38,000 cars will jam the Tunnel every day
- Morning and evening commute times will increase 39% to 82%
- Traffic congestion on city streets will increase 46%
- The same report indicates the project will also reduce air pollution by reducing the time vehicles spend stuck in traffic
- The project will create 30,000 jobs during the five to six year construction period and result in a $2Billion investment in the Phoenix-area economy.
- The money to the build the freeway is in the budget, it was voted on and approved TWICE (1985 & 2004 respectively),we voted for the 1/2cent tax increase in 2004 to support the build.
- There is no more important project to the area's commuters and workers than the South Mountain Freeway project. Please vote to Build It NOW!

Please consider the following request when making your YES vote:

1 - Design and construction of community value additions such as **attractive sound barriers** and a **bike/running/pedestrian path**along the length of the freeway as well as the use of Rubberized asphalt as per the ADOT's "Quiet Pavement Pilot Program" initiated in 2002.

2 - We have award winning examples in Tucson, AZ which received an excellence award in 2002 by the Federal Highway Administration (FHWA) for the Diamondback bicycle/pedestrian bridge as well as it's Intelligent Transportation Systems excellence award for ITS public-private partnership.

- Other examples are the Schuylkill Expressway in Philadelphia, the Rockville Parkway in DC, and the San Antonio,TX Freeway systems ranked best among largest US urban areas.

Thank you in advance for your vote of YES to support of this freeway!

Code	Issue	Response
1	**Visual**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation standard applications. The process municipalities might take to achieve the desired aesthetic treatment of for noise barriers or other structures is explained on page 4-162 of the Final Environmental Impact Statement.
2	**Design**	The study has considered concepts for parallel multiuse paths, however the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

Sincerely,

Matt and Kari Fumusa
2810 W. Harvest Groves LN
Phoenix, AZ 85041

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Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:01 PM
CALLER: JA FURR	CALLER ADDRESS: GILBERT, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support building that freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Michelle Thompson
To: ADOT
Subject: FW: Proposed Pecos Alignment of the South 202
Date: Friday, May 03, 2013 9:41:12 AM

Michelle Thompson
Senior Community Relations Officer
1655 W. Jackson St. MD: 126F
Phoenix, AZ 85007
602.316.4057
azdot.gov

From: Beth Gagnon [mailto:beegee62@hotmail.com]
Sent: Thursday, May 02, 2013 11:56 PM
To: Projects
Subject: Proposed Pecos Alignment of the South 202

1 In all of the meetings, hearings, etc. that I have attended over the years to stay informed and express my opposition to the proposed South 202 truck bypass (because lets be real, it is not to aid in the commute to downtown Phoenix) my house was shown to sit in the "footprint" of homes that would be bought and destroyed by the State in the construction of the freeway. In looking at your recent "flyover" videos, however, it looks as though now the freeway will simply be in my backyard and my house will not be destroyed structurally, but financially, as it will no longer be worth a dime!

2 3 Can you please clarify for me what the exact proposed future of my home is? My property is located at 3139 E. Redwood Court (the northwest corner of Pecos & 32nd street). Due to multiple health issues as well as the potential loss of my current employment, I need to know as much information as possible regarding my relocation options and the timeframes for acquisition of my property as soon as possible.

4 Thank you for your assistance in this matter.

Beth Gagnon

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Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
4	**Acquisitions and Relocations**	**The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.** **The address noted in the comment would be located outside of the current right-of-way footprint for the proposed freeway. Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible at the project Web site: <azdot.gov/southmountainfreeway>.**

Code	Comment Document

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F
Phoenix, AZ 85007

Dear ADOT ,

I am a member of PARC and currently working in the health care profession in Central Phoenix. I am concerned about the many issues not sufficiently addressed or omitted in the recent DEIS and would like this entered into the public comment section of the process:

Issues not raised or not fully studied in DEIS are as follow

1. *Direct impact to autism cause by highways close to kids. Recent evidence in 2013 should be added into the impact*
2. *DEIS does not have accurate and up-to-date 2013 2012 asthma and autism impacts growing in metro Phoenix nor updates to impacts of highway 51 health issues we see from folks living 1 mile for freeways. DEIS need to go back and review current health impacts of existing highways air quality an EPA air violations . Then DEIS needs to model the impact of the growth projections on worsening the air and health risks. Population growth alone will estimate a sever worsening of health risks and cause air quality to be worse than EPA standards in 43 ave 51 ave zip 85045 85048 GRIC and laveen. Major flaw in such a study since it does not estimate these issues accurately for 2014 -2016 growth in toxic air and worsen health counts and health symptoms that the doctors and hospitals see now up for 2013.*
3. *Must better study for impacts top current and future residents and school kids who's play area and day cares will be less than ¼ of a mile from traffic*
4. *Did the study add in the additional traffic due to the building of the premium outlet mall at highway 10 and 202. This substantial increase in polluting traffic needs to be in the study. Not avoided since they exit the highway.*
5. *Blasting thru south mountain will cause religious and racial discrimination and civil rights violations in SMF DEIS*
6. *Is it legal to destroy burial rights and petroglyphs and Indian artifacts in the line of demolition. If DEIS does not really go on Indian land and it does not protect their adjacent artifacts is it accurate and inclusive. DEIS should study all the true direct and indirect impacts to the highway on AIRFA passed in 1978 is not being followed.*
7. *Truck traffic from Mexico and high sulfur diesel and benzene levels will be worse than study portrays. The DEIA clearly does not model the additional air pollution for this traffic,*
8. *This highway will not improve the air quality for phoens . DEIS does not model the future impact. Our city will be in violation of Clean air Act. Also will worsen west and south phoenix air,*
9. *There is no serious discussion or consideration in the DEIS of the 2005 monitoring of toxic chemicals (present air toxins) . This 2005 study conducted by EPA and ADEQ in joint effort with JATAP showed results reported in 2006 showed emission from traffic were already (in 2006) above the standard of 1 million chance of cancer in a life time of exposure in west an south phoenix and GRIC, This need new data for 2007 2008 2009 2010 2011 2012 2013 since air and traffic are now worse. To not have DEIS study this is unethical and flawed.*
10. *Jatap monitoring already found formaldehyde at 34 times the standards,*
11. *Benzene at 8 times the standard, butadiene 1 and 3 7.5 times the standard, acetaldehyde at 3.4 times the standard, our residents are being exposed to these entire carcinogens not just one. DEIS must study the combined effects of these current carcinogenic mixed compounds on Health. And then study the new higher levels of all of the above thru 2013, Then model and project the added compounds of ultrafine and fine particulates.*
12. *DEIS does not mention hazmat transportation issues a risk of tanked from Mexico. Must redo the study for this*
13. *Ozone levels and exceeding the parts per million set by EPA and the clean air act and not considered. Postponing EPA enforcement standards must be reconsidered to do a true DEIS . Also explaining that dust storms cause all this is not accurate. Modeling of today's levels need to be updated and*
14. *Congestion and future traffic counts not molded correctly and congestion on west I 10 on ramps not designed correctly to handle traffic volumes. ADOTS past modeling results have been inaccurate and realistic . We need better and realistic quality data inputs into the study. 2012 and 2013 traffic pattern data not updated in the study. Must relook at peak traffic from April 2013 as look at current air quality EPA violations.*
15. *Sulfur and benzene test stations should be set up to get accurate 2013 air quality reading in laveen GRIC and 85045 85048 zip codes.*

Sincerely, Randy W Gallagher - Member of PARK
I Do Agree with the contents of This letter We will Need To Stop 202 Southmountain Freeway You make >

Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Traffic**	The traffic projections used in the traffic analysis are from the Maricopa Association of Governments regional travel model, as certified by the Federal Highway Administration and reviewed by the U.S. Environmental Protection Agency for air quality conformity (see Draft Environmental Impact Statement page 3-27). Traffic projections are regularly updated by the Maricopa Association of Governments. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011. When the Maricopa Association of Governments adopts new socioeconomic projections and traffic projections, it will be reflected in the study documents. Key model inputs used to forecast travel demand included (see Table 3-7 on Draft Environmental Impact Statement page 3-27): · socioeconomic data based on the adopted general plans of Maricopa Association of Governments members, which includes projected growth in population, housing, and employment (including proposed commercial centers), along with economic forecasts and the existing and planned transportation infrastructure as identified by Maricopa Association of Governments members · the anticipated average number of vehicle trips within the region (including those to and from the region's households) on a daily basis (this number is tracked regularly by the Maricopa Association of Governments) · the distribution of transportation modes used by travelers in the Maricopa Association of Governments region (also tracked regularly by the Maricopa Association of Governments) · the capacity of the transportation infrastructure to accommodate regional travel · the future transportation infrastructure established using *Regional Transportation Plan*-planned projects and improvements and from known arterial street network improvements assumed to be made by the County, Cities, and private developers The Maricopa Association of Governments approved new socioeconomic projections in June 2013. The new data are presented in the Final Environmental Impact Statement (see page 1-11). Although slower growth in total vehicle miles traveled was noted, the need for the freeway did not change. The revised traffic analysis validated that the proposed project is needed today.

(Responses continue on next page)

Code	Comment Document
13 14	Sick For SAKe of money etc. Their are other Routes for Mega Thuck route being currently used Thank you Randy Baldwin 16641 S. 27th Ln. Phx, Az 85045 6/23/13 To Adot certified

Code	Issue	Response
3	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed on page 4-147 of the Draft Environmental Impact Statement, a programmatic agreement was developed for the project to establish a process for consultation, review, and compliance with federal and State preservation laws as the effects of the project on historic properties become known. The programmatic agreement states that any data recovery on federal lands necessitated by the project must be permitted under the Archaeological Resources Protection Act in accordance with the federal land-holding agency and that, in the event any data recovery for the project should take place on tribal lands, all applicable permits would be obtained. Because the project is proposed, a programmatic agreement is in place to address data recovery on federal and tribal lands, and no excavations have yet occurred. The proposed freeway is and will continue to be in compliance with the Archaeological Resources Protection Act.
4	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
5	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	
7	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause significant adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement).

(Response 7 continues on next page)

Code	Comment Document

Code	Issue	Response
7 (cont.)		The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
8	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the *Regional Transportation Plan* that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014.
10	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Alternatives, W59 Alternative Versus W101 Alternative**	
12	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analyses. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement. According to U.S. Environmental Protection Agency guidance, new monitors are not necessary to analyze air quality impacts.
13	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
14	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Draft Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

Name: Sheri Gallagher - PARK Member
Street Address: 16641 S. 27th Ln.
City, State, Zip Code: PHX, AZ 85045
Date: 6/23/13
To: ADOT
Attn: Mountain Freeway Study
Street Address: 1655 W. Jackson St. MD 10AE
City, State, Zip Code: Phoenix, AZ 85007

Dear representative of A.DOT.:

I am writing to state my opposition for the proposed expansion of Loop 202/South Mountain Freeway (SMF).

1
2

This project has been under consideration since 1983, when oil and fuel prices were inexpensive. At a present time when volatility of the oil industry incurs an ever-rising cost of fuel prices to consumers, the proposed project is outdated in its purpose at a critical time when transportation decisions should address the increasing temperatures of urban cities.

3 4 5

The two currently proposed routes for the freeway are less than a mile apart. Both will have the same harmful effects on the Gila River Indian Community's (GRIC) air quality, health and traditional cultural properties. The on-reservation alignment will result in a loss of approximately 600 acres of tribal land, and the forced relocation of O'odham families.

6
7 8 9

The off-reservation alignment would gouge a 40-story high, 200-yard wide cut into South Mountain, which is sacred to all four O'odham tribes. South Mountain is also significant to the larger Phoenix area due to it being the largest city park in the United States. Laveen and Ahwatukee residents would ultimately be affected by air and noise pollution, as well as the inevitable devastation of numerous local businesses, homes and a church in the line of the proposed route.

10
11

The Sierra Club Report "The Best and Worst in Transportation Investments" listed SMF as one of the worst projects in the United States based on oil, environmental, health, economic, and land use impacts. The freeway would impose on a critical wildlife corridor for various threatened desert animals and fragile ecosystems unique to both the Estrella and South Mountain ranges.

12

I want to advocate "No Build" as the only option that preserves the environment, health of GRIC, respects O'odham traditions, and is also beneficial for Laveen and Ahwatukee residents.

Sincerely,

Sheri Gallagher -
Member of PARK

7

Also, I believe the DEIS study has not addressed the many aspects of the added pollution of a freeway as Ahwatukee is, in fact, a "bowl" and →

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
3	**Alternatives**	There is only one action alternative studied in detail in the Eastern Section of the Study Area in the Draft and Final Environmental Impact Statements. While an alignment on Gila River Indian Community land was considered, it was ultimately eliminated from detailed study (see page 3-24 of the Final Environmental Impact Statement). The Community Alignment, as depicted in Figure 3-11 on page 3-25 of the Final Environmental Impact Statement would not result in the relocation of any residences on Gila River Indian Community land.
4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Cultural Resources**	
6	**Section 4(f) and Section 6(f)**	
7	**Air Quality**	
8	**Noise**	
9	**Acquisitions and Relocations**	
10	**Sierra Club Report**	The Arizona Department of Transportation and the Federal Highway Administration respectfully disagree with the referenced Sierra Club Report. As noted in the Final Environmental Impact Statement, when compared with the No-Action Alternative, the Preferred Alternative would result in less energy consumption (page 4-172), regional improvements to air quality (page 4-74) that would be expected to produce health benefits, and economic benefits of reducing regional traffic congestion (page 4-65), and would be consistent with local and regional long-range planning efforts (page 4-18).
11	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document
4	pollution would collect worse than the 101 HWY or the 202 as they are not between mountain ranges. also, the particulate matter would adversely affect the Ahwahnee residents, especially the children! I agree with the statements in this letter fully! Sheri Gallagher

Code	Issue	Response

Code	Comment Document

4242

of our 2,600 members, the greater Phoenix Chamber of Commerce agrees it is time to build the South Mountain Freeway. We support investments in transportation projects that will improve mobility and contribute to economic development, environmental quality and jobs. We need the jobs, and we want the investment.

It's time to relieve the congestion in the southern portion of our metropolitan region, and allow for free movement of people and commerce. As we supported it 25 years ago, we support it again today. Thank you so much for the opportunity to provide comment.

THE FACILITATOR: Thank you. Kate Gallego.

MS. GALLEGO: Hello, I'm Kate Gallego, South Mountain resident. Former chair of the Environmental Quality Commission in Phoenix, and I'm here in support of the freeway. I think it will relieve congestion and stop some of the cut-through traffic. It will bring important economic development to Laveen and job creation, creating over 30,000 jobs.

It's an important part of our transportation network. It needs to be part of a

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

multi-modal network, so we need commuter rail. I hope eventually we will have light rail coming up to Baseline and then to -- to connect with this freeway, so we do need all forms of public transportation, but we need this freeway.

Thank you.

THE FACILITATOR: Thank you.

Alexander Soto.

If you'd like to speak, please go out to the registration desk, get registered, and we'll have your name up here.

Thank you.

MR. SOTO: I'm Alex. So go?

(Speaks in foreign language) Alex Soto, (speaks in foreign language), I'm from the community cells of the Tohono O'odham Nation. I currently live here in Phoenix, Arizona, and I'm here to comment against this freeway.

Overall, this South Mountain Freeway is an attack on my civil rights as an indigenous person. And the lack of cultural consideration that is in this EIS is shocking. It is a fact that, I know there's a lot of civil rights statutes and protocol that an EIS would include towards communities of color, in particular ones that have been historically

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 12:45 PM
CALLER: LEO GAMBIDORO	CALLER ADDRESS: 1331 EAST [UNCLEAR] DRIVE, CHANDLER, ARIZONA 85249
PHONE: 480-883-8871	EMAIL:

1

CALLER REMARKS/QUESTIONS:

I am in 100% support of that new 202 Loop way. Glad to see it come alive, thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 3:00 PM
CALLER: JANAE GANAL	CALLER ADDRESS: PARADISE VALLEY, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in favor of the freeway, ah the South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202
Date: Monday, July 15, 2013 8:05:17 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Larry Ganann [mailto:larry.ganann@cox.net]
Sent: Sunday, July 14, 2013 4:09 PM
To: Projects
Subject: Loop 202

1 2 3

We are residents of South Mountain since 2003. We have patiently watched the deliberations regarding the ultimate route of the 202 extension to our south. It is hard to imagine that a highway could be built so close to existing residences, schools, churches and businesses, negatively impacting the entire community, when open desert land is available immediately adjacent to the Pecos route. How is it possible that a negotiation could not solve this issue to the benefit of all parties. Is it money? Is it native american self-determination? Is it obstinacy on the part of the DOT?

We are very concerned that the entire area will be changed forever because of a needed highway. Certainly there are instances when no options exist and the communities affected simply bend to the needs of the larger community. When options are available it seems shameful to not consider those who affect the fewest.

Respectfully,

Larry Ganann
15023 S. 21st Place
Phoenix 85048

_____

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 4:59 PM
CALLER: JOSE GARCIA	CALLER ADDRESS:
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:

Hi. I'm calling about support for the freeway, for the Loop 303 going through the South Mountain. I'd really like you guys to go ahead and finish that project, or even start the project. It's going to be a great relief on traffic so if you could go ahead and start that project that would be great. Thanks. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:46:48 AM

From: Jim Gardner [mailto:jimgardner1947@gmail.com]
Sent: Friday, May 10, 2013 10:24 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1 Build the south mountain freeway help reduce congestion and help lower pollution caused by delaying traffic. Thank you, Jim Gardner

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

So in conclusion, I guess, I just want to make sure that -- that all these comments against the freeway are realized and heard, and I want to make sure that this project does not go through to the highest bidder or whoever. It's become a private project anyway. It's all about money at this point. And I want to see the streets improved. I want to see more bike lanes. I want to see Complete Streets passed and moved forward with. And I support Mayor Stanton, in that I do not support the 202 Freeway.

Thank you very much. I appreciate your willingness to hear my comments.

If you could add something to that, one of the pro-202 speakers mentioned that we need a freeway in order to build a hospital in Laveen. And I believe the complete opposite is true. We need a hospital in Laveen before we build a freeway. We don't need a freeway to get to a hospital.

That's all.

MS. GARZA: Well, my name is Anna Garza, A-n-n-a, G-a-r-z-a. I am a living resident in ZIP Code 85239. And I'm here to share my comments.

I feel it is time to build the South Mountain Freeway. Our Valley commuters have waited long enough. In the meantime, we are -- we have traffic jams,

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

a lot of congestion as our community grows. The freeway would help cut the congestion in an area, reduce air pollution. 64 percent of the voters voted it in, and we are still waiting.

Traffic on the I-10 between Ahwatukee and Goodyear will grow about 20 percent and will have another 10 -- 103,000 cars that will use the Broadway curve each day. Another 38,000 cars will jam the tunnel every day. Morning and evening commute times will increase by 40 percent to almost 82 percent, and traffic congestion on the city streets will increase by 46 percent unless they build the freeway.

The project will create approximately 30,000 jobs during the five to six-year period -- construction period and can -- will result in a 2 billion investment in the Phoenix area economy. The building -- the money to build the freeway is already in the budget and was approved by voters twice; first in 1985 and again in '04.

So there is no more important project to the area's commuters and workers than the South Mountain Project Freeway. So we must build it now.

MR. KUEFER: William, last name K-u-e-f, like Frank, -e-r.

Okay. I live in Laveen. And I'm very much in favor of the proposed Freeway Extension 202.

Code	Issue	Response

Code	Comment Document
1	Jezanna Garza Document Created: 7/18/2013 12:24:16 PM by Web Comment Form With the continuous expansion of the west valley a 202 extension becomes an essential part of the growth of the Phoenix area. I live in the Laveen area and often commute to different areas around town, I fully support the expansion project and urge you to look at the positive impact this will have on the community at large. The environmental factors while a primary concern for many are fully addressed through this proposal and by eliminating travel barriers and restrictions for people from every city the highly populated areas will be positively impacted as well. The population growth is not going to change as a result of this expansion and the additional convenience will only allow for increased satisfaction amongst residents.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 I am against this freeway, both on Pecos Rd. or
2 on the Gila River Community. My reason is air quality. I know that the wind blows across my property from the south and on through towards South Mountain Park. I live one block north of E. Chandler Blvd., and I feel that the pollution from both cars and trucks will directly affect my quality of life here in the Ahwatukee Foothills.

Optional

Name PATRICIA GEARHART Email artzy@cox.net

Address 2017 E. CATHEDRAL ROCK DRIVE

City PHOENIX State AZ Zip 85048

Phone 480-460-3439 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Proposed Loop 202
Date: Friday, July 19, 2013 1:10:53 PM
Attachments: image001.png
Importance: High

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Jeffrey Gearhart [mailto:jghmc@msn.com]
Sent: Friday, July 19, 2013 12:59 PM
To: Projects
Cc: jghmc@msn.com
Subject: Proposed Loop 202
Importance: High

1 As a homeowner in the Ahwatukee Foothills I am vehemently against building the loop 202 Freeway anywhere in the pristine Ahwatukee Foothills. The Environmental Impact study cannot compare the Broadway Curve to the Ahwatukee Foothills. Pollution, smog, and dust from Tractor Trailers and automobiles would be trapped within the Foothills, plus damage homes and diminish their worth. More importantly have a significant adverse effect on the Children who live and attend schools in the Foothills.

2 3 4 5

I moved to Phoenix from Los Angeles in 2002, and quickly noticed how lack of planning and apparent knee jerk reactions led to freeways being outdated immediately after they were built. Now you want to do it again……so that a few can profit from the proposed loop 202. The City of Phoenix will not profit from this build, it will only be a detractor for the City and Ahwatukee Foothills.

6

My understanding is that South Mountain is sacred ground to the Native American Communities within the proposed Loop 202. Routing traffic through or around South Mountain will also destroy the history and Culture of our Native America neighbors.

7 8

Learn from your previous mistakes 60, I-143, I-17, and the I-303 Freeway to nowhere.

Jeffrey Gearhart

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Code	Issue	Response
1	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Acquisitions and Relocations**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
5	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Purpose and Need, Lack of Support**	
7	**Section 4(f) and Section 6(f)**	
8	**Cultural Resources**	

Code	Comment Document

Stacey Gentry Document Created: 5/21/2013 4:50:57 PM by Web Comment Form

As an 8 year resident of Laveen I fully support the freeway extension. This will allow us to travel to the southeast valley and west valley much quicker, as well as entice larger restaurants and businesses to move in. Laveen and surrounding areas grew tremendously during the housing boom. I moved in during this time and was very excited at the prospect of the freeway and how it could benefit the community. This will allow us to keep more of our dollars in our community. Currently we have to drive 20-30 minutes for any sort of major shopping center, including Target, or a movie theater. And primarily the only full service restaurants are an Applebees and Native New Yorker. The residents of Laveen are of all income brackets and are in need of diverse shopping/dining opportunities. I can't believe 7 years later we are still in the discussion phases.

In regards to the impacts to the environment, homes and businesses, I know the freeway will be inconvenient to some but it is necessary in this ever growing population. I'm sure the I-10, 101 and 202 freeways caused ill effects to the environment and displaced homes and businesses but they are necessary for progress in the vastness of this valley. Also the layout has been clear for more than 10 years, so the residents of Ahwatukee had plenty of fair warning. I understand the concern on the part of the Indian community, but this freeway would also be beneficial to reaching the 3 Casinos they will be along it's path. If we can avoid harming the sacred lands or South Mountain, let's use the alternative route. 1

If you have ever tried to get through the light at 51st Avenue heading West on Baseline road in the evening, you would see how much this freeway is needed. I've had to sit there for 10 minutes before as it gets really backed up. We need some relief, and opportunities for our residents.

The sooner the better in this humble optinion.

Thank you,
Stacy Gentry

Code	Issue	Response
1	**Alternatives, Gila River Indian Community**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 10:52 AM
CALLER: PHYLLIS GEORGE	CALLER ADDRESS: AHWATUKEE, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the route around South Mountain to help with the congestion, thank you very much.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4406

be moving east to west, which would not happen if we had another reliever such as the Loop 202 around the mountain. With that, again, I strongly speak in support of the South Mountain freeway and I hope that we can get it done as soon as possible. Thank you.

THE FACILITATOR: Thank you.

Rohno Geppert.

Mr. Geppert, you have three minutes, here's the timer.

MR. GEPPERT: Hello. Thank you for allowing public comment. I appreciate the opportunity to speak. I am in favor of the alternative that connects to the west 101, any of those three alternatives just from a traffic flow perspective. The preferred alternative goes directly into where everything gridlocks at both rush hours, so I would appreciate if it could be moved as far west as possible so that trucks needing to bypass the downtown area won't be a part of the congestion so much as the ones that are currently going to bottleneck if it goes through the 51 corridor. Thank you for the time and I appreciate you taking those thoughts into consideration.

THE FACILITATOR: Thank you, sir.

Arthur Bivvins.

Mr. Bivvins, you have three minutes, here's the

1

Page 75

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 10:51 AM
CALLER: TIMOTHY GERKE	CALLER ADDRESS: 2025 EAST CATCLAW STREET, GILBERT, AZ 85296
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in major support of the freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
6/13/13	4:47 PM
CALLER: MARTHA GESSEL	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I just want to leave a message that I do support the South Mountain freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1 2 3

Tom Giannoukakis Document Created: 6/18/2013 12:50:03 PM by Web Comment Form

The consequences related to pollution and noise at the current alignment will be dramatic. What made sense in 1985 does not make sense today. I strongly oppose this freeway.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Purpose and Need, Old Plan or Use of Old Data**	

Code	Comment Document

Jeff Gibbons Document Created: 7/24/2013 6:13:13 PM by Web Comment Form

1 2 3 4 5 6

Short and simple.... I am voting a "no build" on the Loop 202 South Mountain Freeway. My main concerns consist of noise/air pollution, egress for South Mountain community members in emergency situations such as a hazardous material spill/release, degredation to South Mountain Preserve and all of the flora and fauna within its boundaries. With all of the new green technology and issues with the environment, I believe the money set aside for this project would be best spent increasing public transportation (i.e. buses, trains, etc...) instead of building more roads.

Code	Issue	Response
1	Noise	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	Air Quality	
3	Hazardous Materials	
4	Section 4(f) and Section 5(f)	
5	Biology, Plants, and Wildlife	
6	Alternatives, Nonfreeway Alternatives	

Code	Comment Document

From: Sierra Club on behalf of William Gibson
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 11:36:17 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

I teach at a High School in Laveen, and commute there daily during the school year, and often in the summer. Freeways are a form of infrastructure for public transportation that no longer serve the future in the way they did in the 20th Century. ADOT's mission must look beyond simplistic "build more" support to public transport; we built freeways during a time of increasing petroleum supply that is now ending. We need to find ways to connect local communities that are lower in maintenance, lower in energy use and in emissions. Freeways no longer serve us.

2

The freeway will exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

3

The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4

South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

5

6

The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

7

8

It is not obvious from inside an automobile, but freeways are like a

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
3	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

wall of death for wildlife, a real barrier to movement. It is astonishing how many small animals are dead by the side of the road.

3 The freeway will exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. We need to redevelop our local communities to reduce the need to travel, and to direct our resources toward maintaining existing infrastructure, rather than overbuilding for an obsolete technology. Thank you.

Sincerely,

Mr. William Gibson
1965 E Oxford Dr
Tempe, AZ 85283-2345
(480) 577-3556

Code	Issue	Response
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	
7	**Section 4(f) and Section 6(f)**	
8	**Biology, Plants, and Wildlife**	

Code	Comment Document
1 2	Laura Gill Document Created: 7/24/2013 5:52:47 PM by Web Comment Form This is a time where the need to shift from greed and consumption is critical. We MUST think about the future of the environment and put that before ourselves. Please think about the message this is sending.. we really don't need more freeways.

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 4:44 PM
CALLER: PETE GILMORE	CALLER ADDRESS: 4919 EAST SUNNYSIDE DRIVE, SCOTTSDALE, ARIZONA 85254
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the freeway, the South Mountain freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 9:55 AM
CALLER: BOB GINGER	CALLER ADDRESS: 3724 EAST DERRINGER WAY, GILBERT, ARIZONA 85297
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1

Yes, I support the freeway but I was only given limited information. I was not given any other information except that it would be a great idea and I thought it would be. But I can't base my entire opinion on just one thing. What are the negative impacts of making this freeway. Thank you.

Code	Issue	Response
1	**Impacts**	The environmental consequences of the proposed freeway are described in detail in Chapter 4 of the Draft and Final Environmental Impact Statements. The impacts of the action alternatives and No-Action Alternative are summarized in Table S-3 beginning on page S-10 of the Draft and Final Environmental Impact Statements.

Code	Comment Document

From: Felicia Calderon
To: ADOT
Subject: SM Voicemail Comments
Date: Monday, May 20, 2013 3:11:06 PM

Hello,

Please see the below is a comment left via voicemail on our projects line at: 855.712.8530

1. 5/12-Lester Ginyad, Phoenix AZ- we need the Pecos Rd. alignment very badly.

1

Thank you,
Felicia Calderon
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

February 2, 1990

Still applicable
May 20, 2013 (23 yrs.)

Re: Mountain Preserves; [illegible]

Dear Sirs and Madames:

To all Americans the words "for purple mountains' majesties above the fruited plains" propagates visions of unspoiled, natural vistas. To the people of Phoenix these words represent what we know as home, and what we have endeavored to preserve for our future generations. Arizona is the promise of a new, unspoiled land for the many "pioneers" who continue to choose to settle here. But the fact that people are still coming, to enjoy the environment and lifestyle we hold so dear, creates pressures on land use and transportational needs. This perpetual threat to our majestic mountains was recognized years ago by concerned citizens. Thanks to the steadfast commitment of these patriots, the Phoenix Mountain Preserve system has set aside over 24,000 acres of the most visible elevations of desert terrain. The voting majority has, time and again, supported this program with bond elections for acquisition and initiatives relegating the disposition of the Preserves to the electors. [redacted] the establishment of the Preserve parklands and adoption of a Mountain Preserve section in the Phoenix City Code (Chapter 26, Section 1-5) has [redacted] removed the mountains from the threat of eminent domain for roadway purposes, [redacted] so that protection is achieved for the public good, through their own ballot determination, in a truly democratic process.

1

It should be noted that, regardless of the Phoenix City Code or [redacted] House Bill 2218 [redacted] control over highways through public parks, [redacted] are subject to federal statutes under Section 4(f) of the Department of Transportation Act (23 U.S.C.A. Sec. 138), Section 138 of the Federal Aid to Highway Act (49 U.S.C.A. Sec. 1653 (f)) and Section 102(2) of the National Environmental Policy Act (42 U.S.C.A. Sec. 4332). Likewise, the State Route in the State Highway System [redacted] is also subject to these federal statutes, being a segment of a major highway project having federal aid assistance. As stated within the landmark U.S. Court of Appeals case, cited as 446F.2d 1013, on Page 1014, No. 7-Highways, "the State as a partner in construction of the project was bound by those laws (of Congress) and could not subvert the principle of federal supremacy by a mere change in bookkeeping or by shifting funds from one project to another in an attempt to proceed with the project using its own funds."

[redacted] House Bill 2218 was intended [redacted] and enacted in a manner that will result in the control of roadways through Mountain Preserve property. The mountains have been bought and paid for by the citizens, it is they who enjoy the multitude of trails and recreational opportunities provided by these preserves; it is only fitting and proper that they decide if roadways are appropriate. Thank you for your diligent consideration and support of this popular cause.

Respectfully submitted,

#15 David C. Gironda, 1515 East Las Palmaritas, Phoenix, AZ 85020 944-9323

2

It is intended to serve as a bypass route around central Phoenix, but even with mountain cuts, will have a steep grade that will have greater cost for trucks and cars, generating more emissions to climb over mountains.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

See submitted one page letter, referenced in my oral presentation (David Gironda #15) and hereby submitted as an exhibit, for consideration.

1 Attachment, dated originally, Feb. 2, 1990 addressed to members of the Arizona State Legislature, as marked "Still applicable. May 20, 2013 (23yrs.)

Optional

Name DAVID GIRONDA Email gironda@live.com

Address 1515 E. LAS PALMARITAS

City PHOENIX, AZ 85020 State ARIZONA Zip 85020

Phone 602-944-9323 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

it took me to get all the way up to the Desert Ridge area, so I know that we need this 202. We need a hospital. When I gave birth to my son, it took me 40 minutes to get to the hospital just to be able to give birth.

I mean, I understand about South Mountain, I love hiking, I'm a biker. I mean, when you do build the 202, we definitely want the bike route along it so we can have that access. We want sound-proof barriers, we want it to be pretty, we don't necessarily want to destroy South Mountain, but we also need to make some sacrifices in order to, you know, take into account all of the extra building that's going to be happening in Laveen shortly.

We can't overlook the fact that all the growth is still going to be continuing within the next ten years, and now is our opportunity to be able to handle all the extra traffic, especially with the casino that will be opening in July. Thank you.

THE FACILITATOR: Thank you.

David Gironda. Did I pronounce that properly?

MR. GIRONDA: Gironda. I do have a written statement which I can give to the court reporter.

THE FACILITATOR: Thank you, Mr. Gironda.

Prem Goyal. Did I pronounce that name correctly? Is Prem Goyal in the auditorium?

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	John Giroux — Document Created: 5/21/2013 5:36:58 PM by Web Comment Form Please move forward with the freeway! The traffic on 51st.ave with all the semis is out of control. This has been long over dew. We moved to Laveen in 2004 with the understanding a freeway would be coming. Please get it done.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, May 20, 2013 8:24:02 AM

From: Lori Girshick [mailto:lgirshick@cox.net]
Sent: Sunday, May 19, 2013 1:27 PM
To: Projects
Subject: South Mountain Freeway

1 I would like to provide my comment against the South Mountain Freeway Project. This project is outdated and contrary to any wise transportation solution. There are several reasons why I am opposed.

2 We should be investing heavily in public transit systems which would be much more cost effective and part of an alternative to the individual car. Continuing to be oil dependent is the opposite of what we should be building towards.

3 Secondly, this project will have a negative impact on our Native peoples. Many of the affected mountains in the South Mountain Range are sacred homelands of the O'odham people. People matter.

4 Third, the project will harm the environment and animals. The freeway will cut through a critical wildlife corridor connecting South Mountain Park to the Estrella Mountains, limiting connectivity for mountain lions, coyotes, javelina, reptiles, roadrunners, and other desert animals. Ecosystems matter--why would we support destroying this one?

Please develop an alternative plan that won't have all these negative impacts.

Thank you,
Lori B. Girshick
Mesa, AZ 480-325-1450

Check out my web site at http://www.loribgirshick.com

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Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	
3	**Cultural Resources**	
4	**Biology, Plants, and Wildlife**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 5:06 PM
CALLER: JIM GLADSICK	CALLER ADDRESS: 16233 S. 1ST AVENUE, PHOENIX, AZ 85048
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the 202 extension freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:04 PM
CALLER: CAROLINE GLOSKER	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I absolutely support building the South Mountain Freeway. The sooner, the better. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1 MS. GLOVER: My name is Vicki Glover and
2 I'm opposed to the 202 being completed in the
3 proposed area that they have outlined. I think that
4 there are other alternatives that would go south of
5 here and not interfere with the mountain. I think
6 that ADOT and the government has been very
7 heavy-handed with the way that they have tried to
8 push this project through, telling the Native
9 Americans that if they don't go along with it and
10 work with it, they won't get an exit at their newly
11 built casino.
12 The study is too antiquated. The study
13 was done too many years ago to adequately evaluate
14 what the situation is now. They've spent millions of
15 dollars in a project that is not going to accomplish
16 what they're looking at. The facts, the data is not
17 current.
18
19
20
21
22
23
24
25

Page 6

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	Federal law prohibits the denial of access to any community. Thus, traffic interchanges would be located along the freeway where it borders the Gila River Indian Community (see Final Environmental Impact Statement page 3-51). Roadway connections on Gila River Indian Community land to the traffic interchanges would be the responsibility of the Gila River Indian Community, in coordination with appropriate jurisdictions.
3	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Please depress the South Mountain freeway
Date: Monday, July 08, 2013 8:48:21 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Jenny Gniffke [mailto:jengniffke@gmail.com]
Sent: Saturday, July 06, 2013 9:22 AM
To: Projects
Subject: Please depress the South Mountain freeway

Dear ADOT Personnel,

I'm writing to provide you our input on the proposed 202 freeway. We are residents of the Lakewood neighborhood and our children will likely attend Lagos School which backs to Pecos Road.

1 2 3 4 5

We have concerns about air quality and noise from the freeway. Please consider building the freeway below-grade (depressed) so that these impacts can be minimized. We understand there are additional costs involved, but there will be long-term costs of the freeway (health, air quality, property values, etc) and we believe that those long-term costs far outweigh the additional construction costs of building the new freeway below-grade.

Thank you for your time and consideration.

Jennifer Gniffke
16406 S 36th Street
Phoenix, AZ 85048

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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Noise**	A depressed freeway option was evaluated in the Final Environmental Impact Statement and is described on pages 3-15 and 4-91. Although depressing the freeway would reduce noise levels, noise walls would still be needed to further reduce noise to meet the Arizona Department of Transportation noise policy. Whether the freeway is built aboveground with tall walls or belowground with shorter walls, the final mitigated noise levels would be nearly the same at nearby residences. The major disadvantage of building a depressed freeway would be the increased construction cost and the possible acquisition of additional right-of-way for pump stations and retention basins.
4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SOUTH MOUNTAIN FREEWAY SUPPORT
Date: Wednesday, May 22, 2013 10:54:00 AM

From: desertbutterfly@centurylink.net [mailto:desertbutterfly@centurylink.net]
Sent: Tuesday, May 21, 2013 11:12 AM
To: Projects
Subject: SOUTH MOUNTAIN FREEWAY SUPPORT

Good Afternoon,

I have been a Laveen resident since 2005, moving here from the east coast to start a new life. When I purchased my new home I heard and read about the new 202 highway to be built and couldn't wait for the opportunities to follow. Unfortunately, here we are more than 8 years later and still no better. I have attended many of the meetings over the years to show my support for such said freeway, always to be disappointed and told that there is a delay, it may not happen etc.

I as a Laveen resident have to drive to the East or Central valley each and every day for services that I can not get in my own neighborhood, how sad? Besides a slew of fast food eateries, gas stations and supermarkets I have no options as a tax paying resident in my own community. Baseline Road has turned into a highway due to lack of highways around us, creating more traffic, pollution and accidents.

1

It is time to build the South Mountain Freeway. We have waited long enough. The project is estimated to create 30,000 jobs during the five to six year construction period and result $2 billion investment in the Phoenix area economy. The money to build this freeway is in budget . It was approved by voters twice, first in 1995 and again 2004, please remember to include sound barriers when building.

The freeway will cut traffic congestion across the metro area, reduce air pollution, and save drivers time and money. 64.3 % of likely voters in Maricopa County support construction of the freeway according to results of a new poll commissioned by We Build Arizona. In a separate survey, also commissioned by We Build Arizona, 59 % of likely voters living in Ahwatukee and Laveen support the freeway.

If we don't buld the South Mountain Freeway, traffic in the region will get much worse over the next two decades. According to ADOT'S own study:
Traffic on I- 10 between Ahwatukee and Goodyear will grow 28%.
Another 103,000 cars will use the Broadway Curve each day.
Another 38,000 cars will jam the tunnel every day.
Morning and evening commute times will increase 39% to 82%.
Traffic congestion on city streets will increase 46%.
Building the 202 will also reduce air pollution by reducing the time vehicles spend stuck in traffic.

This is the last part of the valley that is not connected to any freeway system grid, there is no important project to the area's commuters and workers that the South Mountain Freeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

project. We must build it now you have my support.

Thank you for taking the time to read my support letter for this freeway.

Sincerely yours,

Frank Goldschmiedt

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Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I ama resident of the Foothills since 1991. I am also the principal of Kyrene de los Lagos. I oppose the construction of the freeway for the following reasons: 1) destruction of the Mountain that is sacred to Native Americans 2). increased pollution to our community – the school where I am principal backs up to Pecos. If built, this would create a tremendous safety issue (breathing - possible accidents w/ hazardous materials), increased noise levels affecting instruction; 3) increased truck traffic – THIS WILL BECOME THE traffic route for trucks – Mexico to Canada. Our community will never be the same →

Optional

Name Ana Gomez del Castillo Email

Address 2323 E. Mountain Vista Dr

City Phoenix State Az Zip 85048

Phone 480 460 2305 Fax

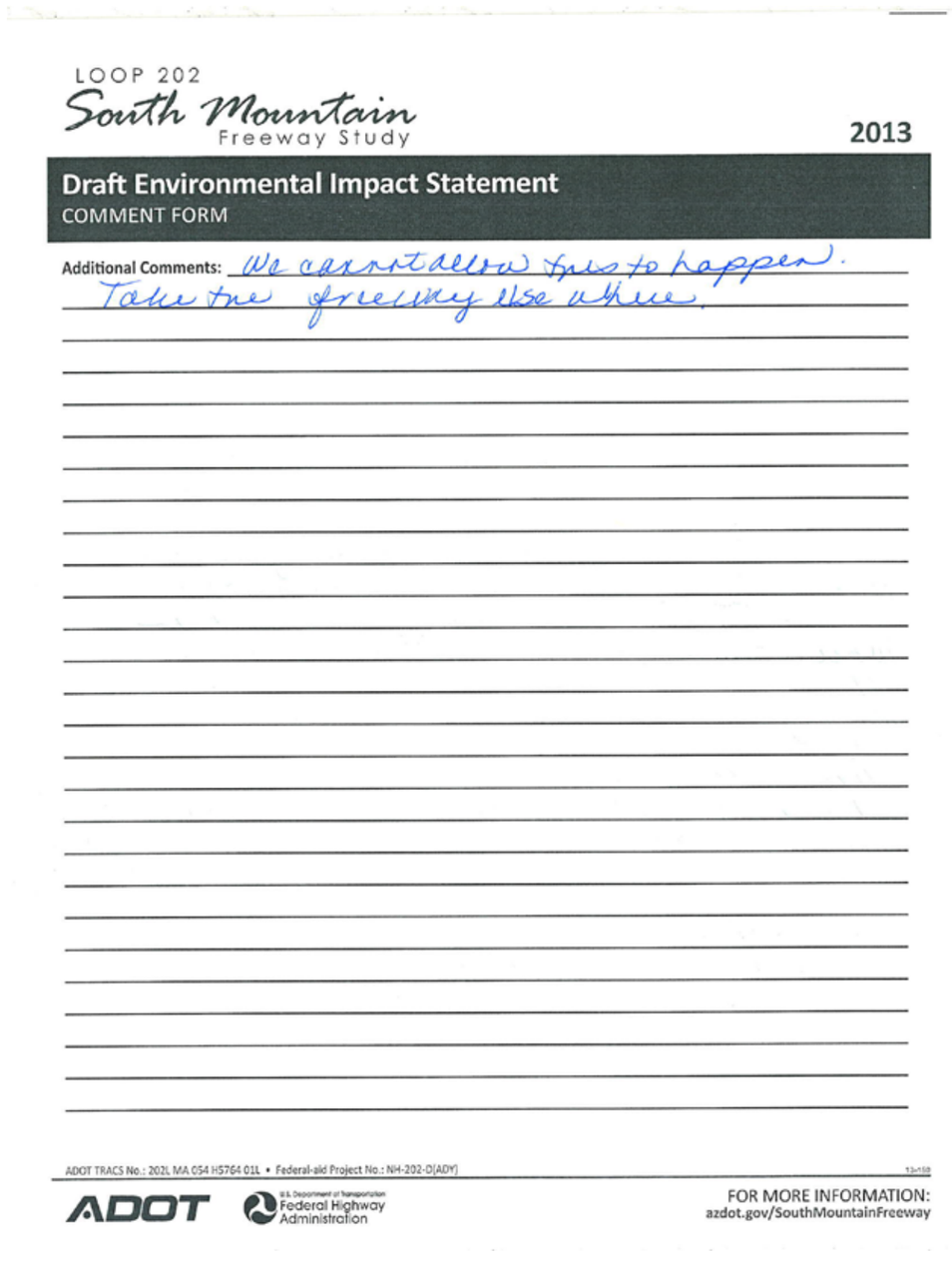
Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Air Quality**	
4	**Health Effects**	
5	**Hazardous Materials**	
6	**Noise**	
7	**Trucks**	

Code	Comment Document
8	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: We can't allow this to happen.
Take the freeway use where.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

13-150

ADOT

U.S. Department of Transportation
Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
8	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

(1) (2) As a resident of Ahwatukee Foothills I am opposed to the proposed Freeway. Reasons:
1) Destruction of mountain that is sacred to Native American tribe
(3) (4) 2.) Noise & pollution
3) Increased crime due to proximity of freeway
(5) (6) 4.) Will become a truck route.

Optional

Name Jose M. Gomez del Castillo Email

Address 2323 E. Mountain Vista DR.

City Phoenix State AZ Zip 85048

Phone 480-460-2305 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-188

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Noise**	
4	**Air Quality**	
5	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
6	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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ANA GOMEZ DEL CASTILLO: Well, first of all, my name is Ana Gomez Del Castillo. I have been a resident here in the Ahwatukee Foothills area since 1991. And since that time I've been watching and hearing about all this proposed freeway. And while I did purchase my home knowing that this freeway was going in, I was not aware --

And when you think about 1991 I was a lot younger and probably not thinking about the implications that such a freeway would have in this community. And since then I've become a little more educated about what the impact would be, such as, first of all, I'm very concerned about what the proposal is to get rid of the mountain that is sacred for Native American people. (1) (2)

When I see the drawings, I understand that they are looking at cutting the mountain. It's still defacement of the mountain and I really think that should be considered the primary reason for not building it. The other reasons are the amount of pollution that it would be creating. (3) And while there's a lot of information that's saying that there are studies, you know, I still am not believing that those studies are as accurate as they could be.

I'm not only a resident, but I'm a principal here in the Kyrene School district. And I

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3	**Air Quality**	

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happen to be the principal of the school of these playgrounds you see along Pecos. And, as it is now, whenever I'm on playground duty, the amount of dust that is kicked up just by cars traveling on Pecos, I can see the cloud as I'm heading out to the playground. I know it's affecting the kids; I know it's affecting their breathing. And, if kids have asthma, it's also affecting them as well. But then I think about that's just four lanes. I can't imagine what a 10-lane freeway would create for the children.

The other thing I worry about is how they would create a barrier for the children who are out there that wouldn't support the safety of the children while being out on the playground.

The other thing I'm concerned about also is that even though this freeway is not being viewed as a truck passage, I know that, at some point in time, this is what's going to be the truck route that connects Mexico with Canada; it's inevitable. And I really believe that right now we should be looking at other options.

And the other option would be using the -- I think it's called Highway 85 and just designating that because, when you take a look on the map that this is supposed to save people time to get to downtown, well, by

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5	**Trucks**	
6	**Alternatives, Gila River Indian Community Alignment**	
7	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

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the time they go out this way, they have to backtrack, so they are really adding more miles rather than saving miles.

I know I've given some various reasons, not only as a resident but also as an administrator. I am very much opposed to this because I really believe it's going to change what Ahwatukee really stands for. It's a small community, a cul-de-sac, and it will never be the same again.

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We're ready to get started.

We have a new panel, we have Tom Deitering from Federal Highways, we have Brent Cain from ADOT, and Chaun Hill from ADOT. We'd like to get started.

When you come up, come up to either mic. You'll have three minutes, there's a timer down in front of you, and please feel free to state your business.

I'd like to call Brad Goodman.

MR. GOODMAN: Hello, thank you for listening. I'll be very brief. Whether it's deserved or not, the west side of Phoenix has far too long been considered the dregs of the entire metro area. But compared to the eastside Valley, the opportunities for well-paying jobs simply don't exist on the west side mainly because we're so landlocked and, you know, jobs like those with Intel are just hard to get to. Building this freeway will not only bring much-needed jobs in terms of construction, but will usher in a lot of needed commerce that would help provide opportunities that will most certainly reverse the stigma that we now have to endure. The rise in income and the taxes collected will also benefit everyone in the Valley.

Additionally, study after study has left no question as to the numerous benefits that would result from the building of 202.

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1

And the Gila River Indian Community for years has been opposed to the build and the people and the state have bent over backwards to accommodate their wishes. The proposed build of the freeway now does not encroach on their land, and because of the painstaking efforts of so many people, I would ask now that they respect our wishes and needs, so that we can build this much-needed thoroughfare so the west side of the Valley can prosper in the same way as the east side of the Valley. Thank you very much.

THE FACILITATOR: Thank you.

If you'd like to speak, please go out to the registration table and get registered. Your name will appear on our list and we'll call you up. Thank you.

Jeane Devine. Could you come over to this microphone, we're going to switch you guys.

MS. DEVINE: Am I -- can you hear me? Thank you very much for having these hearings also. I wrote just from my heart like why I'm here and why I'm opposed to the South Mountain freeway. I grew up in Chicago, I moved to the Phoenix area in 1974 and South Mountain Park was one of the first places that I hiked, I'm still hiking today; I'm 71 years old. I still rave about this wonderful place of South Mountain Park to out-of-town visitors. And we have the largest city park in the

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 3:50 PM
CALLER: JOYCE GOODMAN	CALLER ADDRESS: 2417 EAST VILLA [UNCLEAR] DRIVE, PHOENIX AZ 85032
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway. We need to do anything we can to alleviate the traffic problems in this city, so I do support the freeway. Thank you bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Thursday, May 16, 2013 4:20:09 PM

From: Don L Goodrich [mailto:Dlgoodrich@sundt.com]
Sent: Thursday, May 16, 2013 3:26 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I have lived in the Valley for close to 50 years and have had to deal with my share of freeway construction and paid my fair share of taxes for the construction of this piece of the 202. Please do not allow a few people block the much needed construction of this important and clearly beneficial section of freeway.

SUNDT

Don Goodrich, DBIA, Employee Owner
V.P., Director of Pre-Construction
Sundt Construction, Inc.
2620 S 55th Street
Tempe, AZ 85282
Direct 480-293-3003
Cell 602-448-1015
Dlgoodrich@sundt.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Jane Goodwin
To: Projects
Subject: South Mountain Freeway Loop 202
Date: Tuesday, June 04, 2013 10:00:16 AM

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4 5 6
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As a resident of Ahwatukee Foothills, I would like to object to the building of this freeway for the following reasons:

1) Air Pollution: We have a lot of dust pollution already from the direction of the Gila reservation which is stopped by South Mountain & hangs over the area. You are proposing to add traffic pollution to this which will make our air quality totally unacceptable!
2) Noise/Vibration Pollution: especially from trucks
3) Environment: habitats for wildlife will be altered or destroyed; South Mountain desecrated.
4) Crime: We are at the moment fortunate to have a very low crime rate; with increased accessibility the crime in the area will undoubtedly increase.
5) The need to destroy houses & a church to build the road.

PLEASE DO NOT BUILD THIS ROAD!

Jane Goodwin & Frederick James
959 E South Fork Drive,
Phoenix AZ 85048

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1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Vibration is not normally assessed.
4	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Cultural Resources**	
6	**Section 4(f) and Section 6(f)**	
7	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
8	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

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From: Projects
To: ADOT
Subject: FW: Please don"t use Pecos
Date: Monday, May 20, 2013 8:42:47 AM

-----Original Message-----
From: Lorraine Gordon [mailto:LGORDON330@AOL.COM]
Sent: Friday, May 17, 2013 6:25 PM
To: Projects
Subject: Please don't use Pecos

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Build, but a bit lower down please.

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Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
3	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
4	**Alternatives**	A depressed freeway option was evaluated in the Final Environmental Impact Statement and is described on pages 3-15 and 4-91. Although depressing the freeway would reduce noise levels, noise walls would still be needed to further reduce noise to meet the Arizona Department of Transportation noise policy. Whether the freeway is built aboveground with tall walls or belowground with shorter walls, the final mitigated noise levels would be nearly the same at nearby residences. The major disadvantage of building a depressed freeway would be the increased construction cost and the possible acquisition of additional right-of-way for pump stations and retention basins.

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and help us to -- I feel like Laveen is somewhat at a crossroads and we can move forward to be a good community for our families. Or if it stays kind of stagnant where it is, that it's not going to be as good of a place for people with families trying to improve their community, so I support the freeway coming through. Thank you.

THE FACILITATOR: Thank you.

David Gould.

MR. GOULD: I hope this is not the walk of shame.

THE FACILITATOR: Not at all.

MR. GOULD: It's a lovely facility you have here. I'm from Maine and we don't have anything like this up there. Bear with me until I get my question.

THE FACILITATOR: Mr. Gould, before you begin, this is not a Q-and-A session, it's a --

MR. GOULD: I'm kind of hard of hearing, I apologize.

THE FACILITATOR: Yes. This is not a question-and-answer session, it's merely to gather your comments.

MR. GOULD: All right.

THE FACILITATOR: And you have three minutes and the timer is right there. Begin, please.

MR. GOULD: Okay. Well, there are a lot of

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(Comment codes begin on next page)

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1 questions to be had from where we live over on our
2 street. I live right off 24th Street, five houses in
3 between 24th and Chandler, and we were not aware of any
4 of this going to happen when we moved out here two years
5 ago from Maine. We're very concerned, not only on the
6 impact of the traffic going back and forth there, but
7 also, I am an advocate of anything that's an endangered
8 species and I'm told that the chuckwalla is -- I hope you
9 all know what that is -- it's a desert lizard that's out
10 here that is inherent only to the Sonoran Desert and only
11 to certain parts of Phoenix, and apparently most of the
12 world. I have a couple in my backyard. My backyard
13 abuts a wall, and I think it would be a shame that -- and
14 I know that's not the primary reason I'm here, but I want
15 everyone to know about those chuckwallas and, I'm sorry,
16 that they are an endangered species and that ought to
17 count for something in the vote in the long run.
18 We're wondering -- as far as I know, that road
19 is being set up so that to ease the traffic, particularly
20 truck traffic. We think that's going to have a lot of
21 implications on all the homes nearby from the diesel
22 chemicals and the light that come off that. I don't
23 think any of that was ever planned for before when these
24 houses were originally built, so I think that's an issue
25 as well. And I'm sure with more roads and everything out

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2	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The coloring of the male common chuckwalla is unique to the South Mountains; however, it is one of two color patterns and does not indicate a separate species or subspecies (see the Arizona Game and Fish Department's abstract for the common chuckwalla). The common chuckwalla is not an endangered species and is not a species of concern identified by the Arizona Game and Fish Department.
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	

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5 6 6 7 8 9

there the heat index is going to go up; it's already hotter out there than any other parts of the Valley.

Also, along with the increased congestion there will be increased air and noise pollution that is not accounted for around those homes, and just building a berm between the two perhaps is not really a fair solution to the people that have lived there so long. So we would be anxious to know if this goes through, what the plans might be to inhibit that noise and how much widening is going to be done. And that's about all I have, and I want to thank you for the time.

THE FACILITATOR: Thank you, sir.

If anyone else is in the auditorium and you'd like to speak, register at the front desk, your name will be up on the screen, and we'll call you in order. Thank you.

Erica Keenan.

Ms. Keenan, hi. You have three minutes, the timer is here in front of you. Please begin.

MS. KEENAN: All right. My name is Erica Keenan, I'm a resident of Laveen, Arizona, and I appreciate you letting us speak today. Over the past ten years the population of Laveen and Southwest Phoenix has doubled and the environmental impact projects that the number to be more than doubled in the next 25 years.

Code	Issue	Response
5	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
6	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
7	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered "acceptable" by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway. As mentioned in the sidebar on page 4-91, the Final Environmental Impact Statement is based on preliminary design and traffic information. As the design progresses to the Final Design phase, noise barrier locations and heights would be refined and finalized. During Final Design, more detailed information on the location, actual height, and distance from the property line of each noise barrier would become available.
9	**Design**	Preliminary widths for the proposed eight-lane freeway are discussed on Final Environmental Impact Statement page 3-58; see particularly Figure 3-34, "Typical Eight-lane Freeway Section."

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get it settled with the --

MR. MARTINEZ: Why didn't they have this meeting back in 2009, when they were going to make up their minds and they did? You know, instead of having it three years later. Well, guess what? We're going to have a meeting. It's already -- the decision's already been made. So don't bother coming. And that's the feelings I have it.

And I thank you for listening to my rant and rave. I had to vent.

MR. GOULD: All right. I'm willing to give my name. Doesn't matter. My name is Dave Gould, G-o-u-l-d. I live on 2422 East Mountain Vista Drive, which is off 24th Street. If you get off Chandler and go down 24th, take a left immediately, I'm the fifth house in.

So now I'm -- I have a couple of real big issues. Got a lot of issues, really.

Coming from one of the cleanest states in the union to one that does not have good air control, as we all know, pollution control, because you're in this valley, it's just going to be even worse where we are. And the noise pollution, the air pollution from the diesel trucks is just amazing that will be coming.

Now, this gentleman over here with the

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2	**Air Quality**	

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3

engineering firm that is doing one of the studies said, oh, you won't be getting big tractor-trailer trucks coming down there, you know, the 16-wheelers or whatever hauling groceries or whatever. They're already on the turnpike -- freeway. Up in New England we have turnpikes. You pay to ride on them. We don't have too many freeways.

And I don't know that that's all really true or not. He says, you're only going to get smaller trucks that will be servicing your area, like a air-conditioning or plumbing guy.

Well, we don't know that for sure. So we're very concerned. Everyone on my street is very concerned. I'm here actually representing a lot of people.

4

There's also, I found out the other day -- I've already spoken to the panel over here -- an endangered species that's going to be involved. I don't know if everybody's aware of that or not. But it's the chuckwalla. The chuckwalla is a lizard. And it is inherent only to the Sonoran Desert, and only part of it, from what I hear, in the whole world.

So if they do stuff out where I am, they are going to affect the longevity of this species. And it is a magnificent creature. I actually -- my back yard abuts a hillside, so I have some of them there that live naturally. And I just think it would be a shame if that

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3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The coloring of the male common chuckwalla is unique to the South Mountains; however, it is one of two color patterns and does not indicate a separate species or subspecies (see the Arizona Game and Fish Department's abstract for the common chuckwalla). The common chuckwalla is not an endangered species and is not a species of concern identified by the Arizona Game and Fish Department.

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is overlooked in the decision-making.

And that's all I want to say. Okay? We are definitely not in favor of it for so many reasons.

MR. WITHERS: My name is Thelbert Withers, T-h-e-l-b-e-r-t, last name Withers, W-i-t-h-e-r-s.

I'm in support of the freeway just for the simple fact that Laveen is a growing area now. We need more hospitals and more advanced things in this area and that community, not to mention that it's going to bring a lot more jobs and building the freeway and everything.

But I just want to put I'm in support of the freeway. I -- you know, let me think.

Just for entertainment purposes, you know, movies, you know, out -- evenings out, there's not really nothing too much in the Laveen area to choose from. I just think with this freeway, it will bring more of those type of -- restaurants, type of -- entertainment activities.

And like I said, more importantly, a freeway will bring a hospital, which is something that we really need in Laveen.

So I just want to put my support down for it. And if there's anything I can do to support it to get there, I'm on board with it.

So thank you. I appreciate your time.

Code	Issue	Response

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Jeff Gove

Document Created: 6/8/2013 11:35:56 AM by Web Comment Form

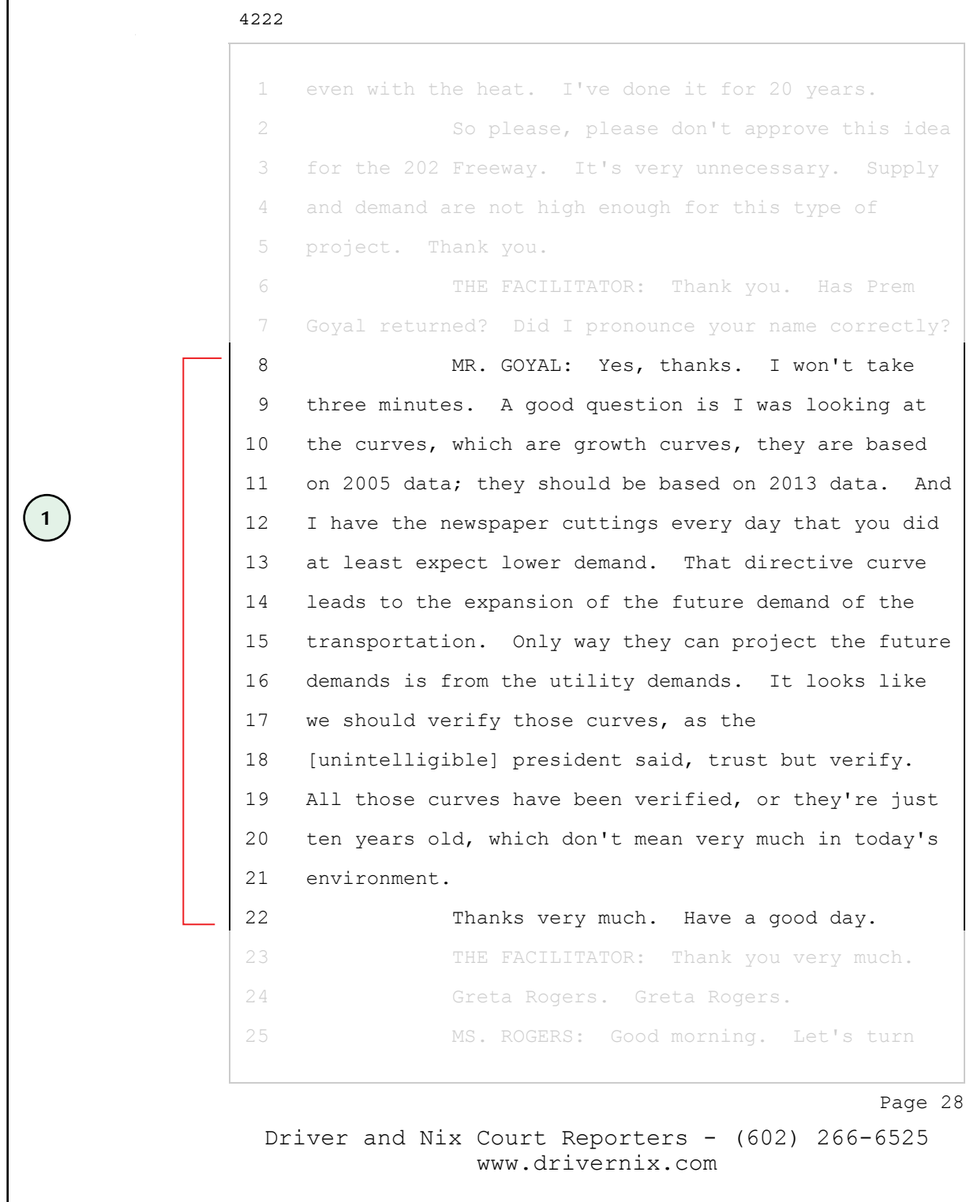
I appreciate the thoughtful effort the study team has taken to assess the proposed alternatives. To the naked eye, just looking at the map of all of the proposals, it is not clear why you wouldn't just connect to the 101. Given the extra costs to do so and the opposition from the local communities, it appears the the W59 alternative is the best choice.

However, given that this freeway has been in the works since 1985, I am baffled as to why ADOT and/or the state or MAG didn't secure a more direct right of way for the freeway a long time ago, when many of the communities in the west valley barely existed. I'm sure there's a good reason (like the money was being spent on the I10 and I17). But still, the lack of long-term foresight at that time is resulting a route that, in my personal opinion, is less than optimal from the standpoint of providing a city bypass for traffic coming from the south.

1

Code	Issue	Response
1	**Alternatives**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land despite the risk that the freeway would eventually be built. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.

Code	Comment Document



4222

even with the heat. I've done it for 20 years.
So please, please don't approve this idea for the 202 Freeway. It's very unnecessary. Supply and demand are not high enough for this type of project. Thank you.
THE FACILITATOR: Thank you. Has Prem Goyal returned? Did I pronounce your name correctly?
MR. GOYAL: Yes, thanks. I won't take three minutes. A good question is I was looking at the curves, which are growth curves, they are based on 2005 data; they should be based on 2013 data. And I have the newspaper cuttings every day that you did at least expect lower demand. That directive curve leads to the expansion of the future demand of the transportation. Only way they can project the future demands is from the utility demands. It looks like we should verify those curves, as the [unintelligible] president said, trust but verify. All those curves have been verified, or they're just ten years old, which don't mean very much in today's environment.
Thanks very much. Have a good day.
THE FACILITATOR: Thank you very much.
Greta Rogers. Greta Rogers.
MS. ROGERS: Good morning. Let's turn

Page 28

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

5064

MR. GOYAL: Prem Goyal. I'd like to see if we can put on the website the MAG data which is the growth curves. It looks like we get the data from the MAG growth curves. I'd like to see if we can put somewhere on the public website so we can access that. See what -- how variables are input to develop the growth curves. That's good. Appreciate it. Thank you.

1

2

Page 6

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Traffic**	The Maricopa Association of Governments socioeconomic data are available on its Web site, <azmag.gov/Projects/Project.asp?CMSID=1132&MID=Information%20Services>.
2	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4416

are you going to do about our cultural sites? I know our rule has something to do with that, but I want to know is our petroglyphs, is our sacred sights going to be protected? Are they going to be moved somewhere else? That's what I want to know. Thank you very much.

THE FACILITATOR: Thank you.

An announcement, please. The last bus will be running in about five minutes at 7:30 for all destinations, orange, green, and blue, routes one, two, and three. Thank you.

Ashley Grace.

Ashley, could you please come to this microphone.

MS. GRACE: Thank you for letting me speak. I'm a recent addition to Phoenix, I moved here about a year and a half ago and I'm a military spouse. South Mountain, I think, is more important the way it is as a tourist attraction as one of, you know, Phoenix's points of pride, the largest -- the largest city park in the United States, as a place for wildlife. If you put an interstate through the middle of it, even if you conserve most of the area for wildlife, they won't be able to cross between and that creates big problems. You know, javelina and bobcats and everything else that is out there, they don't really have a very easy time crossing

Page 90

Driver and Nix Court Reporters - (602) 266-6525
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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants,and Wildlife**	

Code	Comment Document

3

eight lanes of traffic.

Also, I think economically it would be bad for Phoenix, because when you create more and more large interstates going in and out of a major city, you encourage urban sprawl, which takes a lot of money outside of the center of Phoenix and distributes it to make it wider and wider and wider urban sprawl, which Phoenix already has quite a bit. And that's all I wanted to say. Thank you.

THE FACILITATOR: Thank you.

For those of you who may not have heard, the last bus is leaving in about three minutes for all destinations out there.

Cheryl Dumpert.

Cheryl, could I ask you to use this microphone, please. Thank you.

MS. DUMPERT: Hello, my name is Cheryl Dumpert and I'm a member -- I live in Ahwatukee, I've lived there since 1990. I'm an avid hiker and I helped extend the parking at the Telegraph Pass parking lot. I'm a member of several hiking groups with thousands of members that hike South Mountain regularly.

Have you ever had a slice of pie, maybe just a sliver, but oh, it's so good, you want another and then another, and before you know it, you've eaten the whole

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Code	Issue	Response
3	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1) This is a bedroom community. The residents are not looking for economic development. We want a nice, clean, safe neighborhood in which to live and raise our families. We have access to the commercial/business by I-10 and we are just a few minutes from Chandler Fashion Square. The Gila River tribe is looking for commercial development not the residents of Ahwatukee/Foothills. (1)

2) The South Mountain Freeway will cause pollution like in Central Phoenix and the 202 by Chandler/Gilbert (2)

Optional

Name DIANNA GRACZYK Email retirementqueen@cox.NET

Address 15808 S 7th DRIVE

City Phoenix State AZ Zip 85045

Phone 480-460-1940 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	

Code	Comment Document

Loop 202 South Mountain Freeway Study

Dianna Graczyk – Comments

3

3. I have been in my house for 17 years and I bought the house knowing the traffic issues with this community. I value my quality of life and enjoy, clean fresh air, well maintained city streets, low noise and traffic. In the evenings and weekends the traffic is reduced to mainly residents only. We do not get a lot of traffic because our situation is one way in one way out. I enjoy biking, hiking, walking my dog in a safe environment with little traffic on the city streets.

4

4. The 202 Exits will bring more traffic into our bedroom community and crime rate will go up. If I wanted to live, shop, worship or play with the residents on the other side of the mountain, I would have saved hundreds of thousands of dollars and bought a house on the west side of the south mountain range. We don't care about the economic development in Laveen or where ever. We are being asked to give up our style of living for their economic development. Why would I drive there to shop when I drive less than 10 minutes and go to Chandler Fashion Square?

5

6

7

5. Not only will crime and pollution rise in this area but the additional traffic on our city surface streets will drastically increase thus causing more vehicle accidents in this area. The additional traffic on Chandler BLC will cause a danger to bicyclist, joggers, roller blades and folks walking with their children and pets. The landscapers/gardeners will face additional danger because of the volume of cars. It will be harder for them to keep the grounds pristine and get their tree trimming and general maintenance completed.

8

People come from all over the state to enjoy the serene hiking opportunities in our neighborhood. It is not unusual to see one or two cars without of state license plates at the entrance to the trails at chandler Blvd/19th Ave. Our state economy is primarily based on tourism and it would be a shame to have one last choice in hiking for tourists. Places like Squaw Peak are overburdened with

Code	Issue	Response
3	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
4	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
5	**Social Conditions**	In the case of the proposed action, the purpose of the project is not to promote economic development specifically in Laveen Village or anywhere else. The purpose is to respond to a growing need for additional transportation capacity as a result of regional growth occurring now and as projected.
6	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1).
7	**Traffic**	The traffic projections for Chandler Boulevard (see Figure 3-12 on page 3-29 of the Final Environmental Impact Statement) show a reduction with the proposed freeway when compared with conditions without the proposed freeway.
8	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
	hikers, it is almost impossible to get a parking spot unless you arrive extremely early. 6. I fear for the safety of our children, outdoor playing/riding bikes or even in the schools which will find themselves in the range of one mile or less from the South Mountain Freeway. I believe there are no public schools in the I-10 corridor from Elliot to Chandler Blvd. 7. Most of the crime in the Ahwatukee/Foothills area is centered within a 1 mile radius of I-10, numberous Bank robberies, AMC theatre, etc. In fact 1-10 is a major artery for moving drugs/and human trafficking. We certainly do not want to expose our residential area to this type of illegal activity. 8. Why not put the Freeway down by Maricopa or Casa Grande to hook up with 51st Ave? Is the primary reason for the Freeway to get 18 wheelers around the city of Phoenix? I am sure the Gila River Indians would be concerned if the Freeway would be placed down by Maricopa or Casa Grande. Their planned economic development around 40th street would be halted. Land in Maricopa or Casa Grande should be a lot less than is in the Ahwatukee/Foothills area. Highways are ugly litter with debris, billboards and fences. I could go on forever on the reasons not to build the South Mountain Freeway anywhere near Pecos road. This battle has been going on for years and for a very good reason. It is probably safe to assume the folks putting this proposal together and conducting environment studies look at numbers and care nothing about communities. Please seriously reconsider putting this freeway elsewhere. Sincerely, Dianna Graczyk
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9 10	
11	

Code	Issue	Response
9	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration. A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
11	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
6/12/13	7:00 PM
CALLER: ELLEN GRAHAM	CALLER ADDRESS: SUN CITY, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

I think putting the freeway in would be very beneficial. I've been in the valley since 1973 and I drove the inner city streets from Sun City area into central Phoenix for a number of years of working and when the I-10 and the 101 were completed, it made my travel to work much better and I know the traffic congestion is horrible, although my working hours, when I was working, I am now retired, but my working hours I avoided the heavy traffic, but I always remembered hearing reports on the television about the traffic tie up and the times and things and I know how much the freeway of the 101 and the 10 helped with the Phoenix Metropolitan area when they were completed. And, I think this other freeway connecting the South Mountain Freeway to the 10 would be a great deal of help because the outlining areas down there now of Maricopa and just the further South Mountain range, Laveen, all those down in there, Baseline area are now developing and before it was just farmland and as our valley develops as far as population, schools, jobs, everything, naturally we need to update and keep up with the roadways to supply the travel in an adequate manner for the population of the valley to move around. And I know how much it helped to have the freeways that are in existence now that didn't exist when I first came out here, only the I-17 existed and it's just unbelievable with the 101 and the 202 and the finishing of I-10 going through Phoenix and it was stopped at a certain point in Blithe and now that it is all complete it's really, really nice and I think, like I said, as the valley grows, the population grows the roadways have to grow. I'm not sure how that's going, the South Mountain, I haven't read up on it recently, I don't know exactly how that's going to involve the Indian reservations down there, but I am sure that it would benefit both and I know that through Scottsdale down Pima Road things were understood and there would possibly be adjustments made through the South Mountain Freeway. So it would benefit both communities; the reservation and the people that do not live on the reservation. But, we have to take into consideration people's rights and we have to think of everyone equally. So, I am very much in support of it and I don't know what else to say, but I, like I say I'm retired and I am unfortunately not able to travel outside of Sun City that much because of my health, but for many years the roadways, the last few years of working were a great deal of convenience for me and I hope that the younger generation can benefit from the newer roadways to come. Thank you very much for the opportunity to express my opinion on it. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Opposition to Proposed Loop 202 Extension
Date: Tuesday, July 16, 2013 10:07:54 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Justin Graham [mailto:grahamjm88@gmail.com]
Sent: Monday, July 15, 2013 9:08 PM
To: Projects
Subject: Opposition to Proposed Loop 202 Extension

To Members of the South Mountain Study Team:

1 2 I am writing to briefly voice my opposition to the proposed extension of the Loop 202. As a resident of Downtown Phoenix, I am keenly aware of the localized pollution collecting around South Mountain from our valley's freeways. The future of growth and economic development for the valley is to improve transit options closer to our core, rather than encouraging exurban growth through the construction of new freeway rings. We have the opportunity to avoid pouring more money into these relatively short-sighted projects, and to the extent this $2.6 billion dollar project takes money away from alternative transit options it 3 is directly harming the future economic competitiveness of the valley.

2 In summary, I oppose the Loop 202 extension as a massive misallocation of public funds that will not eliminate environmental problems, but rather encourage them through the well-understood principle of induced demand.

Thank you for your attention to this matter,

Justin Graham

--
Justin Graham
J.D./M.B.A. Candidate- Class of 2015
Arizona State University
602.510.3737
grahamjm88@gmail.com

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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Secondary and Cumulative**	The proposed freeway is a response to existing and anticipated travel demand in the metropolitan Phoenix area. It is not meant to increase travel beyond that expected to be generated from existing and anticipated population and employment growth and related land development. It is important to consider that improvements proposed for any type of transportation system (e.g., a new bus route, rail transit line, commuter rail service) would likely lead to changes in travel behavior, which, in turn, would lead to increased use of the particular system. Improvements made to a given transportation system are meant to attract new users (see Final Environmental Impact Statement pages 4-170 through 4-174). If this were not a primary goal, the improvements would be neither effective nor warranted. For the proposed action, a goal is to attract users of other segments of the Regional Freeway and Highway System and the local arterial street network, now and in the future, to the proposed action to optimize, in part, the entire regional transportation system (as outlined in the proposed action's purpose and need in Chapter 1).
3	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:09 PM
CALLER: LYNN GRANDIE	CALLER ADDRESS:
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I received this phone call today and I am in support of the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Draft EIS
Date: Wednesday, May 22, 2013 10:54:07 AM

From: Michael Grandy [mailto:grandym35@yahoo.com]
Sent: Tuesday, May 21, 2013 9:20 AM
To: Projects
Subject: Loop 202 South Mountain Draft EIS

1

I have read through the Loop 202 South Mountain Draft EIS and concur with the recommended alternatives. Let's get to building the needed freeway as soon as possible. Don't let the Gila River Indian Community or Ahwatukee residents play the stall game any longer.

Thanks,

M.G.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202
Date: Tuesday, May 14, 2013 9:48:27 AM

From: Ernie Granese [mailto:ernie.granese@usa.net]
Sent: Sunday, May 05, 2013 1:18 PM
To: Projects
Subject: Loop 202

Hi,

1 How come I don't see or read anything about making the Loop 202 part of the Federal Interstate freeway system?? All big cities (I am assuming you classify Phoenix as a big city) have Interstate Bypass freeways. This Loop 202 could be Interstate 10 bypass, called 110 or 210. This is actual what this roadway will be used for, trucks and cars going to Californian and bypassing downtown Phoenix. Doing this makes the feds pay for most of it. Also it may

2 be better for the feds to negotiate with the Gila Indians for putting the freeway on some of their land. By the way, we don't need the entire Loop 202 to be on Gila land just the few miles that would take the homes along side Pecos.

Thanks for listening.... Ernie Granese

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Code	Issue	Response
1	**Purpose and Need**	There are two general paths by which highways or future highways are designated as future Interstates. One path is the administrative path. In this case, a state (or states) asks the Federal Highway Administration to take a designation action; presents a case that the corridor to be designated is a logical addition to the Interstate system; demonstrates, where appropriate, coordination with other states and with metropolitan planning organizations; and makes a commitment to complete the route to an Interstate design level within 25 years. The other path is called the Congressional path. In this case, a future Interstate corridor is identified through statutory language primarily within the uncodified provisions of section 1105(e)(5) of the Intermodal Surface Transportation Efficiency Act, P.L. 102-240), as amended (in which the process stated in Title 23 of the Code of Federal Regulations, Part 470, generally applies). The Arizona Department of Transportation, Federal Highway Administration, and Maricopa Association of Governments are not pursuing Interstate designation for the proposed freeway. The route has been adopted into Arizona's State Highway System. The primary purpose of the proposed freeway is not to create a ""truck bypass"" for downtown Phoenix. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic– including truck traffic—to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. Commercial trucks would use the proposed action. As with all other freeways in the Maricopa Association Of Governments region, trucks would use it for the through-transport of freight, for transport to and from distribution centers, and for transport to support local commerce. And as with travel on all other freeways in the Maricopa Association of Governments region, the primary users of the proposed action would be automobiles. Further, it is not expected that the entire 21 percent of through-traffic (by tonnage) using Interstate 10 would divert from Interstate 10 to use the proposed action (see Final Environmental Impact Statement page 3-64). The trucking industry heavily depends on the efficient and fast movement of freight and on travel time savings. Trucking destinations in the Phoenix metropolitan area (either distribution centers or for local commerce) would require trucks to enter congested areas. Choosing to travel on the proposed action versus Interstate 10 would not translate to any substantial travel time benefits. Therefore, it is expected that "true" through-truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
2	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Curtis Grant Document Created: 5/21/2013 2:55:21 PM by Web Comment Form The time to build is now, with the economy at this point, the cost to construct is at it's lowest level it will ever be. The longer we wait, the more expensive the project will become, the more congested the existing roadways will become and the longer the construction schedules will become. The time is now!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Heidi Grant Document Created: 7/1/2013 8:28:17 PM by Web Comment Form

1 2 I am commenting as a member of PARC. I am strongly opposed to the South Mountain Truck by-pass. I am amazed that ADOT would consider putting a truck bypass so close to a very nice quiet community. We moved to the Ahwatukee area because of South Mountain and the quiet community it creates. Secluded from the busy big city. We love having a view of the mountain, and we love the fact that the mountain provides a very quiet community for us to live in with our 3 children. My husband loves mountain biking and hiking in this quiet community. Plopping a truck by-pass, just down the street from everyone who lives here is something I am amazed that would even be considered. Please think about the citizen and children who love this area before making such a horrible decision. Please think of the 3 pollution you would be putting right next to those who just want a quiet place to live. Please think of us before you put a truck by pass that will provide no added benefit to those who live 4 in the area. The only ones benefiting are truckers just passing through and don't really care about our neighborhood.

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Purpose and Need, Lack of Support**	

Code	Comment Document

From: Michelle Thompson
To: ADOT
Subject: FW: 202 loop
Date: Friday, May 03, 2013 9:41:12 AM

Michelle Thompson
Senior Community Relations Officer
1655 W. Jackson St. MD: 126F
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From: JSJJGrass@aol.com [mailto:JSJJGrass@aol.com]
Sent: Friday, May 03, 2013 7:26 AM
To: Projects
Subject: 202 loop

1 I am against placing a freeway over Pecos Road.

2 I would suggest if the idea of an internal loop is to move residents of Phoenix around the city easier; then restrict the 202 loop to two axle vehicles only (passenger cars/trucks) and force the truck trailer combinations to use the 10 freeway.

Regards,
Jeff Grass

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	

Code	Comment Document

5017

MR. GRASS: I'm Jeff Grass, G-r-a-s-s, Jeff Grass.
My comment would be that, if I'm understanding correctly, the idea of the Pecos Road development is for continuous use, for improving traffic flow within the City or around the City of Phoenix, which I can understand.
However, I would like to suggest, if it's primarily for the citizens of Phoenix or the eventual growth of Phoenix, to improve the transportation within that area, I would like to suggest that we handle Pecos Road like other cities have done. For example, Salt Lake City, they have put expressways that are restricted to two-axle vehicles only, so that we're not creating a thoroughfare for freight companies, from Jacksonville, Houston, trying to drive to Los Angeles or the other way; that the loop would be for improving traffic flow for the citizens that want to get to downtown Phoenix or around Phoenix easier. And it would be restricted to the cars, the trucks, anything, just only two-axle vehicles.

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:16 PM
CALLER: CLAUDIA GRAY	CALLER ADDRESS: 457 EAST VERA LANE, TEMPE, AZ 85284
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

children with the status quo, using the exorbitant right-of-way freeway paid the landowners the highest buildout cost. The Arizona legislature has done that to us.

Nor should we ignore the many deaths, semi rollovers, and the expensive public responders to the many and frequent crash freeway accidents.

Now, what we need is safe, efficient, useful, sustainable, affordable, state-of-art regional connective transportation.

And even considering a fast train, high-speed elevated train, from Tucson to Phoenix around this Broadway Curve as a viable alternative.

MANUEL TOPETE: And I live in Laveen, 51st and Baseline. And I can't wait for this to happen. As simple as that.

My only regret is I won't live to see it. Just I wish it was already done. I think you should also hear this, aside from all this bad.

KARIN GRAY: I have been a resident of Ahwatukee for over ten years, moved here from Texas, and absolutely love South Mountain. One of the reasons I moved to that area was to have access to all 15 miles of the Nation Trail, from one end to the other on South Mountain, the biggest city park in the United States.

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(Comment codes begin on next page)

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It would be an absolute disaster if any kind of highway goes through South Mountain. I have no problem with an expressway that goes around it in some form or fashion. I wouldn't mind if it went all the way down to 101 on the west side and connected there.

But I would be totally opposed to any plan that infringes on the South Mountain Park area. I am especially concerned with the wildlife. One of the joys of living in Ahwatukee is having havalina in the front yard, the coyote wandering through. My son rescued a Great Horned Owl chick about two years ago, and the nesting pair are still in our neighborhood.

And the kind of freeway they are talking about would disrupt the wildlife that call South Mountain their home.

Let's see, what else? I've always thought if we had the technology to build a tunnel under the English Channel -- and that was done several years ago -- we could certainly build a tunnel under a mountain. I have looked at the proposals. They include HOV lanes and talk about Homeland Security issues. I understand all that. I understand all that.

I do believe it can be done, and I also believe it could pay for itself by the people who would be willing to pay a monthly toll to use the tunnel to

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	
3	**Biology, Plants, and Wildlife**	
4	**Alternatives**	Information related to the challenges and costs of a tunnel through the South Mountains is described beginning on page 3-16 of the Draft Environmental Impact Statement. The primary purpose of the tunnel would be to eliminate impacts on the South Mountains; however, the tunnel option would not accomplish this. The project would be completely funded through federal sources and local ½-cent sales tax, as programmed in the Arizona Department of Transportation 5-year Transportation Facilities Construction Program and the Maricopa Association of Governments *Regional Transportation Plan*; therefore, tolling is not required to fund the proposed action.

Code	Comment Document

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bypass having to go on I-10 or around 48th Street.

So if I had a vote, it would be for either a tunnel or to extend the 202 all the way out to connect to the 101, bypassing the park.

That's it.

GABRIEL JASSO: Definitely need the South Mountain Extension Loop 202 built ASAP. It will help alleviate traffic within the city's freeway system, eliminate bigger trucks on our roadways down on Baseline and 51st Avenue, and bring business to the area, valued business to the South Phoenix/Laveen area, creating jobs and better opportunities for people, and would also mean less travel for us residents in South Phoenix to other parts of the Valley, which would also help improve with traffic in other areas, as well as pollution.

That's it.

(The proceedings concluded at 8:00 p.m.)

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PROCEEDINGS

MR. GRAY: My name is Walter Gray, G-r-a-y, and I belong to an organization known as the West Side Town Hall Steering Committee. I'm the coordinator. That group may or probably will take an official position probably expressed in a letter to the appropriate people, ADOT or the City Council or whoever the right people are.

In my personal opinion and my personal view, just from viewing the panel and also the video, one concern I have is that the real basis of this Loop 202 South Mountain Freeway is to take the freeway to Downtown Phoenix, relieve traffic from I-10 going into Downtown Phoenix, create an alternative route into Downtown Phoenix on the West Side. I think that's the basic fallacy of the study.

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I don't think we should continue to pour all transportation into Downtown Phoenix. You know, what will follow then is the East Valley will get crowded, Downtown Phoenix will grow, these freeways will get crowded and they'll build a light rail in the freeways and that'll go through and everything will go to Downtown Phoenix. And that creates unbalanced development because it's all Downtown Phoenix and everybody lives outside of Downtown Phoenix.

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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So my first reaction to this is that what they -- what I would prefer is employment centers in Ahwatukee, in Laveen. The City of Phoenix has two that are -- one is at 99th Avenue and I-10 and one is at 27th Avenue and I-10, two employment centers. They're not existing, but they're planned employment centers. Plus, you have additional employment along the Loop 101 north of I-10.

So what I've been advocating -- I advocated this in the light rail hearing in Glendale -- is that we try to shift more employment to the West Valley so that we can -- so that we can reduce the impact of traffic all going to Downtown Phoenix. So to do that, you know, to balance planning -- I mean, the idea is to keep the residential relatively close to the employment. That seems to be a major link there, employment and residential, and then everything else kind of fits into that, the business part of it, the recreation, other parts of the community involvement.

So my feeling is that they should take the -- the employment -- the two city employment centers and also have one down in Maryvale -- I mean in Laveen and one in Ahwatukee, and that would encourage people -- and they're existing and there could be additional employment centers in Chandler, and that would encourage people to travel closer to home to go to work and reduce the impact of the

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infrastructure and having to build these very costly freeway systems and light rail systems.

And that makes for better community development. It reduces pollution. It provides the people more time, more leisure time. It provides more things that are available.

So I -- that's my feeling. That's the basic feeling. I think there should be employment centers. You know, for example, in Ahwatukee, you know, it would be more office kind of employment or government kind of employment; same thing with Laveen. The ones in Phoenix on 99th Avenue and 27th Avenue, those, I think, are more suited for manufacturing. And so there could -- you know, there doesn't have to be just one employment center in Laveen. There could be two.

But the basic complaint that I have -- also, I think it's important to be considerate of the Gila River Indian Nation, because they are -- you know, they have a different culture and they have different values. I know that I've been at hearings where they have expressed concerns about pollution, you know.

I guess one reason they rejected having the freeway on their land is you've got the South Mountain that will kind of do the same thing that it does on the Phoenix side, which is keep the pollution kind of

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funneling south of South Mountain. And that would settle right over the Indian Nation, which, you know, they're just more environmentally sensitive than the normal person.

Let's see if I have anything else.

I'm also a member of the Sierra Club, and I know they're concerned about cutting through the park, the South Mountain Park. They -- I don't know if that's such a critical concern, you know, or my own personal view, because it's only 31 acres and it's at the very end of the mountain range. And so -- but that's a consideration also.

Yeah, I think what makes more sense to me is they've already eliminated the route through the 101, which is called the west of 101 or something like, that would connect with the Loop 101. To me, that might make more sense, because, you know, again, the idea is to take traffic away from Downtown Phoenix in my opinion. By having that traffic go to the 101 and up towards Glendale where you have the stadium and the arena and other potential employment -- plus, you have the 99th Avenue City of Phoenix employment center at 99th Avenue and I-10. It seems to me that that way we'd take traffic west away from Downtown Phoenix.

And I think, you know, socioeconomically, if you

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Code	Issue	Response
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Alternatives, W59 Alternative Versus W101 Alternative**	

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keep putting everything into Downtown Phoenix, then, you know, Downtown Phoenix will increase in value and the rest of the Valley won't increase as well -- as evenly, you know. All the property value, the income, all of that will be concentrated in the hands of relatively few people. And if you disperse the employment and transportation, then you will spread out wealth among a greater number of people.

Well, I guess that's about it, you know, for this rendition. I'll take one of these statements, talk to people who are on the West Side Town Hall Steering Committee and see -- I think there's going to be one more public meeting that Councilman Michael Nowakowski, N-o-w-a-k-o-w-s-k-i, is planning. He's planning a meeting, so that's another opportunity to comment.

But this is the official process of the Environmental Impact Statement, so we'll probably submit a statement to ADOT as directed in this bulletin -- or this brochure.

THE REPORTER: Okay. Thank you. If you have anything you think of later, you're welcome to come back and talk to us.

MR. GRAY: I have an addendum. I'm not sure if I talked to one of the engineers, but as I mentioned, I'm a member of the Sierra Club, and one of the concerns of the

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Sierra Club is urban sprawl. And urban sprawl just means that the development just expands in low density to the extremes of the metropolitan area. And I think that this would encourage that rather than having more dense development that would occur if we had, you know, more balanced development with employment centers in Ahwatukee, Laveen, West Phoenix and Glendale and Chandler.

That way, we'd have a variety of housing connected with the employment, and, you know, it would not -- it would kind of increase the economic value of that area and have people staying in that area rather than moving to the extremes, although they've already done that. So that's one of the concerns of the -- of the Sierra Club, and that continues to be a concern here.

Another thing is that there's something called inversion. Inversion is when you develop your inner core, your downtown and your surrounding areas of downtown, the inner core. And that attracts largely younger families and individuals, generally people who are middle class, back into the inner core because there's a lot that appeals to them.

But what that means is that -- what that means is that the people in the low-income areas within the inner city, they don't move that way because they can't afford to live -- because the whole value of the whole downtown

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Code	Issue	Response
5	**Secondary and Cumulative**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
6	**Planning**	Growth patterns and densities are largely determined by each respective jurisdiction's land use planning decisions, as identified in its General Plan and implemented through its local zoning decisions. In the Laveen Village area, the Phoenix General Plan identified an employment center along the Preferred Alternative at Dobbins Road. This center, envisioned as areas of mixed land use, is not inconsistent with the concept of smart growth, which concentrates growth in compact, walkable urban centers to avoid sprawl.

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area or the whole inner core gets so high that they can't afford to live there. So the growth just expands and eliminates some of them.

In other cities, like Seattle and Chicago, when it happened like that, nobody, to date, makes any plans for the people who get displaced, low-income people who get displaced by the spread of the inner core. So what I'm talking about here is that, you know, one of my basic concerns is the people who are the working poor or poor, because I live in Maryvale, in West Phoenix, and I've lived here 30 years. That's my concern. I mean, I've been active in the community for many years.

So to protect those people and to increase their wealth, then we should have development in their area. And that's where I talk about these employment centers that are in these areas that keep the -- keep the people -- well, it gives them jobs so that they can stay in the area and increase their income and contribute more to the economy.

So those are two things I wanted to add. Thank you.

THE REPORTER: Thank you, sir.

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PROCEEDINGS

THE REPORTER: State your name, please.

MR. GRAY: Walter Gray.

Well, the concern I have is that the proposed alignment along the 51st Avenue corridor will not benefit West Phoenix, because there will be more traffic into I-10 and downtown, which means they have to expand I-10 by two lanes, and that will not be as -- the additional lanes will not be -- will just be more traffic, and reduce the -- and won't -- they won't benefit the traffic movement necessary for employment centers at I-10 and 27th Avenue and I-10 and 99th Avenue. They will -- and it might make it a little bit more difficult to get to those employment centers, because you have more lanes of traffic.

I don't see any real -- in that proposal along 51st Avenue to 59th Avenue, the big interchange at 59th Avenue, I don't see how that's going to benefit West Phoenix. It seems to me that if you're going to spend $2 billion, West Phoenix and Laveen should -- should -- should benefit. West Phoenix should not be left to be a low-income community.

Whereas this infrastructure, the Loop 202, really benefits Laveen and Ahwatukee and Chandler, it has very little impact on West Phoenix.

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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It does very little for West Phoenix. I think it might be better, although it is not a preferred route, to bring the 202 -- one, starting in the east to make the 202 a parkway from I-10 to the South Mountain divide. And that would apparently be more, from what I was told, be more acceptable to Ahwatukee and the Gila River Indian Nation. And then in Ahwatukee, convert the golf course, the abandoned golf course in Ahwatukee, to a Texaco and office center, to relocate jobs from downtown to Ahwatukee, because many people in Ahwatukee work downtown.

And then moving west, that would reduce the amount of traffic going into downtown, meaning less infrastructure for the 202 -- less infrastructure for the 202, and shorter patterns between home and work for Ahwatukee residents and Chandler residents. And then I don't have much -- I think the alignment of the 202 as a freeway would be good -- is good from the South Mountain divide to State Route 30, and State Route -- from State Route 30 or the proposed State Route 30 from there to I -- to I-10, at 59th Avenue, I don't think that would benefit West Phoenix. That would be a huge cost, and -- to build that interchange, add lanes, they may still -- you know, you're going to add two lanes. So

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Code	Issue	Response
2	**Purpose and Need**	In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.

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the thing is that my preference is to take the 202 from the South Mountain divide to the State Route 30, then take State Route 30 west, with a branch to the 101. That would not have to be quite as big, a full freeway. And that would mean not having to replace the interchange at the 101. And at the same time, the employment centers can be located in Laveen and in Tolleson, you know.

New employment centers, employment centers particularly that have manufacturing as part of their -- as part of the centers, that they have manufacturing there or green jobs. The Laveen population has a satellite community college, which will upgrade the work force in Laveen. We only have a little community college center, which we hope to expand. So we have a longer way to go to upgrade our work force. And I think bringing jobs for the west rather than just trying to take jobs out to Chandler from the west, and Laveen and Avondale, would be better. It would be better to have a branch from the 101, an employment center at 99th Avenue and I-10, and that employment center -- I prefer infrastructure that facilitates the employment centers in the west to reduce transportation in Laveen and West Phoenix, and also Tolleson. And even Avondale.

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Code	Issue	Response
3	**Alternatives**	The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Final Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The *Regional Transportation Plan* includes other freeway projects, such as State Route 30 and State Route 303 Loop that provide additional capacity and mobility in the region. All of these transportation facilities work as a system and rely on each other to provide optimum performance. Also, the *Regional Transportation Plan* included funding for improvements to 99th Avenue south of Interstate 10.

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So by -- in this way, I think they'll save some costs. They'll save some costs, and they'll -- because the way they're going now, you know, it's just going to be -- Laveen will benefit quite substantially, West Phoenix will not. West Phoenix will be left to be the low-income community. And this is consistent with what has been happening for 30, 40 years.

Whereas, the whole emphasis is on making downtown the employment center. And I think that, you know, that the City of Phoenix needs to upgrade the work force in East Phoenix also, and South Phoenix and Sunnyslope and the Canyon Corridor, which are behind, even behind West Phoenix, they're further behind West Phoenix. So the City of Phoenix needs to work with the Maricopa Community College District to -- to bring about the higher work force that can travel shorter distance to the employment center.

Also, I wanted to make a statement about the hearing process. This is -- this same kind of hearing process has been used for about 30 years, 25, 30 years. It was initiated by President Reagan through the Department of Transportation. And through all the federal agencies, to provide this type of meeting without having a large audience. And

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without having -- because they don't want one speaker to influence other people. But at the same time, they provide this format, overwhelming staff positions, staff-supported positions against individuals. And there's no way to hear what the different views are. So I think ADOT should and the governor, through the governor, and through the congressional delegation ask the president, which I think can be done by executive order, to change back to the old format, where you could have a large audience when there's a significant -- you know, when there's a significant project. And you can have speakers.

In this case, there's no public testimony, other than by transcription. The other people in the room don't know what I believe, and I don't know what they think. And it puts us at -- it puts any opposition to any project at a great disadvantage, and does not allow for opposition. You know, meaningful opposition. We don't know, you know, if people would -- other people believe what I believe. Only one of these hearings has been held close to West Phoenix. No hearings have been held in West Phoenix or meetings, not really hearings. None have been held in West Phoenix. One was held close

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Code	Issue	Response
4	**Public Involvement**	The public hearing for the Draft Environmental Impact Statement was held on May 21, 2013, at the Phoenix Convention Center from 10 a.m. to 8 p.m. The public hearing's main purposes were to present findings of the Draft Environmental Impact Statement and to obtain public testimony or comment on the Draft Environmental Impact Statement. During the day-long public hearing, participants had the opportunity to watch a video describing the study, review study information, talk to project team members, and provide verbal comments to a panel of project team members in front of an audience. The six community forums were held at geographically diverse locations: west Phoenix (Sunridge Elementary School, 6244 West Roosevelt, Phoenix); the Gila River Indian Community; Ahwatukee Foothills Village; Laveen Village; Avondale; and Chandler. Notification that community forums would be held was included in the public hearing materials, and forum dates and locations were posted online and advertised at each successive community forum. Print advertisements for the community forums were placed in the following publications from April 26 through July 3, 2013: The *Arizona Republic*, *La Voz*, *Ahwatukee Foothills News*, *Arizona Informant*, *East Valley Tribune*, and *West Valley View*. These forums provided a more informal opportunity to learn about the Draft Environmental Impact Statement. Attendees could watch the study video, view study materials, and talk to project team members. Court reporters were available to take individual verbal comments with no time limit, and written comments could also be submitted.

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to West Phoenix, but it was south of I-10, south of the warehouse corridor. And there also needs to be -- I'm sure there must be somebody here who speaks Spanish, but if you had it, you know, in a large setting, you could provide earphones and things, and the Spanish-speaking would have an opportunity to listen to what's said and maybe express their views or support other views and express their own views.

I'm particularly disappointed that no public meeting was done in West Phoenix. And not promoted properly in West Phoenix to draw -- to draw a large crowd. I was told by the state representative that State Representative Mark Harden and City Councilman Michael Nowakowski were going to hold their own meeting on the 202, that has not been transpired. Whether that comes later or not, I don't know, but certainly something like that should have occurred during this review of the EIS, the Environmental Impact Statement.

I guess the concluding point is that this facilitates -- it facilitates long-distance travel to employment centers, rather than short work trips. It's more to do that. And I believe there should be -- greater emphasis should be on infrastructure, not only physical infrastructure, but

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5	**Public Involvement**	At the public hearing and all six community forums, Spanish interpreters and a sign language interpreter were available to assist participants as needed. O'odham language interpreters were available at the public hearing and two of the community forums. Informational brochures were also available in Spanish.
6	**Public Involvement**	The six community forums were held at geographically diverse locations: west Phoenix (Sunridge Elementary School, 6244 West Roosevelt, Phoenix); the Gila River Indian Community; Ahwatukee Foothills Village; Laveen Village; Avondale; and Chandler. Notification that community forums would be held was included in the public hearing materials, and forum dates and locations were posted online and advertised at each successive community forum. Print advertisements for the community forums were placed in the following publications from April 26 through July 3, 2013: The *Arizona Republic*, *La Voz*, *Ahwatukee Foothills News*, *Arizona Informant*, *East Valley Tribune*, and *West Valley View*. These forums provided a more informal opportunity to learn about the Draft Environmental Impact Statement. Attendees could watch the study video, view study materials, and talk to project team members. Court reporters were available to take individual verbal comments with no time limit, and written comments could also be submitted.

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also, you know, educational infrastructure, other types of infrastructure, social infrastructure, to reduce the physical infrastructure costs, increase the other costs, and balance out development throughout the Valley and have shorter work-to-home trips.

So -- and that would mean that West Phoenix would have a better opportunity to -- West Phoenix would have a better opportunity to upgrade themselves, rather than remain as a lower income community.

THE REPORTER: Is that it?

MR. GRAY: Yes.

THE REPORTER: Thank you so much.

MR. GRAY: Thank you.

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 10:51 AM
CALLER: FRED GREDGE	CALLER ADDRESS: 1522 EAST TREASURE COVE DRIVE, GILBERT, AZ 85234
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:

I support the freeway. It should be connected to the 303 at the proper place, not before it. I support it and it needs to done. But, it should be a complete loop, not a dog leg left and then right like you're going north it should be a loop and properly done.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, July 16, 2013 10:08:03 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Cheryl Green [mailto:cheryl@cjbg1980.com]
Sent: Monday, July 15, 2013 6:44 PM
To: Projects
Subject: South Mountain Freeway

1

We do not want the South Mountain Freeway
Cheryl And Brett Green
4172 E Rockledge Rd
AHWATUKEE

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 4:50 PM
CALLER: BENDRA [UNCLEAR] GREEN	CALLER ADDRESS: 18220 NORTH 26TH PLACE, PHOENIX, ARIZONA 85032
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I would vote yes for the South Mountain Loop 202 freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments Regarding Proposed 202 Loop
Date: Monday, July 08, 2013 8:49:57 AM
Importance: High

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: cgreene22@cox.net [mailto:cgreene22@cox.net]
Sent: Sunday, July 07, 2013 7:33 PM
To: Projects
Cc: cgreene22@cox.net
Subject: Comments Regarding Proposed 202 Loop
Importance: High

We are writing to state our OPPOSITION of the proposed 202 Loop for the following reasons.

1 2 Environment impact.
Air and Noise Pollution.
Increased traffic will produce result in additional pollution, impacting 75,000 people. I understand your study states you have met the federal standards. Regardless of the federal standards, pollution is pollution no matter what number you assign it. I am not comforted by some federal standard. I don't trust your study or the federal standards you propose it meets. . All one needs to do is drive on Interstate 10 into Phoenix and see the brown haze that sits over downtown. I certainly don't want that on this side of the mountain. The no-build option is the only option.

3

Traffic noise can be heard a mile from I-10. If you add another freeway, that noise will increase profoundly.

4

Dangerous trucks in a fragile area
As more cars pass through a major thoroughfare, there's a greater chance of someone throwing a cigarette butt out of a window and causing problems. Sonoran Deserts are not fire adapted. When you have people using a major thoroughfare, you're going to increase the chance of anyone throwing a cigarette butt out. It's going to increase the risk, whether it's incidental. You're also going to have species that will fill in empty spaces left by construction and those species help fuel local fires. There's a number of factors, but when combined it will have an impact, and I fear a negative impact on that ecosystem. (Source: Wendy Hodgson, research botanist and herbarium curator at the Desert Botanical Garden)

5
6

7 We are concerned, as is the Ahwatukee-based Protecting Arizona's Resources and Children (PARC), about the possibility of truckers using the South Mountain Freeway as a Canamex route, to get trucks and whatever hazardous materials they may be carrying from Mexico or Canada through the U.S. as quickly as possible. The DEIS does state in several areas that hazardous materials will be allowed on this freeway. This is UNACCEPTABLE!

8

Destruction of South Mountain terrain.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Alternatives, No-Action (No-Build) Alternative**	
4	**Noise**	Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered "acceptable" by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.
5	**Biology, Plants, and Wildlife**	Comment noted.
6	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Trucks**	
8	**Hazardous Materials**	

Code	Comment Document
9	Cutting through the mountain will destroy the land and its inhabitants. This is deplorable and would destroy a portion of the park that many hikers and residents greatly enjoy. The actual impacts of the freeway cutting through South Mountain Park, on the maps are presented like it's not a big deal but when you're talking about cutting acres off the corner of a park, that is a huge impact! It's not just the direct impact of eliminating acres of the park, but it's the fact that now you have a major freeway right next to one of the largest urban parks in the country. South Mountain Park is a focal point for many.
10	The proposed plan to cut a 220-foot cut through one ridge, a 190-foot cut to another, and a 70-foot cut is simply unacceptable as is the expected $30 million to do so.
6	Affects on Wildlife The best thing YOU could do for wildlife is to not build the freeway. You need to take a deeper look at the impact to the desert wildlife, i.e. the desert tortoises. Proposed mitigation, irrespective of whether or not the tortoises are listed right now as endangered, should be considered. There should have been more efforts to ensure that the tortoises are not harmed and that additional habitats for tortoises are protected. The plant life on South Mountain should also be considered. While the freeway may not directly destroy endangered species, it will fragment the habitat and create problems for the entire ecosystem. The Sonoran Desert is unique to our region… We're losing it. We're continually fragmenting it. We have to be careful of that. It's not an infinite resource. (Source: Wendy Hodgson, a research botanist and herbarium curator at the Desert Botanical Garden) Furthermore, even DEIS admits that noise during construction could be a problem for many species of birds and that the area is known to be a habitat for desert tortoises.
11	Who Really Benefits? Who really benefits from the freeway? The truth has not been fully disclosed. For truckers, it adds another route - no benefit to Ahwatukee. For developers – it opens up new land options on the west side to build because now undesirable land becomes valuable due to quicker access to either side - no benefit to Ahwatukee. Time savings was 6 minutes to downtown. For the damage incurred, that is not a justifiable trade-off for Ahwatukee.
2 1	Bottom Line: The Necessity for the Freeway Doesn't Exist! The necessity for the freeway doesn't exist, but an increase in noise and air pollution, and the destruction to our land and its inhabitants is quite evident. By increasing traffic; it will add to the toxins already in the area. This geographical area is going to hold this problem and not disperse it. We're going to end up with a place that's not fit to live in. I agree with the Sierra Club of Arizona; the cost is too great. Funding could be better spent repairing infrastructure that already exists and promoting different forms of transportation.
12	Progress isn't always the right answer if you destroy land and people in the way. You can't undo the damage once done. Please do NOT build Loop 202 South Mountain freeway....because it is the right thing to do for Ahwatukee as a whole. Sincerely, Cheryl and Michael Greene Ahwatukee residents since 1993
	_____ Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments. .

Code	Issue	Response
9	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Visual Resources**	Draft Environmental Impact Statement pages 4-157 and 4-158 state that construction of the proposed road cuts at the western end of the South Mountains would cause "severe visual impacts" and that these cuts "would be visually inconsistent with the natural setting of the surrounding area." These impacts would, however, be in a remote, seldom-used area of the Phoenix South Mountain Park/Preserve and not near any major trails. General mitigation measures to minimize these visual impacts are described on page 4-158. These measures would include the incorporation of newly exposed rock faces characteristic of the adjacent natural rock features. Contractors would respond to the faces' scale, shape, slope, and fracturing to the extent that could be practicable and feasible as identified through geotechnical testing and constructibility reviews. The Arizona Department of Transportation would require the contractor to round and blend new slopes to mimic the existing contours to highlight natural formations. The Arizona Department of Transportation would evaluate having the contractor adjust and warp slopes at intersections of cuts and natural grades to flow into each other or transition with the natural ground surfaces without noticeable breaks. A local example of such treatment would be the cuts associated with Dreamy Draw on State Route 51 in northern Phoenix.
11	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I Oppose the South Mountain Freeway
Date: Thursday, July 18, 2013 9:18:03 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of William Greene
Sent: Thursday, July 18, 2013 9:00 AM
To: Projects
Subject: I Oppose the South Mountain Freeway

Jul 18, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

1 2 3

Our city and state needs to prioritize public transportation, not build another freeway through a protected area. More highways are not the solution - light rail, commuter trains, bicycle infrastructure, and other transit options should be our focus. Please select the No Action Alternative. Thank you!

Sincerely,

William Greene
2027 E University Dr Unit 118
Tempe, AZ 85281-8526
(480) 259-7551

_____

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

1

From: Projects
To: ADOT
Subject: FW: Loop 202 completion
Date: Monday, May 20, 2013 1:06:40 PM

From: twohoo@aol.com [mailto:twohoo@aol.com]
Sent: Monday, May 20, 2013 12:56 PM
To: Projects
Subject: Loop 202 completion

To Whom it May Concern,

I am a registered voter over the age of 18 and current resident of Laveen Village/Phoenix South Mountain. I am in favor of the Loop 202 being completed in our district. Not only will this completion make it easier to access the rest of the Phoenix Metro area but it will bring immense value to our neighborhoods. It will bring a much needed modern hospital to our area. This freeway will also bring us shopping choices that we are currently having to travel at least 10 miles (and 20 miles on average) in any direction to access.

Completing the Loop 202 will increase our home values. Being one of the hardest hit areas in the Valley during the housing crisis many of us have seen our home values plummet. Many of us are still underwater in our mortgages. Because we love our neighborhood and want to see it become the jewel we know it can be we have stood our ground and fought to keep good people in their homes. We have excellent schools in our area including Eagle College Prep Elementary School, Vista del Sur Elementary School, and Legacy Traditional School. All of these schools are rated among the top in our state.

Completing the Loop 202 will not only increase our home values but it will increase our property tax dollars which can then be spent to improve our local public schools, police, and fire departments. Our tax dollars will go to improving our roads and increasing pedestrian safety. Currently many of our roads have no sidewalks forcing pedestrians to walk along streets with high speed limits. Baseline Road, for example, has an average speed limit of 45 mph. I will not allow my children to walk to school even though we live less than a mile away because they would have to cross Baseline. Bus service would increase in our area reducing the need to drive everywhere thus improving Phoenix's air quality.

I have personally watched several good families move from our area because the logistics of accessing anything a family would need is a nightmare. The nearest quality dance studios and gymnastics are no less than 20 miles away in any direction. The nearest movie theater is downtown. The nearest mall is 20 miles in any direction. The nearest hospitals are in crime infested areas of the city. I am afraid to take my children to any of these facilities. Often we find ourselves using one of two aging urgent care facilities in our neighborhood. We have no craft stores in our area to patronize when our kids need to do school projects (there are so many school projects). We have no clothing choices other than Walmart. We currently have only two grocery stores to choose from- Safeway and Fry's. We have three fuel stations- Safeway, QT, and Circle K. We have a Walmart that is overrun with disgruntled and angry employees making it a nightmare to shop. We have very few sit down family restaurants and way too many fast food franchises. Bringing the Loop 202 thorugh our district will not only ease our frustration in meeting the basic needs of family life it will increase sales tax dollars as well.

Please complete the Loop 202 as quickly as possible. It will greatly improve our quality of life here in Laveen/South Mountain. It will bring in much needed health and shopping opprotunities. It will increase the population in our Village giving us a stronger voting presence. It will increase tax dollars being collected by the city and state. Our residents have been waiting patiently for over 15 years for this project to be completed. The city has already set aside the money for improvements. Please give our area access to the rest of the city.

Thank you,
Jessica Grevorovic
7301 S 31st Dr

Code	Issue	Response
1		Comment noted.

Code	Comment Document

5038

GERALD GRIEMAN: My first objection is that there is not adequate planning for when they will close the freeway for either repairs or for DPS for a crash. I've lived in the Valley long enough to know that freeways are closed regularly. And this area is not suited for a major freeway because there are not alternate routes.

(1)

The only road is Chandler Boulevard which -- in this area. It's a four-lane road; it goes down to a two-lane road. If they close the freeway, it's going to be a disaster back here. It will be not only inconvenient, but it will be difficult for emergency vehicles if they are -- say your house catches fire or there's some other emergency.

(2)

Chandler Boulevard will be just a basket case because all of the freeway traffic will be funneled onto it. And when you funnel a freeway onto a two-lane street, it doesn't fit. And there's no plan for a frontage road. There's no plan for additional streets back here, so that just will not work. Along those same lines, Pecos is one of our few city streets in this area we have as you go east. You also have Ray Road at the curve.

I lived here before Pecos was connected to

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www.drivernix.com

Code	Issue	Response
1	**Traffic**	Hazardous Materials Commodity Flow Studies and other information are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing Emergency Response Plans. If the plan were amended, it would be made available to the Arizona Department of Transportation.
2	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 of the Final Environmental Impact Statement).

Code	Comment Document

I-10 and the highway department rated every intersection in that area as an F because the congestion was so appalling with everyone trying to use two roads. When they added Pecos, it was -- it relieved and it allowed us to have an adequate number of city streets back here.

If they take away Pecos as a city street, we're back to two roads or one road and that, again, is not enough to handle even the normal traffic in Ahwatukee. We need Pecos as a city street.

They would never think of building a freeway -- I asked at one of the meetings years ago, "Well, why don't you build a freeway on Camelback or Indian School Road?"

They said, "Well, those are streets."

I said, "Well, here Pecos is a street for us." This is how we get around. We need this street. And if you take it away from us, it will destroy our ability to get around within our city. So that's -- that's the first comment.

The second comment is regarding trucks. They insist that this is not a truck bypass and, yet, anyone who can look at a map and read the map knows that it will be used as a truck bypass because it connects to I-10 in two places. It will be a nice, lightly used road for all of the trucks to scoot around Phoenix and

3

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Code	Issue	Response
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4

continue to Los Angeles.

If they are serious about it not being a truck route, I would ask that, if it is built, that they ban trucks. I've seen that done on highways in other cities and in an area where it was supposedly only for residential traffic.

If it's for residential traffic, put your money where your mouth is and ban trucks. If you're driving on interstate 35E in St. Paul, Minnesota, for example, you come to the place where it branches off and it will say, "No trucks on this road. If you're a truck use this road," and they can easily do that here, too, if they are serious this is not a truck road. If they don't do that, I don't believe them.

And those are the two larger issues. But I also want to add a personal issue. I moved here, bought my house in 1999 and, at that time, I came here for health reasons. And I chose Ahwatukee specifically because it was isolated. There was little traffic. There was mainly desert landscaping. I have allergy problems, severe allergy problems that affect my breathing.

I came here because this was the area in the Valley that best suited my health needs. At that time, I looked at everything the highway department had

Code	Issue	Response
4	**Trucks**	Arizona highways, as are most highways across the United States, are open to all kinds of traffic, so long as the cargo being carried is in accordance with U.S. Department of Transportation regulations for the specific type of cargo. The Arizona Department of Transportation has a few locations in the state with hazardous cargo restrictions, but these restrictions are based on emergency response issues or roadway design limitations specific to that location. For example, the Interstate 10 Deck Park Tunnel has certain hazardous cargo transport restrictions because of the limited ability for emergency responders to address a hazardous materials incident in the tunnel. The South Mountain Freeway, if implemented, is expected to operate under the same rules as other similar facilities in the state; use by heavy trucks would be expected to be permissible (see text box on page 4-157 of the Final Environmental Impact Statement).

Code	Comment Document

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put out. At that time, they said there is no funding for 202, the South Mountain Freeway and it is not on our plan -- it's not in our plans that it will ever be built.

If it is built, they had it on the map as a purple road, a purple dotted line. Purple meant possible toll road. They said it will not be built as a regular road. So when they say that it's been on the map since the '80, that's not true. In the '90s they took it off the map and said only a possible toll road. And I thought well, they are not going to build a toll road in Arizona. People won't put up with that. I said, "I'm safe."

So I bought my home. I moved in. And it's been wonderful. My health has never been better than living back here. I live literally two blocks from where the proposed freeway will be.

First of all, there would be a year of construction with tremendous dust and everything. I'd have to virtually move for that year. At the end of that, there would be all the dirt from all the trucks unless they would ban them, which I doubt they will because I don't believe them that it's not a truck bypass. In effect, I'm going to be forced to try to sell my home and move and I'm -- at my age, I don't want to do that.

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Code	Issue	Response
5	**Purpose and Need**	The Southwest Loop Highway—the South Mountain Freeway predecessor—was integral to the Regional Freeway and Highway System approved by Maricopa County voters in 1985. Although other facilities were considered a higher priority early in development of the Regional Freeway and Highway System, the South Mountain Freeway has been included in every subsequent update. The same route was approved by the State Transportation Board in 1988. In 2004, Maricopa County voters approved Proposition 400, which was designed to fund completion of the remaining segments of the Regional Freeway and Highway System, including the proposed South Mountain Freeway (Final Environmental Impact Statement page 1-21).
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Air Quality**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
8	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

I love this area. It's a beautiful area, and to destroy it at this point I just find reprehensible.

And there are a lot of other people back here who have health issues also, reasons for having come back here.

And I really encourage them to keep their promise that they were not going to put -- and that's what it was, they said, when I asked them -- and I did pursue it. And I'm asking them to keep their promise that they will not build a regular freeway through here.

I think that's it.

Thank you.

I just want to add I think it is absolutely appalling that they are thinking of cutting through South Mountain Park for this freeway. South Mountain park has been considered to be one of the treasures of Phoenix. They have bragged about it for years, about how the people who settled in this area had the foresight and the wisdom to set aside these huge mountain preserves. South Mountain Park is a treasure for the entire Valley.

I realize that it's just a small part that they are going to slice through, but it will impinge on it nonetheless and I'm so offended by that.

9

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Code	Issue	Response
9	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

10

And I only need to look -- I spent enough time in Phoenix over the years that I know what North Mountain Park used to be. I know what Dreamy Draw was like before they punched the Squaw Peak freeway through. They said it wasn't going to ruin the park. It did. It took an idyllic part of the city and turned it into a noise box raceway and I dread that happening to our South Mountain.

Phoenix calls it one of its points of pride even, they are so thrilled with it. And now ADOT is threatening to cut through it and damage it in a way that it will never be able to repair.

Code	Issue	Response
10	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Wednesday, May 15, 2013 12:36:27 PM

From: Mark Griffin [mailto:lighthouseflowers@yahoo.com]
Sent: Wednesday, May 15, 2013 12:26 PM
To: Projects
Subject:

1 As a florist we deliver in that area and putting in the 202 will save me time and money. This should have been built years ago.

Mark Griffin, Lighthouse Flowers & Photography
Family owned and operated since 1962
1007 East Southern Avenue Mesa AZ 85204
Phone (480) 892-5093 we are on the web at
www.lighthouseflowershop.com
www.lighthousephotosaz.com
We are open 9:00 am to 5:00 pm Monday through
Friday and 9:00 am to 3:00 pm Saturday

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support South Mountain Freeway
Date: Tuesday, April 30, 2013 8:52:50 AM

From: Mary Griffith [mailto:magriff1@cox.net]
Sent: Saturday, April 27, 2013 11:02 AM
To: Projects
Subject: Support South Mountain Freeway

ADOT Study Team Panel
Re: Loop 202 Report

1 I support building the South Mountain Freeway. In 1991 my husband and I bought a home near where the freeway will be, based on the expectation that this wonderful loop around Phoenix would be completed in a few years. We are confident, even after waiting now for 20 years, that if we ever sell, our property value as well as our lives will be enhanced by the freeway. Please build Loop 202 around South Mountain.

Thank you for your consideration.

Sincerely,

Mary Griffith
15251 S. 26th Street
Phoenix, AZ, 84048

PS: I tried to use your on-line email form but it seems to be bugged.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support for South Mountain Freeway along Pecos route
Date: Tuesday, April 30, 2013 8:52:34 AM

From: Jim Griffith [mailto:GriffPhx@cox.net]
Sent: Saturday, April 27, 2013 1:39 PM
To: Projects
Subject: RE: Support for South Mountain Freeway along Pecos route

ADOT Study Team Panel
Re: Loop 202 Report

ADOT Study Team Panel
Re: Loop 202 Report

1

I encourage building the South Mountain Freeway along the Pecos route. In 1992 my wife and I purchased a home near that route with the expectation that the road would be built as planned. We still look forward to using the road and sharing it with other Phoenix area traffic.

Please build the road soon; we've had way too many meetings.

Sincerely,

Jim Griffith

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:30 PM
CALLER: BRENT GRIMES	CALLER ADDRESS: 1337 E. ERIE STREET, GILBERT, AZ 85295
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I 100% approve of the freeway expansion of the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street
MD 126F
Phoenix, Arizona 85007 May 24, 2013

Dear Study Team:

1 These comments address the preliminary right-of-way(ROW)/engineering for the eastern section of the South Mountain Freeway in the area of the Main Ridge South.

I own parcel 300-05-004D. The preliminary ROW footprint shows the freeway cutting through the south-southwest portion of this parcel.

There is no consideration in the draft environmental impact statement (DEIS) for access to 300-05-004D and the parcels to the west and north if the proposed alternative is built, even though the proposed alternative would have a drastic impact on reasonable access.

While the DEIS does concern itself with access issues in developed areas, it does not address access to this undeveloped area of residentially zoned property in the City of Phoenix.

The impact of the proposed action on access to the Main Ridge South area needs to be addressed because of the major access impact the proposed action has and because the proposed freeway corridor has frozen development in this area since the early 1980's—which is why this is the only undeveloped

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

portion of the Ahwauteukee Foothills. The current lack of development should not preclude ADOT solutions for access to this area as ADOT's multi-decade plan for the freeway is the cause for the lack of development.

ADOT has an affirmative duty to not impede reasonable access to parcels due to its actions. According to ARS 32-2185.02. A: "No subdivided land may be sold without provision for permanent access to the land over terrain which may be traversed by conventional motor vehicle unless such provision is waived by the commissioner." Unless ADOT assists in creating a solution for the access challenges created by the proposed freeway ROW taking it will be difficult, if not impossible, to provide vehicular access to the approximately 250 privately owned acres located in the City of Phoenix.

The proposed action freeway ROW takes the 25' deeded right-of-way to 300-05-004D that is meant to be the parcel's access as an extension of Shaughessey road.

In addition, the only effective potential road access to parcels to the west and north of 300-05-004D is through the freeway ROW ADOT proposes to take from 300-05-004D. Effected parcel access includes access to 300-04-014B, 300-04-016,300-05-003B, 300-04-013E and 300-04-015X. (Parcel 300-05-006B is almost all taken by the proposed freeway ROW).

There are also 15 additional parcels to the north of those mentioned above that would be impacted by potential lack of access because of the freeway ROW. These include: 300-04-013G and 300-04-011D, 015D, 015K, 015J, 011A, 015F, 015W, 015R, 015T, 015Q, 015L, 015V, 015Z and 015Y.

Code	Issue	Response

Code	Comment Document

It should be noted that the previous owner of the adjacent parcels to the south, west and north of 300-05-004D was Woodside Homes. Woodside Homes had a preliminary plat for a subdivision comprised of these parcels. The plat had access to these parcels through the ROW ADOT proposes for the freeway through the Main Ridge South.

The access to 300-05-004D and the other parcels to the west and north is highly problematic if ADOT takes the proposed freeway ROW. Access from the north and north -west of the freeway ROW for the affected parcels would be difficult because of the steepness of the terrain.

Access to this area from the South Phoenix/Laveen area is precluded because of South Mountain Park.

The location of the ADOT ROW through the Main Ridge South makes sense because of the planned route, the intent to avoid as much of South Mountain Park/South Mountain as possible and the fact the South Mountains slope downwards in this area. However these factors also make this location the only logical solution for right-of-way to access all the private parcels in this area.

The EIS should address this ROW issue before a Record of Decision is issued as potential solutions have environmental, fiscal, and cultural impacts that should be analyzed. (e.g. there are Native American artifacts in this area) and the area impacted is significant.

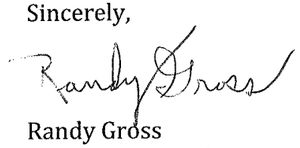
The purpose of the National Environmental Policy Act (NEPA) is to promote informed decision-making by agencies by making "detailed information concerning significant environmental impacts" available to both agency leaders and the public.

Code	Issue	Response

Code	Comment Document

The South Mountain Freeway ROW issue in the Main Ridge South area will need to be addressed if the proposed action is implemented. Examining the impact of the access issues caused by the proposed action in the EIS is the type of issue NEPA envisions be explored before the EIS is finalized.

Sincerely,



Randy Gross
1632 E. Diamond Drive
Tempe, AZ 85283
(480)695-7566
ydnar144@msn.com

Code	Issue	Response

Code	Comment Document

Reggie Rector

From: Reggie Rector
Sent: Wednesday, May 22, 2013 10:12 AM
To: 'randy gross'
Subject: RE: Parcel Maps and Freeway
Attachments: 20130522105256550.pdf

Good Morning Randy:

The copy isn't as clear as I'd like, but its best we can get. Can't see the APN, but the parcel lines are visible. You can compare this with sheet 8 in the online aerial mapping.

Please bear in mind this is for visual reference only and not representative of final right of way requirements which could change significantly depending on the outcome of the EIS. We need to see if a build option is decided on, and if so, get into the final design stage for this construction segment.

Nice meeting you yesterday as well. Contact me anytime.

Reginald Rector, SR/WA
Right of Way Project Coordinator
205 S. 17th Avenue
MD 612E
Phoenix, AZ 85007
602.712.7710
www.azdot.gov
ADOT
Intermodal Transportation

From: randy gross [mailto:ydnar144@msn.com]
Sent: Tuesday, May 21, 2013 3:12 PM
To: Reggie Rector
Subject: Parcel Maps and Freeway

Reggie,

It was nice meeting you at the hearing today; I do appreciate your helpfulness. I did find the freeway map in the "library" section of the website.

You mentioned that you could send me a copy of a portion of the assessor's map overlayed on the South Mountain Freeway right-of-way map. This would be very helpful. The parcel in which I have a interest is:

300-05-004D.

I am also going to follow your suggestion and comment on the EIS. Since my comments pertain to the ROW in this area, I will e-mail a copy of the comments to you for your information.

05/29/13

Code	Issue	Response

(Comment codes begin on later page)

Code	Comment Document

Thank you for your assistance,

Randy Gross
ydnar144@msn.com

05/29/13

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

Reggie Rector

From: Reggie Rector
Sent: Wednesday, May 29, 2013 1:40 PM
To: 'randy gross'
Subject: RE: South Mountain Freeway ROW

Hello Randy:

Yes the long weekend was good, but too short as always. Hope yours was good as well.

The link below will take you to Arizona Revised Statutes Title 28 which deals with Dept of Transportation. If you scroll down 2/3 way or so to 28.7092, that general 'area' (article 6) has to do with land acquisition and related for highways.

http://www.azleg.state.az.us/ArizonaRevisedStatutes.asp?Title=28

Until we know if a build alternative is decided upon and if so, then get into final design for this segment, right of way requirements and impacts to your property are subject to change. The appraisal would address any 'damages' or other issues during development of this construction segment.

Reginald Rector, SR/WA
Right of Way Project Coordinator
205 S. 17th Avenue
MD 612E
Phoenix, AZ 85007
602.712.7710
www.azdot.gov
ADOT
Intermodal Transportation

From: randy gross [mailto:ydnar144@msn.com]
Sent: Monday, May 27, 2013 9:23 AM
To: Reggie Rector
Subject: South Mountain Freeway ROW

Reggie,

Hope you had an enjoyable Memorial Day. For your information, I have attached a copy of the comments I mailed to the EIS study team concerning right-of-way in the Main Ridge South area.

1 Could you please forward to me, or tell me where I could find, the rules/regulations/guidelines/laws that govern ADOT when they take property for a freeway? I am concerned that the potential taking will eliminate the right-of-way for the property I own and wish to know how ADOT approaches such a situation.

Thanks,

05/29/13

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Randy Gross
1632 E. Diamond Drive
Tempe, AZ 85283
ydnar144@msn.com
(480)695-7566

05/29/13

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: no freeway in Ahwatukee...
Date: Tuesday, July 23, 2013 4:50:16 PM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT Communications

From: Julie Grove [mailto:jgrove926@cox.net]
Sent: Tuesday, July 23, 2013 4:25 PM
To: Projects
Subject: no freeway in Ahwatukee...

1

Please add my name to any email list/petition sign-up against the proposed expansion of the 202 freeway in Ahwautkee. I don't feel it's what's best for our community as far as growth. Thank you.

Julie Grove, REALTOR® Stone Path Real Estate
A.K.A. Curb appeal coveter. Passionate for all things plant & patio.
Perpetual house hunter & neighborhood nester.
Pursuer of all paths that lead to making a house a home.
Like to search the MLS (from the comfort of your sofa) too?
Search just like I do at juliegrove.listingbook.com
Right to the Red Phone 480.577.8428

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: comments on south mountain freeway DEIS
Date: Friday, July 05, 2013 8:38:42 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Jian Gu [mailto:jiangu1@gmail.com]
Sent: Thursday, July 04, 2013 3:24 PM
To: Projects
Subject: comments on south mountain freeway DEIS

1 I am writing regarding the south mountain freeway DEIS. The study shows the importance of the proposed freeway to reduce traffice congestion, and connect southeast and southwest valley. I am living in laveen and working in Chandler. Each day I have to use baseline, which becomes more and more congested. I think we should start building the freeway NOW!

Thanks,
Jian Gu
6840 W Fremont Rd
Laveen, AZ 85339

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SMF
Date: Wednesday, July 17, 2013 2:11:51 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Ralph Guariglio [mailto:kokonuto@cox.net]
Sent: Tuesday, July 16, 2013 5:40 PM
To: Projects
Subject: SMF

1

2 3 4

As a concerned citizen and 18 year Ahwatukee resident, I am absolutely opposed to the construction of the South Mountain Freeway, especially considering there is a blatant, obvious alternative - SR 85 from I-10 to Gila Bend! This redirects truck traffic from Phoenix and sends it through Gila Bend - a HUGE shot in the arm for their economic development and a giant cost savings to the construction of the freeway. It also eliminates the need to displace families and businesses or to destroy national park/sacred land.

5

Just because this freeway has been on the books for 20+ years does not make it a necessity through Ahwatukee. Put aside your political aspirations and agendas and do the right thing. Save all of us taxpayers a lot of money and heartache and use the route already in existence - SR85!!!

Thank you,

Ralph "*Don't Make A Move Without Me*" Guariglio
REALTOR
AZ Residential Realty, LLC
480-241-7622
kokonuto@cox.net
www.HomesByRalph.com

Oh, by the way, please think of me whenever the subject of **Real Estate comes up!**

Code	Issue	Response
1	**Alternatives**	An alternative that would run along Interstate 10 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 was considered (see text on page 3-9 of the Draft Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and inter-regional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, it was eliminated from further consideration.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Cultural Resources**	
5	**Purpose and Need, Old Plan or Use of Old Data**	

Code	Comment Document
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Code	Issue	Response

Code	Comment Document
1	Barbara Guignard Document Created: 5/20/2013 7:10:22 PM by Web Comment Form Please build the South Mountain Freeway. We have been waiting for years for this project to be done. I saw this proposed freeway on the maps when I moved to Ahwatukee in 1987. I do, however, prefer the alignment with the I-10/101 intersection. This would truly provide a circle around the Phoenix Metro area. Bringing the freeway into the I-10 at 55th Avenue seems to be a ridiculous location considering the current traffic issues in that area on a daily basis.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 2:46 PM
CALLER: BONNIE GUILDEAUX	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

I am calling to support the new freeway. We have such a terrible time every time we have to go down once a week toward Ahwatukee. This would be a wonderful thing besides the fact that in this day and age we need as many job programs as possible and improve our infrastructure. As opposed to letting it disintegrate like so many other cities do. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Renee Guillory Document Created: 5/21/2013 5:39:10 PM by Web Comment Form

1 2 3 4 5

I strongly encourage ADOT to focus only public/mass transit infrastructure development, not on freeways. Transit-oriented development is a big win-win for the public. Center-city residents should not subsidize freeways for far-flung sprawl areas. We should not sanction projects that result in 1) significant increases in pollution (which has significant health risks) and 2) significant loss of open spaces. Let's build some transportation infrastructure, but let's do it right - build transit systems, not auto-centric freeways; serve people & the environment, not sprawl. Thank you!

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Health Effects**	
4	**Section 4(f) and Section 6(f)**	
5	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 I strongly encourage ADOT to focus on only PUBLIC/MASS transit infrastructure development, not on freeways.

2 • Transit-oriented development is a big win-win for the public!
• center-city residents should NOT subsidize freeways for far-flung sprawl areas!

3 • We should not sanction projects that result in: ① significant increases in pollution, and ② significant loss of open spaces

4 Let's do our infrastructure right — build transit systems, not auto-centric systems serve people and the environment, not sprawl!

Thank you!

Optional

Name Rguillory Email [redacted]

Address 1127 E Bluebell Lane

City Tempe State AZ Zip 85281

Phone 602-410-3704 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Section 4(f) and Section 6(f)**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 South Mountain
Date: Monday, May 20, 2013 8:23:12 AM

From: Marshall Gurian [mailto:marshallgurian@cox.net]
Sent: Sunday, May 19, 2013 2:46 PM
To: Projects
Subject: 202 South Mountain

1

Gentlemen
Please add my name to those supporting the creation of said project.
Thanks.
Marshall Gurian
3277 E. Raven Ct.
Chandler, AZ 85286

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

The public hearing on May 21 was very well-organized & informative.

Based on the answers I received from my questions and information I gathered I feel the preferred alternative (W-59) is the best choice available for the Loop 202 Freeway.

1 This route will provide opportunity for much needed improvements in health care and business access for the Laveen area.

Optional

Name ALICE GUSTAFSON Email

Address 7365 W. Magdalena Ln

City Laveen State AZ Zip 85339

Phone 815-245-1810 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 3:20 PM
CALLER: LORI GUTHRIE	CALLER ADDRESS: 1222 WEST GOLDEN LANE, PHOENIX, AZ 85021
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I approve of the freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway!!
Date: Tuesday, July 16, 2013 10:08:46 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: azrjm@yahoo.com [mailto:azrjm@yahoo.com]
Sent: Monday, July 15, 2013 4:18 PM
To: Projects
Subject: Build the South Mountain Freeway!!

1

Build the South Mountain Freeway!!

It was planned in the 80's and EVERY buyer of a new home near the route was given disclosure about the freeway.

It will greatly reduce traffic through central Phoenix, BUILD IT!!!

Thank you,
Kim H

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:15 PM
CALLER: TED HAAS	CALLER ADDRESS: 11417 W. SAGE COURT, AVONDALE, AZ 85392
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Of course I'm in favor of it. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Document Created: 5/18/2013 12:59:00 AM by Web Comment Form

Dear ADOT,

Please reference the attached document. (I sent e-mail with attachments to 'projects@azdot.gov')

1 2 My name is Christopher Hadden and a 20 year resident of Ahwatukee. I know this highway plan has been in the works for many years and question if the plans set forth 10+ years ago are going to meet the growing and future needs of the valley to include the Gila River Indian Community, Queen Creek, Sun Lakes and Maricopa communities for future development. The attached document has several alternatives outlined in it that I feel would better serve the above mentioned communities and not just be limited to or impact Ahwatukee.

3 Some of the alternatives proposed would potentially reduce the number of homes and/or business from having to be demolished however would require building a tunnel through South Mountain. From the looks for the existing proposals in the Loop 202 South Mountain Freeway study, there appears to be a tunnel or two already proposed cutting through the western edge of South Mountain Park on the existing proposals.

In the Proposal 1, I am suggesting moving this to approximately 23rd Avenue. The tunnel would be approximately 3.0 – 3.5 miles long and go completely under South Mountain Park which I believe would reduce the impact to the park. I have proposed connecting the freeway to I17, but to be honest, once the tunnel exits South Mountain at 23rd Avenue, there are many possible connections to I10 or I17 that could be proposed. These proposal were largely based on the existing study.

In Proposal 2, I reworked the routing to be much cleaner connecting both the 101 and I17 to the South Mountain Loop 202 via a tunnel through South Mountain approximately located at 23rd Avenue. This proposal gives an option to connect directly to Pecos with minimizing any impact to houses, business and schools. It also allows a connection to or continuation to Riggs Road which then will tie in Maricopa, Sun City and Queen Creak communities connecting back to the 101 at Price Road. I believe this proposal would be the best taking into account future growth; however since it crosses the Gila River Indian Community that

Code	Issue	Response
1	**Alternatives**	The alternatives development and screening process included alternatives similar to those proposed by the commenter (see Figure 3-5 on page 3-7 of the Final Environmental Impact Statement). The Riggs Road and Queen Creek Alternatives are similar to the Riggs Road Alternative considered in the Draft Environmental Impact Statement. The Riggs Road Alternative would not complete the loop system, thereby causing substantial out of direction travel for motorists. Additionally, the alternatives would be partially located within Gila River Indian Community land, and the Gila River Indian Community has not given permission to study alternatives on its land. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process. Information related to the evaluation and reasons for eliminating the alternative from further study are provided on page 3-9 of the Final Environmental Impact Statement. The alternatives that include a tunnel through South Mountain would result in similar benefits and impacts as the Central Avenue Extension Tunnel. The reasons for eliminating the proposed 23rd Avenue Tunnel would be similar to those provided for the Central Avenue Extension Tunnel on page 3-12 of the Final Environmental Impact Statement.
2	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives**	The text boxes on pages 3-16 and 3-17 of the Draft Environmental Impact Statement discuss the additional factors that weighed as strong negatives for tunnel options: impacts, engineering factors, maintenance costs and issues, security, constructibility, and construction costs.

Code	Comment Document

would need to be addressed.

4

I may not fully understand or have an appreciation for the limits on where the highway can be built on the Gila River Indian Community. However, the most recent news has shown support for the freeway from the Indian community. And, we have seen many highways constructed through Indian communities that have made positive impacts to those areas to include and not limited to the Loop 101 and Beeline Highway 87.

Let me know if there are any questions about these alternatives or if these options have been previously ruled out. I would be open to meeting and discussing this proposals further.

Best Regards,

Christopher Hadden

480-706-6438 HM

Code	Issue	Response
4	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway Feedback
Date: Monday, May 20, 2013 8:33:22 AM
Attachments: Loop 202 Alternatives.ppt

From: Christopher Hadden [mailto:christopher.hadden@cox.net]
Sent: Friday, May 17, 2013 10:52 PM
To: Projects
Subject: Loop 202 South Mountain Freeway Feedback

Dear ADOT,

Please reference the attached document.

1 2 My name is Christopher Hadden and a 20 year resident of Ahwatukee. I know this highway plan has been in the works for many years and question if the plans set forth 10+ years ago are going to meet the growing and future needs of the valley to include the Gila River Indian Community, Queen Creek, Sun Lakes and Maricopa communities for future development. The attached document has several alternatives outlined in it that I feel would better serve the above mentioned communities and not just be limited to or impact Ahwatukee.

Some of the alternatives proposed would potentially reduce the number of homes and/or business from having to be demolished however would require building a tunnel through South Mountain. From the looks for the existing proposals in the Loop 202 South Mountain Freeway study, there appears to be a tunnel or two already proposed cutting through the western edge of South Mountain Park on the existing proposals.

3 In the Proposal 1, I am suggesting moving this to approximately 23rd Avenue. The tunnel would be approximately 3.0 – 3.5 miles long and go completely under South Mountain Park which I believe would reduce the impact to the park. I have proposed connecting the freeway to I17, but to be honest, once the tunnel exits South Mountain at 23rd Avenue, there are many possible connections to I10 or I17 that could be proposed. These proposal were largely based on the existing study.

In Proposal 2, I reworked the routing to be much cleaner connecting both the 101 and I17 to the South Mountain Loop 202 via a tunnel through South Mountain approximately located at 23rd Avenue. This proposal gives an option to connect directly to Pecos with minimizing any impact to houses, business and schools. It also allows a connection to or continuation to Riggs Road which then will tie in Maricopa, Sun City and Queen Creak communities connecting back to the 101 at Price Road. I believe this proposal would be the best taking into account future growth; however since it crosses the Gila River Indian Community that would need to be addressed.

4 I may not fully understand or have an appreciation for the limits on where the highway can be built on the Gila River Indian Community. However, the most recent news has shown support for the freeway from the Indian community. And, we have seen many highways constructed through Indian communities that have made positive impacts to those areas to include and not limited to the Loop 101 and Beeline Highway 87.

Let me know if there are any questions about these alternatives or if these options have been previously ruled out. I would be open to meeting and discussing this proposals further.

Best Regards,

Code	Issue	Response
1	**Alternatives**	The alternatives development and screening process included alternatives similar to those proposed by the commenter (see Figure 3-5 on page 3-7 of the Final Environmental Impact Statement). The Riggs Road and Queen Creek Alternatives are similar to the Riggs Road Alternative considered in the Draft Environmental Impact Statement. The Riggs Road Alternative would not complete the loop system, thereby causing substantial out of direction travel for motorists. Additionally, the alternatives would be partially located within Gila River Indian Community land, and the Gila River Indian Community has not given permission to study alternatives on its land. Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process. Information related to the evaluation and reasons for eliminating the alternative from further study are provided on page 3-9 of the Final Environmental Impact Statement. The alternatives that include a tunnel through South Mountain would result in similar benefits and impacts as the Central Avenue Extension Tunnel. The reasons for eliminating the proposed 23rd Avenue Tunnel would be similar to those provided for the Central Avenue Extension Tunnel on page 3-12 of the Final Environmental Impact Statement.
2	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives**	The text boxes on pages 3-16 and 3-17 of the Draft Environmental Impact Statement discuss the additional factors that weighed as strong negatives for tunnel options: impacts, engineering factors, maintenance costs and issues, security, constructibility, and construction costs.
4	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Christopher Hadden
480-706-6438 HM

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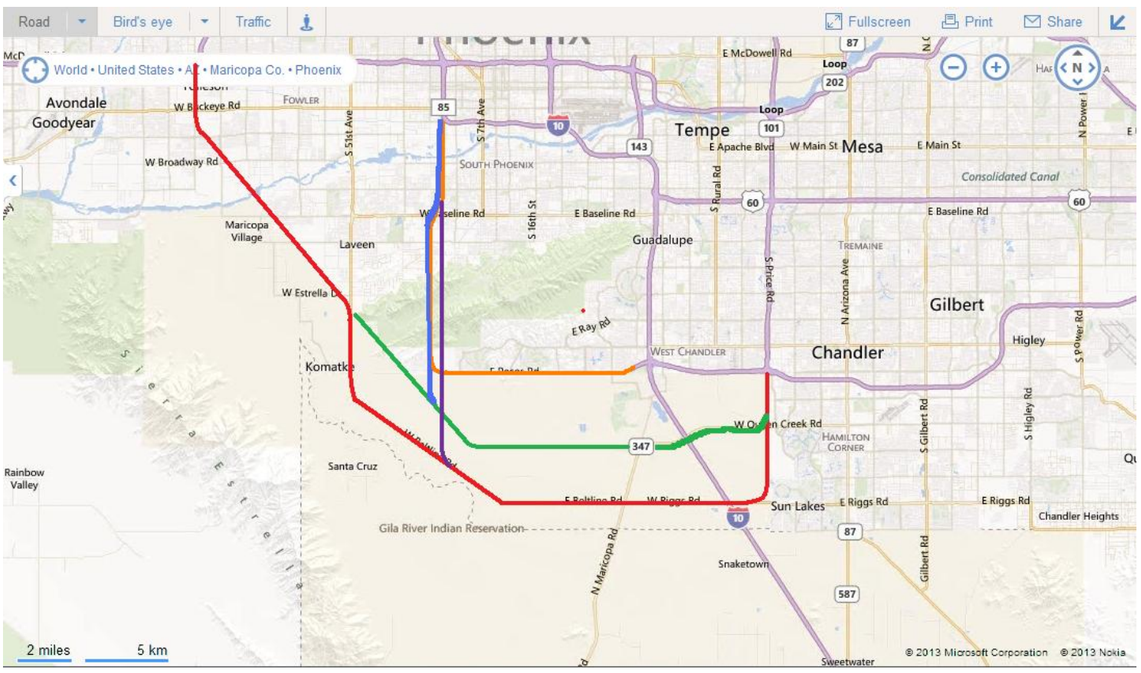
Code	Issue	Response

Code | Comment Document

Proposal 1

- Riggs Road Alternative
- Queen Creek Alternative
- Pecos Alternative Tunnel through South Mountain to I17
- Queen Creek Alternative Tunnel through South Mountain to I17
- Riggs Road Alternative with Pecos Connection plus Tunnel through South Mountain to I17



Code | Issue | Response

Code	Comment Document
	Proposal 2 Riggs Road Alternative Tunnel through South Mountain and connect to I17 and Loop 101 This option also permits for Pecos to connect as an alternate.

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 11:44 AM
CALLER: NOAH HAGEN	CALLER ADDRESS: 27TH AVENUE AND BETHANY HOME [UNCLEAR]
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Yes I guess I can leave [unclear] support the economy. [Unclear]

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

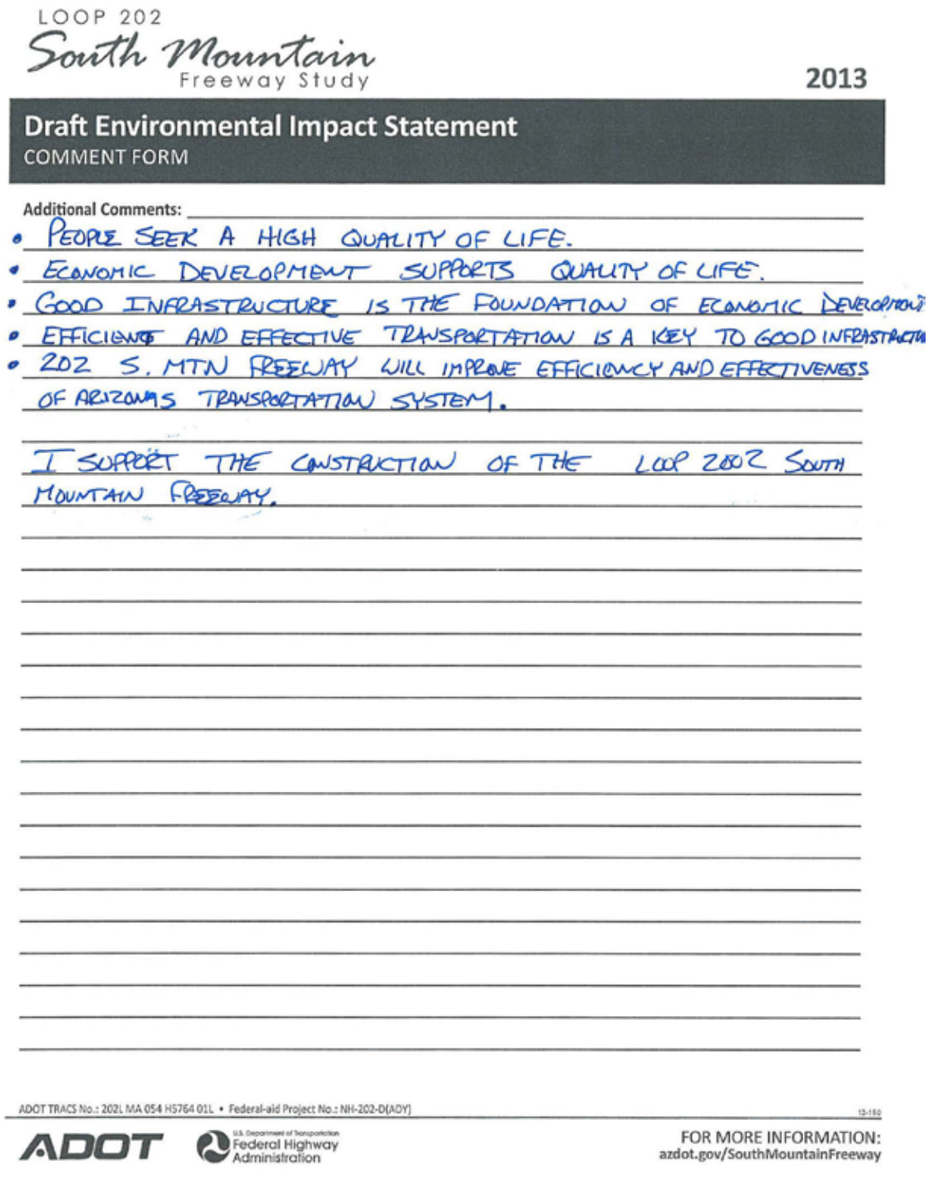
TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 12:47 PM
CALLER: NATALIE HAGER	CALLER ADDRESS: 12969 W. ROY ROGERS ROAD, NO. PEORIA, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I'm definitely in support off the South Mountain freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study
2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

- PEOPLE SEEK A HIGH QUALITY OF LIFE.
- ECONOMIC DEVELOPMENT SUPPORTS QUALITY OF LIFE.
- GOOD INFRASTRUCTURE IS THE FOUNDATION OF ECONOMIC DEVELOPMENT
- EFFICIENT AND EFFECTIVE TRANSPORTATION IS A KEY TO GOOD INFRASTRUCTURE
- 202 S. MTN FREEWAY WILL IMPROVE EFFICIENCY AND EFFECTIVENESS OF ARIZONA'S TRANSPORTATION SYSTEM.

I SUPPORT THE CONSTRUCTION OF THE LOOP 202 SOUTH MOUNTAIN FREEWAY.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 12-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

SEE OTHER SIDE

Optional

Name GREGORY HAGGERTY Email gregory.haggerty@dibblecorp.com

Address 2142 E. ORANGEWOOD AVENUE

City PHOENIX State ARIZONA Zip 85020

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-158

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: oppose the 202 extention
Date: Wednesday, May 22, 2013 10:49:37 AM

From: Diane Haik [mailto:diane.haik@gmail.com]
Sent: Tuesday, May 21, 2013 5:19 PM
To: Projects
Subject: oppose the 202 extention

1

Our Ahwatukee community will change drastically if this road goes through. I am completely opposed to it!
Diane Haik
Phoenix, AZ 85045

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Jeffrey Hale Document Created: 5/21/2013 6:14:22 PM by Web Comment Form I am highly in favor of the proposed Loop 202 South mountain Freeway. The EIS is a great first step on getting this built. Please follow through with the millions of residents who support this freeway. Thank you!

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Amy Hale Document Created: 5/21/2013 6:15:46 PM by Web Comment Form Please, please, please build the south mountain 202 freeway. I am pleased that the draft EIS has been completed and am happy with the results. Please move forward with what the residents of maricopa county have wanted for years and build the freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	I am a civil engineer and have lived in the Phoenix area since 1996. As I recall the South Mountain bypass was a hot topic of discussion even then. I find it very difficult to understand why it is not already a reality. Every day that passes is a lost opportunity to improve the air quality and thereby improve the health of our children. Few of us realize what it actually costs us to sit in traffic tie-ups, burning extra fuel and fraying nerves. In the mid 90's, my wife was selling new homes in Ahwatukee and she was instructed to advise every potential buyer of this pending freeway. My hope is that this will become a fact sooner than later. Jim Hallman 480-369-4879

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Ahwatukee resident input 202 loop-F.Y.I.
Date: Monday, July 15, 2013 10:36:53 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Amy Halm [mailto:amy.halm@cox.net]
Sent: Monday, July 15, 2013 10:26 AM
To: Projects
Subject: Ahwatukee resident input 202 loop

Thank you for the opportunity to comment on the 202 loop through the South Mountain corridor.

1 If this project is truly intended as a route to bypass Phoenix, the current proposals do not even make common sense.

2 An obvious route and one which would not require cutting through sacred lands or residents' living rooms, would be (from I-10) south on 85 to Interstate 8. Why hasn't that route been discussed publicly?

Thank you,
Amy

Amy Halm
Communications Consultant
602.908.2042
...connecting the dots that matter

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Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 6:34 PM
CALLER: KEVIN HAMBECKE	CALLER ADDRESS: 1166 E. MARY LANE, GILBERT AZ 85295
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the Freeway going through. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Wednesday, May 15, 2013 11:13:45 AM

From: Mel Hamilton [mailto:pampered_girl@mac.com]
Sent: Wednesday, May 15, 2013 11:07 AM
To: Projects
Subject: 202

1

I think the south mountain freeway needs to be completed. Right now its unsafe because people drive at high speeds down pecos. Also we need to clear out some of the traffic on I10 durring rush house and offer a bypass around the downtown area. My husband travels to Harquahala and back for work and right now fighting the traffic makes his commute hellacious. Having the bypass would greatly improve our commutes for a number of reasons.

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Five Year Program
To: ADOT
Subject: FW: ADOT"s Five-Year Program - Comments
Date: Tuesday, May 14, 2013 10:04:31 AM

-----Original Message-----
From: Daniel Hamilton [mailto:BearPawse@yahoo.com]
Sent: Monday, May 13, 2013 6:50 PM
To: Five Year Program
Cc: stevec.lopez@yahoo.com
Subject: ADOT's Five-Year Program - Comments

1 In favor of Scenario B, as i have used this road for many years and this work is long overdo, and needs to be a priority!

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Sandy Hamilton Document Created: 5/21/2013 3:34:00 PM by Web Comment Form I am pro- freeway, as soon as possible. As a Laveen resident, I see the great advantage to the freeway, both in travel time and convenience, and in the economic advantage in having it. We've been waiting for 10 years for this to happen.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 Extension
Date: Thursday, May 30, 2013 9:15:52 AM

From: Doug Hamilton [mailto:DHamilton@markmharndencpa.com]
Sent: Thursday, May 30, 2013 9:11 AM
To: Projects
Subject: Loop 202 Extension

1

I am in favor of the project and also believe that the direct alignment with the Loop 101 is the only one that make sense. We have many clients in the west valley who are also in favor of the freeway and the Loop 101 alignment. This freeway will ease congestion and actually reduce pollution in our Valley.

Douglas Hamilton

Douglas Hamilton (doug@mm...
Mark M Harnden CPA P.C.
Enrolled Agent Tax Specialist

(480) 368-5755 #2 Work
(480) 368-5455 fax
doug@mmhcpapc.com
7689 E Paradise Lane #7
Scottsdale, AZ 85260
United States of America

Click here to send me a file

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

PLEASE CONSIDER BUILDING THE SO. MTN FREEWAY AS IT IS VITAL IN REDUCING CONGESTION ON THE CURRENT FREEWAY SYSTEM.

Optional

Name JEFF HAMILTON Email jeff579@gmail.com

Address 3841 E. DUBOIS AVE

City GILBERT State AZ Zip 85298

Phone 480 503 3672 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4300

would be feasible. And that's what I've got.
MR. HAMILTON: I just did a comment via the computer, but I thought of something else.
COURT REPORTER: Okay. What is it?
MR. HAMILTON: You mean, specifically, my comment?
COURT REPORTER: Yes.
MR. HAMILTON: I would like ADOT to keep the preferred route, the purple route, in the west end. That's the only -- That's the only thing I forgot to add to my original comment.
MR. BRENNAN: Okay. So I already spoke inside, regarding some of the impacts specifically with traffic.
Oh, you have to do every stutter and "Oh," don't you? I'm sorry.
Traffic, particularly with existing traffic conditions with the trucks, the warehousing and shipping business located to the north of Laveen, currently using 51st Avenue going south, as well as spilling over frequently onto our surface streets like Baseline Road, as well as whenever traffic incidents slow traffic on the I-10, which pushes traffic onto our surface streets, and I think that that creates a negative impact on both the Laveen community as well as the rest of the South Mountain/South Phoenix area, which is where I presently live, and have previously lived in Laveen and remain fairly active in that part of the South Phoenix

1

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:00 PM
CALLER: KEN HAMLIN	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in favor of building the freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:04 PM
CALLER: RICHARD HAMLIN	CALLER ADDRESS: 3336 E. SEQUOIA TRAIL, AWATUKEE, AZ 85044
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I just wanted to pass on that we are very much in favor of the Freeway that goes along Pecos Road and would be extremely disappointed if it did not pass. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support for the South Mountain Freeway
Date: Monday, June 24, 2013 9:03:51 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Michael Hampshire [mailto:rmlssg@aol.com]
Sent: Saturday, June 22, 2013 5:29 PM
To: Projects
Subject: Support for the South Mountain Freeway

I would hate to have my silence result in the defeat of the South Mountain Freeway by a vocal minority. The South Mountain Freeway is essential to the future of road transportation in Arizona. The South Mountain Freeway has been in the planning stages for far too long and it is time to proceed with its construction. Those in opposition to the freeway for the most part knew of its future construction when they purchased their current properties.

The South Mountain Freeway will assist in relieving the congestion on Interstate 10 through Phoenix. Traffic from Tucson through Phoenix to Los Angeles should almost exclusively utilize the South Mountain Freeway. In addition, those of us who travel from the Southeast Valley to the west side of Phoenix will have a route that will not resemble a parking lot for part of the day.

I travel from Chandler to Luke AFB on a regular basis and each trip westbound adds another vehicle to the congestion on I10 northbound from Loop 202 through the Broadway Curve and I10 westbound from the tunnel to Loop 101. Congestion on the return trip usually starts just east of the tunnel on I10, slacks off from the I10/Loop 202 split to the I10/I17 join then is usually stop and go traffic until south of Ray Road on I10. I have tried to use the current road system around South Mountain to the South, however, the speed limits and few residential areas make this inefficient.

1 2

Build the South Mountain Freeway now. Connect it directly to Loop 101 on the west side of town so as to not add to the congestion on I10 west of I17. Start construction on the Pecos Road portion of the freeway and if the Gila Indian Community provides and alternate path then divert the freeway south from the portion already under construction.

Those in opposition to the South Mountain Freeway are truly a vocal minority concerned with protecting their own interests at the expense of the majority of the citizens of the Phoenix area.

Thank You,
Michael D. Hampshire
1040 E. Hawken Way
Chandler, Arizona 85286

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/14/13	INCOMING CALL TIME: 1:31 PM
CALLER: JOHN AND PEGGY HANAFORD	CALLER ADDRESS: 15805 W. YAVAPAI, GOODYEAR
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Both my Husband and I support the new road. Please note.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Gary Hancock Document Created: 5/21/2013 4:15:34 PM by Web Comment Form At this time I believe the Multi-purpose Pass Throughs on E-1 are sufficeint for the wildlife in the area. I was concerned that there might be a lack of wildlife travel corridors on the Eastern side, however after seeing the large scale maps it appears that the development in the area would preclude the need for travel routes. Please keep the health of the wildlife populations in mind durring the rest of this process. Thank you.

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4328

made on a final bill? We've been in limbo with our home because at one point we were in the right-of-way and now we're not which is okay, but we're just trying to plan obviously for the future and any improvements we'd like to make on the home and all that. Obviously we won't do that if we were remaining in the right-of-way and they want to take it.

So, you know, I think that's all we have to say. We're just more interested in how they would design the wall with those property owners that it would be right up against, so.

MR. HANCOCK: My name is Jordan Hancock. I'm a student over here at Chandler-Gilbert. I first learned of the freeway through a friend. She's from the Akimel O'odham tribe, Gila River. She's from the reservation, the Pima reservation, where ADOT was -- there was three options, from my understanding, of the freeway, and they first tried to push it onto their land.

And I became aware of some of the abuses that they were doing, especially from the contractor Pangea, that they were going to pay to build the freeway on the Gila land. So that's when I first became aware of this and became opposed to the

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 freeway. So I thought that was very dishonest of
2 what they were doing.
3 Two, I started to talk to Pat Clark and I
4 really don't want this freeway. I think it is going
5 to lead to be a trucker bypass. So, it's very close
6 to the I-10. If you look at sort of what the can of
7 mix was and then some of the justifications I was
8 hearing from the Perez guy from Pangea, he was the
9 leader of the development company, and he was just
10 lamenting and being completely open with the fact
11 that this is going to be the can of mix freeway, or
12 this is going to provide for the corridors as if it
13 was a good thing.
14 The threat of trucker emissions is not
15 addressed in the EIS. It's a severe threat. There's
16 documentation after documentation of being within 500
17 meters of a freeway, what it does to the carcinogens,
18 causes cancer. There's four elementary schools that
19 I know within 500 meters of the proposed freeway on
20 the Pecos on that option. There's several housing
21 developments that I know of and these are not
22 addressed.
23 It's blatant, I think a human rights
24 violation. I don't appreciate the fact that ADOT,
25 they bus their contractors in here and allow them to

Page 7

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www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Air Quality**	Diesel exhaust from trucks is not a major contributor to concentrations of particulate matter (PM_{10}) in this area. Dust is the largest contributor in Maricopa County. Review of particulate matter (PM_{10}) data collected by the Maricopa County Air Quality Department suggests that locations adjacent to industrial, mining, or agricultural areas generally have the highest concentrations (see Final Environmental Impact Statement page 4-72). Locations adjacent to freeways typically have particulate matter (PM_{10}) concentrations within standards.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Public Involvement**	Target busing of special interest groups was not included in the public involvement plan or activities, nor provided by the project. Free shuttles were provided in specific locations to accommodate populations that might not have had access to other transportation to attend the public hearing downtown. The rules for the hearing included: "Displays, signs, or banners are not allowed in the Convention Center."

Code	Comment Document

have T-shirts. They don't know any of the talking points for one, yet when we try to pass out information, the Sierra Club, they won't let us do it. I know they already spent $24 million of paid tax payer money to do it, so I see their reasons.

Two, there's two city ordinances that have been passed. One in '97 by a popular vote and one in 2003 that I know of that basically say you can't sell any land or do anything to the wildlife preserve, which is the South Mountain, the mountain preserve, without voter consent.

I know that there's some -- they can get around this from what I read -- ADOT cam, but it's in violation of the spirit of the law, it's not fair and I definitely hope we get a lawsuit to try and do this. So I think it's illegal actually what they're doing. It's in violation of two voter referendums.

This is the largest city park in the country, a very popular and historic mountain preserve. I'm not quite sure what is so hard about the word "preserve" for ADOT to understand. You can't preserve something if you build a freeway through it. It's a big part of our history, and not to mention the cultural importance of four Native American tribes, especially the Akimel O'odham. It's

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Code	Issue	Response
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Cultural Resources**	

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their origin myth. It's from their origin. This mountain's very important for them and they're just sort of building a freeway right through it. It's a civil rights violation.

And the -- the effects of the Gila River tribe are not even mentioned in the EIS. That's very disturbing since they're so close to it. Cities can't transfer preserved land for freeways without a vote. This was 1990 House Bill 22118. I don't see how they're going to get around that.

And currently since 1997, our city has led the country in carbon emissions -- excuse me, not carbon emissions, but carcinogens, pollutions being put in the air since '97. So just as a whole since 1997. And we used to be a haven for, you know, asthma patients. And this is -- what it's become now, we're just below the limits of the EPA currently.

And if this becomes what I think it is, a trucker bypass station in the middle of the city, it's going to increase pollution and we're going to go over that limit, and we're in great threat of losing funding from the Federal Government. So that's losses of billions of dollars, not to mention the 2 billion they say it is going to cost to build

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Code	Issue	Response
9	**Tribal Involvement**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
10	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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the freeway when it was originally 4 billion. So this is a bare bones freeway.

They've taken away -- I don't know how they're going to be able to afford wildlife passes and things like that. It's a very bare bones freeway. $2 billion for 22 miles. And these are just a few, but that's about it.

MR. MYERS: David Myers, M-y-e-r-s. I'm opposed to the South Mountain corridor, and I would say that we're basically just stealing land from the natives once again. And a good example of this would be, what if we wanted to put a freeway through Camelback Mountain, let's say, or say a north Phoenix or north Scottsdale? If we want to just run a freeway right through one of the upscale neighborhoods, how would they feel about that?

And, I mean, I understand that it's on the edge of Ahwatukee and parts of those are a little more upscale, let's say, but nothing compared to say like Scottsdale, and I honestly don't think that they would like it very much. And as a former auto mechanic, I can say that a truck route would increase air pollution substantially. I am now a sustainability student, and I oppose everything going on with the South Mountain corridor.

Code	Issue	Response

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From: Projects
To: ADOT
Subject: FW: Loop 202 DEIS Comments & Questions
Date: Tuesday, July 23, 2013 10:38:26 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT Communications

From: Dietmar Hanke [mailto:Dietmar.Hanke@iceenterprise.com]
Sent: Tuesday, July 23, 2013 9:25 AM
To: Projects
Subject: Loop 202 DEIS Comments & Questions

South Mountain Freeway (Loop 202) SR202L

ADOT Project Number: 202L MA 054 H5764 01L
Federal Aid Project Number: NH-202-D(ADY)
Draft Environmental Impact Statement ("**DEIS**")

Homeowner: Dietmar Hanke
2729 West Redwood Lane
Lot 73, Parcel D of the Mountain Preserve

1. Environmental Impact Statement Process

1

While the document presented is truly impressive in its sheer folly and largess, it contains virtually nothing in the way of facts or analysis as required by 42 U.S.C. § 4321 et seq, nor does it conform to the goals articulated by the preamble to the National Environmental Policy Act of 1969.

This particular Draft Environmental Impact Statement formally enlists the input and

Code	Issue	Response
		Response to letter received after the comment deadline can be found on page B3838.
1	**Environmental Impact Statement Process**	The Arizona Department of Transportation is the sponsor of a proposed action, the construction and operation of the South Mountain Freeway in Maricopa County, Arizona. The Federal Highway Administration, the federal lead agency for the proposed action, in cooperation with the U.S. Army Corps of Engineers, the U.S. Bureau of Indian Affairs, and the Western Area Power Administration, prepared the Draft Environmental Impact Statement in accordance with: · the National Environmental Policy Act of 1969 [Title 42 United States Code § 4332(2)(c)] · Section 4(f) of the U.S. Department of Transportation Act of 1966 (Title 49 United States Code § 303, as amended) · Section 404 of the Clean Water Act of 1977 (Title 33 United States Code § 1251) The other groups noted in the comment, business leaders, Gila River Indian Community, and Maricopa Association of Governments have been involved in the study process (as described in Chapter 1, 2, and 6 of the Draft Environmental Impact Statement); however, the ultimate decision related to the identification of the Selected Alternative will be made by the Arizona Department of Transportation in coordination with the Federal Highway Administration.

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considers the needs of "business leaders" and representatives of "The Indian Nation" in addition to the majors of the cities within Maricopa County. Neither of the two former entities, irrespective of state legislature and executive actions, are competent to make decisions that affect private land owners in these United States of America. In fact, these are unconstitutional forms of representative government.

(2) Under what authority and pursuant to what facts are members of the Indian Nation to be included in the decision making process for the Pecos Road Alignment, an alignment which is NOT on the lands of The Indian Nation? Surely it's not the single forged hieroglyph found in the proposed right of way on South Mountain or the vista onto the lands not on the Indian Nation lands. This artifact of Arizona government has not yet been challenged. But it will be.

2. Historical Context

(3) The South Mountain Freeway may have been originally included in the proposed 232-mile Maricopa Association of Governments (MAG) Regional Freeway System (now called the Regional Freeway and Highway System) as planned in 1985. However, it was never indicated as an easement or even a possibility on any plat anywhere near my house. What was indicated was an easement 500 feet from my house for the extension of Pecos Road.

Since 1985, the city of Phoenix has issued building permits in what is now to be considered the "right of way" for the proposed freeway. In my case, less than one year before the notorious homeowner notification in October of 2005. If the "general location" of the proposed freeway was so well known, why were these building permits issued? Isn't this a glaring case of wasting taxpayer money? If the Pecos Road alignment was so precisely defined and a decision had already been made, why did the first public notification signage appear on the 28th of May 2013 at the South 24th Street and Pecos intersection?

3. Purpose and Need

(4) The DEIS purports that traffic in general will continue to increase at exponential rates in Maricopa county. This is identified as the primary reason for the need for the South Mountain Freeway. All biological systems that experience geometric growth will stabilize or collapse at some point in time. This is a concept of real science. Why is this concept not a factor in the DEIS? It is omitted altogether. In a day and age when telecommuting is increasing at geometric rates, this is inexcusable.

Furthermore, the DEIS cites a fictitious need for residents of the Central West Valley to commute to the Chandler/Gilbert/Queen Creek area and vice versa. Surely we are all in agreement that there is no such "need" between the residents of Chandler and Ahwatukee Foothills and the residents of Tolleson; the demographics just don't comport. Why isn't there any study mentioned of how many cars travel from Chandler/Ahwatukee Foothills to the Central West Valley now? License plate recognition software and hardware is readily available and can access registrations nearly instantaneously. That's because such travel doesn't exist. Isn't ADOT's insistence of the former merely a case of "if you build it, they will come"? How are general valley traffic volume statements and projections

Code	Issue	Response
2	**Alternatives**	As noted on page 2-8 and 3-5 of the Draft Environmental Impact Statement, the Gila River Indian Community held a coordinated referendum in February 2012 to favor or oppose construction of the South Mountain Freeway on Gila River Indian Community land or to support a no-build option. The highest number of votes were received by the no-build option, therefore, the on-Gila River Indian Community land alignment was eliminated from further study. The referendum results did not affect the alternatives development and screening process related to the E1 (Pecos Road) Alternative. Laws, such as the National Historic Preservation Act, American Indian Religious Freedom Act, Section 4(f) of the U.S. Department of Transportation Act, provide protection for cultural resources even if they are located off of Native American land. More information related to how these laws affected project determinations and design are presented on page 4-128 and in Chapter 5 of the Draft Environmental Impact Statement.
3	**Acquisitions and Relocations**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.) It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).
4	**Purpose and Need**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. An analysis of the origins and destinations of projected freeway users is presented in Figure 3-18, on page 3-36 of the Final Environmental Impact Statement. Freeway users are defined as those motorists who pass through the bend of the freeway (around the South Mountains). So, this does not count motorists in Laveen Village who go to Interstate 10 (Papago Freeway) and motorists in Ahwatukee Foothills Village who go to Interstate 10 (Maricopa Freeway). The results of the origin-destination analysis show that 73 percent of the traffic going around the South Mountains has origins or destinations in the area within or around the Study Area and supports the conclusion that the proposed action would serve east -west mobility consistent with commuting movements.

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even relevant here?

5 1

Inherently, there is no local need now. After all, Chandler and Ahwatukee Foothills are more than 95% developed. Everything south of Pecos Road and east of its current terminus is Indian Nation lands. ADOT, Phoenix, and MAG (if it is legal entity) cannot make decisions about private lands in Arizona based on the needs of the Indian Nation. Isn't that the exclusive purview of the Department of Interior for these United States of America?

6

So where could increased traffic come from? The better question is where will increased traffic come from? It will come from the CANAMEX Highway. When Congress adopted NAFTA, this highway became a requirement of the United States Government – not Arizona. But where is the segment between Pecos Road and Las Vegas? It doesn't exist! Which is why the federal government is paying for a significant portion of the local freeway. Why is the CANAMEX traffic load not considered in the DEIS? How is CANAMEX a responsibility of the Arizona or Maricopa or Phoenix taxpayer?

7

To cast the need for the South Mountain Freeway in terms of relieving the congestion on the I-10 freeway between Pecos Road and the 143 irrespective of the CANAMEX Highway overlooks two fundamental issues. First, from Pecos Road to the 143, fourteen lanes of traffic are crammed into seven. Worse, carpool travelers going to PHX from the I-60 must cross six lanes within the most crammed quarter mile to get to the airport. Wouldn't an elevated HOV cross-over be much more efficient? Isn't this the real problem?

4. Gila River Indian Community Coordination

1 2

The Federal Highway Administration may not have the right to survey the lands of The Indian Nation, but the federal government does have the right to condemn lands of the Indian Nation under eminent domain. That's exactly why the USDOT has stepped back in this case. Just as the Bureau of Indian Affairs is chartered to address the transportation needs of the Indian Nation, the states and their subordinate organizations are NOT! More specifically, MAG's "coordination" is not/should not be decision-making. Fire Departments, ambulance companies, and hospitals all coordinate with each other, but neither makes decisions for any other. How can ADOT confuse such fundamental concepts?

8

Significantly, the proposed South Mountain Freeway alignment is not within any portion of the tribal lands of the Gila River Indian Community. Why is that community involved in the decision-making process affecting the properties of Phoenix landowners? More importantly, why is ADOT proposing off ramps and street stubs that serve the property and business developments of The Indian Nation? Who in The Indian Nation's allotted landowners stand to profit from Casino developments and billboard placements? Does the greed of these Indian Nation profiteers outweigh the rights to residents of those not within the Indian Nation? Apparently, they also outweigh the desires of the rest of their tribal members.

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Finally, how can a tribal representative for tribe of a few hundred have the same voting or veto power as the mayor of Phoenix? Don't we have a concept of one person one vote in

Code	Issue	Response
5	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The proposed freeway would not be part of the CANAMEX Corridor. The CANAMEX Corridor is to follow Interstate 10 from Tucson to Interstate 8 near Casa Grande, Interstate 8 west to State Route 85 near Gila Bend, State Route 85 north to Interstate 10 northwest of Buckeye, Interstate 10 west to Wickenburg Road, Wickenburg Road to Vulture Mine Road west of Wickenburg, and then connect with the planned US 93/US 60 Wickenburg Bypass. Additionally, the proposed freeway would not offer shorter travel times. The CANAMEX Corridor's proposed routing avoids any congestion associated with the Phoenix metropolitan area (see Draft Environmental Impact Statement page 3-64). Recent studies completed by the Maricopa Association of Governments, including the Interstate 10/Hassayampa Valley Roadway Framework Study and the Interstates 8 and 10/Hidden Valley Transportation Framework Study, have further defined the long-range planning for the CANAMEX Corridor in Arizona.
7	**Traffic**	While the improvement proposed by the commenter could help eliminate some weaving issues in that area, the cost to build such a cross-over would likely not be in line with the limited number of vehicles demanding that movement. The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing motorists an alternative route to already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County.
8	**Alternatives**	Federal law prohibits the denial of access to any community. Thus, traffic interchanges would be located along the freeway where it borders the Gila River Indian Community (see Draft Environmental Impact Statement page 3-51). Roadway connections on Gila River Indian Community land to the traffic interchanges would be the responsibility of the Gila River Indian Community, in coordination with appropriate jurisdictions.
9	**Purpose and Need**	An explanation of the Maricopa Association of Governments is on Draft Environmental Impact Statement page 1-4. That discussion lays out its membership, history, and legal role. The Maricopa Association of Governments is the federally designated metropolitan planning organization for regional planning in the Maricopa County region. Its current membership includes three tribes along with 25 incorporated towns and cities.

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these United States of America? ADOT needs to revisit the standards against which administrative agency action is tested against. After all Kelo v. New London only added another standard; it didn't replace the other tests (arbitrary & capricious, illegal, prohibited actions).

5. Alternatives

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Proclaiming a fictitious need inherently corrupts any further analysis of the viable alternatives. This is a fundamental concept of real science and the scientific method. Unfortunately, this concept is, modernly, largely lost on administrative agencies that rely on repeating unfounded dogma until most people believe it.

11 6

Thus, if one is to proceed with the notion that there is a real current need for commuter travel from the Central West Valley to the Chandler/Gilbert/Queen Creek area and vice versa, certainly an extension of Pecos Road would suffice. After all, it's a four lane divided road with very few traffic control signals. Why is the lack of achieving a "projected traffic" flow of dubious origins for a freeway whose true nature and purpose are not addressed even relevant here? That's because the flow is a yardstick for CANAMEX Highway purposes.

12 5

And, if the real need is to comport with the lane and flow requirements of CANAMEX, both a real freeway is required and multiple alternatives come to mind. The logical question that follows is why did ADOT not consider an alternative from Casa Grande (or close by on the I-8) to Tolleson? Such an alternative would not cause any of the social or environmental consequences identified below, nor traverse tribal lands. It would, however, lie almost exclusively on federal lands. Is this a conflict of interest for USDOT? Why was this alternative not studied by ADOT or identified in Figure 3-5 of the DEIS?

The Casa Grande to Tolleson alignment can be detailed to exclude all residential property condemnation. Further, it would truly be a truck bypass, avoiding all residential contact except for possibly, but not necessarily, one eighth of a mile. How does such an alignment differ from any "studied" alignment for interstate traffic purposes? Why was that not discussed in the DEIS?

The Casa Grande to Tolleson alignment can also be designed to include two or more lanes that interchange with the I-10 or I-8at the southern end and the 303 and the I-10 at the northern end without significantly disrupting traffic. This is required by the CANAMEX Highway specifications. The Pecos Road alignment would require massive reconstruction to achieve such. Why was this not discussed in the DEIS?

13 1

Furthermore, why did USDOT not study condemning lands of the Indian Nation for the Riggs Road Alternative? If this is a CANAMEX segment, USDOT certainly should be at the forefront of the alignment studies and condemning decisions; not ADOT, not MAG, not anyone else.

Vertical alignment is much more complex than the short shrift given to it in the "Alternatives" section of the DEIS. The complexities of this are discussed in the relevant sections below.

Code	Issue	Response
10	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Alternatives**	Extending Pecos Road as an Arizona Parkway or other facility was considered (see page 3-19 of the Draft Environmental Impact Statement). In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.
12	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the Phoenix metropolitan area by increasing capacity and providing alternatives to allow traffic to avoid already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of the Phoenix metropolitan area. Routes south of the Gila River Indian Community, such as that noted in the comment and the State Route 85/ Interstate 8 Alternative were evaluated for the proposed project. The reasons these alternatives were eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
13	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

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6. No-Action Alternative

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As noted above, there is no articulable, scientifically supportable need for this freeway, absent CANAMEX. The "No-Action Alternative" and/or the Casa Grande to Tolleson alignment (for CANMEX traffic) are the only two supportable alternatives. Further, the I-60 to 143 overpass is notably a significant I-10 current traffic mitigation option which is likely to yield the most results for non-CANAMEX traffic. Why was this not discussed in the DEIS as a viable traffic mitigation option?

a. Displacements, Relocations, and Economic Impact

15

What's a home worth? That's the overriding issue ADOT has not addressed. It's the elephant in the room. I purchased my new home in 2004 in the Mountain Reserve after reviewing 128 model houses in all states of completion. I moved in in August 2005. I paid $355,000.00 for it and spent another $40,000.00 in front yard and window coverings required by the association. I spent much more on cabinetry. I had leveraged the economy of a tract builder with the freedom to request a multitude of customizations. My house is truly unique.

I had put $140,000 down as a down payment. I have no back yard. Most people who bought near around the time I did don't (check Google Earth). Why? Because ADOT announced that my house probably will be mowed down for the Loop 202 Freeway, seven weeks after I moved in. That was before the housing bubble collapsed and values collapsed even further.

The last house that sold on my street (with a back yard and a pool) sold for $173,000 (check Zillow.com). Wow, I might as well have flushed $100,000.00 down the toilet eight (8) years ago and I'd still be more than $60,000.00 ahead of the game. I may even have had a back yard down through those years. How much is a back yard worth? …for 8 years? I think that most people will agree that it's worth a lot.

Also, I have lived in a community where transient rentals were the norm for eight (8) years. Monthly rentals predominated. There was absolutely no sense of community. Indeed the HOA had no forum of board members for years. Nobody cared. The ADOT owned houses were a blight upon the neighborhood for many years. What's that worth? Is there any mention of this in the DIES? Much, much damage has already been foisted upon Mountain Preserve homeowners.

16

I moved to my neighborhood because of the views and the low levels of traffic, noise pollution, light pollution, air pollution, and lack of access by the criminal elements of the various crime riddled areas of the west valley. Can ADOT even find comparable relocation sites? Why is the latter not addressed in the DEIS?

So, again, what is a house worth? Is it the current standard of the "reasonable market value"? Or is it something else? I suggest it is the value of buying comparable property, building the same house thereon, and putting my family up in a resort during the time of its construction. And further, that property has to have similar characteristics with regard noise, views, light and air pollution, property taxes, and access by criminal elements.

Code	Issue	Response
14	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
15	**Acquisitions and Relocations**	
16	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document
	Why not? Can anyone articulate why not? In the end, how much is all of this worth to a tax-paying resident of Phoenix? One that's been paying taxes for eight years and commuting to a remote location where he's never been able to even enjoy a back yard? The DEIS does not address this, not even remotely. Why? Because it's painful and expensive maybe? And, ADOT may not want to admit to the true cost of such land acquisition and replacement home building. b. Noise The DEIS addresses noise pollution. Unfortunately it uses the average hourly noise level as its only metric and does not incorporate any temporal variations. While it does acknowledge that it barely achieves federal maximum mandates, it does not even address the more pertinent parameters of the characteristics of noise and timing of thereof. Internationally, noise classification has advanced well beyond the crude "average pressure level" used in the DEIS.
17	
	Irrespective of the international classifications, the DEIS statement does identify that the Pecos Road alignment will barely achieve federal maximum noise levels in most cases, even if abatement walls are used. Why is that not a major problem? Further, these maximum classifications are based on abstract generalizations of laterally displaced noise level estimates. Why is there no mention of the directed and "channeling noise" of the converging freeways segments on Parcel D of the Mountain Preserve? Mountain reserve residents would be subject to air brake and incline ascending noises of both domestic and CANAMEX trucks, the volume of which are not incorporated into ADOT's simple projections. Lower frequencies travel farther. Period. What if the actual noise levels exceed the federal maximum noise levels? What then?
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17	
	And, more basically, ADOT submits factually incorrect current ambient noise levels for comparison. Noise levels not within the narrow arrival and departure times of commuters and not within the high heat air conditioning months (October through May) are much lower than indicated for neighborhood. Typically, they are in the decibel ranges from the 30's to low 40's on my back porch at my house, and even lower during the night. Why has ADOT not provided the true, evening, no-AC, ambient noise levels?
17	
	Noise can come in all forms. ADOT would have one believe that the sounds of birds at my bird feeder and sounds of my neighbor's children playing are equivalent to the recurrent, revolving, and mechanical sounds of lumbering trucks and motorcycles. It's embarrassing to even have to address this. The rest of the world has moved on. The quintessential question is why does ADOT rely on outdated and erroneous methods and metrics? Most likely because they're convenient obfuscating tactics. There are much more relevant international standards and measurements that are available.
17	
	ADOT itself pontificates that "it is recognized that transportation noise is perhaps the most pervasive and difficult source to avoid in society today". This is exactly what we currently don't have at the western end of Pecos Road. This was a major consideration when I bought my house. How is the maximum tolerable noise level relevant here? How about a combination of maximum noise pollution, air pollution, light pollution, disaster risk, and transient crime? Who would want to live in such an environment?

Code	Issue	Response
17	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed on Final Environmental Impact Statement page 4-88, the Final Environmental Impact Statement is required to comply with the Federal Highway Administration regulations, which specify the noise metric of A-scaled decibels. Noise analyses for Federal Highway Administration transportation projects are to use the hourly equivalent sound level (Leq), which is a logarithmic energy average over a 1-hour period. While other noise metrics are used in some other countries for other types of noise, they have not been accepted in the United States for various reasons, and the Leq metric remains the most common metric for discussing and evaluating highway- and transportation-related noise. As the Federal Highway Administration points out in Title 23 of the Code of Federal Regulations, Part 772, the Federal Highway Administration and Arizona Department of Transportation Noise Abatement Criteria are not to be considered maximum acceptable noise levels or design noise levels, but are the level at which noise abatement is considered. Regarding the no-air conditioning evening, noise levels, as mentioned on page 4-80 of the Draft Environmental Impact Statement, ambient noise measurements were conducted according to Federal Highway Administration guidelines in Measurement of Highway-Related Noise. The goal is to obtain representative ambient noise levels from the Study Area, not necessarily the absolute lowest sound levels that could occur in the area. The procedures and metrics used in the noise analysis are consistent with those used throughout the country and in much of the world for highway-related noise. Regarding anticipated noise from large trucks, the Maricopa Association of Governments' regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This forecast truck traffic is based on existing traffic studies and projected socioeconomic data. This percentage is similar to current conditions on Interstate 10 between State Route 101 Loop and Interstate 17 and on U.S. Route 60. Noise modeling for the Final Environmental Impact Statement used this forecast truck traffic, with the model accounting for greater noise generation by trucks in future noise levels. Noise mitigation is designed for this predicted noise level, including the noise from trucks.

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17

Finally, the question of time of day when noise is absent is avoided entirely. Why? So a noise at midnight is equal to a noise during the day. How is that possible? Is it rational? Whether CANAMEX or a general truck bypass is the main ingredient of the traffic on the proposed freeway, it is likely that the louder, lower frequency noise generated by large trucks will dominate. And, that this noise will continue 24x7 and carry further at night. How does that compare to the crude measurement and prediction that ADOT proffers? It doesn't. And, why has ADOT not addressed the conflict between wildlife corridor bridges and sound barriers? (More on that topic below.) All this appears to absent in the DEIS.

c. Water Resources & Floodplains

The DEIS identifies the flood plain relevant to the Pecos Road alignment. Unfortunately, its roaming generalizations do not address several pertinent aspects of drainage. The South Mountain Park and adjacent southern alluvial flood plains drain to the south. It is this author's experience that, during summer deluges the entire area from South Dessert Foothills Parkway to Chandler floods and drains through and across Pecos Road.

This drainage can cause the entire area from Chandler to South 17th Avenue to flood and drain through the multiplicity of drainage culverts *and over Pecos Road itself*. The current "alignment" proposes that the Loop 202 will be elevated along its passage by my house. AND, that the alignment will be 22 feet above the current grade. Wow, kind of like Hoover Dam in your back yard. More on that later.

19

20

With only one drainage culvert in the segment, what is the strategy to channel/buffer drainage waters? Further, and more significant, what are the consequences of erosion damage on the tribal lands of The Indian Nation? Why has the DEIS not even addressed this? It is a sure consequence of law that damages of The Indian Nation will be adjudicated by the Indian Council (see recent decisions by the federal courts), employing a different set of laws (they remind us of that with signage every 50 feet along Pecos Road), and dictated to Arizona taxpayers. What is the potential cost of that? I don't see anything that addresses this in the DEIS.

d. Biological Resources

21

The South Mountain Park is the largest municipal park in the world. It is the place where local citizens can enjoy *nature*. It hosts a plurality of *natural* inhabitants, from the Chuckwalla lizard to numerous bird species. It is a natural ecosystem that interacts with the desert flatlands and the adjacent Estrella Mountains on a genetic and predator-prey basis.

22

If anyone can believe all species in an isolated park can proliferate for more than a few years though a couple of tunnels (4 that I see) and one bridge traversing a 300 or 500 foot right of way, please present the scientific evidence. While the importance of wildlife corridors, such as those in the Ahwatukee Foothills area, has been scientifically established, drainage culverts and bridge corridors have not.

Quite the contrary, for many species they present a gauntlet to navigate while

Code	Issue	Response
18	**Noise**	As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes, which may be elevated above the roadway, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
19	**Design**	Drainage studies have been conducted; culverts would be maintained, and new culverts would be installed to maintain flows under the freeway (see Draft Environmental Impact Statement pages 3-58 and 4-101). The drainage design along Pecos Road Surface water could be altered from runoff drainage; seeding the disturbed soils with native vegetative species would help to minimize runoff and erosion. Best management practices associated with the project Stormwater Pollution Prevention Plan would also help minimize runoff.

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opportunistic predators, such as foxes and coyotes, cash in on the parade of traversers. Furthermore, position, size, food sources, and cover are key factors in determining which species will attempt to employ the use of such underpasses. Progressive proposals have been made to create vast corridor overpasses over the I-10 to Tucson. Is ADOT regressing in its thinking? Does it have better data?

The species least likely to traverse a tunnel or bridge corridor would be Road Runners, the Giant Sonoran Desert Toad, Desert Tortoises, Gila Monsters, horned lizards, Chuckwallas, rabbits, squirrels, skinks, low flying birds such as the Gila Woodpecker, the Road Runner, and Gambels Quail. And even if they do, the restricted opportunities to traverse will sharply decrease their genetic diversity and survival chances in the SMPP's ecosystem.

Most of these species are not likely to cross at the proposed Rio Salado Oeste project area either, as they do not inhabit marshes. All of these species have appeared in my back yard. Most of these species are an intimate part of the *nature* evident in the park today. Many of these species migrate daily or seasonally from the mountains to the flatlands. All communicate genetically with the greater Sonoran Desert inhabitants. Bottom line is this: Coyotes and Javelinas are the most likely species to use the tunnel and bridge corridors. Is there any shortage of those? Why has the natural biodiversity, genetic isolation, unbalanced predation, and ecosystem health of the SMPP's fauna not been addressed in the DEIS?

22

Further still, should ADOT decide that a bridge corridor is necessary somewhere in the vicinity of the Pecos Road terminus, what is the strategy for a sound barrier there? I've never seen such a barrier on a bridge outside of central Europe. Bridge corridor, vertical alignment, sound barrier, and ecosystem health are all related. Most significantly, the DEIS avoids altogether the question of what is the goal of the mitigation efforts are. Is to save endangered species? Or is it to maintain the health of the SMPP's ecosystem and natural state?

Let's also not forget that any corridor's effectiveness can be completely thwarted by commercial developments on the Lands of the Indian Nation. Quite frankly, evidence has shown that they just don't care. They'll build a casino where ever they please and recent court challenges have borne out yet again that no agreement with municipalities or the State of Arizona has any affect. Why is that fact completely ignored in the DEIS?

e. Hazardous Materials

15

The current alignment would have the CANAMEX or otherwise highway truckers pass a few yards from my house if it's not torn down altogether. But, then again, ADOT hasn't decided on the true right of way width yet. So we don't know. Why is that? Irrespective of this indecisiveness, the specter of a mishap on the Loop 202 resulting in an errant vehicle carrying hazardous materials rolling down the 22 foot embankment into a residential neighborhood is scary.

23

Why is there no discussion of this vertical alignment issue, especially with CANMEX truckers in mind. The DEIS only discusses general concepts? Isn't the transport of hazardous and harmful materials a key element to the freeway's alignment? How is the above scenario different than the Deck Park Tunnel? Has Homeland Security been

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advised of this?

ADOT instead chose to concentrate this section of the DEIS on the potential to disturb existing Haz-mat sites. How about what the proposed alignment (both horizontal and verticel) creates as far as Haz-mat circumstances and situations? Why hasn't that been considered?

f. Visual Resources

24 As mentioned above, the current vertical alignment places the Loop 202 at 22 feet above grade near the terminus of Pecos Road. With another 20 feet of sound barrier on top of that, the remaining front line of homes will be greeted by the view of Hoover Dam to the south. The barrier will be nearly twice as high as the adjacent roof gables. While some folks are worried about their sacred views of mountains not on their lands, taxpayers near the right of way will be greeted by an atrocious industrial strength view. What's the value of that? And why is there no mention of this specter in the DEIS?

g. Light Pollution

The DEIS avoids altogether any discussion of light pollution. Though discussed at various public meetings, ADOT summarily responds with generalizations about mitigation measures. Light pollution is, however, a complex issue poorly understood by administrative agencies such as ADOT. Light pollution is a matter of water vapor, particulate air pollution, and the location and direction of light sources.

Merely lowering light standards is laughable. Even thirty foot standards would emit light 52 feet above grade near Parcel D of the Mountain Preserve. Furthermore, vehicle lights traveling in both directions approaching Parcel D of the Mountain Preserve will illuminate the area from higher elevations based on the proposed vertical alignment. Vehicles also emit the very particulates and water vapor notorious for scattering and reflecting light. Particulate emissions from Mexican trucks (CANMEX) will be even higher than domestic commercial diesel trucks.

25 6 26 Even more important, what will stop the business interests on the adjacent tribal lands from erecting illuminated billboards and jumbotrons? One need only look at the Santa Freeway between I-10 and the Loop 202. Does ADOT think a contract with the Indian Nation not to build such will be upheld in federal court? Recent decisions indicate they won't. And the Indian Nation only cares about revenue, nothing else.

3 I purchased a home in Parcel D of the Mountain Preserve because I can see the Milky Way on many evenings. That is not possible even the Lakewood area of Ahwatukee Foothills. How much is that worth and who gets to decide that?

h. Air Pollution

27 As noted above, air pollution is a function of the level of traffic, the type of traffic, even the time of such traffic and the direction of the prevailing winds. There is absolutely no mention of what the pollution levels will be during cool evenings when the truckers dominate and the air is heavy, moving only slowly in the direction of the prevailing winds

Code	Issue	Response
20	**Drainage**	Flood protection levels are dictated by the design class of the highway. In the case of the proposed South Mountain Freeway, it is designated as a Class I. Therefore, flood protection levels would be designed to the 50-year (storm) level. However, as a standard Arizona Department of Transportation practice, the floodwaters developing upstream of the culvert entrance would be reviewed at the 100-year level to ensure "headwaters" do not adversely affect existing properties. (See Draft Environmental Impact Statement page 4-102.) All bridges on major waterways such as the Salt River are designed to maintain minimum water surface elevations at the 100-year level for flood levels and built to structurally withstand the superflood, a flood expected only once in 500 years.
21	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
22	**Biology, Plants, and Wildlife**	
23	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
24	**Visual Resources**	For most of the alignments of each of the action alternatives, the proposed freeway would be elevated above the natural grade of the surrounding land. This elevated profile would allow noise to carry farther, creating noise impacts at greater distances from the freeway. Depressing the profile of the freeway below grade might reduce traffic noise levels adjacent to depressed sections. However, it would be necessary to also construct at-grade noise barriers to achieve noise reduction goals at receiver locations adjacent to depressed freeway sections (see page 4-91 in the Final Environmental Impact Statement). This strategy would reduce visual impacts associated with high noise barriers on elevated freeways, but would entail ground-level noise barriers and their associated interference with views. Thus, with either approach to noise reduction, views of nearby mountains could be disrupted. The specific impacts would depend on sightlines that would be determined by the height of any noise barriers constructed, the intervening topography, and the distance of the barriers from the residences in question.
25	**Visual Resources**	Light from the freeway would be produced from vehicle headlights and taillights and from fixed light poles at interchanges along the freeway. Nighttime users of the park and residents of Ahwatukee Foothills Village may see lines of seemingly crawling vehicles, each with lights front and back. Fixed freeway lighting would be provided for safety reasons only at interchange exit and entrance points. Freeway lighting at these locations would be designed to reduce illumination spillover onto sensitive light receptors such as residential areas (see page 3-58 of the Final Environmental Impact Statement).

(Responses continue on next page)

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28	in parallel with the proposed Pecos Road alignment. Why is this worst case evening scenario not even addressed in the DEIS? i. Temporary Construction Impacts and other Issues Finally, the DEIS statement only obliquely addresses temporary construction impacts. Where is the estimated commute time to get from South Mountain Preserve to the San Tan Freeway? There is no mention of the air quality and local health impact of soil stabilization techniques (lime and potassium chloride), diesel fumes, blasting noise from the mountain gorge, and temporary water drainage measures. Why? How much is living next to a construction site worth? Why does the DEIS summarily avoid the cost impact of implementing all of the mitigation measures on the over cast of the freeway? Could it be because the freeway would never be built if these cost estimated were actually included? Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
26	**Visual Resources**	The State of Arizona (through the Arizona Department of Transportation) administers an Outdoor Advertising Program as mandated by the Federal Highway Beautification Act. Arizona's program provides regulations for the permitting, placement, and maintenance of outdoor advertising signs along Interstate highways as well as State highways within Arizona. The State statutes (Arizona Revised Statutes §§ 28-7901 through 28-7915) and the State rules (R17-3-701 and R17-3-701.01) provide that the Arizona Department of Transportation must regulate any sign that is within view of, directed at, and intended to be read from the main traveled way of a controlled highway. (A controlled highway is any highway that is part of the National Highway System along with specific State routes. The South Mountain Freeway would be both a State route and part of the National Highway System.) While the Arizona Court of Appeals did decide in November 2011 that electronic billboards violate the 1970 Arizona Highway Beautification Act, a new law was passed by the State Legislature that banned such billboards in much of the state but allowed them in most of Maricopa County and parts of Pinal, Yuma, and La Paz counties. Weeks later, the Phoenix City Council created a zoning ordinance to regulate such billboards on city streets and highways. Chapter 7, Section 705, of the Zoning Ordinance of the City of Phoenix does not permit billboards to occupy public property or to extend across a property line where such property line borders a public highway. Electronic messages are permitted only on land zoned as commercial or industrial or zoned as a nonresidential use in Residential Districts. Under current zoning, this eliminates most, if not all, of the land along the E1 Alternative. Such signs might be permissible along portions of the W59 Alternative. Such signs may not be illuminated between 11 p.m. and sunrise "when (1) located within one hundred fifty (150) feet of Single Family Residential zoned property and (2) visible from such development or property." Erection and operation of any billboards on Gila River Indian Community land would be subject to regulation by the Gila River Indian Community.
27	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

(Responses continue on next page)

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28	**Construction**	Temporary construction impacts are described in the Draft Environmental Impact Statement beginning on page 4-161. The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours might be needed during construction. In general, travel times along Pecos Road would remain unchanged during construction. Individual mitigation measures for environmental elements such as blasting and water quality can be found in the respective sections of the Draft Environmental Impact Statement (for example, mitigation related to blasting is in the section *Topography, Geology, and Soils*, beginning on page 4-113.) The mitigation measures proposed in the Draft Environmental Impact Statement are included in the total cost of the proposed freeway, as provided on page 3-59 of the Draft Environmental Impact Statement.

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TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 1:46 PM
CALLER: GEORGE HANNEY	CALLER ADDRESS: 7211 NORTH 7TH STREET, APT. B-40, PHOENIX, ARIZONA 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I fully support the freeway, I think this is the best idea that's come along in a long time. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 3:31 PM
CALLER: ANNETTE HANNON	CALLER ADDRESS: 1521 W. HARMONT DRIVE, PHOENIX, ARIZONA 85021
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: And yes I support the South Mountain freeway. Thank you. Good luck. Bye bye.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO BUILD!!!! LOOP 202
Date: Monday, July 01, 2013 8:44:29 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: tammyhansen@cox.net [mailto:tammyhansen@cox.net]
Sent: Saturday, June 29, 2013 11:15 AM
To: Projects
Subject: NO BUILD!!!! LOOP 202

Dear AZDOT,

We are writing in regards to the issue of 202 extension from Ahwatukee to Laveen. Let us begin by saying that we do not support this freeway. NO BUILD of the 202.

Here are many of the reasons we disapprove of the 202 extension on Ahwatukee land.

1

1. COMMUNICATION - We are a resident of Ahwatukee since 1999. We can honestly say that it wasn't until about 5 years ago when we first heard of this 202 freeway. We are disappointed in the lack of communication to home buyers, home builders. How many years did you keep quiet with NO mention of this within the news or information given to the residents to follow up on this issue? That is completely unacceptable as a resident of Maricopa and Arizona.

2

3

4

2. DRAGGING FEET – We are also disappointed in the long time extension of this project. ADOT presented this, and it was voted yes back in 1988. We are now 2013. This is a completely unacceptable time line to get a project completed. 1988 to present time has had Ahwatukee grow in people, homes, schools, and businesses. It is a completely different life here now. It is completely different demographics, people, life. This vote should be completely NULL and VOID. We suggest you vote again and see if it would pass with todays people living here. Relying on this 1988 vote today is like taking a vote of people in say NYC to approve a freeway here in PHX. It is ridiculous and absurd.

Code	Issue	Response
1	**Public Involvement**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Purpose and Need**	The Southwest Loop Highway—the South Mountain Freeway predecessor—was integral to the Regional Freeway and Highway System approved by Maricopa County voters in 1985. Although other facilities were considered a higher priority early in development of the Regional Freeway and Highway System, the South Mountain Freeway has been included in every subsequent update. The same route was approved by the State Transportation Board in 1988. In 2004, Maricopa County voters approved Proposition 400, which was designed to fund completion of the remaining segments of the Regional Freeway and Highway System, including the proposed South Mountain Freeway (Final Environmental Impact Statement page 1-21).
3	**Purpose and Need**	It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).
4	**Public Involvement**	No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period.

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5	3. AIR – We live one mile from Pecos/202. I have a daughter that have cardio-thoracic disease. She had open heart surgery when she was 9 days old. She continues to deal with heart and lung issues. If you build, we would bet that it would take years for you to start and complete this project. Your history supports this. So, for an unnumbered of years, during the destruction and then construction, the land will be turned over and disrupted.
6	We would place a bet on the increase number of lung related problems in the residents, including and not limited to asthma and valley fever. Especially with those that have underlying conditions and this could result in hospitalization, and possibly death, especially
7	for residents like our 12 year old daughter! Can you imagine the law suits and class action suits you will possibly incur from residents? We are not ones to sue, but we are only speculating from a realist point of view. The air quality I am referring to is only from the construction process, not from the traffic of living by a freeway. That is a whole other topic....
8	4. AIR – TRAFFIC. There will be an increase in pollution and various other road mishaps that will lead to terrible air quality in Ahwatukee. And with many schools within less than a mile from the highway, you are affecting children and their long term health! Your studies are actually unsupported and cannot be relayed into this project.
9	5. CRIME – We cannot begin to tell you the fear of increased crime for me, my family and friends here in Ahwatukee with a major freeway so close to our homes. We KNOW that more crime happens within freeways because of the access to it for getaways, and bringing more people to the area. It scares me. We also wonder how many illegals will be using this road to get from Mexico to other areas in Arizona and beyond. We are not speculating, you know this is a very valid concern.
10	6. SOUTH MOUNTAIN – Please save South Mountain Preserve. It should not even be considered to change the landscape of a state park and sacred land. A freeway is not worth the destruction of our landscape.
	These are just a few issues that come to mind right now. I know there are many other reasons too, stemming from our quality of life and values of homes both decreasing.
	Here is what we want ADOT to do:
4	1. Re vote! We demand a re-vote by the people in Laveen and Ahwatukee directly affected by this freeway. We think a vote today is the only valid decision. The previous vote of this build should be VOID. That is too many years to sit on it, and now think you can act on it. Things have changed. It is not apples to apples. You must cut your losses and move on with new ideas.
11	2. If the road must happen, Other Routes ONLY be on the list. Ahwatukee destruction of

Code	Issue	Response
5	**Construction**	The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would expedite the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years and the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period. Potential construction-related air quality impacts and mitigation are described in the Final Environmental Impact Statement, beginning on page 4-164.
6	**Construction**	Detecting the fungus responsible for valley fever in soils is not practical at this time. However, to reduce the amount of construction dust generated that could carry the fungus, particulate control measures related to construction activities would be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from the Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
7	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Air Quality**	
9	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
10	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Alternatives, E1 Alternative**	

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3 12	homes, a church, etc. should be eliminated from the discussion! We demand that ADOT work harder and we demand you all come to agreement with Gila River for a route through the land just south of us. We are sure there is an agreement that can be made. We think negotiations should continue. Perhaps you need to get some fresh people to the negotiation tables...with fresh perspectives, ideas, and faces. We are surprised it has come to this in this point of time. You must believe there are better ways, please take the time to FIND them and act on them. This is not for the good of the majority affected by this freeway. You must step back and move in a different direction. Re-vote and re-negotiations with Gila River! Thank you for your time. Sincerely, Scott and Tammy Hansen tammyhansen@cox.net Residents of Ahwatukee, 28th and Chandler Blvd. area., since 1999.

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Code	Issue	Response
12	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 2 3 4

(1) I live approx 1.5 miles north of proposed alignment (Pecos Rd). Freeway will degrade air quality, increase noise level, and increase traffic in an approx 1 mile wide corridor north of Pecos. Will see increase in crime.

5

(2) Recommend finalizing of EIS be delayed for 5 yrs to allow GRIC more opportunity to consider the freeway. Economics will move GRIC to develop commercial along south border of City of Phoenix, hence opportunity for freeway.

6

(3) The EIS needs to look @ an alignment south of GRIC

Optional

Name Larry Hansen Email lhansen2@msn.com

Address 2142 E. Goldeneye St

City Phx State Zip 85048

Phone 480-759-5179 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-133

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
4	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
5	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 10:19 AM
CALLER: DALE HANSTON	CALLER ADDRESS: 14 E. GALVESTON STREET, GILBERT, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the development of the South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of David Harbster
To: Projects
Subject: Requesting a delay for further study and input of the S.Mtn. Freeway proposal
Date: Wednesday, July 24, 2013 7:18:42 PM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) I am deeply concerned the proposed South Mountain Freeway will contribute to the serious problems we are having with our air quality and further exacerbate the ever-increasing nighttime temperatures we are enduring. Just recently, in our neighborhood, an all-time temperature reached 97.8 degrees F at 9:37 pm.

Further, the current Urban Heat Island Effect we have will likely increase its perimeter due to the effects of usage of the proposed freeway, and the likely making of large-surface-area parking lots. It is a given, commerce will follow the highway. No doubt, a freeway and more parking lots and buildings would increase ambient air temperatures. How could it not?

(4) Another concern we may be creating problems from the freeway we don't have the means to correct over time as matters mentioned above could, and likely will, become worse. Having seen the innumerable environmental problems that have significantly impacted the health of the public since freeways came to our region, such problems will increase geometrically with even more freeway surface and the externalities that result from it.

(5) (6) South Mountain Park is already an recreational desert ecosytem that has been negatively impacted by overuse. I laud the park rangers for their efforts and the quality of the desert park has declined. As a user of the park for many, many years--arriving in Phoenix in 1948 as a baby--I have seen much erosion of the trails and the despoiling of plants and the harming and killing of native wildlife. Now possibly adding a major freeway nearby, further disrupting the park with pollutants that afternoon winds will bring to the surrounding communities. Moreover, it is ineviable there will be even more light pollution, noise, and increase its nighttime temperatures.

(7) (8) (3) My hope is this proposal will be delayed to further study the likely problems we may not be able to correct in the future. Moreover, I am requesting more public input for alternative means to resolve what could be a major crisis from the synergy of current environmental problems with new ones we can't even imagine at this point.

(2) (4) At some point what are the limits of such freeway use and its effects? What can we look forward to in a positive way what the proposed freeway will provide. Will the air be cleaner to breathe? Will our health

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Section 4(f) and Section 6(f)**	
6	**Biology, Plants, and Wildlife**	
7	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
8	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

improve?

There just are too many questions to yet to ask and how will we deal with the resulting problems from such a project and who REALLY stands to benefit?

Sincerely,

Mr. David Harbster
6222 W Del Rio St
Chandler, AZ 85226-1707
(480) 961-1097

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain 202 Loop
Date: Monday, July 22, 2013 11:53:14 AM

FYI

From: Clint Harder [mailto:clint.harder@gmail.com]
Sent: Monday, July 22, 2013 11:48 AM
To: Projects
Subject: South Mountain 202 Loop

I am writing to articulate my concerns about the South Mountain 202 Loop project. I am sensitive to the fact that decisions of this size and nature must consider myriad constituents. However, I do not think nearly enough has been done to detail the attempts, if they exist, to minimize the effect of the freeway on the affected community.

As a community member, I am concerned with the increased air pollution, noise pollution, visual pollution, and traffic that this will represent. While there is some mention of air pollution in the draft EIS, there is little to no mention of the other items. Some of my questions:

- Are there plans in place to mitigate the noise and visual pollution? (1, 2, 3, 4)
- Where is traffic to Foothills Reserve going to be routed? (2)
- How is traffic going to be routed during construction? (5, 6)

I could actually see myself (and many of my neighbors) supporting the project if we had easy access and acceptable answers to these questions. We have not seen any of this to date. In a situation like this, the details matter, significantly. Without them, I simply cannot support the project.

Finally, I do have some concern about the effect on South Mountain Park. My understanding is that the far west area of the park will be "shaved" to make this project happen. This as well seems fairly short-sighted and not well planned out or communicated. I was surprised when moving to Phoenix how conscious people seemed to be of open space and preservation of it. These seems like a step in the wrong direction. (7)

In short, until these questions are satisfactorily answered, I will be opposing the project and will be doing whatever I can to limit its progress.

Clint Harder
15405 S. 18th Ave.
Phoenix, AZ 85045

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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
4	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
5	**Visual Resources**	Final Environmental Impact Statement page 4-161 of the mitigation section for visual impacts lists four measures that could be taken to mitigate the visual impacts of overpasses: · placing landscape treatment on the periphery of right-of-way areas at overpass locations as well as at other areas adjacent to residential development · using earth colors for overpasses, retaining and screen walls, and noise barriers · using bridges and overpass structural systems that help unify a visually complex landscape · minimizing structural sizes and/or recessing the face of structural members from the edge of the roadway to reduce real or apparent breadth of structures Additionally, Final Environmental Impact Statement page 4-162 has nearly a full page discussing how structures are aesthetically treated and how the public could be directly involved in developing aesthetic treatments.
6	**Traffic**	The extension of Chandler Boulevard west of 19th Avenue is included in this project because reasonable access must be maintained to the neighborhoods at the west end of Pecos Road (see Figure 3-33 on page 3-57 in the Final Environmental Impact Statement). Early in the study process, a travel interchange at approximately 27th Avenue was evaluated but ultimately eliminated because of increased residential displacements and cost. The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)

(Responses continue on next page)

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Code	Issue	Response
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4256

speed rail to --

THE FACILITATOR: Thank you, Ms. Barker, I'm sorry, your three minutes have run.

MS. BARKER: -- killing the citizens, just to satisfy old ADOT.

THE FACILITATOR: I'd like to welcome our next speaker, Travis Hardin.

Welcome, Mr. Hardin, you have three minutes.

MR. HARDIN: Thank you. To the committee that sits here today, I'm definitely in favor of this Loop 202 transition. I believe this is going to do two major things: One thing that's focused on is the congestion coming from the Southwest Valley, as well as the West Valley. I think you free up a lot of travel time, travel space for those community members that are in the Laveen area, Tolleson, Avondale. I think you're going to clear up with this project, with the proposed being a yes, I think you're going to clear up more room for retail. I think this brings a lot of retail opportunity for the Southwest Valley, and then you also -- you open up areas for the East Valley to meet with the West Valley. I'm not a native of Arizona, but you often hear about people in the West Valley saying they don't know much

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

about the East Valley, and people in the East Valley saying they don't know much about the West Valley. And I think what you're doing is bringing one community together from east to west and allowing those people to come together as one, which is what Arizona is all about. In order to be one Arizona, we have to connect east to west and stop living as if we're East Coast to West Coast in our own community here in Arizona.

I'm in favor of this project. It will lessen the congestion in the West Valley, and also will speed up some of the downtown traffic into downtown Phoenix and away from downtown Phoenix, during the rush hours, in the a.m. and the p.m. hours. Thank you.

THE FACILITATOR: Thank you, Mr. Hardin.

Good afternoon, everyone, we have seated a new panel for the 4:00 p.m. to 6:00 p.m. slot, Matthew Burdick from ADOT, Al Hansen from the Federal Highway Administration, and Steve Beasley from ADOT.

Those of you in the room, if you are planning to speak, please make sure that you register at the registration desk just right outside the door. Your name will appear on the screen and we will call you at that point. Also be advised to treat all the

Code	Issue	Response

Code	Comment Document

From: Sierra Club on behalf of Audra Harding
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Tuesday, May 28, 2013 2:45:03 AM

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center. How is it that we have roads and bridges in poor repair and yet you can come up with the money to build this monstrosity?

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Ms. Audra Harding
6825 W Drexel Rd
Tucson, AZ 85757-9561

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Sierra Club on behalf of Henry Harding
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Tuesday, June 18, 2013 9:34:45 PM

Jun 18, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 Objection to the South Mountain Cut
I am against the proposed building of the extension that would cut through or near to some of the most beautiful and natural habitat of The Valley of the Sun. People still use that area as a backdrop for Commercial Photography because of its uniqueness. A highway through it would be like a wart on the nose of a beautiful model.
I attended the meeting in downtown Phoenix at the Convention Center. While there one of the transportation staff members who said that within 10 years the dollars spent on Highways (70%) and Public Transportation (30%) would reverse from their current expenditure. This means that in a relatively few years there will be a major shift away from highways. In the interim period the expectation is to spend billions of dollars for highway miles that will be obsolescent when completed. It would be a far better investment to put those dollars into that which will be worth more in the future. I would do that and so would anyone who hopes to profit from their effort.
An investor would be far better off investing in something that promises to have a higher yield at the end. That is what I expect when my money is invested and this project is proposing to spend gobs of my money on something that you and I both understand to be an unsound investment. You know the tide is turning and yet the ship keeps going on. Wouldn't it make more financial sense to invest in the future instead of the past?

3 An investment in Public Transportation would yield more than the same investment in highways. To take an example, look at our light rail system in Phoenix. The ridership is twice that of what had been projected and it has since the beginning. Why is that? It is because the people of the city innately understand it to be a better method of transportation than the local government thought it was. People vote with their dollars and actions. Sure there were the chiding resisters of change, but they are silent now about light rail. The actions or votes of the Native Americans on the reservation spoke loudly that they do not want this thing on their land. Why would they want it even near their land if they already voted not to have it on their land? They wouldn't. The ship of bureaucracy turns very slowly and often runs aground.
There are 11 cities in the United States that have subway systems, one has three systems and another has two. Cities much smaller than Phoenix have Subways. Most are on the East Coast. Two are in the Mid West and two on the West Coast. They all started with light rail systems, but, because of infill they could no longer afford to take

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Purpose and Need, Lack of Support**	

Code	Comment Document

land from people so they had to go underground or above ground. Seven, or half of all the American Subways, were finished after 1955, which is to say they are recent additions. Three were built before 1900 and not much before either. A subway system in Phoenix could use old railroad land as well as anywhere underground. In the Boston System (MBTA) you can take the subway from Providence, Rhode Island to Portsmouth, New Hampshire. Outside of the city it is surface running. Imagine that you could take a subway train from Sun City to Tucson. It would be much safer than driving the same way on I-10. Speeds could be very high, 150MPH or more. It could be like the Bullet Train in Japan (200+MPH). It would be way cheaper to build than continually widening the highways with the potential of massive highway deaths at the speeds people drive, to Tucson especially.

4
5

The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including Public Transportation. The only way to effectively reduce highway congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them which another highway would do. How does Japan have half the population of the Unite States in the space of Illinois and still get them to work and home without highways? They do it by rail.

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7

South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

8
9

The freeway would also negatively affect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

10

The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers at a time when we should be conserving fuel and making smarter and more efficient choices. Its construction would continue ADOT's trend of unwittingly forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from their jobs. When I came to Phoenix 15 years ago I had a job. So the logical thing to do was to live close to where the work was to minimize cost. For those 15 years I have been able to walk or ride a bicycle to work. The amount of saving for us has been so much annually that we could afford trips to Europe and other places every year and stay for three weeks. My job is not senior executive or even junior executive, but the value in savings and exercise allows me to be healthier, thinner, wealthier and more traveled than my contemporaries. At a time when the dollar's value is falling, gas prices are soaring and incomes are tightening our purpose should be to make wise choices for those who depend on us as civil servants to make their transition to the future easier as well as fiscally and physically more healthful.

Code	Issue	Response
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	
7	**Health Effects**	
8	**Section 4(f) and Section 6(f)**	
9	**Biology, Plants, and Wildlife**	
10	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document
1	Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you. Sincerely, Mr. Henry Harding 304 W Coolidge St Phoenix, AZ 85013-2713 (602) 279-6250

Code	Issue	Response

Code	Comment Document

4332

a resident of Laveen. I'm very much in favor of the freeway. We moved out there nine years ago and waiting for the freeway to be built, and we moved out there hoping to raise our family out there with a lot of other amenities and the freeway has been holding this up. So we know that with the building of the freeway, there will be many amenities for us and the family and the whole community to use.

We live about a half mile from there, from the freeway, and it would be great access for us. And what else was I going to say? Oh, we're in favor of the 59 west alignment, but we also would be in favor of a -- potentially a parkway tying in the 101. What else? Anything else? I think that's it.

MR. HARDING: I'm Henry Harding and I live at 304 West Coolidge Street here in Phoenix, 85013. I'm not really in favor of this section of the 202. It's just -- if we promulgate more and more highways -- now, I talked to Ben over there. He said that we would save 40 million gallons or -- yeah, I think 40 million gallons of oil every year or gasoline every year.

What if we didn't do that and people start -- took the amount of money that would take to build this section of road and educated the people

Code	Issue	Response

(Comment codes begin on later page)

Code	Comment Document

that if they didn't drive, if they do what I do, live, walk to work, ride their bicycle to work, they would save so much more time and money. The example I always use is I can either commute to work or I can take a trip to Europe every year. And it would be -- well, if I -- if I took an airplane there, I probably would be using about the same amount of gas either way. But I'll tell you what, going to Europe is a lot more fun.

And it's not nearly as healthy to drive. I rode my bicycle here today, as you see. And so to get around, you go shopping, that's what I do. I use my bicycle for most of it. I go grocery shopping. I pick up a good-size grocery sack and I can put one in my backpack and I can carry that.

Also, that highway goes through a very lovely valley. For many years that -- the San Juan Valley in South Mountain Park, that area, the west end of it was used as an area for photographers to do whatever kind of photography, automobile, motorcycles, models, any kind of photography. It's a lovely place to photograph. And I've hiked in that region a lot. I hate to see another highway, another stinking highway in a place that really is lovely.

Watching the sunrise come up during

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

winter go right up the Gila Valley or down the Gila Valley in my case. It's absolutely gorgeous. I don't like listening to the cars that are there now. Having eight lanes of cars, that's just heinous.

Yeah, I -- I'm a member of the Sierra Club also, but then again, I'm also a member of the National Rifle Association. I am a conservative, but I -- because of my personal history, I've been educated in such a way to look at things a much more global feel. And so when I look at the expansion of ridership on highways, I realize that what we're doing is we're taking it away from someplace else that we could be doing that could probably be a lot more effective. Rapid transit, trains. I look at other cities.

I'm originally from one of the large eastern cities and there they have rapid transit that is just spectacular. I'm originally from Boston. And I know a friend of mine, she takes the train to go to work in Boston and it's very easy. She gets on the train. She can work on the train while she's commuting there and get a little bit of work done while she's going to and from. And then when she gets there, she's at work so she doesn't devote a great deal of her personal time to getting from one

1

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

place to another. If you're driving a car, you better be watching the road.

And so, Lord knows we have an awful lot of diversions while we're driving now, cell phones and texting and digital billboards to interfere with it. Are we going to have to live with that too out there? I don't want to see that out there. I'm not really against the highways that exist, but I think that putting the money that we would put into that into educating the people, that they could do a better thing with their lives than sitting behind the wheel of a car. Just a silly thing. I just -- I don't see that. I couldn't see that for myself, and fortunately I don't have to because when I first came here, I knew where I was going to work and I said I'm going to be living right there too. I told the Realtor that I'm going to be within four miles of my work, and that's the way it's been ever since I've been here for 15 years.

When I was in California, I was stationed at Travis Air Force Base and I used to commute by bicycle there eight and a half miles. It was a lovely ride because it was out across the fields and you see the cows and you see the hills and all that going to work. It was wonderful.

Code	Issue	Response

Code	Comment Document

If we did that sort of thing, we would be able to cut down the amount of cardiovascular disease that we have, we would reduce Alzheimer's. All these terrible diseases. We would do away with all of that. We could eliminate a lot of these diseases, or decrease them certainly. Guess I can't think of anything else.

MS. KEENAN: Erika Keenan, E-r-i-k-a K-e-e-n-a-n, Laveen, Arizona. I took time off from work today to come down to speak, and I said my three minutes, and I was cut off at my three-minute mark. I understand why rules are in place, but the panel had been sitting there for at least 20 minutes with no one to speak, and I was the only one next in line to speak, so I'm not sure why they couldn't have given me the courtesy of letting me finish what I had to say, especially since we're taking our personal time to come down and say this and there was nobody else around. Thank you.

UNIDENTIFIED SPEAKER: We live on Pecos Road on the street right there, and it's right next to, you know, where the highway would be or -- and on the other side of that would be the Indian reservation where they're struggling to come to a decision. And I've lived there for about nine years,

Code	Issue	Response

Code	Comment Document

From: Sierra Club on behalf of Henry Harding
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 6:39:37 PM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) In talking with one of the transportation personnel at the meeting downtown he said that in the next ten years the expenses of transportation are greatly going to change from 70% to roads and 30% for mass transit to 30% for roads and 70% for Mass Transit. If this is the case we would be throwing my money into something that is going to be obsolete before it is finished. It would be far wiser to put that money now into mass transit.
I come from one of those big back eastern cities Boston. Look at the problems they are still having with gridlock after spending billions of taxpayers dollars to undo what the great minds of the 60's thought was going to be a the wave of the future having a big highway run through the middle of the most congested part of the city. All the while the rapid transit was getting the job done of moving hundreds of thousands to millions of people every day to and from work and home. Their mass transit is just one example of how necessary mass transit is to any city with a mind to grow and become a major player in the world market of cities. Phoenix is bigger than Boston. Every major city in the world has a mass transit system. Look at Europe as another example, Japan, Russia. In Japan you cannot drive effectively anywhere. They have cars, but if you want to go somewhere you take the train or you fly. Often you have to take a ferry because of the landscape.
(3) The proposed freeway solves little and damages a lot. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(5) (6) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be

(7) (8)

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	
7	**Section 4(f) and Section 6(f)**	
8	**Biology, Plants, and Wildlife**	

Code	Comment Document

destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

9 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Henry Harding
304 W Coolidge St
Phoenix, AZ 85013-2713
(602) 279-6250

Code	Issue	Response
9	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South mountain freeway
Date: Tuesday, July 16, 2013 10:08:00 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Pam Hare [mailto:pami27@aol.com]
Sent: Monday, July 15, 2013 7:47 PM
To: Projects
Subject: South mountain freeway

1

I live on Dusty lane is this still in the proposed path? will Dusty lane still be effected no matter what? When will you be considering buying out? We are in favor of the proposed freeway.
Thank you
Pamela Hare

Sent from my iPhone

_____

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Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 3:50 PM
CALLER: JEAN HARLAN	CALLER ADDRESS: 2547 EAST ANTON LANE, PHOENIX, ARIZONA
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:31 PM
CALLER: DOUG HAROLD	CALLER ADDRESS: 565 W. PARK AVENUE, GILBERT, AZ 85234
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I am calling to support the freeway. Thank you very much.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 extension
Date: Friday, June 28, 2013 9:07:00 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Harris, Jim (MCOE) [mailto:Jim.Harris@Honeywell.com]
Sent: Friday, June 28, 2013 7:39 AM
To: Projects
Subject: Loop 202 extension

1

I am a bike rider and live in Ahwatukee because of the isolation from the extreme traffic of Phoenix. We do not need this freeway. I commute (car) everyday to downtown Phoenix and I don't see a problem. Freway traffic is fine except for the number of trucks that have been causing many accidents of late. The extension will become a eye sore for our community as it will become a truck bypass contributing to more traffic and noise. I don't think that was the original intent of the Freeway. It needs to be built somewhere else if it is to be a truck bypass. Maybe through south side of Estrellas or something similar.

2
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5

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	
5	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

Code	Comment Document
1	Angela Harris Document Created: 7/5/2013 5:41:53 PM by Web Comment Form Clearly this proposed South Mountain Loop severely impacts a sovereign group of people who depend on this Muhadag Do'ag or Southern Mountain Range for their very survival. Without this sacred place intact, they lose their cultural identity and very existence. This proposed plan would therefore be a pre-empted attempt at ethnic cleansing. White people in America have already done so much to cripple and kill Native people who inhabited this land before we occupied it. How can you argue that this proposed project would not impact cultural resources in a total and unacceptable way? These are people's LIVELIHOODS on the line. They have had to endure enough already. The impacts are unacceptable because they would cause cultural obliteration.

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1 2	Roger Hart Document Created: 5/22/2013 10:55:37 AM by Web Comment Form Our comment is for a NO BUILD of the 202 South Mountain freeway due to environmental and crime reasons. Roger

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway Study
Date: Monday, July 15, 2013 2:03:42 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Jeanne Hart [mailto:mondayitisnomore@cox.net]
Sent: Monday, July 15, 2013 2:02 PM
To: Projects
Subject: Loop 202 South Mountain Freeway Study

LOOP 202 SOUTH MOUNTAIN FREEWAY STUDY

Reasons for a "***NO BUILD OPTION"*** of the Loop 202 South Mountain Freeway are as follows:

1
2

- The highway will become the CANAMEX Highway from Mexico to Canada which will allow the transport of hazmat materials through our community. Chemicals such as sulfuric acid, gasoline, and especially chlorine gas would be disastrous. Evacuation would be extremely difficult and would have a health and death impact. In order to mitigate this catastrophe shelters would have to be built in the community. An accident on the highway is all that is needed for the release of these toxic chemicals. Let alone that the tax payers would be responsible for the cleanup.

3 4

- The highway is all about moving trucks through the valley from Mexico. They use high sulfur diesel fuel which is not allowed to be sold in this country.

5 6

- The highway will create dangerous air pollution due to transportation exhaust which is known to cause cancer. The Ahwatukee Foothills is at present one of the least polluted communities in the valley.

7

- ADOT spent $43,000,000 buying property along only one route (59th Ave.) since 1988, and not any other route. This shows bias toward their opinion of the proposed route. The study and legal process should have been concluded before the purchase of property. They violated this legal obligation.

8

- Use of 2005 data in the study is not valid any longer. They did not use the most current, updated and scientific data that is required by law. What about

Code	Issue	Response
1	**Purpose and Need**	The proposed freeway would not be part of the CANAMEX Corridor. The locally-preferred CANAMEX Corridor is to follow Interstate 10 from Tucson to Interstate 8 near Casa Grande, Interstate 10 west to State Route 85 near Gila Bend, State Route 85 north to Interstate 10 northwest of Buckeye, Interstate 10 west to Wickenburg Road, Wickenburg Road to Vulture Mine Road west of Wickenburg, and then connect with the planned US 93/US 60 Wickenburg Bypass. Additionally, the proposed freeway would not offer shorter travel times. The CANAMEX Corridor's proposed routing avoids any congestion associated with the Phoenix metropolitan area (see Final Environmental Impact Statement page 3-64). Recent studies completed by the Maricopa Association of Governments, including the Interstate 10/Hassayampa Valley Roadway Framework Study and the Interstates 8 and 10/Hidden Valley Transportation Framework Study, have further defined the long-range planning for the CANAMEX Corridor in Arizona.
2	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need, Truck Bypass**	
4	**Trucks**	
5	**Air Quality**	
6	**Health Effects**	
7	**Alternatives**	Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
8	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

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10
11 12 6
13 11
14

omission of fact.

- "Due Process" was not afforded to the community by way of asking questions and getting answers. The technical substantiated information of the Environmental Impact Study was not provided at the libraries as promised.
- Property devaluation is expected to be about 30%. This is an upscale community and the devaluation in property would significantly affect the state real estate revenues. The character of the neighborhood would change.
- It would disrupt schools, churches, personal property and the lifestyle of the Foothills residents. Some schools and churches that the community attend are now in jeopardy of being destroyed. The children who attend the remaining schools, churches and the YMCA would suffer an environmental impact because of the close proximity to the highway.
- The constant noise of the traffic would go against the reason citizens purchased property in the Foothills in the first place.
- Crime is a real concern for those living here in this peaceful, quiet community and the appeal would be destroyed. More police presence would be required putting a burden on the state

Jeanne Hart

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Code	Issue	Response
9	**Public Involvement**	During the day-long public hearing and public forums, participants had the opportunity to watch a video describing the study, review study information, talk to project team members, and provide comments. Project team members were stationed throughout the meeting rooms to answer questions and offer assistance. The Draft Environmental Impact Statement was available at libraries throughout the Study Area. The technical reports were available upon request from the Arizona Department of Transportation.
10	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
11	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
12	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
13	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
14	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: loop 202 South Mountain Freeway Study
Date: Monday, July 15, 2013 2:11:01 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Roger Hart [mailto:dunnybudgie@cox.net]
Sent: Monday, July 15, 2013 2:10 PM
To: Projects
Subject: loop 202 South Mountain Freeway Study

LOOP 202 SOUTH MOUNTAIN FREEWAY STUDY

Reasons for a "***NO BUILD OPTION"*** of the Loop 202 South Mountain Freeway are as follows:

1
2

- The highway will become the CANAMEX Highway from Mexico to Canada which will allow the transport of hazmat materials through our community. Chemicals such as sulfuric acid, gasoline, and especially chlorine gas would be disastrous. Evacuation would be extremely difficult and would have a health and death impact. In order to mitigate this catastrophe shelters would have to be built in the community. An accident on the highway is all that is needed for the release of these toxic chemicals. Let alone that the tax payers would be responsible for the cleanup.

3 4

- The highway is all about moving trucks through the valley from Mexico. They use high sulfur diesel fuel which is not allowed to be sold in this country.

5 6

- The highway will create dangerous air pollution due to transportation exhaust which is known to cause cancer. The Ahwatukee Foothills is at present one of the least polluted communities in the valley.

7

- ADOT spent $43,000,000 buying property along only one route (59th Ave.) since 1988, and not any other route. This shows bias toward their opinion of the proposed route. The study and legal process should have been concluded before the purchase of property. They violated this legal obligation.

8

- Use of 2005 data in the study is not valid any longer. They did not use the most current, updated and scientific data that is required by law. What about omission of fact.

9

- "Due Process" was not afforded to the community by way of asking questions

Code	Issue	Response
1	**Purpose and Need**	The proposed freeway would not be part of the CANAMEX Corridor. The locally-preferred CANAMEX Corridor is to follow Interstate 10 from Tucson to Interstate 8 near Casa Grande, Interstate 10 west to State Route 85 near Gila Bend, State Route 85 north to Interstate 10 northwest of Buckeye, Interstate 10 west to Wickenburg Road, Wickenburg Road to Vulture Mine Road west of Wickenburg, and then connect with the planned US 93/US 60 Wickenburg Bypass. Additionally, the proposed freeway would not offer shorter travel times. The CANAMEX Corridor's proposed routing avoids any congestion associated with the Phoenix metropolitan area (see Final Environmental Impact Statement page 3-64). Recent studies completed by the Maricopa Association of Governments, including the Interstate 10/Hassayampa Valley Roadway Framework Study and the Interstates 8 and 10/Hidden Valley Transportation Framework Study, have further defined the long-range planning for the CANAMEX Corridor in Arizona.
2	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need**	
4	**Trucks**	
5	**Air Quality**	
6	**Health Effects**	
7	**Alternatives**	Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
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Code	Comment Document

and getting answers. The technical substantiated information of the Environmental Impact Study was not provided at the libraries as promised.

- Property devaluation is expected to be about 30%. This is an upscale community and the devaluation in property would significantly affect the state real estate revenues. The character of the neighborhood would change.
- It would disrupt schools, churches, personal property and the lifestyle of the Foothills residents. Some schools and churches that the community attend are now in jeopardy of being destroyed. The children who attend the remaining schools, churches and the YMCA would suffer an environmental impact because of the close proximity to the highway.
- The constant noise of the traffic would go against the reason citizens purchased property in the Foothills in the first place.
- Crime is a real concern for those living here in this peaceful, quiet community and the appeal would be destroyed. More police presence would be required putting a burden on the state

Roger Hart

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Code	Issue	Response
10	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
11	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
12	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
13	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
14	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document
1	Chad Hartley Document Created: 5/21/2013 1:58:11 PM by Web Comment Form I travel from 32nd and the 10 to the east valley. The I10 at the broadway curve is a dangerous rout due to the high volume of traffic that the Interstate sees every morning and afternoon. There have been several 18 wheeler accident at the Broadway bend that have shut down the interstate. Please build the new 202 loop to ease the congestion and give Arizonans jobs.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

(Comments made by public members to the court reporter as follows:)

MR. HARTLEY: My name is Chad Hartley, Gilbert, Arizona. I travel the Santan on 202 daily towards 32nd Street and I-10.

I believe the Broadway Curve to be dangerous due to high congestion that it sees in the morning and the afternoon.

To alleviate that with the new 202 would be -- I support the construction to alleviate the congestion and the -- I believe it would help alleviate the -- I don't know how to say -- the dangerous Broadway Curve.

Thank you so much for your time.

LAWRENCE ALLEN: Lawrence Allen. Basically this South Mountain Freeway has been in place since early 1980s. You know, this map dates back to, what, 1986. So we might as well go back to 1980. So these are plans. So they had to, you know, think about this for a few years to actually put it on paper.

So this ain't something that cropped up yesterday, as the Ahwatukee residents are probably thinking. Now, it's unfortunate that the developers who built Ahwatukee where those residents live that

Code	Issue	Response
1		Comment noted.

Code	Comment Document

McDowell, which in an emergency would be really far.

Let's see, we have heard that other people would move in like a movie theater and shops and restaurant owners, as well as the hospital if the 202 went in. The only way for our rooftops -- right now we're at 40 rooftops, we need 50 for those people to start coming in. If the 202 was built, Ahwatukee would then be counted as a rooftop because they're so close, they're within our mile range. That would make a huge difference to our area economically.

I'd also love to see if the 202 gets built, the sound barriers to be built nicely and maybe represent Laveen in some way. I'm an artist and I would love to even donate my time to create artwork that would go onto the sound barriers and to have possibly hiking trails or some kind of bike trails that follow the 202, because we have that South Mountain so beautiful right there and just to keep more trails and parks. Thank you for your time.

THE FACILITATOR: Thank you.

Chad Hartley.

MR. HARTLEY: First I want to say thank you for the opportunity to be able to voice opinions, we appreciate that.

Second, I'm a daily commuter of the Broadway

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

curve. At times it's -- well, every morning and every afternoon it's nearly a parking lot. I would very much appreciate -- well, I believe it's also a bit of a hazard, there's been several accidents on the 10 recently that have shut down the 10. Having other means to commute around that would definitely be beneficial.

And also, the economic impacts that come along with a new freeway, property values go up and the person before me just mentioned the social and economic impact for Laveen would be enormous, so I support the construction of the 202. Thank you again for your time.

THE FACILITATOR: Thank you.

Tiffany Sprague.

MS. SPRAGUE: It's so quiet in here, it's a little intimidating to walk up to.

Good afternoon, my name is Tiffany Sprague and I'm a resident of Phoenix, and I'm very strongly opposed to the South Mountain freeway. I urge ADOT to select the no-action to this project. ADOT must begin looking towards real solutions for our transportation needs and this freeway is not it. This is more than evident by our increasingly congested roads and freeways. Widening routes and building new ones only provide short-term relief. More vehicles will soon fill these uncongested areas.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Nissa Hartman

Document Created: 7/24/2013 1:48:13 AM by Web Comment Form

1 2 3 4 5 6 7 8

I am against the extension of the 202 Freeway through South Mountain. As an Ahwatukee citizen, I love the view, and love hiking the mountain trails. This will end once a freeway is cut into it. I have friends who will be displaced and surely will not be able to find homes in the area once their land is taken. Also, all of the Kyrene schools on Liberty Lane will be right next to the freeway ramps. This cannot be safe for children or conducive to students' educations.

I also feel that instead of lessening traffic, it will promote more. Long distance trucks will have a new favorite route from Mexico/El Paso/wherever.. The cons far outweigh the pros in this case. Please don't let this project continue!

Code	Issue	Response
1	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Acquisitions and Relocations**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
8	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Michael Hartman
To: Projects
Subject: South mountain freeway 202
Date: Tuesday, July 23, 2013 9:50:49 PM

1 I'm concerned the DEIS of the South Mountain Freeway does not take into account the increased amount of truck traffic coming from Mexico and travelling through south mountain area. The current truck bypass of Phoenix (I-8 to state 85 to I-10) was built to carry this traffic and pollution away from Phoenix. If the 202 extension is built, it will be 50 miles shorter for trucks to use the new freeway, thus increasing truck traffic. The DEIS does not address this increased pollution caused by these trucks fueled with diesel that has no regulation requirements in Mexico. Also, hazardous material truck traffic using the nearly barren state 85 is preferable to it flowing along a densely populate area like Ahwatukee.

2 3

4 5 I'm also concerned about the path that it takes cutting through South Mountain, which has sacred status among the Native Americans living in the area. We really should avoid taking more of their sacred ground for our a bleak freeway.

6 I would ask why do we mostly build roads to solve our transportation issues? Wouldn't that money be better spent developing some sort of mass transit system along the freeways currently built? We already have air pollution issues, I would think we need to address that more than making it worse with more roads.

7 I oppose building the freeway because of the above items. I would hope the AZDOT reconsiders the plan and decides to not build the freeway.

Michael Hartman
729 E Mountain Sky Ave
Phoenix, AZ, 85048

Code	Issue	Response
1	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Hazardous Materials**	
4	**Cultural Resources**	
5	**Section 4(f) and Section 6(f)**	
6	**Alternatives, Nonfreeway Alternatives**	
7	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South mountain freeway comment
Date: Monday, July 15, 2013 10:17:07 AM
Attachments: image002.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

ADOT Communications

From: Hauptli, Dave C. [mailto:DCHauptli@nmm-jx-group.com]
Sent: Monday, July 15, 2013 10:14 AM
To: Projects
Subject: South mountain freeway comment

1

It's not needed. No funding.

Dave Hauptli
Director, Human Resources
JX Nippon Mining & Metals USA, Inc.
480.812.2662

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support for the construction of 202
Date: Monday, May 20, 2013 8:24:38 AM

From: Khawbaker@aol.com [mailto:Khawbaker@aol.com]
Sent: Sunday, May 19, 2013 10:38 AM
To: Projects
Subject: Support for the construction of 202

1

Build the link to finish the 202 beltway around Phoenix. It will relieve congestion through downtown Phoenix.

Sincerely,

Kay Hawbaker

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I support building the 202
Date: Wednesday, May 15, 2013 8:38:01 AM

From: PJ Hawthorne [mailto:phawthorne@lovitt-touche.com]
Sent: Tuesday, May 14, 2013 4:05 PM
To: Projects; 'info@buildthe202.com'
Subject: I support building the 202

1

I fully support building the 202. I have lived in Arizona for 16 years and the traffic has gotten progressively worse. I also support the jobs that would occur during the building of the 202 which would help our economy.

Thank you,

My office hours are 7:30 am to 4:00 pm. If you need to reach me for an urgent matter after 4:00 pm, please call me on my cell at the number listed below.

CELEBRATING A CENTURY OF QUALITY INSURANCE SERVICES

PJ Hawthorne
Account Manager/SBD Construction
1050 W Washington St., Suite 233
Tempe, AZ 85281
602.385.0507 : p
602.377.0172 : c
602.956.2258 : f
520-722-7245: F
phawthorne@lovitt-touche.com
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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/19/13	INCOMING CALL TIME: 5:47 PM
CALLER: TED HAYES	CALLER ADDRESS: 2507 EAST PEPPER RIDGE, PHOENIX, AZ 85032
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I'm in support of the South Mountain Freeway. Thank you.	

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

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I even made a comment, over there with the reservation people, is that the reservation needs to continue their -- their -- their four-lane road that goes past their casino there, the Vee Quiva or whatever it is, and take it down to Pecos Road, for now, because this is going to take years and years to build, and make it a toll road. That way, you know, a person can pay $2 to shortcut, to get from 51st Avenue to Pecos and get into Tempe for $2, versus having to go all the way through their town, which is 35 miles an hour, go all the way down to the -- go all the way down to the road that goes to Maricopa, and then come back into town that way, which would save a lot of gas and time.

The reservation would make a lot of money and -- and drive right past their casino, for a refreshment break. I don't know.

It's -- it's -- I think there's a lot of money that needs to be spent on this, and it needs to be spent wisely, not -- not just -- The cheapest route is not the best route, you know?

And in fifty years from now, it -- it'll remain the same. Gas will be a lot more expensive, and we'll have the same problems. And people are not going to want to spend money and gas, sitting in a car waiting for traffic, because we did it wrong now. So that's all.

MR. HAYES: Robert Hayes. I have my little notes,

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

but it's not very professional. So do you want me to just speak?

COURT REPORTER: Yeah, that would be fine.

MR. HAYES: Okay. So my concern is that the 202 highway construction plan will become a Camex truck lane freeway, with truck -- truck traffic from Mexico to Canada. And, even though they're supposed to be on Highway 8, they will certainly use this truck route. And the toxins from that truck traffic, on top of the good of a commuter highway, is going to create a more toxic environment than is addressed in the Environmental Impact Study. No counts of Mexico truck traffic is being considered here, but this will be the truck route.

This will negatively impact our families and our community, not only demolishing roads and highways that currently exist -- like Pecos, which is a commuter route for most of us -- it will destroy our homes and tear down homes and build walls and that kind of thing.

Increased noise; increased lights, 24/7; and, most importantly, increased toxins, specifically benzine. So benzine is already above the EPA level on the Indian community and in the foothills. But it's not studied because there's no EPA sensor there. So, when you look at this study, it doesn't address the levels of toxicity currently in Ahwatukee Foothills and in the Indian community because it's not required to be part of the study.

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Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Noise**	
6	**Visual Resources**	Light from the freeway would be produced from vehicle headlights and taillights and from fixed light poles at interchanges along the freeway. Nighttime users of the park and residents of Ahwatukee Foothills Village may see lines of seemingly crawling vehicles, each with lights front and back. Fixed freeway lighting would be provided for safety reasons only at interchange exit and entrance points. Freeway lighting at these locations would be designed to reduce illumination spillover onto sensitive light receptors such as residential areas (see page 3-58 of the Final Environmental Impact Statement).
7	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

7 8 9 10 7 10 2

Dust particulate levels have gotten worse in the last year and a half. And certainly building a highway and having truck traffic and the construction phase will cause the dust particulates to be even worse and, kind of, get trapped by the mountains. That's a concern.

And all of this level of toxins and dust will flow into the backyard of these residents who live in Ahwatukee. We've got an elderly retiree population. We have children. And people are not really thinking through being within a half a mile or even 50 feet of a highway, how bad that's going to affect people's health.

And environmental studies that don't study a projection of these particulates -- benzine, dust, and asthma effects on children -- is flawed, period.

And then the counterargument is: Well, highways are built all across America. Don't worry. Be happy.

Talk to the medical professionals in Phoenix. Children have more and more asthma. And they're learning ability, the disability in learning, is being affected by the particulates that they're breathing in. So we're in a very toxic, toxic environment. And a highway is going to make this considerably worse.

Unregulated trucks from Mexico, that have no emission standards, is a huge concern for me. If we can ban the truck traffic from Mexico, so be it.

Code	Issue	Response
8	**Construction**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit would describe measures to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
9	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
10	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

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Everybody knows this is a truck transport. They've built depots in Laveen. There's going to be truck stops built. I'm listening to people today talk about commercial development to build truck stops south of the freeway on leased land. We have politicians who own 75 acres of leased land rights, that will develop the property the minute this is approved. That's a conflict of interest, okay? And not really knowing the final design phase yet -- and I know that's premature -- does impact the environment.

A couple of other concerns: Building new retaining walls or obstruction walls is going to affect the view of our desert community. Blasting and the destruction of three ridges of South Mountain and taking out two to four million cubic feet of rock, dirt, and dust is unheard of in Phoenix. No highway has ever done that. So the plea is to get away from blasting through the ridges of the mountains.

And, again, I just want to stress: This will become the new truck route for Camex America. This is an American truck route that does transportation of chemicals, tanker trucks full of chemicals going back and forth. Most cities in America have pushed that truck traffic out 20 to 30 miles away from the city, not two miles, three miles north of downtown, one or two miles from where residents live.

So, if there is a spill, there will be no recovering from the disaster, especially benzine. If a

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Code	Issue	Response
11	**Visual Resources**	For most of the alignments of each of the action alternatives, the proposed freeway would be elevated above the natural grade of the surrounding land. This elevated profile would allow noise to carry farther, creating noise impacts at greater distances from the freeway. Depressing the profile of the freeway below grade might reduce traffic noise levels adjacent to depressed sections. However, it would be necessary to also construct at-grade noise barriers to achieve noise reduction goals at receiver locations adjacent to depressed freeway sections (see page 4-91 in the Final Environmental Impact Statement). This strategy would reduce visual impacts associated with high noise barriers on elevated freeways, but would entail ground-level noise barriers and their associated interference with views. Thus, with either approach to noise reduction, views of nearby mountains could be disrupted. The specific impacts would depend on sightlines that would be determined by the height of any noise barriers constructed, the intervening topography, and the distance of the barriers from the residences in question.
12	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
13	**Hazardous Materials**	

Code	Comment Document

benzine-truck-spill accident happens, this is going to drift into this major residential area, and there will be a crisis. There will be no question about it.

The other concern I have is increased-volume traffic. Okay? It's rumored to be more traffic than the 101. The Environmental Impact Study needs to take counts from last month's current foot traffic, car traffic, and project more accurately the true traffic volume for residential cars and trucks. And I think they've done a fair job at estimating that, but they're not realistic in their projections.

Also, ADOT and MAG, the history of them project -- projecting and estimating is very poor. They're not accurate on their estimates. Go back 20 years; they've misestimated pretty much everything that they've tried to attempt to -- to estimate.

I do applaud them for trying to do that, but let's not disguise this for what it really is. This is not a commuter route to get to downtown.

So the other thing, just for the environmental side, is destroying park lands. That should be a common good, a thing that we should not sacrifice. There are petroglyphs in these areas of South Mountain. I don't know how and why people can't see that, when all the local residents know where they are.

Destruction of wildlife. Destruction of endangered

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Code	Issue	Response
14	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
15	**Purpose and Need**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic—including truck traffic—to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County.
16	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
17	**Biology, Plants, and Wildlife**	

Code	Comment Document

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cactus, which we're supposedly not supposed to touch. The subdivision wells will be impacted, and drainage. Subdivision wells, retention wells, and wells for community water park -- water lakes and features, and impact to draining.

The other issue we have is local traffic. In my subdivision, it will be impacted because we have no exit, no on ramp. So, right now, we drive down Pecos to get out of our subcommunity because we're -- we're landlocked.

The biggest concern is health issues for kids and elderly due to the increased toxins: dust particulates that this project will cause during the construction phase, as well as afterwards.

And someone needs to really look at growth, 2015 to 2020, for the traffic impact and the environmental impact of this highway. It's nice that they used old statistics. But, if you project the City of Phoenix growing, even at a rate of 5 percent per year in population, which is conservative, this highway will have that growth on top of its current projections. And this is all, kind of, understated in the Draft Environmental Impact Study.

So, again, we're strongly opposed to it because, if we lose the federal matching funds -- because our air quality is in violation last year; and currently, in 2013, we're in violation of air quality standards -- the EPA says it will pull the $1 billion federal matching highway funds.

Code	Issue	Response
18	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.) Drainage studies have been conducted; culverts would be maintained, and new culverts would be installed to maintain flows under the freeway (see Final Environmental Impact Statement pages 3-58 and 4-101). Surface water could be altered from runoff drainage; seeding the disturbed soils with native vegetative species would help to minimize runoff and erosion. Best management practices associated with the project Stormwater Pollution Prevention Plan would also help minimize runoff.
19	**Surface Water**	Flood protection levels are dictated by the design class of the highway. In the case of the proposed South Mountain Freeway, it is designated as a Class I. Therefore, flood protection levels would be designed to the 50-year (storm) level. However, as a standard Arizona Department of Transportation practice, the floodwaters developing upstream of the culvert entrance would be reviewed at the 100-year level to ensure "headwaters" do not adversely affect existing properties. (See Final Environmental Impact Statement page 4-102.) All bridges on major waterways such as the Salt River are designed to maintain minimum water surface elevations at the 100-year level for flood levels and built to structurally withstand the superflood, a flood expected only once in 500 years.
20	**Traffic**	The E1 Alternative would affect the existing local street network. Approaches for reconfiguring the local street network include removing streets, constructing new streets, constructing the proposed freeway over existing streets, or dead-ending existing streets. Final design of local streets would be coordinated with emergency service providers, local jurisdictions, and other appropriate agencies and would continue through final design stages. See Final Environmental Impact Statement Figure 3-33, on page 3-57. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

Code	Comment Document

This environmental impact draft study doesn't seem to think that it will worsen the air quality on the sensor that's on 43rd Avenue, which will be two to three miles away from this construction. So it really needs to be understood that it could -- could risk Arizona losing its federal funds. And then the City and our citizens will have to pay the bill. This could turn into one of the more expensive highways. And I think a separate study of that impact is very, very important before we go to the final phase of the environmental study.

So thank you very much for your time. I appreciate the opportunity to comment.

MR. SMITH: They've already spent a lot of money studying this thing, right? And they might as well finish the project or a lot of people's work has been wasted already.

And as far as alignments go, I think, even though the one that's more expensive, that would link up to the 101, is probably a better option in the long run, even though it looks like it might be more expensive now. I don't think I have anything else to say.

MR. STROOP: Well, I just wanted to say that I am a Laveen resident and that I am for the proposal to build the freeway in any of the capacities that I saw today. I don't really have a preference on an alternative, but I would prefer it to get built as soon as possible.

MR. ALLEN: I don't know what ADOT's plans for

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Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 3:41 PM
CALLER: RICHARD HAYNES	CALLER ADDRESS:
PHONE:	EMAIL: HAYNESRS1@COX.NET

1

CALLER REMARKS/QUESTIONS:
I strongly support the building of the road between around the back side of South Mountain. Bye

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 4:25 PM
CALLER: LYNETTE HAYS	CALLER ADDRESS: 1256 W. DEVONSHIRE STREET, MESA, AZ 85201
PHONE: 480-833-5918	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I would like to leave a message on the freeway. I am definitely for it. This area, I have lived here all my life, has neglected to get the freeways done that they need to get done. It would make a very big difference, especially for the people coming from the West Valley. I have worked for years for a company where a lot of people came from that area and they had a terrible time getting to work every morning. Thanks. Goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 2:47 PM
CALLER: SHAWNA HAYWOOD	CALLER ADDRESS: 616 N. PINE STREET, GILBERT, AZ 85233
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I am calling in my support of South Mountain Freeway. Thank you very much.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 3:17 PM
CALLER: JOHN HAZELTON	CALLER ADDRESS: 2123 E. RADCLIFFE DRIVE, TEMPE, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the planning and construction of the South Mountain Freeway. The freeway will reduce traffic congestion in Downtown Phoenix and will provide revenue for Maricopa County and the State of Arizona.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 4:26 PM
CALLER BRENDA HEATON	CALLER ADDRESS: 9729 W. OAKRIDGE DRIVE, SUN CITY, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, and I do support this freeway expansion and feel like it needs to go through. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 11:01 AM
CALLER: JANICE & HOWARD HECHT	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 We would like to support the freeway that is down here by South Mountain. We are both voters and we would appreciate it if you would listen to our request for approving it. Thank you. Bye

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Thursday, May 16, 2013 10:13:00 AM

From: Donald Heckhaus [mailto:dheckhaus@yahoo.com]
Sent: Thursday, May 16, 2013 10:06 AM
To: Projects
Subject: South Mountain Freeway

When will this project ever begin?.

1 We are going on 20 Years now since it was first approved, GOOD GRIEF !

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, May 14, 2013 9:36:14 AM

From: Donald Heckhaus [mailto:dheckhaus@yahoo.com]
Sent: Monday, May 13, 2013 1:48 PM
To: Projects
Subject: South Mountain Freeway

Folks;

I just do not see why the hold-up.

1

The project was first approved, by the Public, in 1984!

Funds were approved , by the Public, in 2004.

We need this High Quality Mobility NOW!

simple !

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, May 20, 2013 8:31:51 AM

From: Donald Heckhaus [mailto:dheckhaus@yahoo.com]
Sent: Saturday, May 18, 2013 8:17 AM
To: Projects
Subject: South Mountain Freeway

1

WHY IS IT TAKING SO LONG, 30 YEARS IS RIDICULOUS?

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Diane Hedrick
To: Projects
Subject: South Mountain PRESERVE
Date: Sunday, May 26, 2013 3:40:55 PM

To ADOT, City of Phoenix officials, Federal officials and Governor Brewer

1 I wish to express my opposition to the Draft Environmental Impact Statement's plan to carve more than 30 acres from South Mountain Park Preserve and align the freeway through three ridges at the southwest end of South Mountain.

Regards,
Diane Hedrick
18644 N 52nd Ave
Glendale, AZ
85308

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, May 20, 2013 8:27:44 AM

From: Mark Helling [mailto:drmark12001@yahoo.com]
Sent: Saturday, May 18, 2013 1:46 PM
To: Projects
Subject: South Mountain Freeway

1

Please build this freeway south of Ahwatukee. I have lived here since 1978 and have been waiting for the AZ politicians and AZ ADOT Directors to set aside their greed and manipulations and just build this freeway. As a longtime resident of Ahwatukee I can testify that everyone in this area has known about this freeway plan when they purchased their properties. If the freeways are ok for the rest of Maricopa Co. environmentally, then it is ok for South Mountain also.
Just build it already!!!
Mark Helling drmark12001@yahoo.com 480-332-9483

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

4250

THE FACILITATOR: Thank you, Mr. Tracy.
MR. TRACY: -- the middle of Scottsdale, which should be -- our population area should be the arena. Thank you.
THE FACILITATOR: Thank you. If you have additional feedback, we really encourage you to go next door and speak with a court reporter.
Thank you, Mr. Tracy.
MR. TRACY: Thank you.
THE FACILITATOR: Our next speaker is Stan Hemry.
MR. HEMRY: Hello.
THE FACILITATOR: Welcome, Mr. Hemry. You have three minutes.
MR. HEMRY: All right. Thank you. On this Environmental Impact Statement, I didn't see an inclusion of it about the ecosystem that's in that area and the watersheds coming from both the western range of the South Mountains, and off the Estrella Mountains, and I'd like to see more of that. I want to know what systems will be impacted when a, you know, like a carbon emitting bisection of that area takes place. And there's no animal studies done as to the migration patterns of the animals.
So I think this study is probably

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2
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Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Surface Water**	Flood protection levels are dictated by the design class of the highway. In the case of the proposed South Mountain Freeway, it is designated as a Class I. Therefore, flood protection levels would be designed to the 50-year (storm) level. However, as a standard Arizona Department of Transportation practice, the floodwaters developing upstream of the culvert entrance would be reviewed at the 100-year level to ensure "headwaters" do not adversely affect existing properties. (See Draft Environmental Impact Statement page 4-102.) All bridges on major waterways such as the Salt River are designed to maintain minimum water surface elevations at the 100-year level for flood levels and built to structurally withstand the superflood, a flood expected only once in 500 years.

Code	Comment Document

incomplete, at best, and should be rejected by the community at large. It's clearly flawed and didn't cover all the right areas, and maybe they'll release other portions of it that we might have learned of later, but at least what they've currently released of it, it seems like these are [unintelligible].

Also, separate the hospital from the highway. Those people there deserve a hospital. Whether they have a highway or not should be a separate issue, but to connect the two together is like extortion. And I think the community deserves more than that. I feel like they live there, and there's 40,000 people that live there, they deserve a hospital. They shouldn't have to drive a long distance. They shouldn't have to have a highway in order to get one. I think that's the wrong approach to building communities. I think it's encouraging sprawl, and it's causing more destruction of our environment by taking away the desert, when we should be in filling and closing the highway, where population is decreasing in this area, right, it went from fifth to sixth place in the United States, Phoenix is now the sixth largest city in the United States. We don't need more highways. We need them closing, because we don't have the population to

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Code	Issue	Response
3	**Neighborhoods/ Communities**	The analysis used to determine the possible purpose and need for the proposed action followed Federal Highway Administration guidance (see Draft Environmental Impact Statement Chapter 1). While the W59 Alternative 62nd Avenue Option was advanced for further study to avoid adverse impacts on historic properties and a planned hospital near Dobbins Road (see Draft Environmental Impact Statement, page 3-25, Figure 3-11), the planned hospital facility is not specifically cited as a factor in the proposed freeway's purpose and need.
4	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
5	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

6
7

support it.

And then we should be rebuilding inner city, more around mass transit with no CO emissions, none, CO2 emissions, none. I mean, that should be our goal, right, 400 parts per million, we have already reached. So we should be lowering that. This highway thing is it such a mirage thing, that the voters of the County actually passed in 1985, when it had no specifics about the 202 in that passage of that. It was general funding for highways. Also, the five-year plan doesn't have anything to do with mass transit. Which, again, it doesn't impact the environment, but eventually it impacts everyone's health; it impacts everything around it. And I feel like the people in that area and the different parts of the city that live here don't need another CO2 emission. We need something that's a little bit more environmentally friendly and life-supporting and affirming, to keep the ecosystems intact and encouraging them to grow and, like, flourish; I think the people that live in that area are very, very, very lucky. It is a beautiful part of the city. It's probably as nice as Paradise Valley because of the scenery and the lack of connection to the highway. You know, that's a

6

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Code	Issue	Response
6	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Air Quality**	

Code	Comment Document

beautiful thing. And I wouldn't want to change it.
THE FACILITATOR: We'd like to remind you, that there is -- we discourage applause.
MR. HEMRY: I don't. Sorry.
THE FACILITATOR: Our next speaker is Patrice Herring.
Again, we welcome Patrice Herring.
We welcome Patrice Herring. No need to run. Welcome, Ms. Herring. You have three minutes.
MS. HERRING: Hi, thank you so much for being here today and allowing us to speak. I am a native of Phoenix, Arizona, and a resident of Laveen. I have been a resident of Laveen, my husband and I bought a house nine years ago. And my brother had already bought a house in Laveen, him and his family. And then also my mother-in-law bought a house in Laveen. And my parents ended up moving and buying a house in Laveen. So there's quite a few of us who live in Laveen. And one of the reasons we moved to that area is because we were told that there was going to be a freeway coming through and lots of commercial businesses and things for our community.
My husband does live in Chandler, might I add. Right now there's not a whole lot of things for us in Laveen, which we definitely need. I live at

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1 MR. HEMRY: My name is Stan, S-t-a-n, and
2 my last name is Hemry, H-e-m-r-y, and my zip code is
3 85004. Okay. The myth of growth in the area that
4 we're trying to get for growth is completely false.
5 We have no projections for what we're currently going
6 through in economics. If they had projections for
7 this, we would be closing highways right now, not
8 opening more of them. The communities don't need
9 extra traffic if there's less people living in them.
10 We need to change our policies that are
11 not dictated by 1985 resolutions of whatever was
12 passed here in the state. They did not specifically
13 address the 202 in that 1985 passage money. It just
14 says generally highway funds for the county which is
15 fine, but meanwhile, we do not need to spend those
16 monies on this 202 project based on need for growth
17 or wanting more growth. Those things are fallacies.
18 And with the mention of the EIS report
19 and this person telling me that in that report it
20 talks about animal migration and then mitigating the
21 disturbance made by the highway by mitigating the
22 animals around it, I'm sorry, but that's still a
23 disturbance of the ecosystem. Mitigating for animals
24 does not fix the ecosystem's destruction. I don't
25 know if I made that clear, and so I had some more to

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Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	The Southwest Loop Highway—the South Mountain Freeway predecessor—was integral to the Regional Freeway and Highway System approved by Maricopa County voters in 1985. Although other facilities were considered a higher priority early in development of the Regional Freeway and Highway System, the South Mountain Freeway has been included in every subsequent update. The same route was approved by the State Transportation Board in 1988. In 2004, Maricopa County voters approved Proposition 400, which was designed to fund completion of the remaining segments of the Regional Freeway and Highway System, including the proposed South Mountain Freeway (Final Environmental Impact Statement page 1-21).
3	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

say on that subject because ecosystems are like intertwined little systems. And if one portion of it breaks down, like if some of the insects stop flying or some of the plants stop growing or some of the animals stop migrating, then it changes that ecosystem which to me appears to be pristine and surrounded by mountains on two sides, western edge of South Mountain and the eastern range of the Estrella Mountains that have no bisection at this point coming through. There's no connection to I-10 directly from that area. It is a beautiful part of town. The people that live there should be so lucky to not have another sprawling, you know, hospital-filled freeway coming through.

And I cannot emphasize enough separating the hospital from the highway. Those people deserve good medical care available in their community regardless of whether a highway is built, but I definitely want to stress that growth is the wrong approach. They did not put projections down for what we're currently going through economically. So if they had been more accurate in their projections, maybe we could look to those as a reason to follow policies. But if they're inaccurate, which clearly they have been, then we need to readjust our plans to

4

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Code	Issue	Response
4	**Neighborhoods/ Communities**	The analysis used to determine the possible purpose and need for the proposed action followed Federal Highway Administration guidance (see Final Environmental Impact Statement Chapter 1). While the W59 Alternative 62nd Avenue Option was advanced for further study to avoid adverse impacts on historic properties and a planned hospital near Dobbins Road (see Final Environmental Impact Statement, page 3-25, Figure 3-11), the planned hospital facility is not specifically cited as a factor in the proposed freeway's purpose and need.

Code	Comment Document

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accommodate a smaller population, less car driving people who don't have the money quite frankly to drive and need mass-transit to get around. Those are the priorities now, not from 1985 when they passed this money and made it available. And that was based on the myth that every time growth happens, it's sustainable and we all should just expect it all the rest of our lives which is clearly not right. Thank you.

MS. SLAPKE: I just got a wake-up call. They never told us that when they changed the alignment from ten lanes to eight, that our house was no longer in line of demolition. We were never notified. We would have gotten out five, ten years ago when they changed that, but none of the homeowners, I know for a fact, none of us know this because I know everybody on our entire street. We weren't notified.

So here I sit and now I'm going to have a wall right behind my house when we were anticipating, okay, ADOT's going to have to buy our house. We'll sit tight. There's nothing we can do. We've lost all the value in our home, but at least we know ADOT's going to buy our home. I just found out, guess what, we're screwed. So put that into writing.

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Code	Issue	Response
5	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Sierra Club on behalf of sue hennelly
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 11:06:35 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief.

3 South Mountain Freeway would have incredible negative impacts on our communities. Air quality in the region would worsen over time. Who wants to live in that?

4 5 South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. A freeway through a portion of this park, will inevitably destroy wildlife and habitat. Wildlife corridors will be cut off, valuable public spaces will be lost, and more. I do NOT promote setting this precedent.

1 Please protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mrs. sue hennelly
2264 E Desert Cove Ave
Phoenix, AZ 85028-2409

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Biology, Plants, and Wildlife**	
5	**Section 4(f) and Section 6(f)**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Opposition to Proposed South Mountain Freeway and Deficiencies of the Draft Environmental Impact Statement
Date: Monday, July 15, 2013 8:05:28 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: charleyz24@cox.net [mailto:charleyz24@cox.net]
Sent: Sunday, July 14, 2013 9:40 PM
To: Projects
Cc: parcthesmf@aol.com
Subject: Opposition to Proposed South Mountain Freeway and Deficiencies of the Draft Environmental Impact Statement

Dear ADOT:

I am a member of Protecting Arizona's Resources and Children (PARC) and I am writing to express my opposition to the proposed Loop 202 South (South Mountain Freeway, SMF), specifically along the proposed Pecos Road alignment. I have lived in Ahwatukee for nearly 10 years with my wife. We now have two small children (one of whom suffers from environmental and food allergies - we are also concerned she may have asthma and are have been working with her pediatrician and allergist to clarify the extent of her conditions).

Based on a strong desire to keep my family and community healthy and safe, the robust data now available in the medical literature documenting the health-related hazards associated with traffic air pollution from freeways in close proximity to population centers, decades of delays and poor planning of the proposed freeway's path, and the fact that there are simply better alternatives, I strongly oppose the SMF and any plans related to its Pecos Road alignment.

In addition, I have reviewed the recently released Draft Environmental Impact Statement (DEIS) on the SMF and have noted many serious deficiencies including, but not limited to the following:

1

1) Truck Traffic from Mexico and High-Sulfur Diesel - Truck Bypass Negated

2

The modeling of air pollution impacts in the DEIS do not include the additional air pollution from truck traffic from Mexico. The DEIS briefly mentions the issue, but it claims it has no way to know what impact this have. Patently absurd.

3

We should remember why the idea of a truck bypass came up in the first place, all those years ago. It is because there have been chronic issues about air quality in the Phoenix metro area, so bad and for so long that public policy makers suggested as one of the strategies to reduce particulate matter from truck exhaust in urban Maricopa County was to designate a bypass for truck traffic around the urban area. This bypass is also now the designated route of the Canamex Highway, and it is Interstate 8 (south of Casa Grande) to State Highway 85, to Interstate 10, west of the Phoenix metro area. If the South Mountain Freeway is built, the bypass route, which has few amenities, would be a substantially longer route, about 55-60 miles longer than the route using the SMF. There is no law that would force trucks

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Air Quality**	

Code	Comment Document
2	to use the longer route, so it is entirely likely all these trucks would come through Phoenix, negating the whole bypass strategy and negating a public policy decision. By completing the South Mountain Freeway, this would all be negated, but the reversal of this public policy decision is never mentioned in the DEIS. Further, trucks originating in Mexico will be fueled with diesel that doesn't meet the CARB diesel standards adopted by Arizona over a decade ago. In Mexico, there is no regulation about the sulfur in diesel fuel. In Arizona, the law was changed to allow only diesel fuel to be sold that has had 98% of the sulfur removed. This was another part of the strategy to bring Maricopa County into compliance with the particulate matter standards required by the Clean Air Act (CAA).There was extensive modeling of the effect of adopting the CARB diesel standards and a discussion of this at the Arizona legislature, where it passed, so the data is in government hands. Also, we know exactly the number of trucks arriving from Mexico and their destinations in the US, so this is data that is available for the DEIS. And again, the reversal of this public policy decision is never mentioned in the DEIS.
3	
4	
	Once this additional pollution is honestly quantified and factored in, there would be a huge net increase in air pollution from the SMF, and associated increases in asthma, chronic obstructive pulmonary disease, heart disease, stroke, premature death, and other adverse health impacts. 2) Air Toxics Already a Crisis but Not Mentioned
5	In 2005, there was extensive air monitoring of certain toxic chemicals (air toxics) conducted by EPA and ADEQ in a joint effort named the Joint Air Toxics Assessment Program (JATAP). The monitoring sites included a site near St. Johns on the GRIC, and some in west Phoenix and south Phoenix. The JATAP monitoring results were reported in 2006, during a time the data for the DEIS was being gathered, and it found levels of certain toxic chemicals associated with vehicular emissions were above the standard of a one in a million chance of cancer in a lifetime of exposure in the west Phoenix, south Phoenix, and GRIC sites. The JATAP monitoring found in the high end of the monitoring levels, formaldehyde at 34 times this standard; benzene at 8 times this standard, 1,3 butadiene at 7.5 times this standard, acetaldehyde at 3.4 times this standard. And, remember, citizens are being subjected to all of these carcinogens, not just one. Some of these chemicals are attributed to "mobile sources," or vehicular traffic burning hydrocarbons. Obviously, adding more vehicular traffic emissions by building a freeway where there had not been one would add to this toxic burden. The JATAP results are not included in the DEIS, but instead there is a strange missive about the uncertainty of the risk from these air toxics standards, which is simply not true. The cancer risk standards have been promulgated and published by EPA after extensive research and study, and they are well-known. 3) Risks from Hazardous Materials Transportation Incidents Due to the SMF
6	There are no industries using and emitting toxic chemicals in Ahwatukee Foothills, and no hazardous materials (hazmat) transportation issues and risks because none of these chemicals, other than gasoline and diesel, are being shipped into the area, other than incidentally adjacent on Interstate 10, which is east of the area. Since the NEPA process started, Ahwatukee Foothills residents and others have consistently raised concerns about the added risks from the transportation of hazmat on the new SMF, and in doing so they have consistently voiced concerns regarding the additional problems with hazmat response in the affected area. Ahwatukee Foothills has its own unique layout and design, sometimes characterized as a large cul-de-sac, and in the event of a hazmat incident requiring shelter in place, or especially involving evacuation, there would be particular problems and risks. Due to the proximity of schools, parks, and other public facilities, there would have to be extensive planning and drills for shelter in place and evacuation, an assessment of the types and amounts of hazmat traffic and the chemicals involved, and much more. NEPA requires examination of cultural, social, and economic impacts, and the new hazmat traffic and risks caused by the SMF would affect all of these topic areas.
7	The data about the types and amounts of hazmat on the highways is collected and analyzed periodically by the Arizona State Emergency Response Commission using federal funds, in something called a Commodity Flow Study, which also includes hazmat moved by rail. So an agency of the state

Code	Issue	Response
4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	Assessment of mobile source air toxics is presented in the Draft and Final Environmental Impact Statements beginning on pages 4-68 and 4-77, respectively, and the summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause significant adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement).

(Response 5 continues on next page)

Code	Comment Document
6	government has this information. In a real DEIS, the analysis of this data is common. But there is nothing in the DEIS that even mentions the hazmat transportation and associated risks! This raises many issues, from the $20 million spent on this deficient study, to the scoping for the DEIS that was designed to restrict citizen input rather than allowing and encouraging it, to the blatant ignoring of actual, well documented statements of these concerns by citizens.
8	Hazardous Materials has been mostly limited in the DEIS to a discussion of hazardous materials that might be encountered in the soils during construction. Yet, despite this alleged concern, the fact that the proposed path of the freeway crosses contaminated property near Interstate 10 near 55th Avenue is neither mentioned nor examined, much less the financial liability the taxpayers might be assuming by purchasing the contaminated property. That would certainly be an economic impact.
3	4) More Air Quality Issues: The Straw That Broke the Camel's Back The portion of Maricopa County that is characterized as the Phoenix metro area has had problems for decades meeting the air quality standards for particulate matter (PM) and other criteria pollutants. Ozone levels are too high in the East Valley and Fountain Hills, for example. There have been several exceedances of the standards for PM set by EPA under the authorities given the agency by the Clean Air Act (CAA). The problem has been so bad over the years that every possible delay and postponement allowed under the CAA to come up with a plan to meet regulatory levels of particulate matter have now been exhausted. So, currently, EPA is examining sanctions that include blocking a billion dollars in highway funds. The Arizona Department of Environmental Quality has tried to explain away the several exceedances of the PM standards in the last year or so by blaming it on dust storms and weather-related problems. However, independent experts who have reviewed the data don't believe it was all related to weather.
9	Almost every one of these PM exceedances have been detected at the air quality monitor at 43rd Avenue and Broadway Road. The placement of a freeway about a mile to a mile and a half upwind from a monitor that has had all these high levels seems foolish and short sighted. And of course, the impacts and risks of this are not examined in the DEIS. Nor does the DEIS examine the dust that would be kicked up during the construction phase, when thousands of tons of dirt would be moved around upwind of the monitor. The proposed path of the South Mountain Freeway would take it over the Salt River bed. To construct the bridges would involve extensive earthmoving. Also, blasting South Mountain would also release enormous amounts of dust (PM), and the natural wind currents and prevailing wind patterns would push this PM toward the air monitor at 43rd Avenue.
3	The South Mountain Freeway could therefore be the most expensive freeway ever built. Not only the construction costs, and the $20 million already spent on the bogus DEIS. To top it off, there would be the loss of the billion dollars in highway funds. This is a gift that keeps on giving, or taking, as there would be subsequent billions lost through the years due to PM exceedances.
10	5) Traffic Congestion Issues at West I-10 Junction The junction of the South Mountain Freeway on its west end with Interstate 10 may have been an idea conceived many years ago, but the traffic congestion that exists at the area between 59th and 51st Avenues on that freeway during morning and evening rush hours is already more than extreme. Yet there is no mention in the DEIS of the cumulative impacts and effects of traffic congestion at that proposed junction. A long line of vehicles sitting with engines idling while waiting to get on Interstate 10 at the junction with the SMF would also likely impact the aforementioned air monitor at 43rd Avenue and Broadway. There is much talk about the problems at the Broadway Curve, which is near the confluence of Highway 60, the 143, and Interstate 10. Let us be reminded that the Maricopa Association of Governments (MAG) and ADOT caused this problem through their shortsightedness and design problems. They planned these traffic nightmares. So now these same agencies, failed agencies, want to do this South Mountain Freeway. Will we be talking about the new junction in west Phoenix in the same way? ADOT already completely ignored the recommendations of the original SMCAT, the group ADOT formed to skirt the proper NEPA scoping, in choosing the proposed alignment. The SMCAT, after months of

Code	Issue	Response
5 (cont.)		The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
6	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Hazardous Materials**	The Arizona State Emergency Response Commission maintains the Hazardous Materials Commodity Flow Studies that are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing Emergency Response Plans. Whenever a new road is introduced to an area, the jurisdiction with responsibility for maintaining that area's Emergency Response Plan amends the plan to include the new facility. Once the plan is amended, it is made available to the Arizona Department of Transportation.
8	**Hazardous Materials**	Both the Van Buren Tank Farm and the West Van Buren Water Quality Assurance Revolving Fund site were identified and considered during development of the Draft Environmental Impact Statement (see pages 4-97 and 4-153 and the Draft Initial Site Assessment prepared for the proposed project.) These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected media (groundwater) and the construction zone (near surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165.
9	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

(Responses continue on next page)

Code	Comment Document
10	study, had recommended that the SMF connect to the 101 on the west. So ADOT ignored even the recommendations of its own group and planned the SMF to connect with the I-10 at the currently proposed alignment. This leaves a large question: If ADOT did that at that time long ago, what is to stop it from completely ignoring the current SMCAT should SMCAT vote for a "NO BUILD" option?
11	6) Blasting South Mountain: Religious and Racial Discrimination and Civil Rights Violations in SMF DEIS The DEIS clearly discriminates on the basis of religion and race, and the ongoing ADOT plans for blasting Muhadagi Doog (South Mountain) are ongoing civil rights violations. Throughout the DEIS, it is acknowledged that the GRIC and other native American tribes hold Muhadagi Doog as a sacred site. From the actual language of the DEIS: "The South Mountains are highly valued and considered sacred by some Native American communities. The Community, which includes the Akimel O'odham (River Pima) and Pee Posh (Maricopa) tribes, and other Native American entities—including the Colorado River Indian Tribes and three O'odham groups: the Salt River Pima-Maricopa Indian Community, the Ak-Chin Community, and the Tohono O'odham Nation—consider the South Mountains to play a role in their cultures, identities, histories, and oral traditions." There is plenty of correspondence in the DEIS and its Appendices in which the GRIC repeatedly asserts and reminds ADOT of this, but to no avail. ADOT plans to blast Muhadagi Doog.
12	This is a direct violation of the civil rights of the "Native American entities." In a 1979 consultation on the issue, the United States commission on civil rights defined religious discrimination in relation to the civil rights guaranteed by the Fourteenth Amendment to the United States Constitution. [Section 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.] As for racial discrimination, the equal protection clause was originally added to deal with the lack of equal protection provided by law to all in the course of administering justice in the states that had Black codes. The United States commission on civil rights noted, "Whereas religious civil liberties, such as the right to hold or not to hold a religious belief, are essential for Freedom of Religion (in the United States secured by the First Amendment), religious discrimination occurs when someone is denied "the equal protection of the laws, equality of status under the law, equal treatment in the administration of justice, and equality of opportunity and access to employment, education, housing, public services and facilities, and public accommodation because of their exercise of their right to religious freedom." Also, the American Indian Religious Freedom Act (commonly abbreviated to AIRFA) is a US federal law and a joint resolution of Congress that was passed in 1978. It was created to protect and preserve the traditional religious rights and cultural practices of American Indians, Eskimos, Aleuts and Native Hawaiians. These rights include, but are not limited to, access of sacred sites, repatriation of sacred objects held in museums, freedom to worship through ceremonial and traditional rites, including within prisons, and use and possession of objects considered sacred. The Act required policies of all governmental agencies to eliminate interference with the free exercise of Native religion, based on the First Amendment, and to accommodate access to and use of religious sites to the extent that the use is practicable and is not inconsistent with an agency's essential functions. It also acknowledged the prior violation of that right.
13	Clearly, the No Build Alternative is the only viable option that does not constitute a violation of the 14th Amendment to the Constitution and a violation of the American Indian Religious Freedom Act as any freeway alternative proposed in the DEIS of the South Mountain Freeway requires blasting away part of Muhadagi Doog. Thank you,

Code	Issue	Response
10	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
13	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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Charley Hepfinger, Pharm.D., BCPS, FASCP Ahwatukee Resident

_____

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1

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
7/23/13	2:13 PM
CALLER:	CALLER ADDRESS:
WAYNE HEPNER	118 WEST MARYLAND, PHOENIX, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Hi, I want to voice my support for this freeway [unclear]. There's a whole lot of gas being wasted on traffic jams here in central Phoenix and so that South Mountain freeway would definitely help pay for itself in the long run. Thank you. Bye bye.

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1		Comment noted.

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From: Projects
To: ADOT
Subject: FW: South Mountain Freeway comment
Date: Tuesday, May 14, 2013 9:46:06 AM

-----Original Message-----
From: Henry Hernandez [mailto:adot@henrytheh.net]
Sent: Friday, May 10, 2013 3:33 PM
To: Projects
Subject: South Mountain Freeway comment

First off, allow me to congratulate the team for providing very informative emails, website, and options; most commendable indeed :)

1 The comment I have about the South Mountain Freeway project concerns the Western Section alternatives. I was surprised to see that the W59 Alternative is the recommended one. Whenever I travel eastbound on the I-10 during rush hour, the congestion usually starts back around L-101. Also, what makes it worst, is at 79th avenue, one of the lanes is lost, thus exacerbating the bottleneck upstream.

How was it determined that the volume of the traffic going through Phoenix would actually be continuing past Chandler? Thus, the W59 Alternative would alleviate the congestion. If this was not considered, I'd think that the
W101 Alternative would be preferably to prevent the congestion from forming in the first place. Thus, directing post-Chandler traffic away from Phoenix Metro.

Sincerely,
xHh.
Henry Hernandez
17338 W Buckhorn Trl
Surprise, AZ 85387
Desert Oasis
623-444-6040 (Home)
480-253-2168 (Mobile)

-------Original Message-------
From: Arizona Department of Transportation <adot@service.govdelivery.com>
To: adot@henrytheh.net
Subject: South Mountain Freeway Public Hearing Set for May 21
Sent: May 10 '13 2:29pm

<snipped>

South Mountain Freeway Public Hearing Set for May 21

<snipped>

Those with comments about the proposed South Mountain Freeway don't need to wait until the public hearing – comments are currently being accepted through July 24, via these channels:

· Providing input by email at projects@azdot.gov

<snipped>

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1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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We need it yesterday. I applaud you. It's been a long effort. I've been involved with it historically, even wrote a newspaper article once on the 55th Avenue alignment, and my colleague, who is much smarter, better looking and more [unintelligible] Jim Kretin [phonetic], does say hello, he had a family issue that came up, so he's not here. So I'm the pinch hitter, I'm not as good as the first team, but I'm trying to get to the plate and do the job.

I thank you for your time. You've had a long day, so I will stop well under my limit, thank you.

THE FACILITATOR: Thank you, sir.

David Hernandez.

You've got three minutes.

MR. HERNANDEZ: Yes, sir, howdy. Three minutes. I've lived over here on 59th Avenue and Roosevelt for about 31 years, and I've got three minutes. Off over at the Indian reservation, over there in Ahwatukee, they got more consideration than 59th Avenue. But 59th Avenue, I guess traditionally is Mexican-American. It's a Mexican-American area, and so what, we'll bulldoze that area over, we'll give them more pollution, we'll reduce the quality of

1

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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life for them. There's a school nearby. There's all kinds of studies where all this emission affects kids as well as older adults.

I am for the freeway, but it could be moved further west, but I see that these businesses are going to benefit. These businesses right there on 59th Avenue, right off the 10, and but there's no consideration for the neighborhood that's there. It's not a big neighborhood, and I believe that if there was a majority blacks or a majority whites, there would be more consideration for that neighborhood.

Now, if you're going to be building that area there, which is preferred, I wish you guys would just buy my property so I could go move somewhere else, but like I say, I've lived there 31 years. My house is paid off, I don't want to get into another mortgage, but now what's going to happen to my property values? You know, what, go buy another house somewhere else and start all over? You know, this -- like that guy was saying before, this was started years ago. ADOT and all the powers that be, all the bureaucrats drug their feet, they just drag their feet. Well, back then, when they were going to build it, well, it's going to cost this much money

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Code	Issue	Response
2	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives, W59 Alternative Versus W101 Alternative**	
4	**Environmental Justice/Lifestyle**	While the Preferred Alternative would have an adverse effect on environmental justice populations, impacts would be temporary and would not create undue hardship or be disproportionately high compared with projected impacts on all populations in the Study Area. All populations would benefit from the proposed action's implementation through improved regional mobility and reduced local arterial street traffic.
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

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and there's not much profit to be made. But now, hey, there's more profit to be made, hey, we're all right, you know, but the homeowners, the taxpayers, even us Mexican-Americans, you know, that live there, who looks out for us? Nobody. Nobody.

Thank you.

THE FACILITATOR: Thank you, sir.

If there is anyone else in the auditorium that would like to speak, please make sure that you register at the front desk. Your name will be called and placed on the screen; you'll be called in the order in which you register.

Also, a reminder for those of you who may be speaking and there's an opportunity that you're going to go beyond the three minutes, there are court reporters in the next room that would be happy to take your extended message beyond the three minutes.

We're going to take a five-minute break as we change out panelists and we will return in exactly five minutes, thank you.

(Recessed from 6:00 p.m. until 6:04 p.m.)

THE FACILITATOR: Good evening, everybody. We're ready to get started again. We have a new panel today. We have Tom Deitering, from Federal Highways, we have Brent Cain from ADOT, and Chaun

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hospital 40 hours a week, and this is from my own experience. And it is not caused by cars driving on the 202. In fact, having the 202 will reduce the stop-and-go traffic that you have on the surface streets and reduce pollution in that way, I believe. So that's all I had to add.

* * *

UNIDENTIFIED SPEAKER: I'm very much for the highway for Laveen, I feel that it would bring in jobs, especially for the youth and the community; and I think that that will assist with some of the crime and the graffiti if we had the highway, which would bring more businesses.

The hospital, we have a lot of senior citizens that live in the area, and unfortunately, the nearest hospital is -- I think it's Maricopa Integrated, and that is a long way when it's an emergency.

So that is my comment, and my reasons for supporting the I-10 highway -- Loop 202 South Mountain Freeway.

* * *

MR. HERNANDEZ: David Hernandez. I live in the preferred route, 59th Avenue south of I-10, and they need to build the freeway. Yes, I agree with it. However, the route that they are taking is shortsighted.

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1 It benefits the immediate businesses right off of I-10,
2 and it is detrimental to that neighborhood that's there.
3 It's a small neighborhood. That neighborhood would be
4 devastated by the pollution that the vehicles that
5 already I-10 brings in. And then adding another route
6 going south is going to double the pollution.
7 There's a school. There's a school
8 nearby -- it would affect the kids also. The quality of
9 life would be reduced. The majority of the people that
10 live there are Mexican Americans. And so I feel that
11 they're just going to run or bulldoze their ideas in this
12 freeway over all these properties that are there. But
13 the winners will be the businesses, because they're going
14 to be taking them out and instead of residents that are
15 there.
16 Potentially, I would prefer that they buy
17 me out so I can go move somewhere else. I don't look to
18 go buy somewhere else. My house is paid for and I don't
19 want to get into another mortgage. I see the maps that
20 I've seen that 59th Avenue would be just like an access
21 road, just a southbound lane that would impede fire and
22 police coming into the neighborhood.
23 Ahwatukee and the Indian reservation have
24 gotten more say where to place the freeway, however, over
25 here this preferred boundary has not gotten the

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Health Effects**	
4	**Environmental Justice/Lifestyle**	While the Preferred Alternative would have an adverse effect on environmental justice populations, impacts would be temporary and would not create undue hardship or be disproportionately high compared with projected impacts on all populations in the Study Area. All populations would benefit from the proposed action's implementation through improved regional mobility and reduced local arterial street traffic.
5	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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attention.

I've talked to some of the homeowners in the area that live nearby me, and they never received this mail that stated that they were going to have an ADOT meeting today.

If I got it, why didn't they get it? Or did they just pepper the area with this mailing about announcing this meeting? That's not right. So, like I say, I agree, they should make the freeway, but it should be further west. And if they are, which I believe they will, build it down 59th Avenue, I wish they'd buy the homes on the west side of 59th Avenue and build a bigger buffer with the existing houses that are there, because it's going to ruin the area, as far as I'm concerned. That's it.

* * *

UNIDENTIFIED SPEAKER: I just feel that there's a reason that this has not been built. It was first proposed about 25 years ago and there's a reason why it wasn't built; that's because it's a bad idea.

This is one of the few good things about this area is South Mountain, one reason why people come to this area because of the natural beauty of the South Mountains. So it's going to be an economic loss. It's also just truly beautiful, and we don't have a lot of

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Code	Issue	Response
6	**Public Involvement**	Notification for the public hearing and community forums included: · media alerts · press releases · direct mail to approximately 87,000 residences and · businesses in the Study Area · newspaper display notices in the *Ahwatukee Foothills News*, *Arizona Informant*, *Arizona Republic*, *East Valley Tribune*, *La Voz*, and *West Valley View* · Web site banner ads displayed by the *Ahwatukee Foothills News*, *Arizona Republic*, *West Valley View*, and the *East Valley Tribune* · radio advertising with 25 spots each on KESZ-FM, KMXP-FM, KNIX-FM, KGME-AM, and KFYI-AM

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 Laveen W59 YES!!
Date: Monday, May 20, 2013 8:42:23 AM

-----Original Message-----
From: dpwill2@cox.net [mailto:dpwill2@cox.net]
Sent: Friday, May 17, 2013 6:47 PM
To: Projects
Subject: Loop 202 Laveen W59 YES!!

1

Hello,
We bought in Laveen 9 years ago with the promise that we would soon have a freeway. My brother, parents and in-laws also moved to Laveen with the same hope of a freeway. We need the Loop 202 at W59 to be approved and built. All of my neighbors and friends also feel the same way. Please help our city and build the freeway that was promised to all of us tax paying citizens. We will soon be out growing our current freeway system.
Thank you,
Patrice Herring

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

From: Projects
To: ADOT
Subject: FW: Laveen Corridor Freeway
Date: Monday, May 20, 2013 1:07:56 PM

From: Derek Herring [mailto:derek.herring@us.fujitsu.com]
Sent: Monday, May 20, 2013 11:32 AM
To: Projects
Cc: doc018@yahoo.com
Subject: Laveen Corridor Freeway

Hello~ I want to voice my opinion in support of the freeway for the Laveen and adjacent community. I think the city has to recognize that Laveen is one of the fastest growing areas and has a critical lack of the support infrastructure necessary for a robust community. I know there is opposition from people or groups that are near or on the proposed route, but if these people located in this area with the knowledge that this project was a possibility, I have little sympathy for them. There are just as many or more who located to the area with the belief that the freeway was going to happen. My family is part of that group. I have learned that vital business' such as a regional hospital will not be built here because of this issue being a big factor. A hospital is vital to the health and safety of the Laveen and surrounding community and it should way more heavily in the decision to build this freeway. Personally, I am disappointed in the non-value added business that seems to have no problem locating in Laveen. Smoke shops, marijuana dispensaries, many redundant fast food chains are examples of these which are little value added for a diverse area of a solid, moderate income, family based community. The city has neglected us with the lack of vital bridge construction over the Salt River, inadequate roadways, and no major police force. Please don't take away the opportunity to have quality transportation that connects us to the rest of the Metro area. There are many active registered voters like myself that voted to have this project advanced and seen through completion in my neighborhood. In talking with residents in Avondale and Tolleson, I have not heard one person or group that doesn't support this freeway. This project will also bring much needed and **value added** business and industry to make this a premier area to raise families. Thank you for your support!

Thanks &
Regards,
Derek Herring

Fujitsu Semiconductor Wireless Products, Inc.
RF Wireless Apps & Validation Engineering
2100 East Elliot Road M/D EL536
Tempe, Az. 85284
Office: 480.768.3601
derek.herring@us.fujitsu.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4251

beautiful thing. And I wouldn't want to change it.
THE FACILITATOR: We'd like to remind you, that there is -- we discourage applause.
MR. HEMRY: I don't. Sorry.
THE FACILITATOR: Our next speaker is Patrice Herring.
Again, we welcome Patrice Herring.
We welcome Patrice Herring. No need to run. Welcome, Ms. Herring. You have three minutes.
MS. HERRING: Hi, thank you so much for being here today and allowing us to speak. I am a native of Phoenix, Arizona, and a resident of Laveen. I have been a resident of Laveen, my husband and I bought a house nine years ago. And my brother had already bought a house in Laveen, him and his family. And then also my mother-in-law bought a house in Laveen. And my parents ended up moving and buying a house in Laveen. So there's quite a few of us who live in Laveen. And one of the reasons we moved to that area is because we were told that there was going to be a freeway coming through and lots of commercial businesses and things for our community.
My husband does live in Chandler, might I add. Right now there's not a whole lot of things for us in Laveen, which we definitely need. I live at

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

the cross streets of 57th Avenue and Baseline, which is at the Bougainvillea -- well, now it's the Cotton Fields Golf Course, and many times, almost every day when I come out onto Baseline, at 57th Avenue, the traffic is just terrible. I have to sit there probably for 5 to 10 minutes just to get out. And sometimes it's very dangerous. There's so many cars whizzing by.

And we definitely need this freeway, the fact that it will cut down on pollution alone is a huge plus. The fact that it will bring much businesses to our area that are greatly needed. Laveen, I heard, is the fastest-growing city right now. As far as our median income, it's very high. I saw some of the statistics showing we're close to 60,000 a year, which is very similar to Ahwatukee. We definitely need this freeway. We need the freeway for the traffic. We need the freeway to keep our citizens happy and there.

Right now I go to Tempe to have tennis lessons and to do many things, and I definitely would prefer to keep my tax dollars in Phoenix. So I would definitely like to say please, please, please put in the freeway at the W-59, which would run along the 59th Avenue and Baseline area. It would help to link

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

us up to all of the Valley, and also help us to stay and keep our dollars in Phoenix as well.

Thank you so much. And appreciate your time.

THE FACILITATOR: Thank you, Ms. Herring.

Our next speaker is Ethel Williams.

Welcome, Ms. Williams, you have three minutes.

MS. WILLIAMS: Thank you. Thank you for hearing me, and thank you for being here. Thank you for addressing our problems that we're having in the Laveen community. I know that these improvements will help the whole community and the surrounding communities.

Mainly, I moved to Laveen after my daughter, who just spoke, and my son, and her mother-in-law moved to Laveen, because everything looked promising, and we thought it would be a very good move to help improve some of the things that are going on in our surrounding areas in the City of Phoenix area.

But I think that this will bring a lot of help to us, as far as accidents are concerned, because, like she said, the traffic problems are horrendous during the rush hours. And for my

Code	Issue	Response

Code	Comment Document

4314

back on the I-10 and 51st Avenue, and that would relieve a lot of the truck traffic and accidents and other things.

The other thing would be just -- that would also help pollution and air quality and cars idling and trucks idling. And so all of those benefits, I think, would be beneficial to building the freeway on that. And also HOV lanes and stuff would be included on the South Mountain Loop, so that's probably the main reasons why I support it.

* * *

MS. HERRING: Patrice Herring. And I definitely want a yes vote on the 202 for the W-59 link because I am a Laveen resident. I bought a house in Laveen because I was promised that this freeway was coming through. We have horrible traffic in our area. We have problems with the river -- when it gets flooded, getting over the river. Sometimes we're stuck where we can't even cross over to the other side of the city. This will reduce pollution, as well, and bring much needed businesses to the Laveen area, and link us to other areas of the city. We definitely need the Loop 202 freeway and we need the W-59 route. Thank you.

* * *

UNIDENTIFIED SPEAKER: I really want you to

1

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:40 PM
CALLER: PATRICE HERRING	CALLER ADDRESS:
PHONE: 602-938-9218	EMAIL: DPWILL2@COX.NET

CALLER REMARKS/QUESTIONS:

1

I would like to speak tomorrow. I'm definitely in favor of having the Loop 202 built um with the W 59 Route. I've been a resident of Laveen for going on over 9 years now. My husband and I bought a house out here, as well as my parents and my in-laws and my brother. And we all definitely want that Loop 202 to come through on the West 59 um I would like to speak tomorrow. Thank you so much. Bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 3:25 PM
CALLER: DAPHNE HERRING	CALLER ADDRESS: LAVEEN, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, I'm a resident of Laveen and I definitely want the freeway to come through the west 59th route. I look forward to the freeway being built as it was voter approved. And also I would like for it to be, as far as having sound barriers and be built where it has things that can prevent pollution and that it has a very good quality when it's being built especially coming through Laveen. I do look forward to the freeway, I hope that there can be a rush on this. We've been waiting for this for going on 10 years now. We've been residents in Laveen taxpayers and we're ready for our money to be spent on what we had put the money towards. And also look forward to police being put in the Laveen area as well to help with the traffic and things that are going to be coming through here. So on that note I look forward to it. I hope it's built very soon with quality and thank you so much. Bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2	Scott Herrmann Document Created: 6/18/2013 7:20:40 PM by Web Comment Form dont build it unless it is 5 miles south of pecos road

Code	Issue	Response
1	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
2	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Extension
Date: Wednesday, May 29, 2013 8:21:54 AM

From: Cindy Hersh [mailto:cehersh@gmail.com]
Sent: Wednesday, May 29, 2013 6:57 AM
To: Projects
Subject: 202 Extension

I want to share my thoughts with you. I am newer to the Phoenix-area having moved here from Cleveland in 2004. In 2007 I had the opportunity to buy a home. I knew I wanted new to newer construction and one of the few places I could afford to do so, at that time, was Laveen.

While I carefully decided where in Laveen I wanted to build, I partly based my decision on where the new 202 extension would/could potentially cross Baseline. Unfortunately, I did not do enough research on the entire backstory on this section of the 202. Had I done my due diligence, I would have more carefully considered the fact that this battle has been going on for years.

And how unfortunate this is. Where would Laveen be today, if the builders, developers and buyers, considered the same. Laveen would have remained the sleepy farming community it was and would not have progressed into the 21st century. Where would the employers like Fry's, Walmart, Lowe's, and Safeway be today? They would NOT be in Laveen!

1

While I can appreciate the detractors position, I can also appreciate my own situation and families like mine. I want to have more flexibility in my life. I want to be able to shop in Ahwatukee, Chandler, and more, and not be limited to the Baseline corridor, Tolleson, Avondale, and Tempe. I want to be able to go to my favorite stores in less than 17 miles (one-way). I want the detractors to be more flexible, and to realize the 202 extension is a good thing for us all. Good for commerce, good for lifestyle, and good for the region.

Please consider ALL positions.

Warmly,

Cynthia Hersh
Laveen, AZ
602-301-2502

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support For South Mountain 202
Date: Monday, May 20, 2013 8:31:32 AM

From: Karen Hickok [mailto:hickokke@yahoo.com]
Sent: Saturday, May 18, 2013 8:34 AM
To: Projects
Subject: Support For South Mountain 202

1

I understand on May 21 ADOT will be holding a public hearing about the proposed South Mountain Freeway project in metro Phoenix. I will be unable to attend the hearing, but I want to let you know my feelings about the freeway. I think the project is way overdue and that ADOT should begin construction immediately. I drive to/from Ahwatukee to downtown Phoenix every weekday for work and the traffic congestion during rush hour is terrible. I cringe at the waste of time and money I and each driver experience every day. And, that does not take into account the pollution spewed from vehicles because of the extra time they are on the road. The voters have approved the project twice. It is high time ADOT stops this waste of time and money begins the project that the majority of people want.

Respectfully submitted,

Karen Hickok
11652 S. Jokake St.
Phoenix, AZ 85044

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1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/14/13	INCOMING CALL TIME: 10:26 AM
CALLER: HIGBY	CALLER ADDRESS: 276 E. GERMANN DRIVE, CHANDLER, AZ 85286
PHONE: 480-892-7311	EMAIL:

CALLER REMARKS/QUESTIONS:

1

Build that South Mountain Freeway. It will make jobs and it will make traffic congestion less and since we are all going to run out of water pretty soon and the universe is still expanding, it doesn't make any difference anyway. So go ahead and do it. You might as well have fun while you still have the Glen Canyon Dam producing some electricity until it silts up and enough fossil fuel left to think you can actually accomplish something. Go ahead, bring more people to the Valley to suck the 2,000-year-old ground water out of the ground. Bring the CAP in. You know, you already got more allocated out of the Colorado River than it'll ever produce and we are in a drought and we are in global warming. Go ahead, keep building, see if I care. I can tolerate that. I am just going to move. I'll have to move. We will all have to move. Give it back to the Native Americans who want to eat jojoba and banana yucca. Build that freeway. Go ahead spend all the money. Who cares? Okay, have fun people. Just like fleas on a dog. The world will shake us off like old fleas and it will heal again. Okay. Have a nice day. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:41 PM
CALLER: JOE HILL	CALLER ADDRESS: 4606 SOUTH DORSEY LANE
PHONE: 480-838-1915	EMAIL:

CALLER REMARKS/QUESTIONS:
Yes, I support the South Mountain Freeway. I am a registered voter Thanks much.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO to 202 Freeway Expansion
Date: Monday, July 15, 2013 11:01:12 AM
Attachments: image002.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Gina Hillis [mailto:Gina@AzHHA.Org]
Sent: Monday, July 15, 2013 11:01 AM
To: Projects
Subject: NO to 202 Freeway Expansion

1 2 3 4 5 6 7 8

As a resident of beautiful Ahwatukee for the last 16 years, I am praying that the development of the 202 Loop does not go through. This expansion will destroy the beautiful tranquil neighborhoods of Ahwatukee and expose this community to crime, smog and noise pollution. Then we have the numerous homes and church that will be destroyed to make way for this unwanted freeway! All of this destruction so semis and massive traffic can pass through to the west side. The thought of the many homeowners who will be displaced as their homes are destroyed is an absolute nightmare. There is no way the state will pay these homeowners the money that their homes are worth! It will be such a loss for so many people.

Yes, I have to travel a bit further to get around to the west side, but it's worth it to save our community.

NO to the 202 Loop!!!!!

Gina

Gina M. Hillis
Assistant to the President
Arizona Hospital and Healthcare Association
2800 North Central Avenue, Suite 1450

Code	Issue	Response
1	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Noise**	
6	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
7	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Acquisitions and Relocations**	

Code	Comment Document

Phoenix, AZ 85004
602.445.4300
www.azhha.org
ghillis@azhha.org

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Code	Issue	Response

Code	Comment Document

2111 N. 37th Drive
Phoenix, AZ 85009
July 19, 2013

ADOT
Loop 202 South Mountain Freeway Study
1655 West Jackson Street, MD 126F
Phoenix, AZ 85007

Dear Reviewers:

1 The stated purpose of this freeway is to relieve Interstate 10 congestion in Phoenix. The EIR must include alternatives.

2 3 The only freeway that will relieve this congestion in Phoenix must be built south of the Sierra Estrella mountains. This alternative is not included in the EIR, making it defective.

4 The most needed freeway in Phoenix is the Paradise. This was voted on by an initiative of the people. The vote was for the Squaw Peak and the Paradise freeways. See the picture on the front page of the Arizona Republic the day of the vote.

5 The South Mountain Freeway on the other hand was a referral to the voters that was part of a huge package. The voters were told that this freeway was included in the package but would probably never be built. Because the other projects were needed, we approved the measure.

If the freeway is built, we will have been lied to again.

Yours truly,

John Hinz

John Hinz

Code	Issue	Response
1	**Alternatives**	The Final Environmental Impact Statement contains a chapter (Chapter 3, *Alternatives*) that provides a discussion of the alternatives generation, screening, and selection process.
2	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
3	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
4	**Alternatives**	The Paradise Parkway was included in the original Proposition 300 packages of road improvements (see Figure 1-2 on Final Environmental Impact Statement page 1-6). However, it was dropped from the plan and was not included in the projects proposed in Proposition 400 (the *Regional Transportation Plan*). The South Mountain Freeway was part of both Proposition 300 and 400 proposals.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
5	**Purpose and Need**	The Draft Environmental Impact Statement does not claim that the South Mountain Freeway has ever been subject to a public vote. The Draft Environmental Impact Statement states that the South Mountain Freeway has been included in regional transportation plans since 1985 and, on two occasions, Maricopa County voters have approved a half-cent sales tax to fund the projects in the regional transportation plan. The Southwest Loop Highway—the South Mountain Freeway predecessor—was integral to the Regional Freeway and Highway System approved by Maricopa County voters in 1985. Although other facilities were considered a higher priority early in development of the Regional Freeway and Highway System, the South Mountain Freeway has been included in every subsequent update. The same route was approved by the State Transportation Board in 1988. In 2004, Maricopa County voters approved Proposition 400, which was designed to fund completion of the remaining segments of the Regional Freeway and Highway System, including the proposed South Mountain Freeway (Final Environmental Impact Statement page 1-21).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Wednesday, May 22, 2013 10:50:42 AM

From: Bill [mailto:javelin47@q.com]
Sent: Tuesday, May 21, 2013 12:53 PM
To: Projects
Subject: South Mountain Freeway

1

I support the building of the freeway; it is significantly over due. Phoenix is one of the very few medium-large cities that does not have any way for through traffic to avoid traversing the city center. I'm sure there are a few others, but I can't recall any. It is absurd that a city & metropolitan area this size does not have a "belt way" of some sort circling the city. We have about 3/4 of one with the rest of the 202 and 101 freeways - the circle needs to be completed.

Not only will this reduce the congestion around the Broadway curve and reduce the potential for serious incidents in the Deck Park Tunnel, but along with getting through traffic around the city it will help those of us in the Ahwatukee area get to the west side with lower fuel costs and less pollution. I have found it ridiculous that we can go to 31st Avenue on Chandler Blvd, but can't get around the mountain, so any trips downtown necessitate a 10 mile trip east before going north and west - what a waste of fuel, time and creation of unnecessary pollution.

Thank you,
William Hipple
15827 S 42nd St
PHX, 85048

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: W59 alternative
Date: Wednesday, May 22, 2013 10:51:37 AM
Attachments: image001.png
image002.png

From: Nate Hocking [mailto:nate@cafevalley.com]
Sent: Tuesday, May 21, 2013 2:25 PM
To: Projects
Subject: W59 alternative

I believe the the **W59 altenative** (1st choice) would be the best option, considering it would give the best position for the flow of traffic West of the I17 and East of the 101, south I10 or east valley.

1

The W101 alternative (2nd choice) would also make sense due to the natural flow south on the 101 and prevent buildup Eastbond I10 to make the connection.

I do not like any of the other alternatives.

Nate Hocking
QA Manager

café Valley BAKERY

7000 West Buckeye Road
Phoenix, AZ 85043
Office: (602) 336-2152
Fax: (602) 278-8906
Cell: (480) 226-8151
nate@cafevalley.com

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 - DO NOT BUILD
Date: Friday, July 05, 2013 8:34:44 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Michelle Hoffner [mailto:m_hoffner@hotmail.com]
Sent: Wednesday, July 03, 2013 3:57 PM
To: Projects
Subject: Loop 202 - DO NOT BUILD

(1) (2) After attending the Ahwatukee open forum I am even more opposed to the building of the freeway. It is destructive, expensive, unhealthy and a poor use of funds. There is highway 85 and/or Riggs Road that can and should be expanded and developed to address the truckers and divert traffic around rather than through.

(3) (4) (5) (6) (7) There are homes, schools and beautiful South Mountain that will be destroyed because of this. Not enough due diligence has been put into exploring the other roads to use. This area has been allowed to expand, grow and develop for many years. It is irresponsible and careless to destroy what has been allowed to be built and develop while there are alternatives. This route should go around the valley instead of through it.

(8) (9) (10) (11) Unbelievable and unthinkable how folks would consider destroying South Mountain for this project. What does that say about our consideration of the environment and the beautiful natural structures. I am concerned and fearful of the impact the Mexican trucks and other trucks passing through will have - pollution, accidents, spills, etc., - so close to homes, schools and families.

(1) This is a poor use of tax payers funds and irresponsible on ADOT's part. Spend the money wisely by improving the already existing Highway 85 if something has to be built.

I say DO NOT BUILD!

Code	Issue	Response
1	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
2	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Alternatives**	The Final Environmental Impact Statement contains a chapter (Chapter 3, *Alternatives*) that provides a discussion of the alternatives generation, screening, and selection process.

(Responses continue on next page)

Code	Comment Document

Regards,
Michelle Hoffner

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Code	Issue	Response
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
6	**Acquisitions and Relocations**	It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).
7	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Section 4(f) and Section 6(f)**	
9	**Trucks**	
10	**Air Quality**	
11	**Hazardous Materials**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway - No Build
Date: Tuesday, July 23, 2013 2:49:48 PM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Michelle Hoffner [mailto:m_hoffner@me.com]
Sent: Tuesday, July 23, 2013 2:49 PM
To: Projects
Subject: South Mountain Freeway - No Build

1 2 3 4 5 6

The more I learn about this the more disappointed I am. Why isn't the Highway 85 / Riggs Road route not being used for this? I vote no build and modify the existing infrastructure to handle the tuck traffic rather than destroy the mountain and create a hazardous and dangerous situation for the community.

Regards,
Michelle

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Code	Issue	Response
1	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
2	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Section 4(f) and Section 6(f)**	
5	**Hazardous Materials**	
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code | Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 Draft EIS Public Comment
Date: Tuesday, April 30, 2013 8:52:41 AM

From: Derek Hofmann [mailto:derek.hofmann@gmail.com]
Sent: Sunday, April 28, 2013 12:37 PM
To: Projects
Subject: Loop 202 Draft EIS Public Comment

1 2 If the South Mountain Freeway were built, it would cost taxpayers billions of dollars while only temporarily relieving traffic congestion on the I-10. One day both freeways will be congested again, and then we would be right back where we started, only with more congested freeway lane-miles creating more air pollution than today.

3 4 Implementing a variable express toll on the I-10 during peak travel periods would cost almost nothing to implement and would permanently eliminate traffic congestion on the I-10 without overcharging[1] anyone. This would save Arizona taxpayers billions of dollars compared to building the South Mountain Freeway, and even billions more when the South Mountain Freeway would inevitably need to be widened. Further, the toll revenue would reduce or eliminate the I-10's maintenance cost burden on taxpayers.

United States Transportation Secretary Ray LaHood has indicated a willingness[2] to allow the states to toll federal interstates as long as the revenue stays in the same freeway.

With its vastly lower cost to taxpayers and reduced environmental impacts compared to the other alternatives, why isn't a variable express toll being considered?

[1] Variable express tolls are set only just high enough (but no higher) to eliminate traffic congestion, and are reduced during quieter periods to encourage people to travel outside of rush hour.

[2] http://transportationblog.dallasnews.com/2011/03/us-government-not-opposed-to-t.html/

Derek Hofmann
derek.hofmann@gmail.com

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Code	Issue	Response
1	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives**	The determination of purpose and need for the proposed project includes an assumption that substantial improvements would be made to the Interstate 10 corridor between State Route 51 and U.S. Route 60 (see Final Environmental Impact Statement page 1-13). One of the concepts that have been studied by the Maricopa Association of Governments and Arizona Department of Transportation is to implement managed lanes in the Interstate 10 corridor (see Southeast Corridor Major Investment Study, at <azmag.gov/Projects/>). Even with these planned improvements to Interstate 10, the proposed project remains a vital component of the Regional Freeway and Highway System.
4	**Alternatives**	The proposed freeway at one point featured a ten-lane freeway cross section, with three general purpose lanes in each direction and sufficient right-of-way to add a high-occupancy vehicle lane and a general purpose lane in each direction in the median in the future (when warranted by travel demand). The Maricopa Association of Governments, in association with the Arizona Department of Transportation, later examined an eight-lane freeway cross section, with three general purpose lanes and one high-occupancy vehicle lane in each direction (see Final Environmental Impact Statement pages 3-19 and 3-20). Such a configuration would reduce the right-of-way needed for the freeway without jeopardizing its ability to meet the purpose and need criteria. Additionally, the eight-lane freeway would cost about $200 million less than the ten-lane freeway (see the Final Environmental Impact Statement, beginning on page 3-23). Because the eight-lane freeway would meet the project's purpose and need and would do so with lower costs, less right-of-way acquisition, and fewer impacts than the ten-lane freeway, it was carried forward for further consideration.

Code	Comment Document

Document Created: 6/4/2013 2:13:04 PM by Web Comment Form

1 2

My concerns include inviromental impact, crime and pollution. The Ahwatukee region will suffer when this freeway is installed, and I am concerned. What will ADOT and the City of Phoenix do to keep crime out, and create a clean environment?
Thanks
Connor Hogan

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 17, 2013 2:16:30 PM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Emily Hogan
Sent: Wednesday, July 17, 2013 8:14 AM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

Jul 17, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 3 Every big city needs places where its citizens can go to get away from freeways and the bustle of city life. South Mountain Park is one of the best places to do that. It also contains petroglyphs, and is an historic site. The proposed freeway would end all that.

4 5 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.
ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

6 7 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

3 8 9 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Section 4(f) and Section 6(f)**	
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Health Effects**	
8	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
1	would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center. Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you. Sincerely, Mrs. Emily Hogan PO Box 1736 Glendale, AZ 85311-1736 (623) 245-8534 _____ Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments. .

Code	Issue	Response
9	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 10:31 AM
CALLER: KEVIN AND ELIZABETH HOGUE	CALLER ADDRESS: 7309 S. 74TH LANE, LAVEEN, AZ 85339
PHONE: 602-237-1997	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in favor of the South Mountain Freeway. Actually, my husband supports the project too. Building this freeway would definitely add value to our home. When it rains and things flood, we need to travel east before we can get anywhere to the west. Thanks for your time.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Wednesday, July 17, 2013 2:17:47 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Hohensee, Damian [mailto:dhohensee@cgrmc.org]
Sent: Tuesday, July 16, 2013 5:15 PM
To: Projects
Subject: South Mountain Freeway

1 It is amazing that ADOT continues to state that the South Mountain freeway was voted in…it wasn't. It was part of a package that had some excellent projects within it, and some outright terrible ideas. The project of this size should have stood on its own merits, and should have been a stand-alone proposition. A project that bears this level of cost (1,900,000,000) and has the environmental impact that this project has deserves that treatment. Instead, it was bunched together with other projects. This is an old technique used by ALL governments to pass items that would fail if voted on by themselves. It is clear that members of ADOT are not objective in this project…I can only guess as to how many brown envelopes have been passed under the table on this one!!!

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Code	Issue	Response
1	**Purpose and Need**	The Draft Environmental Impact Statement does not claim that the South Mountain Freeway has ever been subject to a public vote. The Draft Environmental Impact Statement states that the South Mountain Freeway has been included in regional transportation plans since 1985 and, on two occasions, Maricopa County voters have approved a half-cent sales tax to fund the projects in the regional transportation plan.

Code	Comment Document

5585

***

THE REPORTER: State your name.

MS. HOHMAN: Sharolyn, S-h-a-r-o-l-y-n, Hohman, H-o-h-m-a-n.

Primarily, my comment is that I think that it is absolutely criminal the time it's taken to come to a decision. The money that has been spent. I can't even find anybody who remembers when the first Citizens Advisory Team was put together. I served on it. And I think that all of the delays have cost so much money. I just heard an estimate of $25 million. We could build a couple miles of freeway with that money.

But it's done, and we need to move forward. I think we have done due diligence. We have been fair. We have been thorough. And to continue to play a cat and mouse game with various stakeholders is just not moral or ethical any longer.

THE REPORTER: Is that it?

MS. HOHMAN: That's pretty much my statement. If anybody has any questions, I would be delighted to fill in the holes. I know they wanted you to be specific, but that's about as specific as I can be. I've lived -- moved to Arizona in -- to the Valley in 1960, so that was when Black Canyon was

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www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

being built. It was complete to Thomas when I moved out here. So anyway, we need to bite the bullet and get 'er done.

THE REPORTER: Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Casey Holaway Document Created: 6/13/2013 11:15:33 AM by Web Comment Form Any one of the W101 Alternatives would be the best option for smooth traffic flow on east and westbound I-10. Traffic already slows by the 101 and adding another freeway at 59th Ave would just create another bottleneck. Connecting at Loop 101 would be the best long term solution.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 10:35 AM
CALLER: ROY AND LEONA HOLAWAY	CALLER ADDRESS: 605 W SAN MARCOS DRIVE, CHANDLER, AZ 85225
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: We're in support…[Unclear]	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Document in one pdf file
Date: Tuesday, May 14, 2013 9:39:35 AM

From: Les Holland [mailto:les_holland@prodigy.net]
Sent: Saturday, May 11, 2013 2:09 AM
To: Projects
Subject: 202 Document in one pdf file

To: projects@azdot.gov

1 **How do I get a complete download of the 202** Draft Environmental Impact Statement **document in one pdf file so it is easily searchable?**

Are DVDs available either free or under $5 ?

"Each complete chapter is available for download and review" is **a big waste of time** and is **"information hiding."**

Les.Holland@computer.org

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Code	Issue	Response
1	**Public Involvement**	The Draft Environmental Impact Statement as a single PDF was over 500 megabytes in size. To better facilitate downloading from the public, it was divided into sections. The online public hearing included access to an interactive PDF that included hyperlinks for page references and was completely searchable. Compact discs of the Draft Environmental Impact Statement were available at no charge at the public hearing and community forums or by request at the Arizona Department of Transportation.

Code	Comment Document

From: Thomas Holloway
To: Projects
Subject: South Mountain Freeway
Date: Tuesday, July 23, 2013 6:14:26 PM

I would like to express my concern over the proposed loop 202 South Mountain Freeway. I do not want this freeway built in Ahwatukee or on the Pecos Road alignment. I express my desire for a no build option. I believe this is a waste of taxpayer funds and that this freeway is not needed for the expansion of Phoenix. (1)

Money should be spent on alternative ideas like light rail or other non-polluting alternatives. (2)

Thank you for your time and consideration.

Kevyn Holloway
Ahwatukee Resident
85048

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternative**	

Code	Comment Document
1	Greg Holman Document Created: 7/20/2013 4:51:05 PM by Web Comment Form I am definitely for the building of this much needed highway. As a piano tuner who lives on the west side of Phoenix it will save me time, gas, and money if Have an appointment around the area of pesos and desert foothills roads so instead of driving the whole length of pesos from I-10.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

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(1) I AM IN FAVOR AND STRONGLY SUPPORT THE NO ACTION/NO BUILD OPTION FOR THE PROTECTION OF SOUTH MOUNTAIN PARK AND AIR QUALITY IN PHOENIX.

(2) THE PROJECT DESCRIPTION DOES NOT CONTAIN ANY COMPELLING REASON TO PROVIDE THIS FREEWAY.

(3) IT DOES LIST REASONS TO NOT BUILD - SUCH AS A DESTRUCTIVE INCURSION THROUGH SOUTH MOUNTAIN PARK WHICH IS A UNIQUE, VALUABLE AND IMPORTANT ASSET TO THE CITIZENS OF PHOENIX AND MARICOPA COUNTY. NO OTHER CITY IN THIS COUNTRY HAS SUCH A LARGE NATURAL DESERT MOUNTAIN PARK. IT WOULD BE A CRIME TO BEGIN A PROCESS WITH SUCH NEGATIVE

(4) AFFECTS ON THE PLANT LIFE, WILD LIFE, →

Optional

Name LINDA HOLMAN BENTLEY Email lindabentley@earthlink.net

Address 301 W. WINDSOR AVE.

City PHOENIX State AZ Zip 85003

Phone 602-230-7273 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

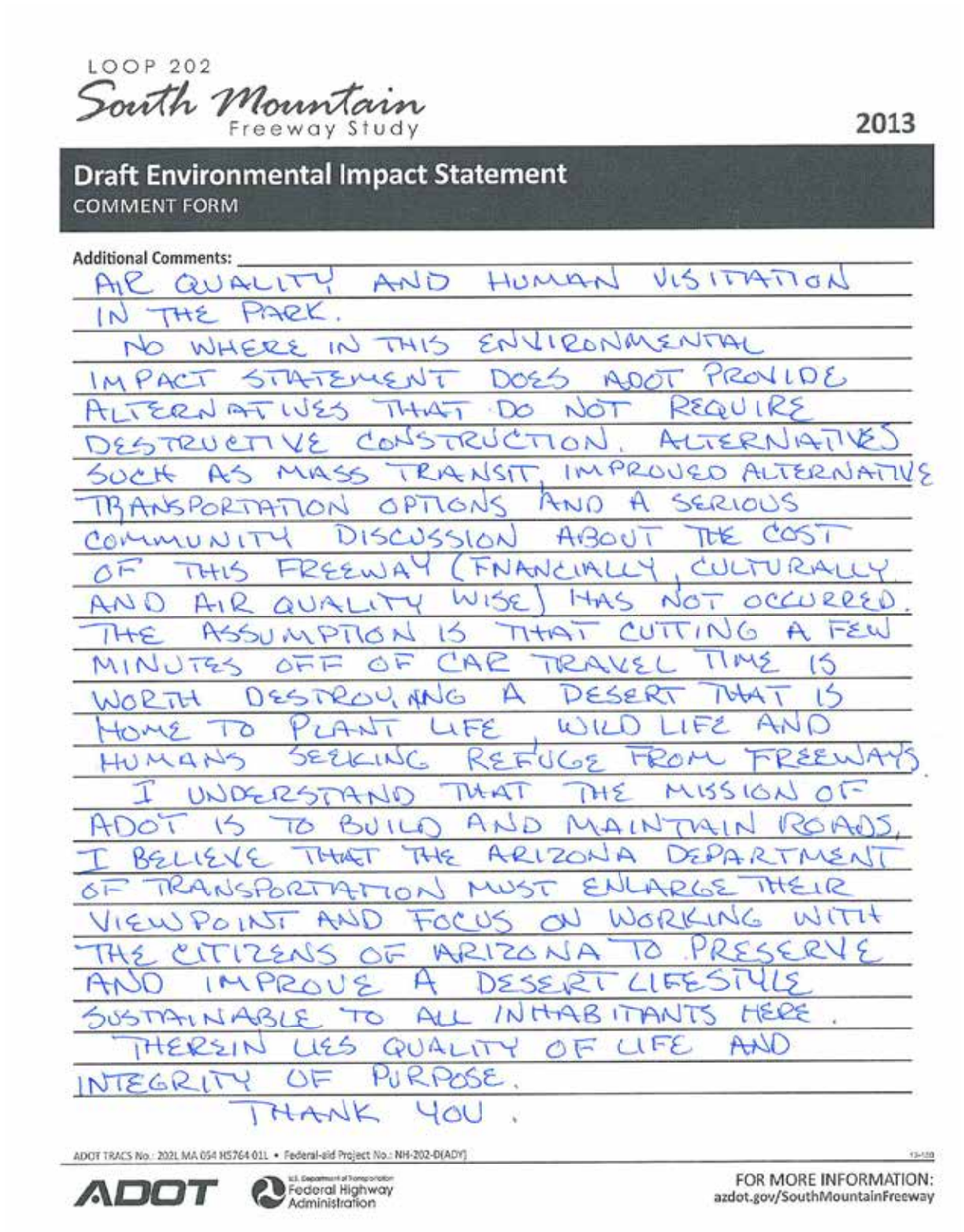
ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Section 4(f) and Section 6(f)**	
4	**Biology, Plants, and Wildlife**	

Code	Comment Document



LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

5 AIR QUALITY AND HUMAN VISITATION IN THE PARK.

6 NO WHERE IN THIS ENVIRONMENTAL IMPACT STATEMENT DOES ADOT PROVIDE ALTERNATIVES THAT DO NOT REQUIRE

7 DESTRUCTIVE CONSTRUCTION. ALTERNATIVES SUCH AS MASS TRANSIT, IMPROVED ALTERNATIVE TRANSPORTATION OPTIONS AND A SERIOUS

8 COMMUNITY DISCUSSION ABOUT THE COST OF THIS FREEWAY (FNANCIALLY, CULTURALLY AND AIR QUALITY WISE) HAS NOT OCCURRED. THE ASSUMPTION IS THAT CUTTING A FEW MINUTES OFF OF CAR TRAVEL TIME IS WORTH DESTROYING A DESERT THAT IS HOME TO PLANT LIFE, WILD LIFE AND HUMANS SEEKING REFUGE FROM FREEWAYS.

9 I UNDERSTAND THAT THE MISSION OF ADOT IS TO BUILD AND MAINTAIN ROADS. I BELIEVE THAT THE ARIZONA DEPARTMENT OF TRANSPORTATION MUST ENLARGE THEIR VIEWPOINT AND FOCUS ON WORKING WITH THE CITIZENS OF ARIZONA TO PRESERVE AND IMPROVE A DESERT LIFESTYLE SUSTAINABLE TO ALL INHABITANTS HERE. THEREIN LIES QUALITY OF LIFE AND INTEGRITY OF PURPOSE.

THANK YOU.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
7	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Public Involvement**	This study, which began in July 2001, is expected to be completed in 2014. During the study process, community members have had and will continue to have various opportunities to ask questions, express opinions, and provide comments about the proposed action. To facilitate public input to the environmental impact statement process, a variety of communication tools were used at major project milestones, including: · A 2-day agency scoping meeting was held with 95 agency representatives at the beginning of the environmental impact statement process. · Communication with local, regional, State, and federal agencies continued throughout the process with monthly coordination meetings. · Both the Arizona Department of Transportation and Federal Highway Administration have sought and encouraged the Gila River Indian Community to allow study of alternatives on its land for the Eastern Section. The Gila River Indian Community has not granted permission to study an alternative in detail within Gila River Indian Community boundaries. Therefore, the Arizona Department of Transportation and Federal Highway Administration have determined that an alternative alignment on Gila River Indian Community land is not feasible. · During the environmental impact statement process, over 200 presentations were made to community groups, homeowners' associations, chambers of commerce, village planning committees, trade associations, and other interested parties. · Eleven formal public meetings were held. Fifteen days prior to each meeting, display advertising was placed in The *Arizona Republic*, the *Ahwatukee Foothills News*, the *Gila River Indian News*, the *Tribune*, *La Voz*, and the *West Valley View*. Total distribution was approximately 260,000 newspapers per formal meeting. · One meeting notice flier and four newsletters were distributed throughout the Study Area in the following quantities (per distribution per meeting): 28,500 door hangers, 5,000 inserts in the *Gila River Indian News*, and 28,000 inserts in the *Ahwatukee Foothills News*. In addition, newsletters and fliers were sent to over 4,500 individuals on the project mailing list. · The November 2008 project newsletter was mailed to 78,700 businesses and residences in the Study Area and to 3,300 individuals on the project mailing list. · The February 2010 project newsletter was mailed to 62,400 businesses and residences in the Study Area and to 3,600 individuals on the project mailing list. A project Web site was developed to provide the public with project information and obtain feedback. Approximately half of comments received were submitted electronically through the Web site's online survey or e-mail. Over 5,000 comments have been received by the project team. Since 2002, the Arizona Department of Transportation has worked with a South Mountain Citizens Advisory Team, representing various stakeholder groups in the South Mountain Freeway Study Area. The group met regularly to review environmental and technical data, discuss the interests and concerns of their respective organizations, and to help find a consensus solution for this proposed project. The general public was welcome to attend each one of these meetings. There also have been various community meetings through the course of this study. For a listing of the past South Mountain Citizens Advisory Team and community meetings, visit <azdot.gov/southmountainfreeway/meeting_notices.asp#communitypast>. Additionally, individual members of the community had an opportunity to review the Draft Environmental Impact Statement, attend a public hearing, and provide comments to be included in the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
9	**Purpose and Need**	Final Environmental Impact Statement page 1-3 states that the Arizona Department of Transportation's mission is to "provide a safe, efficient, cost-effective transportation system that links Arizona to the global economy, promotes economic prosperity, and demonstrates respect for Arizona's environment and quality of life." Its stated goals relating to the proposed action are to: · improve the movement of people and products throughout Arizona · increase the quality, timeliness, and cost-effectiveness of the Arizona Department of Transportation's products and services · optimize resource use · enlist public and political support necessary to meet Arizona's transportation needs

Code	Comment Document

5030

SUE HOLMES: I lived several blocks from a 10-lane freeway in California, and when I became a single parent, I specifically moved to the Ahwatukee Foothills because I had friends who had researched it. There was great schools, great little community— quiet, safe, peaceful. So I am very much against the 202 going in here.

(1)

I also work for the Kyrene School district and I don't think it's the best thing for the children. This is going to be built very near schools in the Kyrene School district. In fact, one -- I think one will butt right up to the playground area, very close, like even Desert Foothills -- Desert Vista High School, which is in the Tempe school district.

(2)

I know that often I read e-mails about the poor air quality here. This is just going to make it worse. The noise pollution, not to mention the sacredness of South Mountain, cutting into that.

(3) (4) (5) (6)

I'm not Indian. I don't live on the reservation, but I respect the sacredness of that mountain.

And like Jim Jochim said in his video, he compared it to being pregnant, "Either you're pregnant or you're not." They need to keep that mountain sacred. If they chip into it at all, I think that's taking away from

Page 2

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Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Noise**	
5	**Cultural Resources**	
6	**Section 4(f) and Section 6(f)**	

Code	Comment Document

it. But I just don't think -- Ahwatukee Foothills will never be the same. It will just devastate this area and I probably will move.

Another thing is I heard that it might affect the lakes here. I bought property on Lake San Simeon and I heard last month that, if they put in the 202, it can affect the water wells here. I mean, if they indeed dry up the lakes, the beauty, this area will never be the same.

That's basically it. I'm very much against it. I just hope it doesn't go through.

7

Code	Issue	Response
7	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See the text box on Final Environmental Impact Statement page 4-108.) The well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Transportation to effectively mitigate well impacts associated with its projects throughout the region.

Code	Comment Document

LOOP 202
South Mountain Freeway Study
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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

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1 I say NO BUILD! I lived several blocks away from a highway in California + at night laying in bed every night had to listen to all the cars, trucks, etc. making noise pollution. I moved to the Foothills here to

2 raise two children because I loved the peace + quiet great community + great Kyrene Schools.

I work for the Kyrene School District + on a daily basis am on the playground supervising kids. It makes

3 me sick to think of the 202 being built so close to so many of our schools here!

4 Not to mention cutting into the Sacred Mountain! Mowing down 100 homes + a beautiful church?? No way!

5 This highway would be a DISASTER! It would ruin the beautiful Foothills Forever + I honestly would probably move as ~~the~~ this would affect my well being negatively

Optional

Name Susan Holmes Email sholmes@kyrene.org

Address 16013 S. Desert Foothills Pkwy #1077

City Phoenix State AZ Zip 85048

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-160

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
2	**Cultural Resources**	
3	**Section 4(f) and Section 6(f)**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Wednesday, May 15, 2013 12:36:19 PM

From: Vi Homolka [mailto:vihomolka@yahoo.com]
Sent: Wednesday, May 15, 2013 12:23 PM
To: Projects
Subject: 202

1

We do need that freeway. Wherever it can be built with the least disruption of present interests and environment. The sooner, the better.

Viola Homolka

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: hong.xie@cox.net
To: Projects
Subject: Feedbacks on the L202 south mountain free way
Date: Wednesday, June 12, 2013 8:24:17 PM

Hi, I am writing this email to show my strong support of the planned 202 South mountain free way. I live in the Awatukee/ foothill area, by the planned 202 free way. I think the planned free way will greatly reduce the congestion on the I-10 free way and offer another route for the I-10 through traffic.

1

Also please try to make the freeway to be 0.5-1 mile south of the current Pecos road. It will reduce the negative effects of the freeway on the current community on noise, pollution, etc, while getting the benefits of the free way.

2 3

thanks, - hong

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:27:31 AM

-----Original Message-----
From: Claudia Honsberger [mailto:chonsberger@aol.com]
Sent: Saturday, May 18, 2013 8:18 PM
To: Projects
Subject: 202

Hi,

1 Just a note in support of completion of the south mountain portion of the 202. Enough is enough get'er done.

Joe Honsberger
Sent from my iPad

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 3:54 PM
CALLER: PATRICIA HOOD	CALLER ADDRESS: 4115 EAST BARWICK DRIVE, CAVE CREEK, ARIZONA 85331
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
Hi, I am for the Loop going through Ahwatukee in South Phoenix. We are definitely for it. Thanks.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Don Houghton

Document Created: 5/21/2013 1:03:39 PM by Web Comment Form

1 I don't agree with the propose 59 connection. The best option is the 101 concepts. It would minimize traffic on I10 going to sporting venues in Glendale and get west bound traffic further out of the Phoenix area. It would cost more money, but when has government been afraid of that? From a personal perspective the fact that there is no ramp at 32nd Street will 2 increase our commuting drive time.Regardless, this freeway needs to be built. Thank you

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have displaced more than 100 homes and would have been located near an existing high school. The storage facility is located on Gila River Indian Community land and would not be displaced. Reasonable access to the facility would remain available from 32nd Street, Chandler Boulevard, and other east–west local streets. A grade-separated bridge would be constructed for the freeway to go over 32nd Street.

Code	Comment Document

Blair Houghton Document Created: 7/24/2013 6:58:34 PM by Web Comment Form

The findings of the DEIS are in parts conflicting, in parts purely specious, and have apparently been guided to reach the single goal of making the project as expensive as possible (and thus as lucrative as possible for the builders of the freeway) while avoiding meaningfully engaging the GRIC. As the GRIC has voted for a "no-build" option, it is clear they do not see a net benefit in building the freeway, and have eschewed interest in attempting to benefit from it. The residents on the other side of the boundary have also expressed little indication of benefit from it. It's clear that nobody served locally by this road will obtain any benefit from it. When the road was putatively approved, it was envisioned to have been completed almost two decades ago, at far less cost, with far less impact. The project has since grown vastly in scope and direct deleterious impact to residents. Further, the voters' choice at the time was to take the entire regional system or leave it, giving them no chance to make a detailed choice as to any particular segment, only to "approve" them all or lose those that were clearly necessary. It's reasonable to expect that some of the segments would have fallen below the line of approval if they were given a chance to place the line at will. And given that this is the last, most expensive, least utilitarian segment in the system, it is logical that this would be the segment farthest below that line. I do not believe that the people currently approve of this part of the project, despite what was voted on a long time ago. The money would be far better spent elsewhere, not least because more will have to be spent to fix what this project will break, if that is even possible.

1

2

3

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Old Plan or Use of Old Data**	
3	**Purpose and Need**	The Southwest Loop Highway—the South Mountain Freeway predecessor—was integral to the Regional Freeway and Highway System approved by Maricopa County voters in 1985. Although other facilities were considered a higher priority early in development of the Regional Freeway and Highway System, the South Mountain Freeway has been included in every subsequent update. The same route was approved by the State Transportation Board in 1988. In 2004, Maricopa County voters approved Proposition 400, which was designed to fund completion of the remaining segments of the Regional Freeway and Highway System, including the proposed South Mountain Freeway (Final Environmental Impact Statement page 1-21).

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- How the proposed action would affect you.

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Please do not build another freeway.
Take $ 2billion Taxpayer $ $ and make
public transportation available statewide.
(1) Build more access on the Native American
main Rds that need upkeep & preservation.
Make BUS Enhancements in rural Arizona.
(2) Commuter Rail Statewide. Flag to Tucson,
Light Rail Extensions toward Avondale,
Bike Lanes → make Phx Bike Only
No Loop 202 - Protect South MT ☺ Thank you! (4)

Optional
Name Liz Hourican & family Email
Address 1821 West Citrus Way
City Phoenix State AZ Zip 85015
Phone 4502360057 Fax

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-156

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

4220

THE FACILITATOR: Thank you. Liz Hourican. Is that the correct pronunciation?

MS. HOURICAN: Great job.

THE FACILITATOR: Thanks.

MS. HOURICAN: Thank you very much. So my name Liz, and I'm a resident of Phoenix, Arizona. And I think this is a huge waste of $2 billion plus. I think that it will decrease air quality, take money away from -- you know, the opportunity cost is so high here. We need bike lanes. We need expanded public transportation, enhanced bus routes, and perhaps, you know, preservation of the freeways, but we do not need one more freeway here.

And then, of course, protecting our beloved South Mountain, the largest municipal park in the country. And we don't want a hole destroying our beautiful South Mountain that brings many, many tourists and visitors and adds to the quality of life here.

So please do not think about the stale, old ideas that might have made sense 20, 35 years ago, but the economy's different. We need to value Arizona as a tourist destination, and certainly preserve the reservation that will be destroyed, and their land, their quality of air. All this will

Page 25

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Purpose and Need, Old Plan or Use of Old Data**	

Code	Comment Document

create is pollution, contamination, poor air quality, and it doesn't make sense in this year of 2013.

So please take those opinions and make sure that you know that I represent Arizona and many people that can't be here today, and certainly in my community. Thank you.

THE FACILITATOR: Thank you. Haley Ritter.

MS. RITTER: Good morning, panel members. Thank you for letting us speak here today. My name is Haley Ritter. And I live off of 23rd Avenue and Camelback. There's a lot of horrible uranium mining going on up north, which is poisoning communities, leaving children waiting for kidneys and things like that. That type of waste is going to be transported on a type of freeway like this, which is also going to contaminate when those types of hazardous chemicals pass through. And we need to, like other folks have been saying, we need to look to alternatives means of sustaining our community.

This national park and this sacred mountain are very, very important to Arizona, and the livelihood of the species, the remainder of endangered species that live there, for example. The native community would be, and the folks that live in

Code	Issue	Response

Code	Comment Document

4325

1 MS. HOURICAN: So my name is Liz
2 Hourican, H-o-u-r-i-c-a-n. I'm a resident of
3 Phoenix, Arizona and I've -- this 30-year-old stale
4 idea of a new freeway is so out of date and I oppose
5 it. I oppose it regarding the opportunity costs
6 associated with the possible two plus billion dollars
7 and what we could apply that to, you know, Light Rail
8 extensions, commuter rails statewide, better
9 preservation of the native American roads that need
10 and don't get much attention compared to Phoenix
11 1,500 miles of endless freeways.
12 So, you know, we as people here, we don't
13 want this old out-of-date plan because of
14 contamination, pollution, congestion, and it will be
15 a zap on our resources and we don't deserve that. We
16 don't deserve that. This would only be for trucking
17 and big corporations.
18 And then, of course, the very all
19 important issue in Arizona that people overlook is,
20 it would desecrate the South Mountain and it would
21 desecrate the Native American land that is a
22 reservation, and it's just a small patch of land that
23 we've designated people to live on. And, you know,
24 it's so beautiful down there, and South Mountain
25 being our largest municipal park in the country.

Page 2

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Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	
3	**Air Quality**	
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Cultural Resources**	
7	**Section 4(f) and Section 6(f)**	

Code	Comment Document

It's a national treasure to Arizona that, you know, regarding outdoor activity, that we all should treat as a natural treasure and something that we should all protect.

So there are many, many reasons to not build this out-of-date freeway. And then, of course, if we look at the people that are the business leaders that are backing that and pushing it down our face, they all represent developers that have been pursuing business interests near the freeway, and they want their own frontage road or freeway exit, et cetera. So we see that and we oppose it and we will resist this in the fullest extent that we can regarding civil -- or resistance here in Arizona.

The people are fed up. We don't benefit from this. So there are many reasons and I hope that that will get in the record, that business only interests do not serve the greater Phoenix, the beautiful Sonoran Desert that is just impeccable.

Here we live in the northern part of the Sonoran Desert, and it is so important to protect it and preserve it for our children, our children's children, and really start living with the land. And, you know, the native American folks here, they're the original environmentalists. They know

8

Page 3

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Code	Issue	Response
8	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

9

how to protect their land, so I will stand on the side of protecting in any way that we can.

I'm with codepink.org. It's a national group. Okay. No build is the only option to conclude.

MR. VASQUEZ: My name is Roy Vasquez. I've been a resident of the Phoenix metropolitan area since 1978. I've experienced the massive infrastructure improvement of the highways during that period of time up until today and really see a need for -- for this project to go forward. More currently, I'm a resident of Laveen and will really feel the impact of this project to my family life and to the community that I live in.

One of the things that I'm in favor of is what it will do for the arterial roads improvement, the projected business improvement environment, also a much needed hospital project. That impacted me because several years ago, I had an appendix attack and I had to go way to Avondale to get that taken care of. So it will be more of a -- that was a personal view point.

I think the routing from Pecos west through the South Mountain area is important. It will give a nice viewpoint for travelers. It will

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Code	Issue	Response
9	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Freeway
Date: Wednesday, May 22, 2013 10:47:20 AM

From: Earl Howard [mailto:howardsgotgame@gmail.com]
Sent: Wednesday, May 22, 2013 7:16 AM
To: Projects
Subject: 202 Freeway

1

I support building the 202 freeway.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, July 16, 2013 1:45:33 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Jim Hoyne [mailto:jhoyne@aol.com]
Sent: Tuesday, July 16, 2013 1:42 PM
To: Projects
Subject: South Mountain Freeway

1

For the love of Pete just build it on the Pecos Rd alignment! There will never be a perfect solution to please everyone.

Jim Hoyne
jhoyne@aol.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:37:15 AM

From: Rebecca Huang [mailto:wenh05@gmail.com]
Sent: Sunday, May 12, 2013 11:00 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

Dear Sir/Madam,

It is my believe the SM 202 will improve Phoenix's image, reduce every day traffic congestion, and related air pollution, time and money wasting. It would help the economic development in Laveen and Southwest Phoenix as well, which we could all benefit from.

1

I strong support the South Mountain Freeway project. It should be built ASAP.

Yours truly,
Wendy Huang

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I support building 202 south mountain freeway
Date: Monday, May 20, 2013 8:31:18 AM

1

From: Xiaoming Huang [mailto:xiaomi_huang@yahoo.com]
Sent: Saturday, May 18, 2013 8:41 AM
To: Projects
Subject: I support building 202 south mountain freeway

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 I supporte to build 202 south mountain freeway.

Optional

Name Xiaoming Huang Email xiaoming_huang@yahoo.com

Address 4163 w Bart Dr

City Chandler State Az Zip 85226

Phone 480-459-7851 Fax 480-237-5963

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 3:42 PM
CALLER: JAMES HUBBARD	CALLER ADDRESS: 2709 E. WALNUT ROAD, GILBERT, AZ 85298
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the planning, proposed alignment, and construction of the South Mountain Freeway. This freeway will facilitate the routing of truck traffic around Downtown Phoenix and that element alone makes the freeway worth it. This is money well spent.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway - Thumbs Up
Date: Wednesday, May 15, 2013 2:29:22 PM

From: George Hubert [mailto:ghubert@carmosa.com]
Sent: Wednesday, May 15, 2013 1:49 PM
To: Projects
Subject: South Mountain Freeway - Thumbs Up

Hi,

I am very excited about the South Mountain Freeway project for the greater Phoenix area. I moved to Phoenix almost 6 years ago and the first person that I met told me how great the 101 freeway was and that many people were opposed to it but now that it is built, everybody loves it. It did exactly what it was supposed to do and everyone is reaping the benefits. I believe the South Mountain Freeway will do exactly the same thing. Some groups may be opposed to it but I believe the vast majority of people want this built. It will make the Phoenix metropolitan area a better place to live. I've talked to about 10 people who know about the project and they all pretty much say the same things such as when will it get built, why is it delayed, it will do so much for the area.

1 This project has my full support and vote. This is the type of project that I want my tax dollars to fund. Please put this project high on the priority list.

Sincerely,

George Hubert
1934 W. Bonanza Ln
Phoenix AZ 85085

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:44 PM
CALLER: JOSEPH C. HUCKSELF	CALLER ADDRESS: 1350 S. ILLINOIS COURT, CHANDLER, AZ 85286
PHONE: 480-391-9296	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in support of the 202 Freeway going down through Ahwatukee connecting to the I-10. Also, I think in regards to this, the Santan 202 Freeway in between Alma School and Arizona should have low retention/temporary wall put in as to increase the noise and traffic. Please call me with any questions. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 Comments
Date: Tuesday, April 30, 2013 8:57:25 AM

From: Dave Huffman [mailto:david.huffman@cox.net]
Sent: Thursday, April 25, 2013 6:45 AM
To: Projects
Subject: Loop 202 Comments

1

I am in total support in getting this new freeway completed as it will really help relieve traffic in many parts of the Valley. Look at a map and you can quickly see the one hole we have in our otherwise excellent freeway system.

I don't see the argument as to how this new freeway would increase pollution. Building this will not increase the number of cars out there in the Valley or miles driven. It will just change where they are. Instead of stop and go traffic they are now stuck in they will be able to run more efficiently on the new freeway without stopping. It is amazing how a few NIMBYs (Not In My Back Yard) can hold the entire region hostage.

David Huffman
david.huffman@cox.net
623-910-9745

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

4327

make -- relieve all the traffic congestion that goes through Interstate 10 through downtown. Having experienced that traffic jam, this will really be an improvement. Thank you very much.

MRS. HUGHES: Ray and Karen Hughes. Well, we were just curious because of the wall is probably going to be in our -- I mean, right -- we're going to be right up against the wall, so we were just curious how high it would be and, you know, is it going to take the place of our -- our property wall that's in the back or what the -- you know, how loud is it going to be with it being right there, you know.

MR. HUGHES: So right now, we see that the alignment is -- they have the right-of-way line is literally on our back property wall. And so we were talking to the noise folks down here, and they explained to us what they -- the study that they've run and that it can be anywhere from 6 to 20 feet tall. And we're just curious when those designs will be finalized and how tall the wall will be and then also how close it would be to a property wall. That's all.

And then the other thing that we're very interested in knowing is when will the decision be

Page 5

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1

1

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As mentioned in the sidebar on page 4-91 of the Final Environmental Impact Statement, the Draft Environmental Impact Statement is based on preliminary design and traffic information. As the design would progress to the Final Design phase, if an action alternative were to become the Selected Alternative, noise barrier locations and heights would be refined and finalized. During Final Design, more detailed information on the location, actual height, and distance from the property line of each noise barrier would become available. Noise walls would mostly be located at the edge of the freeway lanes, not at the property line.

Code	Comment Document

2

made on a final bill? We've been in limbo with our home because at one point we were in the right-of-way and now we're not which is okay, but we're just trying to plan obviously for the future and any improvements we'd like to make on the home and all that. Obviously we won't do that if we were remaining in the right-of-way and they want to take it.

So, you know, I think that's all we have to say. We're just more interested in how they would design the wall with those property owners that it would be right up against, so.

MR. HANCOCK: My name is Jordan Hancock. I'm a student over here at Chandler-Gilbert. I first learned of the freeway through a friend. She's from the Akimel O'odham tribe, Gila River. She's from the reservation, the Pima reservation, where ADOT was -- there was three options, from my understanding, of the freeway, and they first tried to push it onto their land.

And I became aware of some of the abuses that they were doing, especially from the contractor Pangea, that they were going to pay to build the freeway on the Gila land. So that's when I first became aware of this and became opposed to the

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Code	Issue	Response
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. I support construction of the 3rd Freeway ONLY if it can be located South of Pecos on the Gila Indian Land or even further south to facilitate a truck bypass. I do not support construction along Pecos Rd in any manner. The impact on the air quality and quality of life in general are my main objections. In addition as an avid cyclist I am concerned over the loss of Pecos Rd which is a main bicycle path in this community. There is no identified alternative to Pecos Rd for cyclists.

Optional

Name Larry Hughes Email lehughes227@gmail.com

Address 1693 E. Glenhaven Dr.

City Phoenix, AZ State Zip 85048

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
3	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
4	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

4235

I'm Ed Mears; I work for Pulice Construction and Project Development; Pulice Construction was founded here in Phoenix 57 years ago this week, and we employ over 500 folks in the highway construction business. And we do support this project going forward. We recommend that we move through the EIS process as quickly as possible to help keep our employees gainfully employed and building for the Valley, our local employees.

I enjoy the work we do. We enjoy working for ADOT and the Maricopa County officials in these projects that we're able to develop. And that's our position that we support this project and I'd just say build, build, build. Thank you.

THE FACILITATOR: Dale Huish. Dale. He may have just registered.

Dale Huish. Did I pronounce that right, sir?

MR. HUISH: That's correct.

My name is Dale Huish; I live in Gilbert, and for the last four years, I'm the majority owner of Pecos Storage, which is on the south side of Pecos Road right at the 32nd Street interchange. About 40 percent of our customers come from the Ahwatukee area. The other 60 percent are from neighboring

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 cities. My concern with the way that it's being
2 built is that we lose east access and west access,
3 because currently there's going to be no side roads
4 or no interchange at 32nd Street. That will
5 effectively put us out of business, because people
6 that are towing fifth wheels, boats, driving big RVs
7 aren't going to want to make the extra additional
8 three miles to go around Chandler Boulevard and up
9 32nd Street.
10 Is there any thoughts that you guys have
11 put into what to do with 32nd Street to make that
12 more accessible to the east and the west for us?
13 THE FACILITATOR: Sir, this isn't a Q&A.
14 MR. HUISH: Oh, I'm sorry.
15 THE FACILITATOR: That's okay, you're
16 welcome to provide your comments. This just isn't a
17 Q&A-type environment.
18 MR. HUISH: Oh, I apologize. Okay, well,
19 that was my concern. Again, we've been there for 4,
20 4 1/2 years. We do a good business. We serve
21 Ahwatukee, Gilbert, Tempe, Chandler, and we have to
22 access from three points, and we'd like to have some
23 type of access so we can continue to do business.
24 Thanks.
25 THE FACILITATOR: Thank you, sir.

Page 50

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Code	Issue	Response
1	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have displaced more than 100 homes and would have been located near an existing high school. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). There are no provisions for frontage roads connecting 32nd Street to 40th or 24th Streets in the project again because of right-of-way constraints. Access to 32nd Street would remain available from Chandler Boulevard and other east–west local streets.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4279

Phoenix, Arizona
May 21, 2013
10:00 a.m.

P R O C E E D I N G S

MR. HUISH: I'm Dale Huish, H-u-i-s-h, and I'm the owner of Pecos Storage, which is located on the south side of 32nd Street and Pecos.

My concern is currently we have three directions of access, which is east and west, both on Pecos, and then north on 32nd. The current -- I should say with South Mountain currently, if the freeway goes through, we would lose our east and west access. We would only be accessed by 32nd Street, where currently we have access from the east and west, severely impacting our customers' ability to get in and out with RVs, with fifth wheels, with both. It would create a three- to four-mile extra drive than they currently have. (1)

Right now, approximately half of our customers access us through 32nd Street and the other half come from Pecos Road. It would probably put us out of business if we were not able to come to a resolution, either be relocated, bought out, getting access somehow off of the freeway. (2)

That's it.

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Code	Issue	Response
1	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Thomas Hulen

Document Created: 7/24/2013 9:54:23 AM by Web Comment Form

I oppose the South Mountain Freeway Loop 202 extension for the following reasons.

(1) (2) (3) •Increased traffic and congestion: Benefits of new highway construction are typically short lived.
New freeways encourage additional vehicle use, and the new "uncongested" areas are soon just as congested as other roads in the area. This congestion further exacerbates air quality issues, resulting in more pollution spread out over a larger area.
Additionally, these new roadways promote suburban sprawl. The new access to areas previously undeveloped results in new housing, shopping, and business centers, and people must drive longer distances to reach their homes, schools, or work, creating more traffic and congestion. Sprawl also affects our standard of living by making car ownership mandatory. Without efficient transportation options, it becomes critical to own a car in order to participate in our society. Funding highway projects disproportionately with other transportation options severely limits our choices.

(4) (5) (6) •Diminishing air quality and increased potential for health problems and environmental degradation: More vehicles travelling more miles equal more pollution. This is a problem for public health as well as environmental health. The Phoenix area already suffers significantly from poor air quality, much of it related to vehicles. Pollution from vehicles also contributes significantly to climate change.

•Increased dependence on fossil fuels and energy waste: An increase in the daily vehicle miles
traveled further increases our dependence on foreign fuel sources and puts even more strain on the natural resources of our own country.

(3) •Burden on the local tax base: Construction and maintenance of highways and the development
associated with them increases our tax burden. When a new residential or commercial development is built outside of an existing community, roads, sewer systems, and water lines have to be built to service the urban sprawl. In most cases, neither the developers nor the new residents pay their full, fair share – it is the rest of the community that makes up the difference. In most urban areas, the middle class and poor bear a disproportionate share of this burden. Additionally, most new, sprawling development costs more to build and service than the taxes or fees it generates.

(7) •Destruction of habitat and dissection of wildlife corridors: Roads have been identified as a major threat to the persistence of many wildlife populations. They result in increased mortality, habitat loss and degradation, reduced access to vital resources, and division of populations. The proposed South Mountain Freeway will not only destroy habitat and result in direct mortality of some wildlife, but it will also bisect an important corridor that allows movement between South Mountain Parkland the Sierra Estrellas Mountains, as well as to other areas.

•Inefficient use of valuable land: Smart growth ideas are based on the ability to use land efficiently and for the greater good of the surrounding communities. It enables us to preserve open space and habitat while also making it easier for residents to live and work, thus

Code	Issue	Response
1	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Secondary and Cumulative**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	Not all vehicle miles travelled are equal in terms of air pollution. Driving in congested traffic, at slow speeds, is suboptimal in terms of fuel efficiency and tailpipe emissions. Also, due to fleet turnover (older vehicles being replaced by newer ones meeting tighter U.S. Environmental Protection Agency emissions standards), emissions can decrease in the future even if traffic increases (for an example of this, see the projection of mobile source air toxics emissions in the Final Environmental Impact Statement on page 4-77). This is how the proposed action is expected to lower regional air pollution levels (see response #2).

(Responses continue on next page)

Code	Comment Document
	enhancing quality of life. The amount of valuable space used up by the construction of freeways further hinders the ability of smart growth plans to be implemented and maintained successfully. Alternatives to the Proposed Freeway Include: •Increase funding for clean public transportation options such as fuel-efficient buses and rail projects. 8 •Encourage Transit-Oriented Development to integrate public transit, land use (residential,commercial, industrial, open-space), and the environment. •Encourage innovative, incentive-based programs that encourage walking, biking, carpooling, or the use of public transportation. 9 •Authorize zoning decisions that encourage mixed-use development.

Code	Issue	Response
6	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].
7	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
9	**Planning**	Growth patterns and densities are largely determined by each respective jurisdiction's land use planning decisions, as identified in its General Plan and implemented through its local zoning decisions. In the Laveen Village area, the Phoenix General Plan identified an employment center along the Preferred Alternative at Dobbins Road. This center, envisioned as areas of mixed land use, is not inconsistent with the concept of smart growth, which concentrates growth in compact, walkable urban centers to avoid sprawl.

Code	Comment Document

Steven Humbert Document Created: 6/19/2013 4:42:55 PM by Web Comment Form

1 I, respectfully, would like to submit that in the vicinity of the north west alignment of the Loop 202 South Mountain Freeway exist several establishments that engage in transportation of oversize loads. Access ramps to the Loop 202 South Mountain Freeway, particularly at Lower Buckeye, would likely be destined to serve in the future as a significant and major gateway for access to the statewide freeway system. Oversize loads including bridge girders with overall load lengths of 150 to 200 feet are not uncommon. I would request that consideration be given to the appurtenances and configurations of these ramps and the approaches to these ramps including medians, islands, lighting, signage, signals, turning radius, utilities, lane run outs, etc. to facilitate and accommodate the freeway access and transport of oversize loads. Thank you.

Code	Issue	Response
1	**Design**	The design vehicle used to design the intersections and ramps would be in compliance with standards and reflect anticipated turning movements of the larger vehicles.

Code	Comment Document
1	Mozette Humphreys Document Created: 6/16/2013 10:11:11 PM by Web Comment Form I think that this is a great plan. I actually purchased the home that I'm currently living in because of the proposed South Mountain 202 extension. I have been very disappointed that the process has taken so long. I am anxious to have a more user-friendly connection to the rest of the Greater Phoenix area.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: comment on proposed South Mountain Freeway
Date: Monday, May 20, 2013 8:45:29 AM

From: Bobbi K. Hunt [mailto:bhunt@farmersvision.com]
Sent: Friday, May 17, 2013 5:36 PM
To: Projects
Subject: comment on proposed South Mountain Freeway

To Whom It May Concern:

1

Please, please, please approve a "No Build" option for this leg of the 202 freeway!!! We have been homeowners in the Ahwatukee Foothills for 13 years and thoroughly enjoy it just as it is!

2 3 4 5 6 7 8 9 10

This proposed freeway, no matter if built on Pecos or Gila River land, would DEVESTATE our community!!! The pollution will sit against South Mountain and choke us, the traffic noise will be deafening to our tranquil environment and the destruction of our church and hundreds of homes is unthinkable!!! This freeway will simply turn our community into a filthy truck bypass running from Mexico to Canada, which could easily be constructed further south with Hwy 8 thru unused desert! This freeway is also tremendously UNNECESSARY! We rarely travel to the NW valley, except for an occasional football game, and when we do, I10 works just fine! It will not even save any commuting time for our downtown workers, because it comes out on the far end of the metro area.

11 12

ADOT and MAG – PLEASE update your antique 30-year road plan with one of today's needs and growth (i.e. light rail), instead of hanging on to something that makes NO SENSE any longer! Would you still be using a computer from 30 years ago… or even a car from 30 years ago – NO!!!

Thank you for allowing my input,

Bobbi K. Hunt
326 E. Wildwood Drive
Phoenix, AZ 85048
480-460-4644

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
6	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Trucks**	
8	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
9	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Purpose and Need**	An analysis of the origins and destinations of projected freeway users is presented in Figure 3-18, on page 3-36 of the Final Environmental Impact Statement. Freeway users are defined as those motorists who pass through the bend of the freeway (around the South Mountains). So, this does not count motorists in Laveen Village who go to Interstate 10 (Papago Freeway) and motorists in Ahwatukee Foothills Village who go to Interstate 10 (Maricopa Freeway). The results of the origin-destination analysis show that 73 percent of the traffic going around the South Mountains has origins or destinations in the area within or around the Study Area and supports the conclusion that the proposed action would serve east–west mobility consistent with commuting movements.
11	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Alternatives, Nonfreeway Alternatives**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:29 PM
CALLER: SHARON HURACIK	CALLER ADDRESS: 2440 E. NESSDOW, PHOENIX, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I would like to say that I am in favor of the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4237

THE FACILITATOR: Thank you, sir. Stephanie Hurd. As soon as we finish with Stephanie, we're going to change the panel out and take a ten-minute break.

So Stephanie, if you are ready.

MS. HURD: Can I request that -- I'm here with somebody, she's behind me, she's just going to talk, keep it faster, so can you break after her? Just because we've got to leave. It will be so fast. Do you want me to --

THE FACILITATOR: All right. She can come up to this microphone and get ready to speak.

MS. HURD: All right. Can I go?

THE FACILITATOR: The panel is fine with that.

MS. HURD: Okay. Thank you.

THE FACILITATOR: Yes.

MS. HURD: I can go ahead?

THE FACILITATOR: Go ahead.

MS. HURD: Okay. Well, I obviously support South Mountain Freeway, but because it will cut traffic congestion, reduce air pollution, and save drivers time and money. The South Mountain Freeway is the responsible thing to do, because the City has grown and will continue to grow and get much

1

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

worse. I don't want to move because the traffic is unbearable, and I don't have stores, restaurants, hospitals, et cetera. They're waiting for this freeway. I like where I live. I live in Laveen, and I love the rural part of it. I love South Mountain, but it's just unbearable. And I already know people that are failing because of it, and we have worked so hard to make it be a nice, good city that I don't want to see it go downhill.

I would also like to request that the freeway be pleasing to the eye, decorate it. I was on the east side of the airport the other day; it had like cute little purple swirls; it had a little, I don't know, Hopi Indian decorated things; it just made it look so much nicer, and I think especially in that area that would be great. The last eleven years I've lived all around South Mountain, Ahwatukee, South Phoenix, and Laveen. I have always been for the freeway, no matter where I've lived, just because I understand it's the right thing to do with the city growing so much. And we all love and appreciate South Mountain. Please make it happen, thank you.

THE FACILITATOR: Thanks.

We're going to take a ten-minute break to change out the panel. When the ten-minute period is

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Code	Issue	Response
2	**Visual Resources**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation's standard applications. As an example, for State Route 101 Loop (Pima Freeway) in Scottsdale, the City of Scottsdale chose to add public art to the noise barriers. The City's intent went above and beyond the Arizona Department of Transportation's guidelines of reasonable aesthetic treatment and, therefore, the Arizona Department of Transportation did not fund the aesthetic portion of the project. The Arizona Department of Transportation and the City of Scottsdale entered into an intergovernmental agreement for the purposes of allowing Scottsdale rights to design and construct artistic embellishment on the Arizona Department of Transportation-supplied noise barrier. The Arizona Department of Transportation provided the funds for construction of the noise barriers themselves, but the City of Scottsdale provided the funds to cover the aesthetic portion of the walls. Final Environmental Impact Statement page 4-171 explains the process municipalities might take to achieve the desired aesthetic treatment for noise barriers or other structures.

Code	Comment Document

Document Created: 6/22/2013 7:08:19 PM by Web Comment Form

(1) (2) (3) (4) (5) As a life long Ahwatukee native, I STRONGLY OPPOSE the building of the proposed expansion along the Loop 202 South Mountain Freeway. This solution does not seem logical as it would destroy numerous homes within the area and community churches, it will highly impact schools that lie along Pecos Rd and within the immediate surrounding community of Lakewood, it will increase pollution in the area impacting our children's health and the health of the general community and it will destroy pristine habitat for local wildlife. This will without a doubt dampen the beauty of the community of Ahwatukee and will decrease home values for those communities that lie along the freeway. Cheaper is not necessarily smarter.

(6) Building upon our current public transportation systems such as the Light Rail and bus systems seems like a more logical route to go. In the long run, if the city of Phoenix wants to grow and continue to make room for our growing community, it needs to look to other big cities such as Chicago and New York for guidance an build better public transportation systems. This will help the populations in bordering cities travel to and from their homes on the East and West sides of the valley to central Phoenix, Scottsdale and Glendale areas. If we really want to lower the amount of pollution we have in Phoenix, we need more incentive to decrease the amount of vehicles on the road. Building more freeways only encourages people to continue to use their own vehicle and deters them from utilizing more environmentally friendly options such as using our public bus system, light rail system, and car pooling.

(7) Please help keep Ahwatukee a beautiful, vibrant and healthy place to live and raise a family in the "big city." Ahwatukee is truly a unique place to grow up and holds a very special place in my heart, as well as in the hears of thousands of other families here.

Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Health Effects**	
4	**Biology, Plants, and Wildlife**	
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138 -47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
6	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

adding trucks and a longer length of I-10 that will congest the traffic even more, so the faster you can get them off I-10, the better off we will all be.

Other than that, I hope that they build it quickly, you know, cause this would not take forever to build.

Okay. Thank you very much.

MR. HUSTON: I just want to say that I am in favor of the project and after I've reviewed all the boards and the entire process, it seems to make sense what they've narrowed it down to. I think, based on cost alone, it seems like 59th is the best alternative. If cost weren't a factor, I think some of the ones that go further to the west would also be nice to help tie into the west valley. It seems like a long time coming.

It seems like a great project. I think it would be good for, not only our freeway system, but putting people back to work. Overall I just think it would be a really good thing for the community.

That's it.

MR. BAREHAND: My name is Harlan Barehand. I'm from the Gila River Indian Community. I'd like to thank ADOT for finally listening to us and not putting it on the Reservation. I just got through seeing a video next door; it was beautiful. I think it works out fine.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

June 18, 2013

MARIANNE HUTCHINSON
11207 SOUTH TALAVI LANE
PHOENIX, AZ 85044

Re: Loop 202

The idea of putting an inter-state and international truck route short-cut through Ahwatukee is an extremely costly mistake. Not only is it the cost of the hundreds of homes & businesses that will be destroyed. The cost also air and noise pollution, an inevitable increase in crime, and definitely the quality life in Ahwatukee. It will no longer be the delightful community we enjoy living in now.

I agree that trucks need to bypass Central Phoenix, but an alternative is obvious. Trucks should have been routed

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Acquisitions and Relocations**	
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Noise**	
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
7	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

8

st on Interstate 8 long ago, and then
th on Hwy 85 to join up with I-10.
would be much less costly to widen
30 or so miles of Hwy. 85 to carry
heavy traffic). Please spare Ahwatukee
detrimental portion of Loop 202, and
9 build it on Pecos Road!

Sincerely,

Marianne Hutchinson

Also from Karin Gray and family
4021 E. Lakeside Blvd.
Phoenix, AZ 85044

Code	Issue	Response
8	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. An alternative that would run along Interstate 10 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 was considered (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 10 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and inter-regional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, it was eliminated from further consideration.
9	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Will the public vote on the proposed freeway?

NO

"No public vote will be held as part of the Draft for the Environmental Impact Statement review process."

On page 9 in the pamphlet: Public Participant Guide by ADOT it states, "The proposed Loop 202 South Mountain Freeway was first included in funding approved by Maricopa County voters in 1985. It was also part of the funding passed by Maricopa County voters in 2004 through Proposition 400 for implementation of the Regional Transportation Plan."

Really, we in the Ahwatukee/Foothills were not notified that was slipped into this Plan, unnoticed.

Since then, multiple builders were allowed to build and build for the last 25 years without regard or restrictions to any future freeway plans. The building department of Phoenix, the State of Arizona and ADOT never gave guidelines to locate, designate or place restricted land boundaries for a future freeway on any builders or home buyers.

Today in 2013, the costs of right-of-way acquisition of 733 to 1304 homes and 41 businesses, utility relocations and underground mining repairs are estimated to be 1.3 to 2 hundred million, before construction starts. It's outrageously costly for tax payers.

I urge taxpayers to write protest letters to ADOT before the July 24th deadline.

Annita Yhe
2713 E. Colorado Rock Dr
Phoenix AZ 85048
480-759-7887

Code	Issue	Response
1	**Public Involvement**	No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period. The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400
2	**Social Conditions**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.) While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
3	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

more trains and things like that. Oh, and no more building near our home, please. We want to respect the Indian reservation. We want to work in cooperation with them. Thank you.

UNIDENTIFIED SPEAKER: So we live on Pecos and from what I see on the map over there, there's going to be a new bridge that's being built and I don't want it to ruin my home. There's not going to be any type of privacy. People can look right down into my home. I mean, sure there will be a wall, but you can still see over it. It's going to cause more accidents. What if accidents come over the wall into our home area and destroy it, and that's something I don't like. Please, please stop building it. Thank you.

MS. INNIS: Hi, I'm Lillian Innis and I lived in the Gila River community for quite some time, and I've also lived in Ahwatukee for a couple of years and I've been going to school in Ahwatukee since I was in kindergarten, and I do not like this freeway or I do not -- I feel like what some people say that, like, the freeway is going to do, I feel like it won't meet up to their expectations. And a lot of them think money first instead of with, like, actual thoughts of future generations and me when I

Code	Issue	Response

(Comment codes begin on next page)

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grow up and how I will be affected and my children's children.

And I also feel like all the health, like, complications to bring up, it's just crazy. Because I take early childhood and we talked about how freeways affect children and development and birth, and it's -- it's not good, like, at all. And I don't see how people can, like, just sit there and say they're for it without even thinking about all this stuff before and ahead of time.

And people are going to wish they didn't have this freeway. Like in, like, hundreds of years, they're going to wish we, like, stopped now and stopped, like, building stuff. And we don't have the money to build this stuff anyways, in the first place, with our economy. So, yeah, that's how I feel about this freeway.

MR. BRIGGS: Tom C. Briggs. And then -- I'm trying to think. My one suggestion would be is, try to work at removing the 32nd Street bridge and work to provide the U-Haul storage place with access through the tribal lands. No need to build a multibillion dollar bridge for that sole business's benefit. That's one.

The other comment would be within the

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Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	The project is completely funded through federal sources and a local ½-cent sales tax, as programmed in the Arizona Department of Transportation 5-year Transportation Facilities Construction Program and the Maricopa Association of Governments *Regional Transportation Plan*.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build 202 South Mountain
Date: Monday, May 20, 2013 8:32:12 AM

From: cwirvine@cs.com [mailto:cwirvine@cs.com]
Sent: Saturday, May 18, 2013 7:11 AM
To: Projects
Subject: Build 202 South Mountain

Sir:

1 Build the 202 South Mountain Freeway as soon as possible. Save the citizens of Arizona millions of dollars by not waiting

any longer. Sincerely, C W Irvine, Mesa.

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. DEAR ADOT:

WE ATTENDED THE PUBLIC COMMENT OPEN HOUSE IN CHANDLER, AZ RECENTLY CONCERNING THE BUILDING OF THE SOUTH MOUNTAIN FREEWAY. (1) WE ARE TOTALLY OPPOSED TO THE BUILDING OF THIS FREEWAY. (2) THIS WILL BE NOTHING MORE THAN A TRUCK BY-PASS AROUND SOUTH MOUNTAIN, TO BENEFIT THE MEXICO - U.S. - CANADA CONNECTION.

THE ADOT ALWAYS SEEM TO TOUT THE BENEFITS THAT MIGHT ACCRUE, BUT YOU NEVER SEEM TO MENTION THE COSTS INVOLVED, NOT JUST FINANCIAL COSTS, BUT THE HUMAN COSTS; (3) DESTRUCTION OF PARTS OF SOUTH MOUNTAIN, THE LOSS OF HOMES, BUSINESSES, (4) (5) SCHOOLS, PLACES OF WORSHIP, ENVIRONMENTAL DEGRADATION OF THE AREA, SUCH AS TOXIC SALTS AND OTHER POTENTIALLY CATASTROPHIC (6) DAMAGE.

THERE IS ALREADY A BY-PASS AVAILABLE FROM (7) HIGHWAY 85, UPGRADED TO INTERSTATE STATUS, (COVER)

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT · U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Section 4(f) and Section 6(f)**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Hazardous Materials**	
7	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: CONNECTING TO I-8, WHICH CONNECTS TO I-10,

8 WE IMPLORE YOU TO EXERCISE THE NO-BUILD OPTION ON THE LOOP 202 – SOUTH MOUNTAIN FREEWAY.

THANK YOU

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
8	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 11:12 AM
CALLER: MOHAMMED ISLAM	CALLER ADDRESS: 4213 WEST NAVAJO COURT
PHONE: 480-917-3917	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

* * *

MS. FINNER: My name is Jill Finner, F-i-n-n-e-r.

I would like to voice my support of building the 202 freeway, specifically the West 59th alternative. I'm a mother of small children. I've been a leader of a moms' group of over 70 moms which represent over 70 families, and we are constantly driving almost 30 minutes to other cities to find entertainment and dining options for family get-togethers and outings and play dates.

I would also like to request an attractive sound barrier and bike/running/pedestrian paths along the length of the freeway, such as the San Antonio, Texas, freeway system.

I'm in opposition to building a new casino and hotel that our current infrastructure cannot support.

We would like to bring the Ahwatukee and Laveen communities together, and the longer we wait to build, the more the cost of construction will increase. I would like to build it.

Thank you.

* * *

MR. ISLAUB: My name is Lynwood Islaub,

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 L-y-n-w-o-o-d I-s-l-a-u-b.
2 My prime concern is that the impact study does
3 not take into account the congestion that's going to be
4 created on Chandler Boulevard. Pecos Road currently
5 carries a significant amount of traffic that goes out to
6 the eastern end of South Ahwatukee -- or the western end
7 of South Ahwatukee. All traffic is now going to be
8 funneled onto Chandler Boulevard. They're even building
9 an extension of Chandler Boulevard out to 27th Avenue.
10 All those residents will now, because they won't have the
11 access to Pecos Road, be coming down and funneling onto
12 Chandler Boulevard.
13 The residents between 40th Street and 24th Street
14 are all going to lose their access point because
15 32nd Street won't have an on-ramp or off-ramp. There
16 won't be any perimeter roads on this freeway as there are
17 on most other freeways in the Valley, so the residents
18 will all funnel onto Chandler Boulevard and traffic will
19 become gridlock. There's no alternative. The way
20 Ahwatukee is built, Chandler and Ray loop up in the
21 24th Street area, but from that point on, it's Chandler
22 Boulevard all the way out to 27th Avenue, and that's a
23 concern.
24 I think it's going to become a significant issue
25 for the residents in the southwestern portion of

Page 4

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Code	Issue	Response
1	**Traffic**	The extension of Chandler Boulevard west of 19th Avenue is included in this project because reasonable access must be maintained to the neighborhoods at the west end of Pecos Road (see Figure 3-33 on page 3-57 in the Final Environmental Impact Statement). Early in the study process a traffic interchange at approximately 27th Avenue was evaluated but ultimately eliminated because of increased residential displacements and cost. Traffic that currently uses Pecos Road will be able to use the freeway once it is constructed. The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)
2	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). Construction of the interchange would have resulted in the displacement of over 100 homes and the interchange would have been located near an existing high school. Access to 32nd Street is to remain available from Chandler Boulevard and other east–west local streets. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The traffic projections for Chandler Boulevard (see Figure 3-12, on page 3-29 of the Final Environmental Impact Statement) show a reduction with the proposed freeway when compared with conditions without the proposed freeway.

Code	Comment Document

Ahwatukee -- southeastern portion of Ahwatukee.
That's all I have to say.

* * *

MR. ELTERS: My name is Bassam Elters, B-a-s-s-a-m E-l-t-e-r-s.
My comments are that I support the Loop 202. I've lived in Arizona for 30 years and in the Valley for nearly 10 years. The traffic congestion in the area needs a practical solution. This corridor has been a part of the regional plan for years. The voters approved it twice, and it's time to build it.
That's it.

* * *

MR. NOVAK: My name is Will Novak, N-o-v-a-k.
I just wanted to put in a comment that I hope they don't build anything and save the billion-and-a-half dollars and do something else with it, like build some light rail trains or plant 15 million trees or build a commuter rail, any of the number of things we need in Phoenix.
This is a city that is really -- we've got our

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Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 2:13 PM
CALLER: KAREN IVERSON	CALLER ADDRESS: 4242 EAST CORTEZ STREET, PHOENIX, ARIZONA
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the building of the South Mountain freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4262

If there's anyone in the ballroom who would like to speak, please make sure you register at the front desk. Thank you.

Another reminder for those of you who are in the ballroom, if you plan on speaking, please make sure that you register at the registration desk. Your name will appear on the screen; we will call you up when you are registered. Thank you.

Renee Jackson. Ms. Jackson, you have three minutes.

MS. JACKSON: Thank you.

THE FACILITATOR: Here's the timer; please begin.

MS. JACKSON: Good evening. My name is Renee Jackson, and I'm a proud member of the Akimel O'odham tribe. I reside in Va ki Village, and my children, who are here, they also reside in Gila River. They are also O'odham and also of Apache and Navajo descent. My children reside partly in Komatke Village in Gila River. Komatke is located very near this freeway project in the valley between Estrella Mountains and South Mountain. This valley will eventually act as a gas chamber, holding the deadly particulates and vehicle pollutants over the community of Komatke. But the environmental and

1

2

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Code	Issue	Response
1	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

3 4

cultural impacts, coupled with the inevitable health hazards, extend past Komatke, and ultimately, affect not only the Gila River Indian Community, but all four O'odham tribes, the Akimel O'odham, the Tohono O'odham, the Ak-chin tribe, and the Salt River tribe. We all hold South Mountain sacred as it is central to our reservation's story.

3

My people, my family, my relatives, my fellow tribal members, our health is at stake, and our cultural rights are in jeopardy. This freeway project has divided the community with money and false promises as the main culprits. My concerns also extend to the surrounding communities. I resided in Ahwatukee for years. My children have attended school in the Kyrene School District since kindergarten. The negative business externalities will affect us all, and as you can see, I am strongly opposed to this freeway. Not only as an O'odham woman, not only as a mother, but as a citizen of this community. We need to be better stewards of this land, making wiser decisions with our future generations in mind.

3

Arizona, in particular Phoenix, is cited as one of the most unsustainable cities in America. To continue to build and expand exponentially, without

5

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Code	Issue	Response
3	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Health Effects**	
5	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

regards to our limited resources, is complete insanity, and we will pay the cost of all these terrible public transportation policies. Thank you.

THE FACILITATOR: Thank you.

Anyone else in the auditorium wishing to speak, please make sure you register at the front desk.

Janeen Newhouse. Janeen Newhouse.

Ms. Newhouse, you have three minutes.

MS. NEWHOUSE: Okay. Thank you.

THE FACILITATOR: The monitor is right here; please begin.

MS. NEWHOUSE: Good afternoon. My name is Janeen Newhouse. I'm from zip code 85339 in Laveen, and I'm interested in definitely having the 202 go through. It's been a long time coming. We've had -- the voters have voted it in, two times, I believe, and just to alleviate congestion around the Broadway curve, as you guys know, Phoenix is going to be growing more and more. I don't think that we're going to be stagnant. And that's just going to create a lot more traffic, as you gentlemen know.

I'm a huge proponent of it. I do wish that ADOT would definitely make sure that the wildlife and animals and, you know, birds are definitely taken

Code	Issue	Response

Code	Comment Document

5060

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THE REPORTER: Please state your name.

MS. JACKSON: My name is Renee Jackson, and I'm a member of the Akimel O'odham tribe in Central and Southern Arizona. I reside in the Va ki Village, District 5. And there are several reasons why I oppose the freeway. In addition to cultural preservation and land preservation, there are several discrepancies in the DEIS that I became aware of.

One of the most concerning omissions is the lack of information about the trucks coming in from Mexico. I understand that Mexican regulations are different from those of the U.S., and those have not really been talked about in the EIS. And I think it's a huge, huge error to leave that information out. I know that another reason -- I know that the DEIS, or at least concerning the air pollution only extends to about one-fourth of a mile from the freeway itself. But as we all know, pollution does not sit, especially air pollution, does not sit and stay in this corridor of one-fourth mile from the freeway.

And there is a huge concern about the village of Komatke, located in the west side of Gila River. There is almost a bowl that is created. The

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Code	Issue	Response
1	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

Code	Comment Document

valley between South Mountain, Moadahk, and -- South Mountain, Moadahk, to the Komadk, which is also known as the Estrella Mountain range, creates a bowl effect and all that pollution sits between -- in that valley.

Now, there's -- Komatke is one of the biggest villages that we have here in the Gila River. There's many children, schools, churches, Boys & Girls Center, and many, many residential homes. Now, there are already health concerns in our community, and the added pollution that this freeway would create is just adding to that problem. And I understand the argument that it's because the metropolis of Phoenix is growing, that we need to have this infrastructure in place now. I believe that money and effort could be put into the public transportation systems, extended light rail, light pass, et cetera.

What a lot of people fail to understand is we live in a desert. We have limited resources, and we have to think smarter about how we build. Another freeway is not going to alleviate the air pollution, as they state, it's merely going to -- it's merely going to move that pollution to our community.

The other concern is that the lack of

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4 5

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Code	Issue	Response
3	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
5	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	

Code	Comment Document

7

information and the lack of participation that ADOT and MAG have given to the Gila River Indian Community, outside of this public forum. There has been little participation in getting information to the people of the community. I believe that everyone in the community has not had enough information about this freeway, and the fact that that lack of participation from the State to our community and the fact that this time to comment is very short is going to give it a skewed interpretation of how Gila River feels.

7

There was not -- there's not enough outreach to the community. There's not enough availability for the community to give their concerns other than these forums. I believe that this forum itself, today, is another way to silence the people of Gila River. There should have been greater emphasis of having community members be able to speak about how they feel about the freeway. Not just about the environmental, the health hazards, but more about culture and the significance of the mountains to us.

The Gila River Indian Community passed a resolution in 2007 declaring that Moadahk, the South Mountain, is cultural property of our tribe. We find

Code	Issue	Response
7	**Public Involvement**	Communication and coordination with the Gila River Indian Community is described in Chapter 2 of the Final Environmental Impact Statement. A summary of the outreach related to the Draft Environmental Impact Statement is presented beginning on page 6-23 of the Final Environmental Impact Statement. Additional details of this outreach is provided in the following and in Appendices 6-4 and 6-5. After publication of the Draft Environmental Impact Statement, members of the Gila River Indian Community were provided opportunities participate in the environmental impact statement process. The Draft Environmental Impact Statement was published and released to the public for a 90-day comment and review period beginning April 26, 2013, and concluding July 24, 2013 (twice the 45-day comment period required by regulation). In developing this plan, the team also considered specific characteristics of the communities within the Study Area, in conjunction with knowledge gained from previous study-related public involvement efforts. Based on these factors, the following special outreach considerations were integrated into the plan: · Use advertising and graphics to reach illiterate or environmental justice populations · Use bilingual outreach materials, available upon request · Use Hispanic media outlets · Integrate elected officials, intergovernmental liaisons, and special interest groups into the process · Hold the public hearing along transit lines for those who are transit-dependent The Draft Environmental Impact Statement public outreach strategy included four main components: 1) an awareness campaign; 2) the public hearing; 3) an online public hearing; and 4) community forums. Briefings were provided for the Gila River Indian Community, Community Manager (David White). The Draft Environmental Impact Statement was made available online at <azdot.gov/southmountainfreeway>. Electronic versions of the Draft Environmental Impact Statement were distributed to 119 staff from public agencies on April 26, 2013 (including multiple Gila River Indian Community departments). Hardcopies were also made available for viewing at five locations. Prior to the public hearing, a mailer providing notification of the release of the Draft Environmental Impact Statement and the upcoming public hearing was distributed to approximately 87,000 residents and business within the Study Area, as well as to individuals on the project stakeholder mailing list. The mailer also included an overview of the study and Preferred Alternative and information regarding the shuttle buses to the public hearing, including pick-up and drop-off times. Detailed information regarding the public hearing and the various methods to provide comment on the Draft Environmental Impact Statement were also included. The public hearing was the only location that provided a formal 3-minute public comment opportunity. To optimize the opportunity for public participation and, in particular, participation from identified Title VI populations, the Arizona Department of Transportation offered free shuttle bus service to and from the public hearing, located at the Phoenix Convention Center. Service was provided at three times during the day at two locations on the Gila River Indian Community (Komatke Boys and Girls Club and the Gila River Indian Community Tribal

(Response 7 continues on next page)

Code	Comment Document

8

that mountain sacred and it is equivalent to a church to us. Any disturbance to our church is still a disturbance, whether as much as ADOT wants to believe that they are trying not to displace wildlife or cut into the mountain more than they have to, it is still a disturbance to the mountain, and to our spiritual well-being as O'odham people.

I believe that -- I know that this freeway system is important not only to ADOT and the people of Phoenix, but it is barely -- it is merely just another project for them in their transportation system. Whereas this, protecting the mountain, is vital to our well-being as O'odham people. There are various stories that come with the mountain that we've been taught, and that we are relearning. And, in fact, this fight for this mountain has reignited that passion for protecting that mountain, but also for sharing those stories as well.

9

There are many plants and animals that we as O'odham people still hold sacred to -- that live there in that mountain range. There are medicinal plants that are available, there's "shegoi," there's also other foods that we eat from the cactus, the "hashem," these -- these plants are already being affected by the pollution that's on the mountain

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Code	Issue	Response
7 (cont.)		Governance Center in Sacaton). Parking vouchers and transit passes were provided at the public hearing for participants. The online public hearing webpage went live at 10 a.m. on May 21, 2013, at <azdot.gov/southmountainfreeway> and linked to <smfonlinehearing.com>. All of the materials that were presented at the public hearing, including the study video, display banners, aerial maps, an interactive electronic version of the Draft Environmental Impact Statement, and an online comment form were available through the online public hearing. The online public hearing also contained a welcome video explaining the format of the online public hearing, an overview of the purpose of the online public hearing, and information about how to provide comments. The online public hearing attracted 1,864 visitors (approximately 1,600 visited during the comment period) from across the United States. As an additional participation opportunity, especially for those who may not have been able to attend the public hearing, six community forums were held in strategic locations throughout metropolitan Phoenix, attracting nearly 700 attendees. These forums provided an informal opportunity to learn more about the study and the Draft Environmental Impact Statement.
8	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Biology, Plants, and Wildlife**	

Code	Comment Document

today. It's hard to find anyplace to find a clean area to harvest these medicines that have not been tainted with chemicals or air pollution. We have to preserve those plants, not just as O'odham people, but as people all of us collectively who live in these deserts, these plants and animals are vital to us.

Anybody who has a concern about conservation of nature should know that this freeway system, this mere project to the outside community is going to be devastating for us all. This is not just an O'odham thing. This is an everybody thing. We're going to -- we're going to feel the effects of this freeway system in our health and in our own well-being.

This desert cannot support this many people, and I know as we try and try and support and accommodate for everybody, this society is eventually going to collapse. It has been seen before, historically, and it is going to happen again. This place does not have the resources to house this many people. Our aquifers, our groundwater is being depleted. Our plants are being polluted. Our sacred mountains are now being destroyed.

That's what I have to say.

10

Page 30

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
10	**Groundwater**	The Study Area is located within two Active Management Areas that are regulated by the State of Arizona. The Arizona Department of Water Resources administers groundwater use. Water level decline in one subbasin can be offset by recharging water in another subbasin of the Active Management Area. The Arizona Department of Water Resources regulates drilling, installation, and abandonment of groundwater wells. (See Final Environmental Impact Statement page 4-104) If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See the text box on Final Environmental Impact Statement page 4-108.)

Code	Comment Document

1
2

From: Jackson, GregX G
To: Projects
Subject: Comments on South Mountain Freeway - Loop202
Date: Wednesday, July 24, 2013 1:26:20 PM

To whom it may concern,
I wish to offer comments in regards to the proposed construction of the South Mountain Freeway, Loop 202. I believe that construction of the freeway along the proposed alignments (including stated Alternatives) will have a significantly negative impact on the area and it should not be built along these alignments. The Project team has not addressed another Alternate alignment which would lower the cost of land procurement and construction as well as a lower impact to the tax paying public. It is clear that a road with the quantity of lanes as proposed is primarily intended to be a Truck Bypass route thus unloading the I-10 route through central Phoenix. With this in mind, I would like to propose that the AZDOT perform an evaluation to move the alignment away from Phoenix and to align via I-8 to Gila bend and then expand AZ 85 through Buckeye. This provides the following benefits:

- Lower land procurement cost – due to the population density
- Lower construction cost – existing roads exist vs. creating new roads and blasting rock from South Mountain
- Prevents the destruction of a Native American Culture which with the current alignment calls for carving through South Mountain which is Sacred to Gila River Indian Community
- Elimination of pollution over major residential areas (Laveen, Ahwatukee, Estrella Village, GRIC)
- Additionally, the current proposal does nothing to eliminate traffic congestion, it simply shifts the problem to the west side where the vehicles will come onto the I-10. In 1985, this may have been a good idea but with expansion of the city, this will just load up the freeway at the new alignment. By moving out to Buckeye, the problem is eliminated.

3
4
5

I hope you accept these comments and will consider the alternate alignment to enable the Phoenix Metro area to continue to grow without impacting the current residents

Thank you,

Greg Jackson, Arizona Tax Paying Citizen and Homeowner

Greg Jackson
Senior Vice President | Jones Lang LaSalle | Intel Account
Cell: 480 384 0790 | Email:gregx.g.jackson@intel.com

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives, W59 Alternative Versus W101 Alternative**	

Code	Comment Document
	Office: 480 715 3612 Arizona ROC#257718, L-16: 285294 This email is for the use of the intended recipient(s) only. If you have received this email in error, please notify the sender immediately and then delete it. If you are not the intended recipient, you must not keep, use, disclose, copy or distribute this email without the author's prior permission. We have taken precautions to minimize the risk of transmitting software viruses, but we advise you to carry out your own virus checks on any attachment to this message. We cannot accept liability for any loss or damage caused by software viruses. The information contained in this communication may be confidential and may be subject to the attorney-client privilege. If you are the intended recipient and you do not wish to receive similar electronic messages from us in the future then please respond to the sender to this effect.

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/14/13	INCOMING CALL TIME: 1:28 PM
CALLER: JERRY JACOBS	CALLER ADDRESS: 8727 WEST TERRA BUENA LANE, PEORIA, ARIZONA 85382
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain freeway. Thank you. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:44:58 AM

-----Original Message-----
From: jimdjake@yahoo.com [mailto:jimdjake@yahoo.com]
Sent: Friday, May 10, 2013 7:26 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Please build the South Mountain Freeway as soon as possible, I commute from Laveen to Tempe and something needs to be done to relieve congestion in the central core of Phoenix. The tunnel will become gridlock and the Broadway curve a complete joke.
Thanks,
Jim Jacobson

Sent from my iPhone

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 2:31 PM
CALLER: KILLIAN JAGERNAUT	CALLER ADDRESS: 2612 E. COTIS STREET, PHOENIX, AZ 85028
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I strongly support the South Mountain Freeway Loop which takes through the South area Pecos and goes all the way to the interstate. This will relieve the maximum amount of congestion we see on 10 East going to Tucson and also Ahwatukee area, Chandler and anything that connects to the freeway. Particularly the morning traffic and evening traffic is something impossible sometimes and backup for miles and miles. We strongly recommend support of the South Mountain Freeway. I am a resident of Phoenix.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Nancy Jagger

Document Created: 7/24/2013 5:49:27 PM by Web Comment Form

1 2 3 4 5 6 7

Hello. I want to voice my concern over the proposed South Mountain Freeway. As a nearly 20 year resident of Ahwatukee I am very concerned about the impact upon the homes, schools and people of the area. I am concerned for the decreased air quality and increased noise from truck traffic that would divert onto the new freeway. I respectfully ask the commission to relook at alternatives that have been eliminated that would be more friendly to South Mountain park and utilize existing roads from Maricopa connecting to 10 on the West side. Thank you for allowing me to voice my strong resistence to the current proposal.

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	
4	**Noise**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Noise modeling for the Final Environmental Impact Statement used this forecast truck traffic, with the model accounting for greater noise generation by trucks in the future (see Final Environmental Impact Statement page 4-91). Noise mitigation is designed for this predicted noise level, including the noise from trucks.
5	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County.
6	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/ State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support/Build the South Mountain Freeway 202 Laveen
Date: Wednesday, May 22, 2013 10:51:22 AM

From: BILLY JAGROSSE Owner [mailto:desertguy67@centurylink.net]
Sent: Tuesday, May 21, 2013 4:43 PM
To: Projects
Subject: Support/Build the South Mountain Freeway 202 Laveen

To whom it may concern:
As a Phoenix Maricopa County Tax payer who has voted twice in the long history of the South Mountain Freeway loop 202 project I am pledging my support and demanding this project be started! The Phoenix area is clearly in need of this project for future success of the Valleys economy as has been detailed in multiple studies. I am looking forward to connecting the under served area of laveen and the southwestern corner of our great city to the whole. The funds have been voted the EIS is clear and the demand is there LETS BUILD. As for the Gila River Community: PLEASE RESPECT THEM AND NOT BUILD ENTRY EXITS TO THEIR LAND. They claim their land is sacred and we must allow it to stay that way.Federal Land Federal Dollars Lets Build on and only connect to Federal Land.
The Future must be built for and Not building would be a grave mistake for The areas future.
THE TAX PAYERS HAVE SPOKEN VOTED AND VOTED AGAIN. EXECUTE! THE TIME IS NOW PHOENIX MUST GROW!
William J
Phoenix Citizen
TAX PAYER
Highway System User

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Code	Issue	Response
1	**Alternatives**	Federal law prohibits the denial of access to any community. Thus, traffic interchanges would be located along the freeway where it borders the Gila River Indian Community (see Final Environmental Impact Statement page 3-51). Roadway connections on Gila River Indian Community land to the traffic interchanges would be the responsibility of the Gila River Indian Community, in coordination with appropriate jurisdictions.

Code	Comment Document
1	David James Document Created: 5/21/2013 2:36:16 PM by Web Comment Form Not only will the South Mountain Freeway create thousands of jobs, it will alleviate the traffic problems through downtown. Decreasing traffic congestion through the downtown and the Broadway Curve will not only save lives, it will reduce air pollution in Phoenix because of the air pollution associated with traffic delays.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/19/13	INCOMING CALL TIME: 5:30 PM
CALLER: DEENA JAMES	CALLER ADDRESS: 1239 EAST GRISWALD ROAD PHOENIX, ARIZONA 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I have voted for the freeway two times already. I'm still in favor of it. Goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Tracie James — Document Created: 7/9/2013 6:25:54 PM by Web Comment Form Please do not fund the 202 freeway extension. This cannot be the best solution. Please reconsider options with less environmental and fiscal impact on our community. Thank you in advance for your thoughtful consideration.

Code	Issue	Response
1	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Comments
Date: Friday, June 07, 2013 10:11:56 AM

From: sharkb8@aol.com [mailto:sharkb8@aol.com]
Sent: Friday, June 07, 2013 9:32 AM
To: Projects
Subject: South Mountain Freeway Comments

The South Mountain Freeway could forever be known as Arizona's biggest environmental blunder.

I've lived in the South Tempe/Ahwatukee area since 1976. I know this area better than most. I want to make it clear that my current home does not sit in the path of the proposed freeway. Following are some of my observations on this proposed freeway and the area I currently call home.

Many including ADOT state that this freeway alignment has been on ADOTs maps as early as 1985, and adopted as a specific alignment in 1988 well before houses were built and therefore that affords ADOT some kind of claim of "freeway domain." Well, as we all know, 28 years is an eternity in Phoenix area metropolitan growth and times do change.

When that route was chosen, the only "road" anywhere in the area was a dirt access road for SRP maintenance on the hi tension power lines that run next to what is now Pecos Road. The thought at that time was that there was no development (Chandler Blvd., Ray Road and Warner Road didn't exist) for miles in the area and that this land was at the very edge of Phoenix since it abutted Gila River Indian Reservation land. Also since the hi tension power lines were already here, developers wouldn't be building residential homes in the immediate area. There used to be a garbage dump at Ray Road and 48th Street. My how times have changed in just 28 years.

1

2

ADOT's assumption that construction of this Freeway will somehow lesson downtown traffic is also unqualified. One fact about Phoenix area freeway construction is that within a few month's of a new freeway's opening, it reaches capacity. Look at the 101, 51, I-10 Broadway Curve expansion, 60 and on and on. If people are looking for ways to relieve freeway rush hour traffic, drive on surface streets. On March 30, 2006, Bob Hazlett (MAG Senior Engineer) in a presentation to the South Mountain Citizens Advisory Team showed simulations that proved that the South Mountain Freeway would not reduce traffic in the Broadway Curve area by any appreciable amount. ADOT data released in 2006 indicated that the 55th Avenue alignment would lead to more congestion and longer commutes on Interstate 10. The only way to effectively relieve freeway rush hour traffic is to get vehicles off the freeway, not by building more and more freeways which increases the vehicle count across the grid.

I feel it's important to note that the population of Ahwatukee Foothills has lived with some of the worst traffic and city planning for the past 28 years of any city in the metropolitan area. We all hate traffic and have wanted solutions for years but were constantly ignored by local governments. Ahwatukee Foothills with a population close

(Comment codes continue on next page)

Code	Issue	Response
1	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
2	**Purpose and Need**	Figure 3-12, on Final Environmental Impact Statement page 3-29, shows a 6 percent reduction in modeled 2035 average daily traffic volume in the Broadway curve with the proposed freeway implemented when compared with the No-Action Alternative. It also shows no difference in modeled traffic volumes in 2035 for the with- and without-freeway traffic volumes for Interstate 10 immediately west of 59th Avenue. Farther west, there would be a slight reduction in volumes on Interstate 10 with the proposed freeway implemented.
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

(Responses continue on next page)

Code	Comment Document
	to 100,000 people just recently obtained a permanent police station. They used to work out of trailers. A fire station was also added recently which was a much needed facility. This community does not share common boundaries with any other city. We are split off by South Mountain, the Gila River Indian reservation and I-10. That our public service needs have been ignored for decades is no surprise. Happily that is changing now that the area has become a political financial powerhouse. Real estate in Ahwatukee Foothills is some of the highest priced in the East Valley, the school system has become second to none, a vast majority of it's residents carry college degrees and it's close proximity to Phoenix, Sky Harbor Airport, ASU, Tempe and the East Valley make it a very desirable place to live. All this has been built by the hard work and tenacity of it's residents.
3	I encourage officials to come out and walk, ride a bike or jog along Pecos Road and imagine that area turned into an 8 to 10 lane (depending on costs) interstate freeway. I'd be happy to give anyone a tour. The effect of a freeway will destroy a whole community and environment, forever. People who have spent years in the area know that to be true. Ahwatukee Foothills is set between a vast flat plain (in excess of 50 miles) on the South and South Mountain Park with an elevation of 2,690 feet that encompasses over 13,000 acres on the North. This diverse topography creates a micro climate for the Ahwatukee Foothills area. This is truly a unique environment not reproduced anywhere else in the metro area. It is protected from Phoenix, Glendale, Tempe, etc., smog and dust because of South Mountain. Pecos Road comes within six-tenths of a mile of South Mountain Park. The winter inversions of vehicle exhaust pollutants you see are extremely reduced in Ahwatukee Foothills because of South Mountain. The downside is that when dust storms come from the South or East Valley, Ahwatukee Foothills really gets hit hard. The dirt and dust has no where to go except down, on homes. South Mountain and the Estrellas block any escape. The effect of diesel and auto vehicle pollutants from a freeway will forever change the environment and air quality of Ahwatukee Foothills and South Mountain Park. Pecos Road becomes invisible during summer dust storms. Is ADOT going to shut down a freeway during dust storms to prevent the major accidents that will happen during these "dust outs?"
4	
5	
	Some important points that need to be answered and to consider about this Freeway and the reports done thus far:
	1. Ahwatukee Foothills is built out. Only one small parcel (620 acres or significantly less depending on how it's split) remains for developers. And that might not even attract developers because it would abut the freeway.
6	2. Pecos Road contains a "major" church, grade school, post office, and thousands of people living directly in the path of the proposed freeway. These people and businesses will have to be moved and compensated and will be severely impacted if they stay.
	3. Within 3 blocks of Pecos Road is one of the two area high schools with a population of over 3000 students, another church and thousands of people. A proposed new high school sits within 1 block of the Pecos freeway route.

(Comment codes continue on next page)

Code	Issue	Response
7	**Purpose and Need**	The proposed freeway at one point featured a ten-lane freeway cross section, with three general purpose lanes in each direction and sufficient right-of-way to add a high-occupancy vehicle lane and a general purpose lane in each direction in the median in the future (when warranted by travel demand). The Maricopa Association of Governments, in association with the Arizona Department of Transportation, later examined an eight-lane freeway cross section, with three general purpose lanes and one high-occupancy vehicle lane in each direction (see Final Environmental Impact Statement pages 3-19 and 3-20). Such a configuration would reduce the right-of-way needed for the freeway without jeopardizing its ability to meet the purpose and need criteria. Additionally, the eight-lane freeway would cost about $200 million less than the ten-lane freeway (see the Final Environmental Impact Statement, beginning on page 3-23). Because the eight-lane freeway would meet the project's purpose and need and would do so with lower costs, less right-of-way acquisition, and fewer impacts than the ten-lane freeway, it was carried forward for further consideration
8	**Utilities**	The City water line in the area of the South Mountains would be located away from the proposed freeway. It would not need to be relocated. There are City water and sewer lines and other private utilities under Pecos Road. As necessary, these utilities would be relocated to avoid impacts from the proposed freeway (see pages 4-165 and 4-166 in the Draft Environmental Impact Statement for more information about utilities). The cost of these relocations is included in the overall project cost (see page 3-59 of the Final Environmental Impact Statement for more information related to costs).
9	**Utilities**	The major gas lines that run along Pecos Road are operated by El Paso Natural Gas and Kinder Morgan (El Paso Natural Gas Company, L.L.C., is owned by Kinder Morgan, Inc.). Both lines are located south of Pecos Road on Gila River Indian Community land and would not be affected by the project. In the area around 51st Avenue, these lines turn north and cross under the alignment of the proposed freeway. In these areas, the lines would be protected in place. The operation of these lines would not be affected by the proposed freeway.

(Responses continue on next page)

Code	Comment Document
7	4. If ADOT builds a freeway along Pecos Road, since it abuts the Gila Indian Reservation and homeowners on each side, there is no room for future expansion. Zip, Zilch, Nada. Unless taxpayers want to buy off more homeowners and Gila River Indian Landowners. So when this Freeway becomes grid locked, it remains grid locked because future freeway expansion is impossible.
	5. Since there is no land available, that means there will be no industrial development along the freeway thru Ahwatukee Foothills for the State of Arizona or it's municipalities. Zip, Zilch, Nada. This leaves the Gila River Indian Community with a potential financial juggernaut of retail, industrial and hospitality development along the proposed freeway on their land. This will add even more traffic to the community. Since ADOT states no studies can be done on this land, they have no clue as to what kind of developmental impact the Gila River Community has in store for our community. No one does.
8	6. In 2003 a $60 million water line to Ahwatukee Foothills was bored thru South Mountain and runs under Pecos Road. That supplies water to a community of 100,000 people. It would have to be relocated if a freeway is built on Pecos Road. A safe conservative estimate to redo that project – $100 million? That doesn't include the cost of relocating the communities utilities which also run under Pecos Road.
9	7. The valley's fuel supply lines run along Pecos Road. You know, those lines coming from Tucson that caused gas prices to soar to way over $4.00 a gallon for the first time in our states history. I would say it's a safe bet that this line will be shut down many times during construction.
10 11 12	8. Pecos Road lies at the lowest elevation in the area. Sound abatement walls will be totally uneffective if this freeway is built above ground thru Ahwatukee. You can stand a half a mile away from Pecos Road and hear one car driving along it because of this difference in elevation. Sound travels very well in the area's dry air an elevation. For this reason this proposed freeway needs to be built below ground with sound "deflector walls" that channel the freeway noise south. Rubberized asphalt won't do it. Will ADOT provide for residential sound testing for neighborhoods that lie in excess of 800 feet of the proposed freeway's path after this proposed freeway is built? Sound and air pollution from this project will have a dramatic downward effect on real estate prices and quality of life.
13 14 15 5	9. Since a major proportion of the valley's "Big Box" retailers have regional supply warehouses in the area where this freeway will connect with I-10 on the west, it will become a mecca for big rig diesel truck traffic skirting the metro Phoenix area and well as much of the International truck traffic between Mexico, Canada and the U.S. It would be safe to say that over 50% of the traffic on the Pecos Road Freeway would be diesel burning, one of the major vehicle air pollutants. There is no way to limit the types of vehicles driven or monitor them.
16 17	10. The majority of people who live in the Ahwatukee Foothills and vicinity do not commute daily to the West side. That thought is wrong and uninformed and if the freeway is built, they will not use it because of the dangers of the high speed truck traffic.
	11. Currently Pecos Road is used by a vast majority of people for recreation. Jogging, biking, rollerblading and walking. These people will be forced onto Chandler Blvd. and

Code	Issue	Response
10	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country. The Federal Highway Administration developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The regulation, 23 Code of Federal Regulations 772 Procedures for Abatement of Highway Traffic Noise and Construction Noise, applies to highway construction projects where a State department of transportation has requested Federal funding for participation in the project. The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the noise regulations is a prerequisite for the granting of Federal-aid highway funds for construction or reconstruction of a highway. In 1998, the Federal Highway Administration released the Traffic Noise Model, which has been upgraded several times since its release. It was developed as a means for aiding compliance with policies and procedures under Federal Highway Administration regulations. The model is a state-of-the-art computer program used for predicting noise impacts in the vicinity of highways. It uses advances in personal computer hardware and software to improve upon the accuracy and ease of modeling highway noise, including the design of effective, cost-efficient highway noise barriers. These components are supported by a scientifically founded and experimentally calibrated acoustic computation methodology, as well as an entirely new, and more flexible data base, than the former model. The database consists of over 6000 measurements at forty sites across the country.
11	**Alternatives**	The project team analyzed the belowground option, also called the depressed freeway option. The analysis indicated that depressing the freeway would increase the cost of construction and right-of-way acquisition, displace additional residences, create the need for additional pump stations and detention basins, and still need the installation of noise barriers. Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study (see Final Environmental Impact Statement pages 3-15 and 3-18).

(Responses continue on next page)

Code	Comment Document
	Ray Roads both of which have vastly inferior bike lanes. This will result in more traffic, slower speeds and unfortunately, more accidents and deaths. Most of these roads can't be widened and those that can would incur extreme costs.
18	12. If this freeway is built along Pecos Road, the population of Ahwatukee Foothills better get prepared for the worst traffic they've ever seen in the area for the projected 7 to 10 year construction time. Pecos Road would basically be unusable due to all the closures and construction during this time. That forces everyone onto the only three ways out of the area, Chandler, Ray and Warner roads. Now add the thousands of construction workers and equipment used the build this massive project to the daily commute and it will be one big mess. Also don't forget that ADOT loves to schedule other major projects (resurfacing surface streets) during these "big builds."
19	13. ADOT plans to put part of this freeway thru South Mountain Park because they have no other option and Federal law allows them that right. I can't even express in words how wrong this is. Taking even one foot of a park for a freeway is just plain wrong. After all why is it even a park then. We have the best engineers in the world and ADOT can't find a solution that doesn't take park land. I find that fact disgusting and a total insult to engineering intelligence and I would be honored to research and lead the charge for a solution considering our ADOT "engineers" have no clue for an option to save the park. I would think a ten lane twin tube tunnel would be easy to bore thru South Mountain as has been done in the Alps, DC Metro, and the Euro-Tunnel. Contractors such as Bechtel Brown and Root, Morrison-Knudson, etc., could do the job with two Robbins Moles. This could help limit desert destruction to only entry and exit portals. Nine years ago a 20-foot diameter single tube water tunnel was completed, running north to south and more than a mile long and the environmental damage was minimal. Even though core drilling will have to take place along the proposed route, the referenced water tunnel has exposed the structural geology already. This project done correctly, would present the least amount of damage to the environment. But again is ADOT willing to cost this out and present it to the public? A park such as South Mountain Park – all of it – should remain just that – forever.
20	
21	14. Will ADOT pay for yearly independent water and soil analysis to look for leaching of oil, gas, diesel fuel and chemicals into the freeway area near the community that will eventually leach into the water supply? What about the area's well re-location which is impossible. Is ADOT willing to pay the community for water costs forever on wells that are capped in the area. Has this cost been added to the budget?
22 23	15. What is the possible future cleanup cost to Arizona taxpayers if the Superfund site near 55th Avenue is breached and leaks into ground water since the Federal government will no longer be responsible for any costs of cleanup if a freeway is built in the area? Similar sites cleanup costs have ranged from $650 million to $2.25 Billion. Has this cost also been added to the budget?
24	16. Desert Foothills Parkway and 24th Street need to be made off limits to 18 wheeler truck traffic at all times because of the nature of the narrow size and design of these streets. These roads cannot handle big rig traffic with their required extra turning radius. Medians and expensive landscaping will be destroyed. Fines for using these roads should be posted and enforced.
25	17. In the event of an emergency when the proposed freeway is shut down, the Desert Foothills Parkway and 24th Street exits have to made unavailable for diverting traffic off the freeway. These roads cannot handle the capacity with their winding, hilly terrain and narrow lanes. ADOT would create a massive gridlock in that area from which no one would be able to move in or out, including emergency vehicles. This scenario is unacceptable and avoidable if these roads are made off limits during a freeway shutdown. Has ADOT done any studies on the effect of a closure of the freeway and

Code	Issue	Response
12	**Property Values**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
13	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
14	**Trucks**	
15	**Trucks**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60.
16	**Purpose and Need**	An analysis of the origins and destinations of projected freeway users is presented in Figure 3-18, on page 3-36 of the Final Environmental Impact Statement. Freeway users are defined as those motorists who pass through the bend of the freeway (around the South Mountains). So, this does not count motorists in Laveen Village who go to Interstate 10 (Papago Freeway) and motorists in Ahwatukee Foothills Village who go to Interstate 10 (Maricopa Freeway). The results of the origin-destination analysis show that 73 percent of the traffic going around the South Mountains has origins or destinations in the area within or around the Study Area and supports the conclusion that the proposed action would serve east–west mobility consistent with commuting movements.
17	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
18	**Traffic**	The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)
19	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

it's effects on the traffic in the impacted Ahwatukee area? I can't find one. I suggest that ADOT shuts down Pecos Road for one work day during the week to gauge the effect on traffic in the community. And no advance warning to the public, after all freeway shutdowns aren't planned, but pre-planning helps saves lives. It will be grid lock during rush hour.

(26) (18) 18. This proposed 8-10 lane freeway will take 7-9 years to construct. During that time it will throw in excess of 6000 construction workers daily on our streets coming and going. There will be a continual dirt cloud over Ahwatukee until the freeway is completed. Pecos Road will continually be shut down and basically be unusable which means Chandler Boulevard and Ray Road will be the only way in and out for 7-9 years. How are people in this area going to get out? It will be unlivable during construction for the residents south of Chandler Boulevard between 35 Avenue and 40th Street. Will there be a fund to help children and elderly adults who develop major respiratory ailments from the construction's brown cloud? Will residents and businesses be compensated for extra water costs for dirt cleanup during construction? What about blasting apart South Mountain with 3 twenty story high and 200 yard wide cuts and the unknown noise effects on the community?

(27) (28)

(29) 19. Wildlife and native vegetation armageddon.

20. Projected total budget costs for this freeway are currently at the $2-3 Billion range that ADOT throws around. People "in the know" of building this freeway, not only have mentioned that it will be the most costly stretch of freeway ever built in the metro area but also peg the final costs in the $4-5 Billion range at today's costs. Arizona's current STATE budget is $8.9 Billion. This 22 mile piece of freeway will cost more than half of the total budget for the State of Arizona. I have serious problems spending that amount of money on a freeway with huge environmental implications during these recession laden times.

(3) 21. There will always be people who oppose freeways but when a freeway is going to have such a huge negative impact on a community, the land and a designated major metropolitan area Park, alternatives need to be found. Is it right to totally destroy a community for "The Common Good?" People chose to live in the Ahwatukee Foothills area because of what is has become: a huge secluded bedroom community with a great family environment and wonderful Arizona vistas protected from the big city just on the other side of South Mountain. A freeway enclosing and destroying this unique community is just plain wrong when there are so many unknown and potentially devastating obstacles in the way that will change the current environment forever.

(30) Hopefully all my issues will be discussed and answered. The Pecos Road alignment is not a viable solution for this freeway. Land south of Pecos Road on the Gila Indian Reservation is the most environmentally and economically sound decision to build a freeway of this size on. We seriously need to work towards doing the right thing for current and future generations.

Sincerely,
Kevin Janke

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Code	Issue	Response
20	**Alternatives**	Information related to the evaluation of a tunnel option is presented in the Final Environmental Impact Statement, beginning on page 3-16. The commenter's tunnel concept would be similar in nature to the tunnels evaluated in the Draft Environmental Impact Statement A cut and cover tunnel would not be feasible based on the geologic (hard rock) conditions of the South Mountains. A double-decker tunnel would result in similar or even higher costs and impacts as the tunnels considered for the study. In the State Route 710 project in Pasadena, California, the freeway alternatives that include tunnels cost almost $4 billion more than the freeway alternative without tunnels. The City of Phoenix water line has a 4-foot diameter. The tunnel bore was only approximately a 6-foot diameter. Geotechnical data from the City of Phoenix project was used in evaluating the potential for tunnel alternatives through the South Mountains.
21	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)
22	**Hazardous Materials**	Both the Van Buren Tank Farm and the West Van Buren Water Quality Assurance Revolving Fund site were identified and considered during development of the Final Environmental Impact Statement (see pages 4-105 and 4-165 and the Draft Initial Site Assessment prepared for the proposed project.) These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected media (groundwater) and the construction zone (near surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165.
23	**Hazardous Materials**	The corridor analysis revealed sites that would need further assessment during the property acquisition phase of the project, if an action alternative were to become the Selected Alternative. The Arizona Department of Transportation employs a phased approach to site assessment that allows time for cleanup of any sites found to have hazardous waste issues. The project team concluded from the level of analysis conducted during the environmental impact statement process that the types of sites likely to be acquired contain common hazardous waste issues like underground storage tanks, asbestos and lead paint in buildings, and other commonly found issues (see Final Environmental Impact Statement page 4-157). The Arizona Department of Transportation maintains a process for addressing these issues in accordance with all applicable environmental laws and regulations.
24	**Design**	Desert Foothills Parkway and 24th Street have standard 12-foot-wide travel lanes, and the vertical and horizontal geometry make them passable by most vehicle types. These roads are operated and maintained by the City of Phoenix . The City of Phoenix would have the authority to restrict truck traffic, if desired.
25	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
26	**Construction**	The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would expedite the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years; the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period. To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
27	**Construction**	The contractor would submit a written blasting plan to the Arizona Department of Transportation prior to beginning any blasting work. The Arizona Department of Transportation Resident Engineer then ensures that the contractor has followed all requirements for a blasting permit. Prior to blasting, the areas where rock fragments may fall is mapped to ensure there will be no property damage. Residents in the area are notified of any blasting activity (see Final Environmental Impact Statement page 4-123). Blasting is avoided if standard earthmoving equipment can be used.
28	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
29	**Biology, Plants, Wildlife**	
30	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway DEIS Comments
Date: Friday, July 05, 2013 12:24:11 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: sharkb8@aol.com [mailto:sharkb8@aol.com]
Sent: Friday, July 05, 2013 12:14 PM
To: Projects
Subject: South Mountain Freeway DEIS Comments

1

It's been noted in many closed circles within our very private "so-called" transportation board that the State of Arizona DOES NOT have the money necessary to maintain the existing highway system and to also make new highway improvements. Recently (06-2013) that clearly became evident when the State Transportation Board approved a project that wasn't even on the 5 year plan of state projects to be approved. A $66 million dollar project was approved while two critical projects were shelved because of lack of money. The two projects that were terminated (the widening of AZ 260 near Lion Springs and the widening of US 93 near Wikieup) are two of the five DEADLIEST rural highways in Arizona. Federal crash data states that 28 people have died on these two roadways between 2004 and 2011.

It appears that the citizens that make up the State Transportation Board have other issues at stake rather than people lives.

Since it is well stated and documented by the boards action above that the State of Arizona at this time does not have the funds necessary to maintain our highway system and protect the safety of its residents, I strongly support the termination of the PROPOSED South Mountain Freeway at this time. The needs of current state roadways far exceed the needs of a FUTURE 21 mile freeway segment. I suggest that the $2-5 billion dollars in collected tax revenue that is currently available for it's construction be used to maintain and upgrade these and many other needed critical projects for the next 7-10 years. We must look at ourselves, not as counties but as a state, something that the State Transportation Board & ADOT frequently forget.

It will be interesting to see if this letter is censured/deleted by ADOT from the Final EIS.

Sincerely,
Kevin Janke

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Code	Issue	Response
1	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

Simone Janssen

Document Created: 7/24/2013 10:18:12 PM by Web Comment Form

1

2 3

As a homeowner in the Foothills Reserves in Ahwatukee AZ, I choose a NO BUILD for the 202 South Mountain Freeway! Our peace, tranquility, love of nature here will be ruined by building this Freeway. My greatest concern is the pollution/toxins that will be emitted....my family members have asthma and all the schools in the area would GREATLY be affected by this Freeway!!

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Health Effects**	

Code	Comment Document

John Janssen Document Created: 7/24/2013 10:32:11 PM by Web Comment Form

To whom it may concern,

1 2 3 4

I would like to voice my opposition to the building of the loop 202 at all and especially on the pecos alignment. Many houses will be demolished and many more less desirable due to the freeway right out their windows. There at least 2 schools that would be very close to the freeway that would be exposed to toxins from the passing traffic.

5 6 7 8

The south side of South Mountain is beautiful, quiet, and peaceful. I would suspect that he polution from the passing vehicles would be trapped and be even more toxic. Hundreds of people ride their bikes through this area everyday. These routes would be eliminated to a large extent with this freeway. We should be promoting alternate travel instead of making it hard to use.

9 10

The current alignment will try and squeeze 8 lanes in an area with little or no room. It will not be built below grade because of cost. The san tan freeway is below grade along with many others haviing 50-100ft of isolation with the below grade and high walls. The people close to the alignment will have an ugly wall and lots of noise. Everything about this project is on the cheap and disregarding people's quality of life.

11

Do not build or move it further south.

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Health Effects**	
5	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
6	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Traffic**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
8	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Design**	The project team analyzed the belowground option, also called the depressed freeway option. The analysis indicated that depressing the freeway would increase the cost of construction and right-of-way acquisition, displace additional residences, create the need for additional pump stations and detention basins, and still need the installation of noise barriers. Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study (see Final Environmental Impact Statement pages 3-15 and 3-18).
10	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202-Laveen -- YES
Date: Monday, May 20, 2013 10:51:49 AM

From: Jasso, Darleen [mailto:darleen.a.jasso@bankofamerica.com]
Sent: Monday, May 20, 2013 10:36 AM
To: Projects
Subject: Loop 202-Laveen -- YES

1

I am writing to let you know I **support** building the final phase of the Loop 202 in Laveen.

I will not be able to attend the feedback event tomorrow.

Darleen Jasso
602-268-0639

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

bypass having to go on I-10 or around 48th Street.

So if I had a vote, it would be for either a tunnel or to extend the 202 all the way out to connect to the 101, bypassing the park.

That's it.

GABRIEL JASSO: Definitely need the South Mountain Extension Loop 202 built ASAP. It will help alleviate traffic within the city's freeway system, eliminate bigger trucks on our roadways down on Baseline and 51st Avenue, and bring business to the area, valued business to the South Phoenix/Laveen area, creating jobs and better opportunities for people, and would also mean less travel for us residents in South Phoenix to other parts of the Valley, which would also help improve with traffic in other areas, as well as pollution.

That's it.

(The proceedings concluded at 8:00 p.m.)

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Friday, May 17, 2013 1:06:01 PM

From: David L. Jaykins Jr. [mailto:dljaykins@foleymasonryandtile.com]
Sent: Friday, May 17, 2013 10:35 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Please build this project. We cannot afford not to have this completed.

Thank you,

Dave Jaykins
Project Manager
Office: 602.262.5281
Cell: 602.350.2748

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:47 PM
CALLER: MARION JEFFERSON	CALLER ADDRESS: 2225 W. RIVIERA DRIVE, TEMPE, AZ 85282
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:

I support the South Mountain Freeway. I hope that they build it because it gets very congested in my area when people try to get in and out of South Phoenix. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Public comment- Pro Highway
Date: Wednesday, May 22, 2013 10:51:07 AM

From: Ludmila Jegier [mailto:ljegier@gmail.com]
Sent: Tuesday, May 21, 2013 12:32 PM
To: Projects
Subject: South Mountain Freeway Public comment- Pro Highway

To: projects@azdot.gov

Hello my name is Ludmila Jegier and I reside in Laveen at 5212 W. Shumway Farm Rd.

Traffic Congestion Reduction:

1 I'd like to voice my comment to pursue construction of the Highway by way of extending Pecos through Ahwatukee Foothills and provide a transportation path between the South East Valley and the 10.

I recently moved from Chandler to reside in Laveen and have experienced the 1 hour commutes to Chandler due to back up traffic jams along Baseline Rd and the only alternate path down Riggs through the Gila Indian Reservation.

The community is in desperate need of development and transportation to reduce the traffic congestion experienced due to lack of freeway connections.

Economic Growth/Job Opportunities/Mobility:

Lack of adequate highway development is also holding the community back economically in areas of employment, business, growth and mobility.

Environmental Rebuttals:

I understand the GILA River Indian Community feels otherwise however the study demonstrates minimal environmental impacts with the reservation being preserved.

Residents of Laveen have no intention of negatively impacting our Sacred neighbors, taking land, harming nature's wildlife.

We simply would like a way to get to work which reduces our stress level, commute time, time spent away from our families while trapped in traffic.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Highway Benefits to Gila River:

By not having the Highway extended thousands of individuals daily take the 51st Ave Riggs/Beltline road to work or their destinations which runs through the Gila River Reservation.

The 2 lane highway promotes high speed passing, tail gating, accidents, casualties along the road by additional traffic that would be reduced if an alternate route existed.

Countless crosses mark the road memorializing those individuals who have fallen victim to the speeding and accidents along the path.

Creating the 202 extension would allow for a more peaceful experience along Riggs rd for the Gila community and a reduction in accidents from those rushing to make it to their destination.

Promoting Community Success:

Roads have been an American success story in mobility, industry, growth!

Why deny the residents of Laveen the opportunities that this highway can bring?

Ludmila Jegier

5212 W. Shumway Farm Rd

Laveen AZ 85339

_____
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Code	Issue	Response

Code	Comment Document
1	Chris Jelleson Document Created: 5/21/2013 2:02:02 PM by Web Comment Form The project will reduce air pollution by reducing the time vehicles spend stuck in traffic.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: No to the 202!
Date: Monday, May 20, 2013 8:37:34 AM

1

-----Original Message-----
From: Linda Jenkins [mailto:ljenkins25@aol.com]
Sent: Friday, May 17, 2013 8:24 PM
To: Projects
Subject: No to the 202!

Just say!

Sent from my iPad

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

MR. JENKINS: Yes, my name is Rueben Jenkins, and I appreciate the opportunity that you're giving me to make my comments. I'm a member of the Gila River Indian Reservation Community. I'm one of the landowners that, you know, is part of that reservation. And I, myself, would like to see the reservation -- the 202 go on the reservation, as a landowner. But the tribal council is working against us. They're not doing what the landowner wants. Every time we go before the council or something, they won't hear us. They won't listen to us.

And when they put this to a vote to the tribe, the head opinion there called a no vote, no-build. A lot of people didn't understand that. They thought it was going to, you know, be to build the freeway, but I knew from the start that one way on the other that they were going to build that freeway. And we have voted to put a petition in to have another vote, but the tribe is holding us up to the council. They're holding it back, and I'm afraid that they're not going to let us vote until they make a decision about this 202.

So -- and even the reservation under the BIA, and the BIA is not even getting in there to help us, which they're supposed to, the government is

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

supposed to regulate that, and they're not doing anything to stop the council from what they're doing. So I just -- I just wanted to make that comment that I would like to see it go on the reservation. And it would save a lot of the people in Ahwatukee to go through what they have to go through. And it would also save that mountain that they wouldn't have to go through if they built it on the reservation.

So that's the comment that I have, and something that I have in my heart, and hope that in one way or the other, that it will go to the reservation. Thank you.

THE FACILITATOR: Thank you.

Sharon Finell. Finell. Which one is it?

MS. FINELL: Perfect.

THE FACILITATOR: Okay, thanks.

MS. FINELL: Hi, good morning. My name is Sharon Finell. I am a resident of Laveen. And I live just about a mile from where this proposed freeway would be. I am in support of the freeway. I am very excited. I don't have a problem with us having to cut through South Mountain. I love South Mountain as a form of recreation, and I think the pass through South Mountain will provide more recreation opportunities for people, as it will be

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www.drivernix.com

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4418

1 MR. JENKINS: My name is Reuben D. Jenkins,
2 spelled R-e-u-b-e-n, D, and J-e-n-k-i-n-s.
3 I'm a member of the Gila River Indian
4 Reservation Community, so I have an interest in this
5 freeway that's going to be built. I myself would like to
6 see it built on the Indian land because -- one -- one of
7 the big reasons is that I'm one of the landowners that is
8 going to be -- you know, that owns land that's going to be
9 along the freeway there along the 202. But unfortunately,
10 the Tribe is working against us. They're not working for
11 the landowners, the Tribal Consult. The meetings we go to
12 to try to talk to them about it, they won't listen to us.
13 They won't make decisions that will benefit us.
14 But the main thing about this that -- the
15 whole thing that when it started, when the Tribe voted on
16 it for the first time, they had an option there that said
17 no build. And that confused a lot of people. And that no
18 build, for one -- but I myself knew from the start that
19 there was no such thing as no build. I knew from the
20 start that one way or the other, that 202 was going to be
21 built. But this thing went through, so the people voted
22 it down.
23 But since then, the landowners, which you
24 have a corporation out there that's working to -- you
25 know, that things go on a reservation, have put in a

1

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www.drivernix.com

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

petition, and they all signed it. And they've got enough, you know, to get it through. And they took it to the council. And then the council, you know, looked at it, and they said, oh, there's things wrong with it. They're holding it up. They say, we've got to investigate, see if the signatures are legal and all that. And they're just holding it up. Every way they can, they're working against us. They're not working with the landowners as they should be as council members.

And also, the thing that I'm concerned about is all those reservations are under the BIA, the Bureau of Indian Affairs, and they should be, you know, looking into this, that they're not helping the landowners. The BIA hasn't done nothing. They haven't got into it or anything that -- you know, to see if things are going right, you know. But that's my main concern.

But the main concern is that they're trying to hold up the thing that we can be able to vote again. And I know if it goes to a vote, that the landowners will, you know, have it to go on -- on the reservation. But they're fighting against us. I don't know why.

When we go to the meetings, the council meetings, they have the police there watching over us, 'cause they're afraid that the decisions that they make are going to be against us, and they're afraid that we're

Code	Issue	Response

Code	Comment Document

going to revolt or do something like that. But I don't think that's fair, you know. And I would just like to, you know, kind of let the people know, you know, what's going on, because they won't let news medias or reporters go to their meetings or anything, and nobody knows, you know, what's going on out there.

So I just thought maybe I could make a little comment that -- you know, let them know how I feel about it. So that's it. That's it. Thank you.

MS. RITTER: My name is Haley Ritter, H-a-l-e-y, Ritter, R-i-t-t-e-r, and I live in Phoenix, 85015 area, district 4.

I'm excited about the upcoming city council elections, because I think a lot of the younger people coming into leadership in this city will realize that we can't keep building freeways.

I'm against the 202 because there's a lot of pollution going through the city already. The uranium mines up north in Flagstaff and surrounding communities are very, very harmful for that community up there. And then the toxic chemicals that are being hauled through Phoenix and then through the South -- South Mountain Gila River Community if the 202 is built are going to be horrible to the environment.

There have been plenty of environmental

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Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: freeway
Date: Monday, May 20, 2013 8:46:22 AM

-----Original Message-----
From: Scott Jensen [mailto:scottwrestling37@gmail.com]
Sent: Friday, May 17, 2013 4:35 PM
To: Projects
Subject: freeway

1

Please build the South Mountain Freeway. Thanks Scott Jensen

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Edward Jensen
To: Projects
Subject: Opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 12:16:29 PM

To whom it may concern:

Please let this email voice, in the strongest possible terms, my absolute opposition to the design and construction of the Loop 202 South Mountain Freeway in Phoenix.

1 Study after study has come to the conclusion that Americans have reached "peak car," which is to say that we are not only purchasing fewer automobiles but we are driving them less.[1] Americans -- and Arizonans -- are demanding for expanded public transportation options in our cities and communities and investing money in a 20th century freeway project instead of 21st century public transportation infrastructure flies in the face of economic sense.

2 ADOT's move to study passenger intercity rail between Phoenix and Tucson is a project that makes much more sense and is indicative of the projects that a statewide department of *transportation* should be focusing on, not just freeways and highways.

I urge the Arizona Department of Transportation to join with countless neighborhood groups and reject building this portion of the Loop 202 South Mountain Freeway.

Sincerely,
Edward Jensen

[1] "Yet More Evidence of Peak Car" by Emily Badger, The Atlantic Cities, 23 July 2013. http://www.theatlanticcities.com/commute/2013/07/yet-more-evidence-peak-car/6299/

Code	Issue	Response
1	**Purpose and Need**	The study used state-of-the-practice, scientific community methods and similarly accepted methods, including the use of a standard input-output economic model and of assumptions based on traffic data and projections. The analysis is not required to project ranges, and the results are reasonably foreseeable based on what data are provided from the U.S. Environmental Protection Agency-approved Maricopa Association of Governments model as well as local plans. Further, methods, assumptions, and data were developed early in the environmental impact statement process and peer reviewed by the Federal Highway Administration, the Arizona Department of Transportation, and other federal, State, and local agencies. Peer reviewers concluded that the methods, assumptions, and data are appropriate. Potential factors that could influence changes in the analysis and study findings are listed on page 4-1 of the Final Environmental Impact Statement.
2	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Patricia Talcott
To: ADOT
Cc: Patricia Talcott
Subject: ENVOY # 1313655793/Proposed South Mountain Freeway
Date: Thursday, May 16, 2013 3:30:41 PM
Attachments: image001.png

This email came in through the ADOT ENVOY System.

5/16/2013 3:24:19 PM

I could not be more opposed to the South Mountain freeway proposal along Pecos Road. To take out Pecos Road and possibly homes, schools, and businesses along Pecos road would do great harm to the community of South Ahwatukee. Home values of some really nice neighborhoods would go down drastically and the air quality in Ahwatukee would get worse. If ADOT is determined to build a freeway south of South Mountain, ADOT needs to take it further south into the Gila River Reservation and not destroy my neighborhood. I am sure the Reservation leadership will demand a high price to build on their land and if ADOT can not afford it, they should abandon the idea of building the Sounth Mountain freeway entirely. Jessup, John - jsjessup1@cox.net

1 2 3 4 5

Patricia A. Talcott
Program Project Specialist II
206 S. 17th Avenue, Room 101, MD118A
Phoenix, AZ 85007
602.712.7610
www.azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Economics and Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F
Phoenix, AZ 85007

Dear ADOT ,

I am a member of PARC and feel many issues not addressed or omitted in the recent DEIS. I would like the following issues entered into the public comment section:

Issues in DEIS

1. *Ozone levels today are exceeding the standard parts per million set by EPA and the clean air act and not considered to get worse in this study. Postponing EPA enforcement standards must be reconsidered to do a true DEIS . Also explaining that dust storms cause all this is not accurate. Modeling of today's air levels needs to be updated and relooked at accurately.*
2. *Study must calculate and consider increased truck traffic from Mexico where trucks do not meet the CARB diesel standards adopted by AZ. Ignoring and assuming they won't take this faster route is seriously flawed part of DEIS study*
3. *Also the DEIS needs to study the commercial development planned on the highway route. As of 5/21 several plans and public information on development are public including local business owners intended use of land leases on GRIC and truck stops and truck depots already planned. Also swift transportation truck routes and use of this highway have not been studied since there are no laws to restrict truck traffic on this freeway. Must require that camex trucks use highway 8 bypasses only but no enforcement nor acknowledgment in the study reviews the new camex traffic or other illegal truck traffic will now drive on this faster new highway. .*
4. *Direct impact to autism cause by highways built close to kids. Recent evidence already exists in 2013/2012 should be added into the impact and not avoided. DEIS does not have accurate and up-to-date 2013 2012 asthma and autism impacts growing in metro Phoenix nor updates to impacts of highway 51 health issues we see from folks living 1 mile for freeways.*
5. *DEIS need to go back and review current health impacts of existing highways air quality an EPA air violations. Then DEIS needs to model the impact of the growth projections on worsening the air and health risks.*
6. *Population growth alone will estimate a severe worsening of health risks and cause air quality to be worse than EPA standards in 43 ave 51 ave zip 85045 85048 GRIC and laveen. Major flaw in such a study since it does not estimate these issues accurately for 2014 -2016 growth in toxic air and worsen health counts and health symptoms that the doctors and hospitals see now up for 2008 20010 etc..*
7. *Must better study for impacts to current and future residents and school kids whose play area and day cares will be less than ¼ of a mile from traffic*
8. *Did the study add in the additional traffic due to the building of the premium outlet mall at highway 10 and 202. This substantial increase in polluting traffic needs to be in the study. Not avoided since they exit the highway.*
9. *Blasting thru south mountain will cause religious and racial discrimination and civil rights violations in SMF DEIS Is it legal to destroy burial rights and petroglyphs and Indian artifacts in the line of demolition. If DEIS does not really go on Indian land and it does not protect their adjacent artifacts is it accurate and inclusive. DEIS should study all the true direct and indirect impacts to the highway after its built.AIRFA passed in 1978 is not being followed nor respected.*
10. *Truck traffic from Mexico and high sulfur diesel and benzene levels will be worse than study portrays. The DEIA clearly does not model the additional air pollution for this traffic,*
11. *This highway will not improve the air quality for phoenix . DEIS does not model the future impact accurately. Our city will be in violation of Clean air Act. Also will worsen west and south phoenix air.*
12. *There is no serious discussion or consideration in the DEIS of the 2005 monitoring of toxic chemicals (present*

Code	Issue	Response
1	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the *Regional Transportation Plan* that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014.
2	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Draft Environmental Impact Statement page 3-27). Traffic projections are regularly updated by the Maricopa Association of Governments. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011. When the Maricopa Association of Governments adopts new socioeconomic projections and traffic projections, it will be reflected in the study documents. Key model inputs used to forecast travel demand included (see Table 3-7 on Draft Environmental Impact Statement page 3-27): · socioeconomic data based on the adopted general plans of Maricopa Association of Governments members, which includes projected growth in population, housing, and employment (including proposed commercial centers), along with economic forecasts and the existing and planned transportation infrastructure as identified by Maricopa Association of Governments members · the anticipated average number of vehicle trips within the region (including those to and from the region's households) on a daily basis (this number is tracked regularly by the Maricopa Association of Governments) · the distribution of transportation modes used by travelers in the Maricopa Association of Governments region (also tracked regularly by the Maricopa Association of Governments · the capacity of the transportation infrastructure to accommodate regional travel · the future transportation infrastructure established using *Regional Transportation Plan*-planned projects and improvements and from known arterial street network improvements assumed to be made by the County, Cities, and private developers The Maricopa Association of Governments approved new socioeconomic projections in June 2013. The new data are presented in the Final Environmental Impact Statement (see page 1-11). Although slower growth in total vehicle miles traveled was noted, the need for the freeway did not change. The revised traffic analysis validated that the proposed project is needed today.
4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed on page 4-147 of the Draft Environmental Impact Statement, a programmatic agreement was developed for the project to establish a process for

(Response 5 continues on next page)

Code	Comment Document

air toxins) . This 2005 study conducted by EPA and ADEQ in joint effort with JATAP showed results reported in 2006 showed emission from traffic were already (in 2006) above the standard of 1 million chance of cancer in a life time of exposure in west an south phoenix and GRIC, This need new data for 2007 2008 2009 2010 2011 2012 2013 since air and traffic are now worse. To not have DEIS study this is unethical and flawed.

8 4

13. *Jatap monitoring already found formaldehyde at 34 times the standards,*
14. *Benzene at 8 times the standard, butadiene 1 and 3 7.5 times the standard, acetaldehyde at 3.4 times the standard, our residents are being exposed to these entire carcinogens not just one. DEIS must study the combined effects of these current carcinogenic mixed compounds on Health. And then study the new higher levels of all of the above thru 2013, Then model and project the added compound and impacts caused by the study which will make all the toxin levels higher*
15. *Health risks of JATAP have been studied and need to be updated and cancer risks have been extensively published by the EPA and are well known carcinogens hurting health. The DEIS states it's uncertain of the risk proving the DEIS study is a cover-up and inaccurate denial of the facts.*

9 2 10

16. *DEIS does not mention hazmat transportation issues a risk of tanked from Mexico. Must redo the study for this*
17. *The sharp curve designed in the highway south of 85045 zip code should be reviewed for the addition risk for truck and car crashed since it's a steep banked curve, It is fully known that the pitch slope and angles of this curve will contribute to a truck safety issue and will increase the risks of track accidents and hazardous material spills. This extra detail is all missing from DEIS which is designed to protect and inform the public about impacts. A study of why the flaws in the DEIS need to be independently looked at as well and the influence the trucking industry is having and adot on rushing to poor judgment in this study. Independent review must be done to answer why the above points we omitted or played down and Environmental impacts since prior and current facts differ from the DEIS.*

11 3

18. *Congestion and future traffic counts not molded correctly and congestion on west I 10 on ramps not designed correctly to handle traffic volumes. ADOTS past modeling results have been inaccurate and realistic . We need better and realistic quality data inputs into the study. 2012 and 2013 traffic pattern data not updated in the study. Must relook at peak traffic from April 2013 as look at current air quality EPA violations.*

12

19. *Sulfur and benzene test stations should be set up to get accurate 2013 air quality reading in laveen GRIC and Ahwatukee and Chandler who are directly going to be impacted by this as well.*

13

20. *If you do major cut thru and removal of 3 to 5 ridges of South Mountain I assume the wind tunnel and wind patterns will be dramatically different and in the future will cause the wind , dust and pollution flows to be different. May cause more sulfur diesel and benzene to flow into the air and be trapped in zip codes 85045 85048 and on GRIC. The study does not seriously look at this impact with quality findings. I also am not certain that the studied the air quality and violations of EPA standards 2013 and may have exceeded EPA. Detail the EPA sensor air violations thru May 2013 so we all publically know what levels and issues we have before the freeway.*

12

8 14

21. *Dust particulate impact should be study at today's levels the construction levels and post construction levels since the natural wind tunnel with be changed due to cut thru mountain ridges and opening up air toxin portal.. What levels above EPA standard were exceeded in 2013 at the 43 ave EPA test monitor site.*
22. *It has been very difficult to breathe the air in 2013 in awhatukee and south leaven due to increase pollution and benzene and certainly worse than 2012 levels and worse thaqn what was identified inthe DEIS.*

12

23. *Updated data and study still needed and more air sampling must be done and study to wind pattern changes due to cutting thru mountains*

15

I would prefer the freeway be aligned w/ Riggs Road and have Pecos extended as a boulavard to the other end.

Sincerely concerned,

James Jewell

Code	Issue	Response
5 (cont.)		consultation, review, and compliance with federal and State preservation laws as the effects of the project on historic properties become known. The programmatic agreement states that any data recovery on federal lands necessitated by the project must be permitted under the Archaeological Resources Protection Act in accordance with the federal land-holding agency and that, in the event any data recovery for the project should take place on tribal lands, all applicable permits would be obtained. Because the project is proposed, a programmatic agreement is in place to address data recovery on federal and tribal lands, and no excavations have yet occurred. The proposed freeway is and will continue to be in compliance with the Archaeological Resources Protection Act.
6	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
7	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type

(Response 8 continues on next page)

Code	Comment Document

Code	Issue	Response
8 (cont.)		of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause significant adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
9	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Design**	All elements of the proposed freeway design are in accordance with the Arizona Department of Transportation's *Roadway Design Guidelines* and the American Association of State Highway and Transportation Officials' *A Policy on Geometric Design of Highways and Streets*. Hazardous materials commodity flow studies and other information are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as some of the elements considered when developing emergency response plans. If the plan were amended, it would be made available to the Arizona Department of Transportation.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
11	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analyses. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project, which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement. According to Environmental Protection Agency guidance, new monitors are not necessary to analyze air quality impacts.
13	**Air Quality**	Air quality depends on several factors such as the area itself (size and topography), the prevailing weather patterns (meteorology and climate) and the pollutants released into the air. Cuts through the South Mountains would be expected to produce microclimate differences similar to those produced by a series of buildings in a large city that produce localized wind tunnel effects. The mountain cuts, however, would not affect regional air quality.
14	**Air Quality**	Emissions from road dust and additional sources were considered in the quantitative project-level particulate matter (PM_{10}) hot-spot analysis prepared for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
15	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

1

From: Projects
To: ADOT
Subject: FW: South Mountain Loop 202 Freeway
Date: Tuesday, May 14, 2013 9:48:11 AM

From: Mr. Dale Jobe [mailto:azdjobe@gmail.com]
Sent: Monday, May 06, 2013 12:47 PM
To: Projects
Subject: South Mountain Loop 202 Freeway

Where can I find a detail map of the proposed new freeway?

I remember seeing one at a meeting several years ago but can't find a current one.

Dale Jobe
15445 S. 1st Ave.
Phoenix, AZ 85045-0401
Cell Phone (480) 460-0057 ° °

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Code	Issue	Response
1	**Design**	Information related to service traffic interchange locations can be found on page 3-51 of the Final Environmental Impact Statement, specifically Figure 3-28. More detailed aerial maps are available on the Arizona Department of Transportation Web site, <azdot.gov/southmountainfreeway>.

Code	Comment Document

1
2

From: Projects
To: ADOT
Subject: FW: South Mountain Loop 202 Freeway
Date: Tuesday, May 14, 2013 9:47:34 AM

From: Mr. Dale Jobe [mailto:azdjobe@gmail.com]
Sent: Wednesday, May 08, 2013 5:26 AM
To: Projects
Subject: RE: South Mountain Loop 202 Freeway

I've seen this map but am interested in more detail on the route.
Like where are interchanges, What properties will be affected.
The rumor around here is that the Desert Foothils "Post office" and Glenhaven will all be torn down.

Dale Jobe
15445 S. 1st Ave.
Phoenix, AZ 85045-0401
Cell Phone (480) 460-0057 °°

From: Projects [mailto:Projects@azdot.gov]
Sent: Tuesday, May 07, 2013 1:18 PM
To: Mr. Dale Jobe
Subject: RE: South Mountain Loop 202 Freeway

Mr. Jobe,

Here is a link to the South Mountain Freeway Fact Sheet for your review: http://www.azdot.gov/southmountainfreeway/PDF/FactSheet.pdf.

Thank you,

Tony Staffaroni
Senior Community Relations Officer
Arizona Department of Transportation
1655 W Jackson St MD: 126F
Phoenix, AZ 85007
azdot.gov

From: Mr. Dale Jobe [mailto:azdjobe@gmail.com]
Sent: Monday, May 06, 2013 12:47 PM
To: Projects
Subject: South Mountain Loop 202 Freeway

Where can I find a detail map of the proposed new freeway?

I remember seeing one at a meeting several years ago but can't find a current one.

Dale Jobe
15445 S. 1st Ave.
Phoenix, AZ 85045-0401
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Code	Issue	Response
1	**Design**	Information related to service traffic interchange locations can be found on page 3-51 of the Final Environmental Impact Statement, specifically Figure 3-28. More detailed aerial maps are available on the Arizona Department of Transportation Web site, <azdot.gov/southmountainfreeway>.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Loop 202 Freeway
Date: Tuesday, May 28, 2013 8:20:44 AM

From: Mr. Dale Jobe [mailto:azdjobe@gmail.com]
Sent: Saturday, May 25, 2013 9:06 AM
To: Projects
Subject: RE: South Mountain Loop 202 Freeway

I'm familiar with that map. It has no detail all all, it's just a line in the Desert.

1 I would like to see a map that's shows boundry lines, lanes, and interchanges.
2 I'm anxious to see the loop 202 completed around south Mountain.
But can't image how you're going to justify all the demolition.

Dale Jobe
15445 S. 1st Ave.
Phoenix, AZ 85045-0401
Cell Phone (480) 460-0057 ° °

From: Projects [mailto:Projects@azdot.gov]
Sent: Tuesday, May 07, 2013 1:18 PM
To: Mr. Dale Jobe
Subject: RE: South Mountain Loop 202 Freeway

Mr. Jobe,

Here is a link to the South Mountain Freeway Fact Sheet for your review: http://www.azdot.gov/southmountainfreeway/PDF/FactSheet.pdf.

Thank you,

Tony Staffaroni
Senior Community Relations Officer
Arizona Department of Transportation
1655 W Jackson St MD: 126F
Phoenix, AZ 85007
azdot.gov

From: Mr. Dale Jobe [mailto:azdjobe@gmail.com]
Sent: Monday, May 06, 2013 12:47 PM
To: Projects
Subject: South Mountain Loop 202 Freeway

Where can I find a detail map of the proposed new freeway?

I remember seeing one at a meeting several years ago but can't find a current one.

Dale Jobe
15445 S. 1st Ave.
Phoenix, AZ 85045-0401
Cell Phone (480) 460-0057 ° °

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delete or destroy all copies plus attachments.

Code	Issue	Response
1	**Design**	Information related to service traffic interchange locations can be found on page 3-51 of the Final Environmental Impact Statement, specifically Figure 3-28. More detailed aerial maps are available on the Arizona Department of Transportation Web site, <azdot.gov/southmountainfreeway>.
2	**Purpose and Need**	The analysis used to assess the purpose and need for the proposed freeway followed Federal Highway Administration guidance. The proposed freeway is needed to serve projected growth in population and accompanying transportation demand and to correct existing and projected transportation system deficiencies. See Chapter 1, *Purpose and Need*, in the Final Environmental Impact Statement.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

Locally against Peoria
"Truck Route"
L Jochum

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Freeway is a much needed route to alleviate some inner city traffic snag
Date: Monday, May 20, 2013 8:32:55 AM

-----Original Message-----
From: John [mailto:john480az@aol.com]
Sent: Saturday, May 18, 2013 12:05 AM
To: Projects
Subject: Freeway is a much needed route to alleviate some inner city traffic snag

1

Sent from my iPhone

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: re-route the 202
Date: Monday, May 20, 2013 9:45:04 AM

From: Dana Johnson [mailto:dana@alwunhouse.org]
Sent: Monday, May 20, 2013 9:35 AM
To: Projects
Subject: re-route the 202

To whom it may concern,
WE've built too many freeways which have only contributed to our unsustainable urban sprawl. I oppose construction of the 202 and especially the option that is currently under discussion. You should NOT use the route requiring chopping off our sacred South Mountain. It's my understanding that the current option is to cut a large 200' high cut into the mountain. That should not be done. IF you insist on building this massive river of cars at least re-route it so that you don't have to cut into South Mountain.
Thank you,
Dana Johnson

1 2 3 4

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Code	Issue	Response
1	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Alternatives**	The project team examined all reasonable alternatives to avoid the park, but did not identify any feasible and prudent alternatives to avoid impacts on the park. The portion of the park that would be used for the proposed freeway would be 31.3 acres, or approximately 0.2 percent of the park's approximately 16,600 acres (see Final Environmental Impact Statement pages S-39 and 5-31). The Arizona Department of Transportation continues to work closely with park stakeholders to minimize impacts and address various concerns; several measures to minimize harm to Phoenix South Mountain Park/Preserve are under development (see Final Environmental Impact Statement, starting on page 5-23).
3	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Section 4(f) and Section 6(f)**	

Code	Comment Document

From: Erik Johnson
To: Projects
Subject: Building The 202
Date: Sunday, June 02, 2013 11:12:07 PM

1

Yes, I am very supportive of building the 202.
It just might help in getting traffic moving!

Signed
Erik C. Johnson

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:16 PM
CALLER: THOMAS W. JOHNSON, JR.	CALLER ADDRESS: 4005 S. 7TH STREET, PHOENIX, AZ 85040
PHONE: 602-441-3046	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I do support the South Mountain Freeway annex building and would not mind coming to the 10 AM to 8 PM north ballroom public comment time period at all. Please contact me with my particular time to speak, if that's what we do. So, if anyone wants to contact me back, I am very supportive of this and would be glad to speak out for it on that date, the 21st of April, 2013. That's Tom Johnson and I appreciate you calling me even though it was a long thing. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4292

Park, because I feel it's an idea that has passed its usefulness.

I don't believe that building this freeway would reduce the congestion.

I do think it would encourage sprawl and encourage the waste of the natural resources that we have remaining.

I think the massive amount of money projected to be spent on this freeway could be better spent elsewhere repairing our aging infrastructure throughout the region, promoting public transit, bikes, other alternatives.

I believe it would be a waste of money.

That's all I need.

***

ADAM JOHNSON: I like the 59 Alternative. I feel that brings the community closer to downtown Phoenix.

I think bringing the community together involves bringing the economy up. You connect the cities together, to me it helps the people grow, helps the city connect.

I guess what I am trying to say is putting the 59 in, economically it will help the city

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

better because you already have connections.

The 59 gives the Laveen community a way to get to the main freeway so they can go to downtown Phoenix or to the west regardless of where they live in Phoenix. So 59 is more involved for the living community to connect to downtown and the rest of the city.

On top of that, to me it feels like there is no freeway connecting Laveen into any of the city. So I think this might allow us to connect to the city a lot better, to let us bring our ideas to the city, commute back and forth.

I guess that's all I have.

***

PATRICIA WEEKS: Our concerns are once they close off 32nd Street off of Pecos and 32nd Street, the road that goes from Frye off of 32nd Street into the Lakewood subdivision and out through --

LARRY WEEKS: -- will be used to bypass Chandler Boulevard getting to 40th Street to get to the freeway on the 202 and the Briarwood exit.

PATRICIA WEEKS: That's one of the concerns.

LARRY WEEKS: The other concern is there is

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

Code	Comment Document

From:	Projects
To:	ADOT
Subject:	FW: Comments on DEIS for the SMF
Date:	Monday, July 08, 2013 8:48:45 AM
Attachments:	image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Andy Johnson [mailto:andy.johnson427@gmail.com]
Sent: Saturday, July 06, 2013 3:02 PM
To: Projects
Cc: PARCtheSMF@aol.com
Subject: Comments on DEIS for the SMF

To whom it may concern;

I am a snowbird who, with my wife, has spent about six months of the year at our condo at 1024 E. Frye Rd. Unit #1047, Phoenix, AZ 85048 since 2002. Our primary residence is at 9280 Sunderland Way in West Chester, OH, 45069 - just north of Cincinnati about 20 miles. I have been following periodic articles in the AZ Republic and other sources of information on this topic since then. Most recently I read a very informative email issued by PARC. I certainly agree with all of the points they make in their thoughtful analysis.

With regard to my comments on this matter I will focus on one technical topic which doesn't appear to be discussed in great length but which I
strongly believe is a cornerstone issue regarding the ADOT advocacy of the SMF. Specifically, I question the veracity of the modeling studies mentioned extensively by ADOT in support of the SMF. My background as a retired GE engineer includes a B.S. in Metallurgical Engineering from the South Dakota School of Mines & Technology in Rapid City, SD, in 1964, and a M.of Engr. in Materials Engineering from Rensselaer Polytechnic Institute in Troy, NY, in 1974. My 35 years of employment with GE involved Naval Nuclear, Industrial Gas Turbine and Aircraft Gas Turbine industries. I had many assignments in the areas of materials application and advanced material & process development, as a technical engineer, as a functional manager and as a program manager.

Almost all of the projects that I worked on, ranging from several week long quick studies to the last NASA program that I managed at GE Aviation (which lasted eight years and for which my NASA budget averaged close to $1 million/month for a total of $96million) used many types of analytical models. Although modeling was not my technical specialty, I had many PhD's with extensive experience in modeling working for me directly and also
as hired consultants to do very complex analyses. As a manager, I was responsible to assure

(Comment codes begin on next page)

Code	Issue	Response

Code	Comment Document

that the basic objectives of our modeling effort made technical sense, that the work was done diligently and the results reported accurately. On large government contracts not doing so risked cancellation of the project at best and potential civil or criminal penalties at worst. So there was always a strong motivation to get it right.

Three fundamental precepts of any modeling task are 1) establish appropriate boundary conditions, 2) test the results of the modeling against the initial boundary conditions to make sure they are consistent with one another, and 3) verify the results of the model with actual physical data.

1 2 At the current time I am personally unaware of whether or not the modeling results touted in the DEIS for the SMF have met any of these absolutely essential criteria. Therefore I suspect that any arguments made in favor of the proposed truck bypass through Ahwatukee based on modeling would likely be erroneous and fall into the category of GIGO (Garbage In, Garbage Out).

Respectfully,

Andy Johnson
513-290-6258

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Code	Issue	Response
1	**Purpose and Need**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Final Environmental Impact Statement page 3-27). The model projects demand for multiple modes of travel, including automobile, bus, and light rail. Key model inputs used to forecast travel demand in the Study Area included socioeconomic data (based on land use plans and population and economic forecasts), the anticipated average number of vehicle trips within the region on a daily basis, the distribution of transportation modes used by travelers in the region, the capacity of the transportation infrastructure to accommodate regional travel, and the future transportation infrastructure. The project team used the most recent and reliable data available. The Final Environmental Impact Statement (Chapter 1, *Purpose and Need*, and Chapter 3, *Alternatives*) provides more detail on the data inputs to the modeling effort and discussions of the assumptions used.
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:12 PM
CALLER: JEFF JOHNSON	ADDRESS: GILBERT, AZ
PHONE: 480-206-3572	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway. Thank you. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 4:30 PM
CALLER: LORI JOHNSON	CALLER ADDRESS: 11122 W. 165TH AVENUE, SURPRISE, AZ 85388
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO to Southmountain Freeway
Date: Wednesday, July 24, 2013 4:34:52 PM
Attachments: image001.png
Importance: High

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Elsa Johnson [mailto:asdza_elsa@cox.net]
Sent: Wednesday, July 24, 2013 4:34 PM
To: Projects
Subject: NO to Southmountain Freeway
Importance: High

Please do not waste any more of tax payers money to build this freeway. I totally agree with the Gila River tribal members who do want to see more development happening in their beautiful desert. Another freeway only brings more pollution to this pristine landscape impacting all life. (1)

Phoenix and ADOT need to impose vertical development and stop this unruly urban sprawl. As it is there is not enough water to sustain this rampant growth. Please think and plan 50 years ahead. San Diego put limits on development a while back perhaps the Valley needs to do the same. (2)

NO to Southmountain Freeway. (3)

Thank you.

Elsa Johnson

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
3	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Scottsdale resident

"We do not inherit the Earth from our ancestors, we borrow it from our grandchildren" - ancient Native American proverb

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Code	Issue	Response

Code	Comment Document

From: Sierra Club on behalf of Mansur Johnson
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 6:35:21 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) I used to work in the movie business. I remember being on location at South Mountain park. I care about animal corridors and the no build alternative would be best to protect the animals.

Thank you.

Sincerely,

Mr. Mansur Johnson
6056 N Oracle Jaynes Station Rd
Tucson, AZ 85741-3470

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants, and Wildlife**	

Code	Comment Document
1	Document Created: 5/25/2013 6:09:50 PM by Web Comment Form no freeway on gric

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:48 PM
CALLER: CALVIN JONES	CALLER ADDRESS: 7330 W. DARREL STREET, LAVEEN, AZ 85339
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the Freeway being built. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 2:54 PM
CALLER: WILLIAM JONES	CALLER ADDRESS: 8315 NORTH 8TH AVENUE, PHOENIX, ARIZONA 85021
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Get her done, get her done. We've waited long enough. I'll be in support. Get her done, we've waited long enough. Bye Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

project will create 38,000 jobs during the five- to six-year construction period that will result in a $2 billion investment in the Phoenix area economy.

The money to build the freeway is in the budget, and again, this has been approved by voters twice, first in 1985 and again in 2004. I approve the 202, and I would like to see it built. Thank you for your time.

THE FACILITATOR: Thank you, sir. Garell Jordan. Did I get that name proper?

MS. JORDAN: Garell.

THE FACILITATOR: Ma'am, you have three minutes. Here's the timer; please begin.

MS. JORDAN: My name is Garell Jordan; I am a proud resident of Laveen for the last two years. We moved to Laveen, I live at 64th Avenue and Southern, so very close to the 59th Avenue alignment. We knew when we moved there that there was a freeway planned. And we moved there because we wanted more acreage; we wanted land for our animals; we have six dogs, three horses, and a bunch of chickens. But we also knew that we wanted to live in close proximity to downtown Phoenix, where I work, two blocks from here. And we knew that we wanted some of the amenities of living in the city that, you know,

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

frankly, if I really wanted to live on a farm, I would have to move a lot further out.

So that wasn't the goal. The goal was to live in a mixed-use community, a diverse community. A lot of people have mentioned, you know, Laveen has an average per capita income equivalent to Paradise Valley and Ahwatukee, but they also have a higher than average rate of poverty, so we are a very diverse community; we are socially diverse, economically diverse, and I like that.

You know, that's what I moved there for, but I moved there expecting a freeway. And the freeway's been promised for years and years. So we assumed that eventually it would be there. And so I urge you to complete the freeway; however, living in -- on a county island just outside of Phoenix's limits, we are also very concerned about some of the truck traffic that we will see. We live off of Southern Avenue. And there's a lot of industry in the area, so we would ask that in building the freeway, that there be consideration about the concerns of nearby residents related to the burden of increased traffic from commercial vehicles, access of the freeway ramps, and that there be adequate sound barriers and other things.

1

2

Page 83

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Design**	All elements of the proposed freeway design are in accordance with the Arizona Department of Transportation's Roadway Design Guidelines and the American Association of State Highway and Transportation Officials' A Policy on Geometric Design of Highways and Streets.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

3

I love the idea of running paths and, of course, bike riding trails alongside the freeway. I just don't know if that's in the budget, but frankly I think rubberized pavement should be. So those are my statements and I thank you for your time.

THE FACILITATOR: Thank you, ma'am. Raven Barehand.

Raven Barehand.

As we're waiting for the next speaker, I'd like to remind you again, please refrain from clapping or making comments regarding any speaker's position on any of this, out of respect for their position.

If there's anyone in the auditorium that would like to speak, please make sure that you register at the front desk. Your name will appear on the screen; we will call you up in the order that you register.

Katran Mingo.

Good afternoon. You have three minutes; here's the timer. You may begin.

MS. MINGO: Okay. Thank you very much. My name is Katran Mingo; I'm a resident of Laveen. Thank you for hearing us today. It is time to build the South Mountain Freeway. Valley commuters have

Code	Issue	Response
3	**Design**	Recreational or equestrian trails are not included in the proposed project. The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Monday, May 20, 2013 1:57:03 PM

-----Original Message-----
From: Josh [mailto:JMeans2006@yahoo.com]
Sent: Monday, May 20, 2013 1:56 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

Hi,

1 I am writing in support of the 202 expansion through South Mountain. I live at 423 W Bluejay Drive in Chandler 85286. I commonly drive to California and would utilize the expansion to bypass downtown Phoenix en route to California.

Sent from my iPhone

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Josh Document Created: 5/21/2013 2:37:03 PM by Web Comment Form This expansion would create a huge economic growth to the surrounding areas. Construction would create hundreds if not thousands of jobs and the end result would be a product that would be useful to a wide array of users.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Wednesday, May 22, 2013 10:53:30 AM

-----Original Message-----
From: nguyenjoshua@msn.com [mailto:nguyenjoshua@msn.com]
Sent: Tuesday, May 21, 2013 5:22 AM
To: Projects
Subject: Loop 202 South Mountain Freeway

1

I think 59th Ave is the best choice.
Josh

Sent from my iPhone

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain freeway
Date: Wednesday, May 22, 2013 10:56:30 AM

From: Ted K [mailto:sdsu98@yahoo.com]
Sent: Monday, May 20, 2013 7:48 PM
To: Projects
Subject: South Mountain freeway

1

Please build it.

"Carpe Diem!"

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 South Mtn Freeway
Date: Monday, July 08, 2013 8:55:26 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Tiffany Kadlec [mailto:bobsgirl1414@sbcglobal.net]
Sent: Friday, July 05, 2013 2:50 PM
To: Projects
Subject: 202 South Mtn Freeway

Hello,

1 2 3

I wanted to state that me and my wife are strongly against building a freeway to the west side. It will increase crime and take away the ambience that ahwatukee currently possess. It will be a detriment to the area and the need is not there. We request the money be spent expanding I10 if you need to spend the money, otherwise save the money.

Respectfully,

Robert & Tiffany Kadlec
480-629-8788

Sent from my iPad

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.

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 South Mtn Freeway
Date: Friday, July 05, 2013 3:37:36 PM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Tiffany Kadlec [mailto:bobsgirl1414@sbcglobal.net]
Sent: Friday, July 05, 2013 2:50 PM
To: Projects
Subject: 202 South Mtn Freeway

Hello,

1 2 3

I wanted to state that me and my wife are strongly against building a freeway to the west side. It will increase crime and take away the ambience that ahwatukee currently possess. It will be a detriment to the area and the need is not there. We request the money be spent expanding I10 if you need to spend the money, otherwise save the money.

Respectfully,

Robert & Tiffany Kadlec
480-629-8788

Sent from my iPad

_____

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.

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: No Freeway through Ahwatukee
Date: Friday, June 21, 2013 10:23:03 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT
Communications

From: Lori Kaiping [mailto:lori.kaiping@gmail.com]
Sent: Friday, June 21, 2013 10:03 AM
To: Projects
Subject: No Freeway through Ahwatukee

(1) (2) (3) (4) (5) (6) (7)

I just heard with dismay that the push to extend the Loop 202 through Ahwatukee is once again under way. My husband and I have lived here for 13 years and we and our neighbors throughout Phoenix strongly oppose this very ill-conceived project. Urban sprawl has already taken too much of a toll on the city of Phoenix and South Mountain Park is an irreplaceable recreation and wildlife area; it provides a critical balance for the over-development that already occurred. This very unnecessary freeway would be an environmental disaster, bringing pollution and noise to our community, negatively impacting it in every way. The justifications that have been trotted out for building this freeway don't begin to measure up to the facts. Let the people vote on this issue which has such far-reaching consequences. We need to know who exactly will benefit. Whoever it is, it won't be the residents of Ahwatukee and our community at large. Please do not build this freeway.
Sincerely,
Lori Kaiping

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Code	Issue	Response
1	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Biology, Plants, and Wildlife**	
4	**Air Quality**	
5	**Noise**	
6	**Purpose and Need, Lack of Support**	
7	**Public Involvement**	No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period. The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400.

Code	Comment Document

Patrice Kaiser

Document Created: 6/25/2013 10:21:46 PM by Web Comment Form

I have lived in the Ahwatukee Foothills area since December 1991 when we moved here from NJ when my daughter was barely 3 months old. We lived for many years in the Ahwatukee Custom Estates but moved to the Foothills in 2006. We live in an infill gated street behind the Foothills Golf Club. I take Pecos Road daily. I lookout out see the Reservation land empty for miles and miles. I look at the area as a huge waste! Growing up in NJ one of the great things they created which is a toll road is the Garden State Parkway...NO TRUCKS ALLOWED. The NJ Turnpike, another important highway but interstate is also a toll road but does not disrupt residential areas! I cannot imagine the need for either type of road running through Ahwatukee! We are a relatively small community quite self contained. Having a huge highway running through here would completely change the context of our community! The noise, polllution, necessary demolition of homes, church and who knows what is tragic!!! I implore the planning execs to try to negotiate with the private landowners of the Gila reservation that may be appropriate for a roadway otherwise I beg the Transportation Planners to abandon this proposal as unnessary and extremely detrimental to this community!!!

1 2 3 4 5 6 1 2

Code	Issue	Response
1	**Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	
6	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document
1	Bahjat Kalandos Document Created: 7/1/2013 11:50:39 AM by Web Comment Form We Support the southwest mountain freeway project on 59th Ave. When it is scheduled to start buying the properties?

Code	Issue	Response
1	**Acquisitions and Relocations**	Property acquisition would begin if a build option is selected in the record of decision. The record of decision is expected in 2014.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 1:38 PM
CALLER: STAR CARLTON KANINE	CALLER ADDRESS: 1009 EAST PALMAIR, PHOENIX, ARIZONA 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the construction of the South Mountain freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. I AND OUR FAMILY ARE IN FAVOR OF THIS PROJECT. OUR BIGGEST CONCERN IS THE IMPACT THE FREEWAY WOULD HAVE ECONOMICALLY AND ENVIRONMENTALLY ON GROUND WATER, AIR POLLUTION AND WILD LIFE.

1 2 3

Thank you

Optional

Name MICHAEL KAPEL Email M.KAPEL@COX.NET

Address 8043 S. 54th Dr.

City LAVEEN State AZ Zip 85339

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Groundwater**	Groundwater impacts are addressed in the *Water Resources* Section of the Final Environmental Impact Statement, beginning on page 4-101. If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. Mitigation measures would be put in place to reduce impacts on groundwater (See Final Environmental Impact Statement pages 4-106 and 4-107 and the text box on page 4-108.) The well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Transportation to effectively mitigate well impacts associated with its projects throughout the region.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Biology, Plants, and Wildlife**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:25 PM
CALLER: COMEL KARASHI	ADDRESS: 462 EAST MEAD DRIVE, CHANDLER, AZ
PHONE: 480-206-3572	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I would like to support the building of the 202 Freeway. Think we'll like that.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Praveen Kareddy Document Created: 5/21/2013 2:53:24 PM by Web Comment Form Please build the south mountain 202 look as soon as possible, we have been living in this area since 2006 and we have been waiting for this loop so that it would make us to commute easily to my work located in chandler. I take base line and then I-10 to go to work, base line to I-10 itself takes about 30-45min in the peak hours and if there is any construction or something else going on base line then it takes much much longer. we believe this 202 loop is required for Laveen residents so that Laveen growth will be much faster and it is very good for Laveen growth. Thanks

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: south mountain freeway
Date: Monday, July 01, 2013 8:44:40 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Chris Karpman [mailto:chris.karpman@gmail.com]
Sent: Saturday, June 29, 2013 10:27 PM
To: Projects
Subject: south mountain freeway

To whom it may concern,

It's frustrating to read a lot of the media accounts surrounding the South Mountain Freeway because they are so hyper-focused on the opinions of a small segment of people in Ahwatukee who are against the freeway for selfish reasons.

1

Speaking as a Laveen resident who purchased a home along 67th avenue in between Southern and Baseline in 2008, there is absolutely no question that we need the freeway built.

I think it's ridiculous when people in Ahwatukee say there is no need for the freeway. It's so self-absorbed. Tell that to the thousands of people who spend at least twice as much time driving to I-10 in rush hour as in non rush hour (a 5.5 mile drive that often takes 15 minutes for me). Tell that to the people who work in the Southeast Valley and have to drive 25 minutes down baseline for 12-15 miles just to get to I-10.

I have friends in Ahwatukee. It takes 45 minutes to visit them when it would take less than half that time with a freeway because I have to go entirely around South Mountain. I know people who live in Glendale and Avondale and work in Chandler. Tell it to them.

This doesn't even mention what the lack of a freeway has done to the community in Laveen. We have no hospital within a 15 minute drive, no movie theater with a 15 minute drive, no Target within a 15 minute drive, no Costco. Our dining and retail options are enormously limited. And this doesn't just impact Laveen, but the South Mountain district and Estrella.

There are way more people impacted by not having a freeway than the limited number of people directly impacted who live within a quarter mile of Pecos Road. For 95% of people in Ahwatukee, live won't even change as a result of the freeway. Life will change for 100 percent of people in the area I live.

Laveen is only going to continue to grow and develop, of course, and so will the areas west, Avondale,

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Goodyear, Buckeye. Not only is the South Mountain Freeway long overdue, but the I-10 reliever freeway (State Route 30) will need to be built to handle all of the increased I-10 traffic that is certain to come in the next decade or two.

If anything, I would say that the segment of L-202 from I-10 to at least Southern road should be expedited once all of the right of way is acquired once the freeway has been approved. It's going to make a monumental difference for many thousands of people.

Thank you,

Chris Karpman

--
Chris Karpman
Publisher: ASUDevils.com/Rivals.com
cell: 480.619.2255
chris.karpman@gmail.com
AIM/Google Talk: Chris Karpman

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Code	Issue	Response

Code	Comment Document
1 2	Bruce Kasmer Document Created: 5/27/2013 7:27:19 AM by Web Comment Form I have always thought of this freeway primarily as a bypass used by cross country travellers to get through the Phoenix metro area as quickly as possible with minimal impact on local residents. As such I would think that one of the more western alignments would be more appropriate than the W59 selected with the added benefit of more closely aligning with the 101. In addition I wonder if any other alignments farther west than W101 were ever considered.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The corridor screening process (beginning on Final Environmental Impact Statement page 3-6) recounts the development and screening process of corridors that were west of State Route 101 Loop. Initial corridors near Avondale Boulevard, at the western edge of the Study Area, are shown in Figure 3-5, on page 3-7. Figure 3-6, on age 3-10, shows the T09 Alternative (located just east of 107th Avenue), which was eliminated at the second stage of corridor development and screening. Table 3-3, on page 3-11, summarizes the reasons it was eliminated from further study.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:24 PM
CALLER: SUSAN KASTANIS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am for the 202 South Mountain Freeway extension. I think that will help the area greatly. If the environmental impact statement say that it would be ok for that stretch of road going around that, that would be important and so if that passes I think that would be great. So, that's all, thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:55 PM
CALLER: DAVID KASTER	CALLER ADDRESS: 2321 E. GONDOLA LANE
PHONE: 480-507-2321	EMAIL:
CALLER REMARKS/QUESTIONS: I would like to see the South Mountain Freeway go through finally. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Katherine

Document Created: 7/15/2013 1:10:13 PM by Web Comment Form

When watching the simulation video at one of the public meetings, it did not appear that there were many cars on the road. Someone from ADOT at the meeting mentioned that the numbers of cars was calculated based on projected rates. However, was an analysis done using 2010 census numbers and is Arizona continuing to see the rapid growth it once did? Do we really need this highway expansion? We should use this funding to expand the light rail and improve other modes of transportation. Sometimes the no build alternative may be the best one to choose.

1 2 3 4

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	
3	**Purpose and Need, Old Plan or Use of Old Data**	
4	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

Kimberly Kato — Document Created: 7/16/2013 1:31:47 AM by Web Comment Form

1 2 3 4

Do not destroy any part of South Mountain. Leave Pecos as a 2 lane road and continue that AROUND the mountain. It is the perfect compromise. The alternate route would be there, just now a highway. Less environmental impact. No homes or businesses lost. Minimal truck traffic.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The concept of keeping the facility an arterial street is similar to the Arizona Parkway concept evaluated for the proposed project. The reasons that alternative was eliminated from further study are presented on page 3-19 of the Final Environmental Impact Statement. Any alternative alignment that goes around the South Mountains would partially be located on Gila River Indian Community land. Permission to study such alternatives has not been granted by the Gila River Indian Community government (see Figure S-11 on page S-39 of the Final Environmental Impact Statement). Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 3:48 PM
CALLER: BETTY KEARNEY	CALLER ADDRESS: 9037 29TH STREET, PHOENIX, AZ 85028
PHONE: 602-992-1738	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am for the expansion highway. I think that would be a good highway to put people to work, for good transportation – my daughter lives south east of here and it is very difficult getting to and from. It is crowded all down in that area. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 To complete the 202 is a good idea to make the connection with the 101
I approve of the effort to complete the 202

Optional

Name Joann Keating Email

Address 10 / 11 7th St #209

City Phoenix Az 85034 State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

We are totally opposed to the extension of the Loop 202 freeway through Ahwatukee. (1)

The plans for this freeway might have been a viable option when it was first drafted, however, since then our community has grown and does not accommodate this option any longer. (2)

Our homes, schools, local traffic & air pollution will all be affected. There is no upside to this option any longer. (3) (4) (5)

Please add us to the DO NOT COMPLETE THE SOUTH MOUNTAIN FREEWAY AS PROPOSED list. (6)

Optional

Name Tom & Karen Keefe Email tkeefe7@cox.net

Address 14640 S. 20th St.

City Phoenix, AZ 85048 State _____ Zip _____

Phone 480-759-1774 Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1).
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Purpose and Need, Lack of Support**	

Code	Comment Document

4334

If we did that sort of thing, we would be able to cut down the amount of cardiovascular disease that we have, we would reduce Alzheimer's. All these terrible diseases. We would do away with all of that. We could eliminate a lot of these diseases, or decrease them certainly. Guess I can't think of anything else.

MS. KEENAN: Erika Keenan, E-r-i-k-a K-e-e-n-a-n, Laveen, Arizona. I took time off from work today to come down to speak, and I said my three minutes, and I was cut off at my three-minute mark. I understand why rules are in place, but the panel had been sitting there for at least 20 minutes with no one to speak, and I was the only one next in line to speak, so I'm not sure why they couldn't have given me the courtesy of letting me finish what I had to say, especially since we're taking our personal time to come down and say this and there was nobody else around. Thank you.

UNIDENTIFIED SPEAKER: We live on Pecos Road on the street right there, and it's right next to, you know, where the highway would be or -- and on the other side of that would be the Indian reservation where they're struggling to come to a decision. And I've lived there for about nine years,

Code	Issue	Response
1	**Public Involvement**	The public hearing provided members of the community an opportunity to make comments (with a 3-minute limit) in front of a project panel. The time limit was put in place to accommodate the large crowds expected throughout the day. Court reporters were also available to take individual verbal comments; those comments were not subject to the 3-minute limit. Comments could also be submitted on comment cards, through e-mail, a telephone hotline, or the online hearing.

Code	Comment Document

there the heat index is going to go up; it's already hotter out there than any other parts of the Valley.

Also, along with the increased congestion there will be increased air and noise pollution that is not accounted for around those homes, and just building a berm between the two perhaps is not really a fair solution to the people that have lived there so long. So we would be anxious to know if this goes through, what the plans might be to inhibit that noise and how much widening is going to be done. And that's about all I have, and I want to thank you for the time.

THE FACILITATOR: Thank you, sir.

If anyone else is in the auditorium and you'd like to speak, register at the front desk, your name will be up on the screen, and we'll call you in order. Thank you.

Erica Keenan.

Ms. Keenan, hi. You have three minutes, the timer is here in front of you. Please begin.

MS. KEENAN: All right. My name is Erica Keenan, I'm a resident of Laveen, Arizona, and I appreciate you letting us speak today. Over the past ten years the population of Laveen and Southwest Phoenix has doubled and the environmental impact projects that the number to be more than doubled in the next 25 years.

Code	Issue	Response

(Comment codes begin on later page)

Code	Comment Document

Only the Loop 202 connector can ease the traffic nightmare that is currently the I-10, which is clogged with rush-hour traffic, heavy trucking, and shipping traffic.

As a matter of fact, the traffic is so bad that on many days you can find heavy trucking and shipping traffic coming over 51st Avenue to Riggs Road through the GRIC and Laveen through the surface streets. These surface streets were not made for such traffic. Baseline Road and Dobbins Road are already clogged and the pavement is collapsing due to overuse and heavy trucking traffic. When the population doubles and traffic doubles, which is what is projected, what are we going to do without an alternative like the 202? Opponents don't want to see things change, and yet a new multi-thousand-square-foot expansion of the Vee Quiva Casino, complete with 1,000 spaces for parking, is underway. What are we going to do about the added traffic that will be added to the one and only road to and from the casino, which is 51st Avenue?

Unemployment is still a huge problem in Laveen and the South Phoenix area. Construction jobs are nice, and building the road will bring many needed area labor jobs, but the highway can also bring in commercial and professional jobs to our area.

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

I'm 100 percent behind building the Loop 202 connector, but I also realize we must not simply slap in a new highway. We must also make sure the new Loop 202 build is a model to be followed by other highway building projects. This includes making sure there are bike and pedestrian paths along the side of the highway so citizens have a choice on what means they want to commute. Some examples of these freeways and parkways are the Schuylkill Expressway in Philadelphia and the Rock Creek Parkway and W&OD Trails in Falls Church, Virginia.

2

A nice-looking sound barrier is also needed. We are located at the base of South Mountain Park, the largest municipal park in the country and recently touted by National Geographic magazine as the top five hiking destinations in the country. Laveen is also home to Aguila Golf Course, a top-rated Golf Digest municipal course and PGA qualifying course. As such, building the 202 we hope will add access for tourists, and we want it to look nice.

THE FACILITATOR: Excuse me. You've exceeded your three minutes.

MS. KEENAN: I conclude with a plea, don't continue to think of this area as the barrio or the ghetto of Phoenix. This area earns a higher national

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Design**	Recreational or equestrian trails are not included in the proposed project. The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
2	**Visual Resources**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation's standard applications. As an example, for State Route 101 Loop (Pima Freeway) in Scottsdale, the City of Scottsdale chose to add public art to the noise barriers. The City's intent went above and beyond the Arizona Department of Transportation's guidelines of reasonable aesthetic treatment and, therefore, the Arizona Department of Transportation did not fund the aesthetic portion of the project. The Arizona Department of Transportation and the City of Scottsdale entered into an intergovernmental agreement for the purposes of allowing Scottsdale rights to design and construct artistic embellishment on the Arizona Department of Transportation-supplied noise barrier. The Arizona Department of Transportation provided the funds for construction of the noise barriers themselves, but the City of Scottsdale provided the funds to cover the aesthetic portion of the walls. Final Environmental Impact Statement page 4-171 explains the process municipalities might take to achieve the desired aesthetic treatment for noise barriers or other structures.

Code	Comment Document

average household income than the City of Phoenix --

THE FACILITATOR: Excuse me.

MS. KEENAN: -- Paradise Valley, and the greater national average. Thank you.

There aren't that many people here to speak; I don't know why you can't let people speak a couple more seconds.

THE FACILITATOR: Paula Fleck.

Before you begin, ma'am, keep in mind the three-minute time limit.

Also, please be respectful of all the speakers. Your comments need to be kept to yourself so we can honor the comments and opinions of each speaker, regardless of your side of the issue.

Yes, ma'am, go ahead.

MS. FLECK: Okay. I think it is time to build the South Mountain freeway. Valley commuters have waited in traffic jams long enough. The freeway will cut congestion across the metro area, reduce the air pollution, and save drivers time and money; 64.3 percent of likely voters in Maricopa County support construction of the freeway, according to the results of a new poll commissioned by We Build Arizona. Just 19.6 percent said they were opposed or likely to oppose the project.

In a separate survey also commissioned by We

Code	Issue	Response

Code	Comment Document
1	Lindsay Keever Document Created: 5/21/2013 2:37:54 PM by Web Comment Form The Loop 202 would be welcomed to the area to decrease traffic flow for the residents in this community. It would create many more jobs for the community and in this day, we cannot deny anymore jobs. The Loop 202 would also increase equity for nearby homeowners. I see nothing but positive outcomes by expanding the South Mountain Freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:39:44 AM

From: Tim Kehoe [mailto:swishsweetz@gmail.com]
Sent: Friday, May 10, 2013 9:27 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Im in support of building the 202 100%! I believe not only will the extension help reduce traffic on other major freeways but will reduce accidents as well. Thank you for listening.

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Larry Keifenheim Document Created: 5/21/2013 3:06:42 PM by Web Comment Form I strongly favor the building of the South Mountain Freeway. It would improve traffic flow at the I-10 tunnel in downtown. Afternoon traffic flow traveling west is stop and go coming out of the tunnel and reversed during the morning rush hours. There are many accidents etc. around the tunnel which also slows travel. Presently there is no other west freeway travel out of downtown Phoenix. The west valley is expected to add many more businesses and residents in the coming years and will need traffic improvements to handle the growth. The Laveen, Estrella and South Mountain villages of Phoenix are greatly underserved regarding medical care, higher education, commerical, retail and job creation opportunities. The freeway will make it more attractive for developers to invest in this area of the metro. More investment means more tax dollars for the entire region. The South Mountain Freeway provides a chance for the southwest section of the metro to prosper as other sections of the metro have done with the addition or improvements of freeways 10, 17, 101, east 202, 51 and the widening of 60 in the east valley. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Just observing-South Mountain
Date: Thursday, May 30, 2013 11:46:19 AM

From: Herb [mailto:kello1@cox.net]
Sent: Thursday, May 30, 2013 11:26 AM
To: Projects
Subject: Just observing

1

Build 'er boys !! In my 74 years of residency in Arizona, I have seen every type of destruction of land and monuments destroyed in the interest of progress. Metro Phoenix is now running a train system, might as well get some of that I-10 traffic diverted around and tear up some more land. But for cryin' out loud, don't be drilling for oil on federal lands, more oil, more freeways. The 202 connection between I-10 is also essential to the economy of the casinos on the reservation. Afterall, the federal money for medical assistance to the tribe is not enough....with all the money from casinos, they (American Indian Tribes) could have the best contingent of medical facilities and hospitals across the country, more than the V A or the the missions along the trail in California. As far as casinos, let 'em build the one in Glendale, who cares? The 202 loop would give faster access to University of Phoenix and Jobing stadiums. They need the money too. While I'm at it, isn't ironic that spur off San Tan Freeway to Ellsworth road is about to finish? That will give cause to a new terminal on the east side of what was once affectionally known as "Willie Patch" or Williams Field giving way to defense cuts and now Gateway Airport. Yay for Queen Creek, once a great lettuce and potato and agricultural community, now, just another big box on the route. I wonder how much longer Luke AFB will survive cuts? I won't be around to see it but then the continuation to Florence Junction from Ellsworth. In the 50s hunted Willow Springs ranch north of Tucson and East of Oracle Junction. Last time I was in Tucson, drove north on the old "miracle mile" and passed right by Oracle with realizing it. Yep, build 'em boys, make room for some more silicone plants, cookie cutter housing developments and casinos. The biggest challenge is that the cage is the same size but the mice keep multiplying.

Respectfully
Herb Kelley

Code	Issue	Response
1		Comment noted.

Code	Comment Document
	Chandler Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Wednesday, May 29, 2013 8:23:29 AM

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Lisa Kelly
Sent: Tuesday, May 28, 2013 6:17 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) (5) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(6) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Lisa Kelly
8342 E Weldon Ave
Scottsdale, AZ 85251-5934

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Health Effects**	
4	**Section 4(f) and Section 6(f)**	
5	**Biology, Plants, and Wildlife**	
6	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 Our family is very much against the building of this freeway. After looking at the maps and the movie the freeway is not what our community needs. The waste from tearing out homes and churches is horrendous!

2 We live in a wonderful community and I would appreciate it if the State would encourage community growth and unity but not destroy into it and destroying it. It is truly amazing how people (ADOT) make decisions that have a severe impact on our community when they don't have to live here. Please do not

3 push into this and please wait for the tribe to come around with an alternative route. I don't think ADOT have a clue as to how

4 severe this will be.

Optional

Name Margot Kelly Email MKKelly70@aol.com

Address 1225 E. Squirrelbush Pl

City Phoenix State AZ Zip 85048

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-156

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 12:39 PM
CALLER: STACY KELLY	CALLER ADDRESS: 721 WEST CAREY AVENUE, GILBERT, AZ 85233
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the new South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:43 PM
CALLER: PAUL KEMP	CALLER ADDRESS: 6970 S. WINDSTREAM PLACE, CHANDLER, AZ 85249
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in total support of the expansion of the freeway. I think it is very much needed and everything that we can do to continue making our life here so wonderful in the Valley we need to do so. So please mark me as a yes for the freeway expansion. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Monika Kennedy

Document Created: 7/19/2013 10:08:18 AM by Web Comment Form

1 2 3 4 5 6

I am a resident of Ahwatukee Foothills and I do NOT want the Loop 202 going in on Pecos Road. I cannot imagine the noise, pollution and traffic nightmares that this will bring to have trucks passing through at all hours. My family has lived and worked here for over 20 years and this will greatly reduce the reasons why this is a desirable area to live. Do not ruin my community!

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Air Quality**	
4	**Purpose and Need, Truck Bypass**	
5	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:37:50 AM

-----Original Message-----
From: Tom KERTIS [mailto:tommk5@aol.com]
Sent: Sunday, May 12, 2013 9:27 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

We need the 202 loop now. Please move forward. I live in Chandler and drive to the west side every day through the Broadway curve.

Tom Kertis

Sent from my iPhone

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Rehana Khan
To: Projects
Subject: South Mountain Freeway EIS Comments
Date: Wednesday, July 24, 2013 9:26:34 PM

1

2

The EIS did not address in detail the option of 'no build'. No build, if not better, can be an equally viable option as 'build' if comprehensive study of 'no build' option is performed. The study did not take into account in detail the demand management strategies and neither was integrated approach for demand management through multi-modalism, active system management and capacity improvements at exisiting bottlenecks demostrated in the EIS for No build option. ADOT should look into the 'No Build' option comprehensively before proposing and implementing any of 'build' options which are all detrimental to society and environment.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	

Code	Comment Document

From: Rehana Khan
To: Projects
Subject: Re: South Mountain Freeway EIS Comments
Date: Wednesday, July 24, 2013 11:06:18 PM

1 2

Also EIS should carefully account for upcoming technologies such as connected vehicle and autonomous vehicles which will revolutionize transportation industry and provide dynamic traffic and demand management capabilties reducing the need to build new infrastructure including South Mountain Freeway.

From: Rehana Khan <aligsrus@yahoo.com>
To: "projects@azdot.gov" <projects@azdot.gov>
Sent: Wednesday, July 24, 2013 9:26 PM
Subject: South Mountain Freeway EIS Comments

The EIS did not address in detail the option of 'no build'. No build, if not better, can be an equally viable option as 'build' if comprehensive study of 'no build' option is performed. The study did not take into account in detail the demand management strategies and neither was integrated approach for demand management through multi-modalism, active system management and capacity improvements at exisiting bottlenecks demostrated in the EIS for No build option. ADOT should look into the 'No Build' option comprehensively before proposing and implementing any of 'build' options which are all detrimental to society and environment.

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, April 30, 2013 8:53:06 AM

From: Dave Kibby [mailto:dkibby7@gmail.com]
Sent: Friday, April 26, 2013 4:21 PM
To: Projects
Subject: South Mountain Freeway

1

I am new to Phoenix and live in Ahawatukee.
I say yes yes yes yes to the freeway.
Please proceed without delay.

David and Anjanette Kibby
14212 S 12th Place
Phoenix, AZ 85048

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4287

Thank you.

* * *

MS. KIMMICK: Debbie, Kimmick, K-i-m-m-i-c-k.

I live on 59th Avenue and Broadway, and I'm concerned about the alternate route or the proposed route. It's going to knock off my access heading north because that's turning into an access road, and I'm concerned that it's cutting my neighborhood in half.

So my concerns with it being there would be the noise, the air pollution, the extra congestion. I feel that it would be better if they went and connected it to the 101 instead of the 59th route.

I'm going to keep it that simple.

* * *

MR. KIMMICK: My name is Galen, G-a-l-e-n, Kimmick, K-i-m-m-i-c-k, and I live at 59th Avenue and Wood.

I have several concerns about this project and the noise it's going to create, the air pollution that I believe it's going to create in my neighborhood that I don't have now. I believe there's a better alternative by

Page 9

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Traffic**	The W59 Alternative would affect the existing local street network. Approaches for reconfiguring the local street network include removing streets, constructing new streets, constructing the proposed freeway over existing streets, or dead-ending existing streets. Final design of local streets would be coordinated with emergency service providers, local jurisdictions, and other appropriate agencies and would continue through final design stages. See Final Environmental Impact Statement Figure 3-32, on page 3-56. The neighborhood north of Broadway Road near the proposed freeway would continue to have access to adjacent streets such as 59th Avenue and Broadway Road. The access roads adjacent to the freeway would provide a north-south connection between Broadway and Lower Buckeye roads. They would not provide access to the adjacent neighborhoods.
2	**Social Conditions**	Prospective home buyers of neighborhoods built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
6	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4288

Thank you.

* * *

MS. KIMMICK: Debbie, Kimmick, K-i-m-m-i-c-k.

I live on 59th Avenue and Broadway, and I'm concerned about the alternate route or the proposed route. It's going to knock off my access heading north because that's turning into an access road, and I'm concerned that it's cutting my neighborhood in half.

So my concerns with it being there would be the noise, the air pollution, the extra congestion. I feel that it would be better if they went and connected it to the 101 instead of the 59th route.

I'm going to keep it that simple.

* * *

MR. KIMMICK: My name is Galen, G-a-l-e-n, Kimmick, K-i-m-m-i-c-k, and I live at 59th Avenue and Wood.

I have several concerns about this project and the noise it's going to create, the air pollution that I believe it's going to create in my neighborhood that I don't have now. I believe there's a better alternative by

1 2

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	

Code	Comment Document

3

4

5

6

moving it out to the 101 and making it a true bypass. I think that would be a much better alternative.

During the construction phase, it's going to limit our ability to go see our daughter because of where she lives on 59th Avenue, and we're going to be essentially cut off from her. And once it's completed, it's going to take longer to get into Phoenix and the main areas we go to. So I don't see any benefit to me at all.

Even if I was to use the freeway, I can't get on it readily. I will have to drive a mile and a half to be able to access the freeway because of where the on-ramps and off-ramps are located. So I would encourage them to seek other alternatives than the 59th Avenue idea.

Thank you -- oh, can I add something?

Furthermore, I'm concerned with the location of my house to where the proposed freeway is, that in the final draft of where the freeway is going to go, I am going to be severely more impacted, you know, more than I am right now because I can become one of the ones displaced. Since the map has -- they say it's a pretty good guide but not the final guide, and if it changes by one degree, I'm out of a house.

Thank you.

(Proceedings concluded at 8:00 p.m.)

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
3	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Traffic**	Access would be maintained during construction, and construction activities that might substantially disrupt traffic would not be performed during peak travel periods (for more information on temporary construction impacts beginning on page 4-173 of the Final Environmental Impact Statement). Travel times within and around the Study Area are projected to decrease with the implementation of the proposed freeway (see page 3-34 of the Final Environmental Impact Statement).
5	**Traffic**	From 59th Avenue and Wood Street, there would be on- and off-ramps to and from the south at Broadway Road (less than 1/4-mile away) and on- and off-ramps to and from the north at Lower Buckeye Road (around 1 mile away).
6	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:02 PM
CALLER: CLARENCE KING	CALLER ADDRESS: 6211 S. FOUR PEAKS PLACE, CHANDLER, AZ 85249
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, July 08, 2013 8:49:38 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Anne King [mailto:meetingyz@cox.net]
Sent: Sunday, July 07, 2013 2:50 PM
To: Projects
Subject: South Mountain Freeway

1 Every time this discussion comes up, it seems to be addressed as a foregone conclusion that the freeway will be built where Pecos Road now runs. What seems to be missing from the conversations is the quality of life and what drew people to that area of the Valley in the first place.

2 Why are you so many willing to destroy up 326 additional homes and build a freeway so close to those that remain? Why is progress the answer that is given as to why this freeway is needed? Then stop building in that area. There's no reason to cover every inch of the desert with a house or commercial property just because we can.

3 Have any of you ridden a bicycle down Pecos Road? Have you seen the 'other traffic' that occupies that road on any given morning, especially weekends? This is the quality of life I am talking about. This is one of the best bike routes and one of just a few bicycle routes that remains that provides any type of safe, uninterrupted distance for riding. There are also runners, those on roller-blades, countless cycling groups. Did you know that people from the Wounded Warrior Project often use Pecos Road to help its new riders become accustomed to using a horizontal bicycle because of the wide shoulder lanes, long stretches of road and low traffic volume on weekend mornings?

4 The mountains are beautiful; there's sometimes wildlife; you can see an entire sunrise or sunset and it's even quiet at times. While I'm at it, would you please add a port-o-john at the 40th Street and Pecos Park 'N Ride?

5 Anne King
Business Owner and Triathlete
meetingyz@cox.net
602-920-9136

_____

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Traffic**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
5	**Park-and-Ride Lot**	The park-and-ride lot is operated and maintained by the City of Phoenix. The request is outside the scope of this project.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 4:30 PM
CALLER: JOSEPH KING	CALLER ADDRESS: 15855 E. PALAMINO BOULEVARD, FOUNTAIN HILLS, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the building of the South Mountain Freeway. Thank you. Bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Maura Kirby
To: Projects
Subject: URGENT - South Mountain Freeway Comments
Date: Wednesday, July 24, 2013 4:35:25 PM
Importance: High

Dear All,

I am writing to, once again, express my opposition to and concern over the proposed South Mountain Freeway. My family and I have been residents of Ahwatukee for over 13 years, living in the Mountain Park Ranch Community. After investigating the information available these are my opinions:

1 2 3 4 5 6 7 8 9 10

- It is irrefutable that neighborhoods, including my own, schools, churches, and many businesses will be negatively impacted by air pollution, light pollution, noise pollution by both the construction and the existence of the proposed South Mountain 202 Freeway.
- A significant portion of South Mountain, sacred land, will be destroyed.
- CANAMEX Truck Bypass will introduce new, potent pollution to the valley.
- This freeway is a waste of significant taxpayer dollars that could be better spent elsewhere.
- Ahwatukee is filled with individuals and families that care deeply about their community. It's more than a community – it's a huge family. I have never lived in a place like it and would never want to leave. However, the proposed freeway, will now force my family to be uprooted.

My family and I are requesting a 'no build' or 'no action' alternative to the current plans.

Thank you for your time and consideration.

Regards,

Maura Kirby

CFO
16515 S. 40th Street, Suite 125
Phoenix, AZ 85048 USA
Tel: (480) 659-9120
Fax: (480) 659-9193
www.bmaresearch.com

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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Visual Resources**	Light from the freeway would be produced from vehicle headlights and taillights and from fixed light poles at interchanges along the freeway. Nighttime users of the park and residents of Ahwatukee Foothills Village may see lines of seemingly crawling vehicles, each with lights front and back. Fixed freeway lighting would be provided for safety reasons only at interchange exit and entrance points. Freeway lighting at these locations would be designed to reduce illumination spillover onto sensitive light receptors such as residential areas (see page 3-58 of the Final Environmental Impact Statement).
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Section 4(f) and Section 6(f)**	
5	**Cultural Resources**	
6	**Trucks**	
7	**Purpose and Need, Truck Bypass**	
8	**Purpose and Need, Lack of Support**	
9	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
10	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Michael Kirk Document Created: 5/21/2013 11:22:09 PM by Web Comment Form I'm happy the environmental study is complete and support the recommended 59th ave route. We need this freeway! Our Laveen roads are filled with semi trucks and are in poor shape. This freeway would save drivers countless hours in traffic.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway alignment
Date: Monday, July 15, 2013 8:05:12 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: jklein4161@aol.com [mailto:jklein4161@aol.com]
Sent: Sunday, July 14, 2013 2:57 PM
To: Projects
Subject: South Mountain Freeway alignment

1 2 3 4 5 6

As a member of PARC, I am a resident of Ahwatukee for 20 yrs, and live 5 houses north of Pecos Road. I am writing to express my opposition of the DEIS/SMF. Kyrene de los Lagos and the Mountain Park Church are mainstays of our community and will cease to exist. Not to mention the noise of construction and the diesel fumes clouding our skies. The sereneness of South Mountain will be destroyed. The DIES that you presented on April 26, 2013 is flawed because it doesn't take into account the pollutants that Mexican trucks will provide for our skies. Being from Mexico, these trucks do not have to abide by USA emissions standards. These trucks will be able to carry HAZMAT items, and the risk of spilling them and polluting our playgrounds, where our children play, is digusting. Please do not build the SMF.

Jeff Klein

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Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.) The proposed freeway would not result in the displacement of any schools along Pecos Road.
2	**Noise**	It is difficult to estimate construction-related noise levels because they depend on numerous factors, such as construction phasing, staging of equipment and materials, and work schedules. As reported on page 4-98 of the Final Environmental Impact Statement, construction noise levels during certain phases could be as high as 85 A-weighted decibels for short periods. As equipment would move on to other areas, noise levels would be lower. Where feasible, noise barriers would be constructed as early as possible during construction to shield adjacent properties from construction-related noise.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Section 4(f) and Section 6(f)**	
5	**Trucks**	
6	**Hazardous Materials**	

Code	Comment Document

From: jkleppe@cox.net
To: Projects
Subject: Loop 202 South Mountain Freeway
Date: Sunday, May 26, 2013 1:53:03 PM

1

I am in favor of the W59 alternative. I believe this freeway is needed desperately for Phoenix and the surrounding towns.
I work in west Phoenix and commute to East Valley. The commute times in the late afternoon are way too long and the existing freeway too crowded and dangerous.
This freeway would also better connect west Phoenix with Tucson and the Wild Horse pass area.

Jim Kleppe
Gilbert, AZ

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: chriscr6
To: Projects
Subject: South Mountain Freeway proposal
Date: Tuesday, June 18, 2013 11:52:23 PM

1 2 3

I attended one of the community forums on the freeway today (in Ahwatukee) and did see the displays discussing reduced traffic congestion and reduced time for people in Ahwatukee to get downtown.
I did write down several concerns we have, as residents of Ahwatukee have, regarding the negative impact this freeway would have for this area. The negative impact included increased air pollution and noise pollution. Air pollution will be an obvious result. Rubberized asphalt and walls around the freeway were suggested as a way to reduce the noise pollution, however, as most homes in this area are elevated above the level of the freeway, the walls would do little to prevent noises from reaching those homes.

4 5 6

I also listed concerns asking who would benefit from placement of the freeway in this area and aside from the chance someone in the East Valley works on the west side of the valley or vice versa, only trucks passing through from East to West appear to be beneficiaries.
The displays which suggested reduced transit time from Ahwatukee to downtown would actually be false as instead of reducing time, the travel time would be increased during the hours when people travel to and from work; early morning and evening. Those going on this route from the East Valley, may reduce congestion on the East side, however, as they enter the I10 traveling to and from downtown, they would actually increase congestion significantly on a freeway where congestion is already. It would not make sense for anyone to travel to the downtown area using this route during key travel times to travel as they would end up attempting to enter a crowded freeway at 59th ave or farther west in an effort to back track in the eastward direction to downtown and would almost certainly be significantly delayed.

7

Please consider stopping this proposal before creating a negative impact for the residents of Awhatukee and also results in increased traffic congestion.

Thank you.

Chris Kline
602 790-7614

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Noise**	As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
4	**Purpose and Need**	An analysis of the origins and destinations of projected freeway users is presented in Figure 3-18, on page 3-36 of the Final Environmental Impact Statement. Freeway users are defined as those motorists who pass through the bend of the freeway (around the South Mountains). So, this does not count motorists in Laveen Village who go to Interstate 10 (Papago Freeway) and motorists in Ahwatukee Foothills Village who go to Interstate 10 (Maricopa Freeway). The results of the origin-destination analysis show that 73 percent of the traffic going around the South Mountains has origins or destinations in the area within or around the Study Area and supports the conclusion that the proposed action would serve east–west mobility consistent with commuting movements.
5	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Trucks**	
7	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

Code	Comment Document

Larry Kline Document Created: 6/19/2013 12:30:47 PM by Web Comment Form

1 2 3

The proposed South Mountain Freeway is being built on a flawed premise. It will not be an aid to reduced congestion for east valley residents commuting to the west valley. How many east valley residents commute to work in the west valley?...according to ADOT - very few. I can see a very small number of west valley residents desiring a short cut to the east valley. At a meeting 6/18 in Ahwatukee, the proponents of the S.M. Freeway stated that the proposed freeway would aid east valley residents access to downtown. This thought is flawed in that the South Mountain Freeway will deposit commuters to 59th Ave. with an ensuing eastbound commute to downtown...adding mileage and time and pollution to downtown destinations so this argument fails logic and will add to the traffic the inadequate I-10 section west of Phoenix must handle .

4 5 6 7 8

Another poster indicates that the proposed freeway would aid as a trucking bypass. This is a valid argument...but at what cost? There already exists a bypass - I8 to state route 85 bypasses downtown Phoenix for trucking traffic headed west out of Phoenix. The 2 billion dollar plus cost for the proposed freeway extension and disruption and destruction of the quality of life to the residents of Ahwatukee do not justify this "boondoggle". For the residents of Ahwatukee, the proposed 16 foot noise-mitigation walls will only benefit those who would live across the street from the freeway. The land slopes upward to the north, so those residents that live north would receive the noise and pollution from the increased traffic of the proposed freeway. This pollution would be pushed north and remain in Ahwatukee with the prevailing southwesterly winds trapping pollutants against South Mountain. The

9

87,000 residents of Ahwatukee would experience more pollution, decreased property values, increased noise for an unnecessary, very expensive freeway that will not solve the problems that it is alleged to solve. This freeway is ill-conceived and a very poor utilization of precious

10

public resources. ADOT is negligent in not researching alternatives to this freeway extension.

Code	Issue	Response
1	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need**	An analysis of the origins and destinations of projected freeway users is presented in Figure 3-18, on page 3-36 of the Final Environmental Impact Statement. Freeway users are defined as those motorists who pass through the bend of the freeway (around the South Mountains). So, this does not count motorists in Laveen Village who go to Interstate 10 (Papago Freeway) and motorists in Ahwatukee Foothills Village who go to Interstate 10 (Maricopa Freeway). The results of the origin-destination analysis show that 73 percent of the traffic going around the South Mountains has origins or destinations in the area within or around the Study Area and supports the conclusion that the proposed action would serve east–west mobility consistent with commuting movements.
4	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
8	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
9	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
10	**Alternatives**	The Final Environmental Impact Statement devotes Chapter 3, *Alternatives*, to an in-depth discussion of the extensive alternatives generation, screening, and selection process.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

As a resident of Ahwatukee, I am very concerned about the impact the proposed freeway will have on this area. Residents of Ahwatukee have chosen this area for the lack of pollution, lack of noise and beautiful scenery. As we bought our home over 20 years ago - no disclosure of this freeway was given to us. This will definately increase pollution: more traffic, more noise and much more pollution. The studies shown here are incapable the effect of pollution if everyone had environmentally adapted cars. Which is not the case. Trucks from Mexico alone will contribute large amounts of pollutants in the air. The winds + mountains will hold this pollution in our area. Noise pollution: as this area is built in levels - rising above the side of the freeway, noise will be carried above surrounded asphalt and walls + sound rebound from the mountains.

Our home value will decrease: we will have to pursue reimbursement for this loss.

(over)

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Optional

Name Chris Kline Email chrisc16@cox.net

Address

City Ahwatukee / Phoenix State AZ Zip 85044

Phone 602 710-7614 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

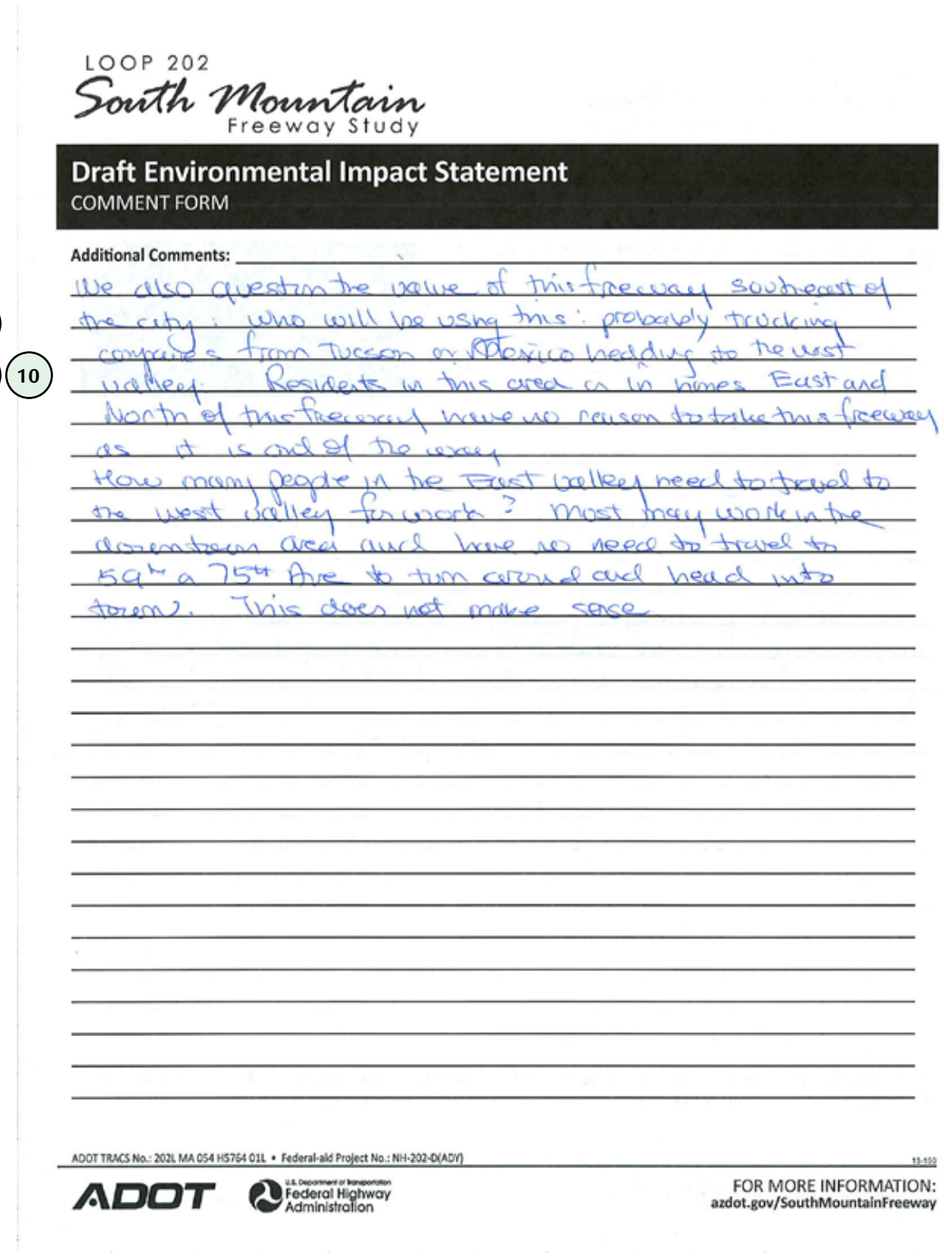
ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 55-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Acquisitions and Relocations**	The text box "Freeway Awareness," on Final Environmental Impact Statement page 4-13, provides a thorough history of the public disclosure of the proposed South Mountain Freeway, beginning with a map made public in 1980 and one in 1984 showing more or less the current alignment. This text box also explains the legal requirements for developers and other home sellers to "inform potential buyers of conflicts with planned transportation projects like the proposed action." The Southwest Loop Highway—the South Mountain Freeway predecessor—was integral to the Regional Freeway and Highway System approved by Maricopa County voters in 1985. Although other facilities were considered a higher priority early in development of the Regional Freeway and Highway System, the South Mountain Freeway has been included in every subsequent update. The same route was approved by the State Transportation Board in 1988. In 2004, Maricopa County voters approved Proposition 400, which was designed to fund completion of the remaining segments of the Regional Freeway and Highway System, including the proposed South Mountain Freeway (Final Environmental Impact Statement page 1-21).
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	
4	**Trucks**	
5	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
6	**Noise**	As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.

(Responses continue on next page)

Code	Comment Document
8 9 10	

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

We also question the value of this freeway southeast of the city: who will be using this: probably trucking companies from Tucson or Mexico heading to the west valley. Residents in this area or in homes East and North of this freeway will have no reason to take this freeway as it is end of the valley.
How many people in the East valley need to travel to the west valley for work? Most may work in the downtown area and have no need to travel to 59th a 75th Ave to turn around and head into town. This does not make sense.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-102

ADOT | U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
7	**Acquisitions and Relocations**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
8	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Purpose and Need**	An analysis of the origins and destinations of projected freeway users is presented in Figure 3-18, on page 3-36 of the Final Environmental Impact Statement. Freeway users are defined as those motorists who pass through the bend of the freeway (around the South Mountains). So, this does not count motorists in Laveen Village who go to Interstate 10 (Papago Freeway) and motorists in Ahwatukee Foothills Village who go to Interstate 10 (Maricopa Freeway). The results of the origin-destination analysis show that 73 percent of the traffic going around the South Mountains has origins or destinations in the area within or around the Study Area and supports the conclusion that the proposed action would serve east–west mobility consistent with commuting movements.
10	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Opposition to Loop 202
Date: Tuesday, July 23, 2013 8:53:45 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

-----Original Message-----
From: Matthew Klopp [mailto:mklopp79@yahoo.com]
Sent: Tuesday, July 23, 2013 8:52 AM
To: Projects
Subject: Opposition to Loop 202

1 2 3

I oppose the $2.6 billion-wasting, sprawl-enabling, pollution-increasing Loop 202 extension. Not only is the proposed extension a bad idea, but I do not trust the dishonest draft EIS, which critically ignored the well-documented dynamic of induced demand. Please stop planning transportation systems for a world that hasn't existed in five decades and which is never coming back.

Matthew Klopp

_____

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Code	Issue	Response
1	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Secondary and Cumulative**	The proposed freeway is a response to existing and anticipated travel demand in the metropolitan Phoenix area. It is not meant to increase travel beyond that expected to be generated from existing and anticipated population and employment growth and related land development. It is important to consider that improvements proposed for any type of transportation system (e.g., a new bus route, rail transit line, commuter rail service) would likely lead to changes in travel behavior, which, in turn, would lead to increased use of the particular system. Improvements made to a given transportation system are meant to attract new users (see Final Environmental Impact Statement pages 4-170 through 4-174). If this were not a primary goal, the improvements would be neither effective nor warranted. For the proposed action, a goal is to attract users of other segments of the Regional Freeway and Highway System and the local arterial street network, now and in the future, to the proposed action to optimize, in part, the entire regional transportation system (as outlined in the proposed action's purpose and need in Chapter 1).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 extension
Date: Tuesday, July 09, 2013 9:28:17 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Haryaksha Gregor Knauer [mailto:haryaksha.knauer@gmail.com]
Sent: Monday, July 08, 2013 4:52 PM
To: Projects
Subject: 202 extension

1

NO BUILD!

FREEWAYS INDUCE TRAFFIC.

--
Haryaksha Gregor Knauer
"DRONE-FREE ARIZONA"

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Code	Issue	Response
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Code	Comment Document

4397

in the '70s and the '80s have studied, documented, and written books about petroglyphs and other artifacts discovered on the South Mountain over the past 40 years. The Gila River Indian Community elders, cultural resources department, community members have told MAG, ADOT, and the State of Arizona of the cultural significance of this mountain and what it means to us. I consider this racial discrimination. You are discriminating against our people and what they believe in.

This is not the first time Maricopa County has done this. They are doing this to North Mountain Church, who has already moved because of the freeway, they did that when they expanded the airport, there's the church in the middle of -- just in the middle of the city between 16th and 24th Street because of progress. This needs to stop. This will not help the community, this will not benefit the people, not to mention what it'll do to the environment and the plants and animals and the natural habitat. I thank you for your time.

THE FACILITATOR: Thank you, Mr. Morago.

We'd like to welcome our next speaker, Mr. Robert Knight.

Welcome, Mr. Knight. You have three minutes.

MR. KNIGHT: Thank you. My name is Robert Nick

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 Knight, I'm a park member and Ahwatukee resident and a
2 small business owner in Ahwatukee. I'm very concerned
3 about the impact that this truck bypass will have on
4 Ahwatukee; let's face it, that's what it is. Commuter
5 traffic is not going to be using this road because
6 commuter traffic destination is Central Phoenix. This is
7 going to be largely a truck route. Would you like a
8 truck bypass in your backyard? I wouldn't. The plan has
9 been on the books for some 30 years. When it started, it
10 was mostly farmlands; that's changed. Now you have some
11 85,000 residents that call Ahwatukee home.
12 Air pollution. Not really reducing air
13 pollution here, they're simply moving it to an area of
14 the Phoenix area which currently doesn't have it. They
15 will have an increase in air pollution at 59th Avenue and
16 I-10 from vehicles idling because of the traffic
17 congestion at the I-10 area of that part of the I-10.
18 Pollution along Pecos Road will be significantly
19 increased as it's blown into the Ahwatukee community; it
20 has nowhere to go, the mountains are in the way.
21 Noise pollution. The measurements being taken
22 along Pecos Road, yes, I understand that the requirements
23 are that you restrict your noise abatement and noise
24 issues to a quarter mile from the freeway. Fundamental
25 challenge here in Ahwatukee is not a

Page 57

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	An analysis of the origins and destinations of projected freeway users is presented in Figure 3-18, on page 3-36 of the Final Environmental Impact Statement. Freeway users are defined as those motorists who pass through the bend of the freeway (around the South Mountains). So, this does not count motorists in Laveen Village who go to Interstate 10 (Papago Freeway) and motorists in Ahwatukee Foothills Village who go to Interstate 10 (Maricopa Freeway). The results of the origin-destination analysis show that 73 percent of the traffic going around the South Mountains has origins or destinations in the area within or around the Study Area and supports the conclusion that the proposed action would serve east–west mobility consistent with commuting movements.
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Design**	Construction of the proposed freeway would include widening along Interstate 10 to facilitate entrance and egress of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26 on page 3-49 and Figure 3-29 on page 3-53 of the Final Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 were developed in accordance with the Federal Highway Administration's Interstate System Access Informational Guide and have received an initial determination of operational and engineering acceptability from the Federal Highway Administration.
6	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

Code	Comment Document

7

8

flat community. The bulk of Ahwatukee slopes up from Pecos Road up into the Foothills, well above the noise abatement wall. Noise travels, it bounces off the mountain and is amplified back, so you'll have a significant noise increase farther away from the freeway than your measurements would indicate.

Essentially, what this boils down to is ADOT is sacrificing a community of 85,000 for the purpose of building a truck bypass, a truck bypass that could be easily done using the I-8 to 85 corridor and improving the 85 highway from I-8 to I-10. If the purpose is to provide and route trucks away from Central Phoenix, this is a far better alternative than the Loop 202 truck bypass. Thank you.

THE FACILITATOR: Thank you, Mr. Knight.

Again, as a reminder, out of mutual respect and as a courtesy to all participants, we ask that you refrain from clapping and making reactions to speakers' comments.

I'd like to invite our next speaker, Tim Stone.

MR. STONE: Do I introduce myself? I don't know the rules.

THE FACILITATOR: Thank you, Mr. Stone. You have three minutes.

MR. STONE: My name is Tim Stone, I've been a

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
7	**Noise**	As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
8	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: south mountain freeway
Date: Monday, July 15, 2013 11:25:19 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: KNIGHT, JOHN [mailto:JK7863@att.com]
Sent: Monday, July 15, 2013 11:12 AM
To: Projects
Subject: south mountain freeway

1 2 3

my name is John Knight. we live ay 4036 W Kiva Street in Laveen. aligning to I-10 anyplace other than 99th avenue/101 Northbound does not make any sense. bringing more traffic through 55th or 59th avenues and placing additional stress from 99th avenue to these junction points is not a sound structure. traffic around phoenix needs to get off of I-10 as quickly as possible easing traffic within the city itself. The impact also to these residential areas is overwhelmingly negative.

Sent from my iPad

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Design**	Construction of the proposed freeway would include widening along Interstate 10 to facilitate entrance and egress of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26 on page 3-49 and Figure 3-29 on page 3-53 of the Final Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 were developed in accordance with the Federal Highway Administration's Interstate System Access Informational Guide and have received an initial determination of operational and engineering acceptability from the Federal Highway Administration.
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Wednesday, May 22, 2013 10:51:03 AM

From: Claire Knightly [mailto:claireknightly@gmail.com]
Sent: Tuesday, May 21, 2013 4:23 PM
To: Projects
Subject: Loop 202 South Mountain Freeway

To Whom It May Concern:

I am unable to attend the hearing/meeting being held today at the convention center regarding the Loop 202 South Mountain Freeway, but I wanted my voice and opinion heard regarding this critical piece of Phoenix infrastructure. I am a resident of Laveen and truly feel the addition of this freeway would greatly help and benefit our community, as well as the whole of Phoenix. Not only will this freeway cut traffic congestion across the metro Phoenix area, it will also reduce pollution and save drivers time and money. Several years ago I worked in downtown Phoenix and commuted to Gilbert. On a good day, my drive was 45 minutes each way. Good commute days were very rare. I can only imagine that the route I used to take has gotten considerably worse over the years—and will continue to do so as the East Valley increases in size with added commuters making the trek from East Valley cities to areas near downtown or the West Valley for their jobs. This project also will create roughly 30,000 jobs during the 5-6 year construction period and result in a $2 billion investment in the Phoenix area economy. How could that possibly be turned down?! Job and economic growth for our city?! Yes, please!

1

My husband and I are both avid cyclists and triathletes and currently make use of 51st Avenue for long training bike rides, as do many other cyclists in the valley. It's a great stretch of road with wide shoulders that make it easy (and somewhat safe) for bike riding. Please add in a pedestrian/bike trail along the freeway. We believe no road should be built unless there is a sidewalk/trail/whatever for pedestrian/bike traffic next to it.. you should be able to travel any way you can.

Thank you for your time.

Regards,
Claire Knightly

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Code	Issue	Response
1	**Design**	Recreational or equestrian trails are not included in the proposed project. The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support of the 202
Date: Monday, May 20, 2013 8:46:32 AM

-----Original Message-----
From: Douglas Knolles [mailto:azalum@msn.com]
Sent: Friday, May 17, 2013 4:30 PM
To: Projects
Subject: Support of the 202

1

Please consider the extension of the 202 around South Mountain. While we reside in Chandler, we are on the West side of the Valley due to kids events almost weekly. It would be very important to our family and a tremendous improvement in our quality of life if we can make this happen.

Warmest regards,

Doug Knolles
602 689 0330

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Alex Koch Document Created: 7/23/2013 3:33:03 PM by Web Comment Form

1 Keep the Freeway on the W59 Preferred Alternative where we all thought it was going to be built, and don't run it through all the new homes with one of the other proposals. I realize that it was a planning blunder not to connect the 202 to the 101, but there is sufficient room on the I-10 to widen it multiple lanes in each direction to alleviate the traffic congestion between the 101 and 59th Ave.

Thank you for allowing me to comment. I hope that common sense will prevail in this decision.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Stop the South Mountain Freeway
Date: Monday, June 10, 2013 4:13:25 PM

-----Original Message-----
From: Nicole Koester [mailto:nicolebrusik@hotmail.com]
Sent: Monday, June 10, 2013 4:12 PM
To: Projects
Subject: Stop the South Mountain Freeway

1 2 3 4 5 6

As a resident of Ahwatukee I am begging ADOT to NOT build the freeway in my backyard. If the freeway moves forward we will relocate our family out of the area. I see no benefit to the freeway. Instead it will bring increased traffic, air pollution, crime and destruction to our neighborhood.

I urge the ADOT and the state to find a solution with the Indian Nation to the south. I feel there is a need for an ext. of the 202. However the current plan is faulty and ill-planned.

Yours,
Nicole Koester
16414 S. 29th Ave.
Phoenix, AZ 85045

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
5	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
6	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:47 PM
CALLER: KARL KOHLOFF	CALLER ADDRESS: 1863 W. SAN ANGELO, GILBERT, AZ 85233
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Register my vote for the Loop 202 South Mountain Freeway study.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 4:37 PM
CALLER: JANE KOHNEN	CALLER ADDRESS: 4250 EAST CLAIRMONT STREET, PARADISE VALLEY, ARIZONA 85253
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: mail
Date: Monday, June 24, 2013 9:06:16 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: kolsen [mailto:kolsen13@cox.net]
Sent: Saturday, June 22, 2013 7:56 AM
To: Projects
Subject: mail

1

Hi just my input about the 202 loop.. All the residents some live in that area close where
the 202 loop to go do not like the free way to go there.. They do not care about the hazardous
some happen when
they come down the 48 sty where I live close bye . morning going and coming at night
nobody think about that .. They only think about them self and held about rest of us...
there live in there pat down close to us..
thank you

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Code	Issue	Response
1	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Christopher Komar Document Created: 7/24/2013 5:43:42 PM by Web Comment Form In terms of your impact studies, I'm wondering if noise pollution has or will be studied. My particular concern is the neighborhood I live is unique as it is in close proximity and is elevated. A noise abatement wall would likely not be sufficient. I'm hoping as part of the study our neighborhood would be a one of the datapoints.

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Freeway
Date: Thursday, May 16, 2013 8:14:39 AM
Attachments: image001.png
image002.png

From: Daryl Koranda [mailto:dkoranda@drakecement.com]
Sent: Thursday, May 16, 2013 6:19 AM
To: Projects
Subject: 202 Freeway

1 Dear Sirs, not only would this project create jobs and revenue for local businesses, it would also help alleviate some of the heavy traffic conditions on surrounding area freeways. I support this project. Thank you. Sincerely,

Daryl Koranda
Drake Security

DRAKE CEMENT

P.O. Box 370
Paulden, AZ 86334
P: 928.636.6004 | **F:** 928.636.4825
C: 928.830.5677 | www.drakeus.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

James Kotchou Document Created: 7/10/2013 11:49:01 PM by Web Comment Form

1 2

I am appalled that this on grade design would be contemplated in such close proximity to four schools in Ahwatukee. I assume the freeway is on grade because of cost? Please confirm a traffic study has been completed to understand the increase traffic on Chandler Blvd. due to this freeway design. Please provide me information on how I can get a copy of the cost estimates developed for the on-grade E1 Alternative any estimates for any below grade alternatives. How do I get information on your consultant design team and or construction manager at risk? I do not see much creativity in the design of this E1 Alternative. It reeks of lowest cost wins and schools/neighbors tough luck. This freeway needs to be below grade with retaining walls to minimize visual and noise impact to the schools and community. Hey isn't that how it was done in Scottsdale? I am totally against this on-grade solution. More money should be budgeted for this section.

3 4

James Kyle Kotchou

Code	Issue	Response
1	**Design**	The project team analyzed the belowground option, also called the depressed freeway option. The analysis indicated that depressing the freeway would increase the cost of construction and right-of-way acquisition, displace additional residences, create the need for additional pump stations and detention basins, and still need the installation of noise barriers. Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study (see Final Environmental Impact Statement pages 3-15 and 3-18). The evaluation presented in the Final Environmental Impact Statement includes cost estimates. Technical memoranda documenting this evaluation (including detailed cost estimates) are available upon request from the Arizona Department of Transportation, Urban Project Management section. Information related to the design consultant, final designers, and contractors can also be requested from the Urban Project Management section.
2	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1).
3	**Visual Resources**	For most of the alignments of each of the action alternatives, the proposed freeway would be elevated above the natural grade of the surrounding land. This elevated profile would allow noise to carry farther, creating noise impacts at greater distances from the freeway. Depressing the profile of the freeway below grade might reduce traffic noise levels adjacent to depressed sections. However, it would be necessary to also construct at-grade noise barriers to achieve noise reduction goals at receiver locations adjacent to depressed freeway sections (see page 4-99 in the Final Environmental Impact Statement). This strategy would reduce visual impacts associated with high noise barriers on elevated freeways, but would entail ground-level noise barriers and their associated interference with views. Thus, with either approach to noise reduction, views of nearby mountains could be disrupted. The specific impacts would depend on the geometrics of the height of any noise barriers constructed, the intervening topography, and the distance of the barriers from the residences in question.
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

911 W Gleneagles Dr.

Phoenix, AZ 85023

July 10, 2013

Dear Elected Official,

1

I am opposed to any alignment of the Loop 202 South Mountain Freeway that allows destruction of any portion of the Phoenix Mountain Preserves.

Voters consistently support park land preservation and as the city increases in density these open spaces will become more valuable for maintaining a balanced lifestyle. Kiplinger named Phoenix one of the 10 best cities for young people in part because of our natural environment and National Geographic lists Phoenix among the best cities for hiking. Two new trails, the Gila and Bursera Trails are in the southwest end of the park which will be impacted by this project. Over three million visitors come to South Mountain Park/Preserve annually and I expect that number will increase as the city becomes more compact. A high capacity freeway will only have a negative impact.

2 3

Taking preserve land sets a bad precedent. Much more than 30 acres will be impacted by introducting additional pollution, erosion and habitat destruction.

Please find an alternative to this placement of the 202 freeway.

Thank you.

Barbara Krajewski

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Biology, Plants, and Wildlife**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:25 PM
CALLER: DICK KRAUSS	CALLER ADDRESS: 1113 E. JUANITA AVENUE, MESA, AZ 85210
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support that South Mountain Freeway, I wish the Indians would let us go on their land a little bit more, I think that is the best route. I do work in the case and travel in Ahwatukee so I am familiar with that area and the need for that freeway. Thank you.

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

When can we start?

1 All in for the construction of the 202 Loop

I believe the benefits to the valley outweigh the negatives to the few impacted.

relief from building traffic along the 10 corridor will help all those who use this route daily.

Optional

Name Derek Kreh Email DmKREH@Yahoo.com

Address 4029 W Darrow St

City Phoenix State AZ Zip 85041

Phone 480-381-4916 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SM Comment
Date: Tuesday, May 28, 2013 8:22:03 AM

From: John Krick [mailto:john_krick@yahoo.com]
Sent: Monday, May 27, 2013 6:51 PM
To: Projects
Subject:

1

Please build the 202 South Mountain. Rich people should not dictate the needs of all. Please make a rational decision related to a rational plan- build it. John T Krick

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Jeff Krobot Document Created: 5/21/2013 2:41:41 PM by Web Comment Form Having lived in cities that ignored the future freeway needs of their residents, I urge you to approve the 202.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Patricia Kryzak Document Created: 5/28/2013 5:16:53 PM by Web Comment Form It makes sense to connect the new proposed 202 to the 101 in Tollson. It would relieve traffic congestion that occurs every morning on I 10 between 75th Ave. and interstate 17.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Sierra Club on behalf of Sandie Kubie
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Tuesday, May 28, 2013 9:16:32 AM

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(5) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(6) PROTECT our communities, our health, and our environment by selecting the No Action Alternative. Again, if you are confused as to why, reread the above paragraph regarding Habitat destruction and wildlife disruption. We want a SMART solution. Concentrate on a well-planned mass transit. Be progressive and forward thinking, don't blow this!

(7) Sincerely,

Sandie Kubie
9680 W Rain Lily Ln

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	Tucson, AZ 85743-8324

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Ed Kucharski
To: Projects
Subject: loop 202 south mountain
Date: Tuesday, June 04, 2013 12:47:13 PM

1) Alignment:

1 Pecos Road west connecting with I-10/loop 101 at 99th avenue.
Any other I-10 intercept is economically and environmentally unacceptable.

2 2) There shall be no exits on the Pecos Road alignment that allow access to the GRIC.

If GRIC wishes access to the freeway, the GRIC will 100% fund all studies for such access and if studies, and AZDOT approve, GRIC will reimburse AZDOT all construction costs.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	Federal law prohibits the denial of access to any community. Thus, traffic interchanges would be located along the freeway where it borders the Gila River Indian Community (see Final Environmental Impact Statement page 3-51). Roadway connections on Gila River Indian Community land to the traffic interchanges would be the responsibility of the Gila River Indian Community, in coordination with appropriate jurisdictions.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 9:37 AM
CALLER: BILL KUEFER	CALLER ADDRESS: PO BOX 6605, PHOENIX, AZ 85005
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the plan for the South Mountain Freeway. I really hope that this potential project is passed.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4421

a lot of congestion as our community grows. The freeway would help cut the congestion in an area, reduce air pollution. 64 percent of the voters voted it in, and we are still waiting.

Traffic on the I-10 between Ahwatukee and Goodyear will grow about 20 percent and will have another 10 -- 103,000 cars that will use the Broadway curve each day. Another 38,000 cars will jam the tunnel every day. Morning and evening commute times will increase by 40 percent to almost 82 percent, and traffic congestion on the city streets will increase by 46 percent unless they build the freeway.

The project will create approximately 30,000 jobs during the five to six-year period -- construction period and can -- will result in a 2 billion investment in the Phoenix area economy. The building -- the money to build the freeway is already in the budget and was approved by voters twice; first in 1985 and again in '04.

So there is no more important project to the area's commuters and workers than the South Mountain Project Freeway. So we must build it now.

MR. KUEFER: William, last name K-u-e-f, like Frank, -e-r.

Okay. I live in Laveen. And I'm very much in favor of the proposed Freeway Extension 202.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN PUBLIC HEARING
Public comments to reporter)
May 21, 2013
10:00 a.m.
REPORTED BY:
Bonnie Ponce, RPR
AZ Certified Reporter No. 50669

MR. KUGEL: Tom Kugel.
I own a house down there, and while it's not
on Pecos, several streets in, so I think it will impact
me personally, will be mitigated. I still feel that
there's going to be a visual eyesore there. There's
going to be an audio issue.
And then I don't know how clear they've
defined whether they're going to raze -- exercise
eminent domain and raze some properties. My
understanding is the church might go on 24th Street.
I'm concerned about what it's going to do to
housing valuations in Club West where I'm at. There's
a school right along the line on Pecos line.
The film I just saw had a variety of options
for the Pecos Road alignment, but then they went on to
say the Pecos Road alignment was the preferred one,
which puzzled me, because it's right next to the
school.
What's going to happen to the valuations of
the homes that are on Pecos? What's the time frame?
Are they still negotiating with the Gila River Indian
Community? Because I've not heard anything about that.
I initially heard there was. Where can I get the EIS?

That's not clear. How many lanes, 10 or 8? I don't
know.
So I just -- I strongly oppose it for those
reasons and the detrimental impact it will have on the
foothills and Club West community. It will change the
whole dynamic of that area.
That's pretty much it.

Code	Issue	Response
1	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Acquisitions and Relocations**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
6	**Construction**	If an action alternative were to be the Selected Alternative, right-of-way acquisition would begin immediately after the record of decision and construction of the entire freeway corridor is estimated to take approximately 5 years.
7	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Public Involvement**	Printed copies of the Draft Environmental Impact Statement and related documents are available for purchase from the Arizona Department of Transportation upon request by calling (602) 712-7767. Copies of the Draft Environmental Impact Statement are available for viewing at the Phoenix Public Library (Ironwood Branch and Burton Barr - Central Library), Sam Garcia Western Avenue Library, and Tolleson Public Library. Electronic versions are available for download from the Arizona Department of Transportation Web site, <azdot.gov/southmountainfreeway>.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
9	**Design**	The proposed South Mountain Freeway is planned to be eight lanes wide. It would have, in each direction, three 12-foot-wide general purpose lanes and one high-occupancy vehicle lane. The four lanes in one direction would be separated from the other four lanes by a median barrier with left shoulders adjacent. Figure 3-34, on Final Environmental Impact Statement page 3-58, provides a typical cross-section representation of the freeway.
10	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments on South Mountain Freeway Draft EIS
Date: Monday, July 22, 2013 8:50:07 AM
Attachments: kuminoff_comments_DEIS.pdf

From: Nick Kuminoff [mailto:kuminoff@gmail.com]
Sent: Sunday, July 21, 2013 4:51 PM
To: Projects
Cc: Nick Kuminoff
Subject: Comments on South Mountain Freeway Draft EIS

Dear South Mountain Study Team,

1

I am writing to comment on the draft environmental impact statement (DEIS) you released for the Loop 2002 South Mountain Freeway study. As a professional economist, a parent of young children, and a resident of Phoenix, I am deeply concerned about what I believe are serious flaws with your DEIS. Please find attached a pdf file containing a cover letter and 12 specific comments that explain some of my concerns. I look forward to seeing your responses to the specific issues I raise in your final EIS. In the meantime, I would be glad to elaborate on any of the issues I raise. Feel free to have your staff contact me with questions.

Best Regards,

Nick Kuminoff
kuminoff@gmail.com
480-727-9802

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Code	Issue	Response
1		Specific comments are addressed below.

Code	Comment Document

July 21, 2013

South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

RE: Comments on Draft EIS for South Mountain Freeway (FHWA-AZ-EIS-13-01-D)

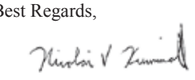
Dear South Mountain Study Team,

1

I am writing to comment on the draft environmental impact statement (DEIS) you released for the Loop 2002 South Mountain Freeway study. As a professional economist, a parent of young children, and a resident of Phoenix, I am deeply concerned about your DEIS. Overall, I think the DEIS reflects an unwarranted bias toward building the freeway with the Pecos Road alignment. After careful review, I cannot help but think that the DEIS systematically overstates the benefits of building the freeway and systematically understates the negative externalities on safety and environmental quality. Furthermore, the DEIS should be forthright about the fact that the precise magnitudes of both the benefits and costs are uncertain. Yet the DEIS has an asymmetric treatment of uncertainty. Economic costs, such as the public health consequences of increased air pollution in Ahwatukee, are dismissed entirely because they are uncertain. Meanwhile, economic benefits, such as the projected reductions in congestion on the I-10, are falsely presented as certain outcomes, despite the deeply uncertain nature of such projections. Finally, the DEIS falls far short of established "best practices" for the analysis of public projects as defined by the U.S. Office of Management and Budget (Circular A-4) and the U.S. Environmental Protection Agency's *Guidelines for Preparing Economic Analysis* (2010). I think it would be highly irresponsible to proceed with building the freeway without first conducting a serious economic analysis that quantifies the benefits and costs, and fully addresses uncertainty.

Please find attached 12 specific comments that explain my concerns with selected aspects of your DEIS. I look forward to seeing your responses in the final EIS. I would be glad to clarify any of the issues I raise to your staff. Feel free to contact me with questions.

Best Regards,



Nicolai V. Kuminoff
kuminoff@gmail.com

Code	Issue	Response
1	**Purpose and Need**	At the beginning of the environmental impact statement process, the need for a major transportation facility was reexamined to determine whether such a facility is still needed. Validation of those findings occurred throughout the entire environmental impact statement process. Analysis of the purpose and need for the proposed action followed National Environmental Policy Act and Federal Highway Administration implementing guidance on the subject matter and used state-of-the-practice analytical tools, as pointed out in Table 1-3, "Traffic Analysis Tools," on page 1-13 of the Draft Environmental Impact Statement. The results of the analysis determined that a transportation problem does exist and that problem will continue in the foreseeable future (see section, *Conclusions*, on page 1-21). The comment implies that the freeway condition was predetermined. As noted on page 3-1 in the section, *Reconfirm the Purpose and Need for the Proposed Action*, a continuous validation process was undertaken throughout the environmental impact statement process to ensure past conclusions in the environmental impact statement process remained valid. The social, environmental, and economic effects of all alternatives, including the No-Action Alternative, are presented in the Draft and Final Environmental Impact Statements.

Code	Comment Document
2	Comment #1: The DEIS implies that a majority of Maricopa County residents support building the proposed South Mountain Freeway without having any factual basis to support this implication. There are numerous examples of this, especially in the early chapters of the DEIS. One example is the "What do the results of Propositions 300 and 400 tell us" sidebar on page 1-9. The problem is that the proposed South Mountain Freeway was a fairly minor detail in the information provided to voters on the broader regional transportation plan. Voters have never had an opportunity to express their opinions on the South Mountain Freeway separately from other regional transportation projects that were bundled as part of these propositions and were in more immediate need of funding at the time the propositions were presented to voters. Furthermore, neither proposition provided voters with basic details on the South Mountain Freeway such as the expected construction cost and the number of lanes. Furthermore, at the time people voted on proposition 300 the town of Ahwatukee was largely undeveloped. Likewise, the regional transportation plan provided to voters as part of the Proposition 400 election of 2004 failed to anticipate the location, size, use, financial cost and social costs of building the freeway. It is also noteworthy that both votes occurred before the onset of the great recession. The bottom line is that there is no reason to expect that Maricopa county voters would support building the South Mountain Freeway, if they were given the opportunity to vote today. In addition, the question of whether or not voters liked the idea of a new freeway extension 30 years ago or 10 years ago is entirely irrelevant to the question of whether or not it makes sense to build the freeway today.
3	Comment #2: The effort to model the effect of the freeway on ambient concentrations of criteria air pollutants is inadequate and misleading. For example, the discussion of carbon monoxide (CO) in section 4-65 of the DEIS points out that impacts were modeled using information from Maricopa County's current network of air quality monitoring sites in the region. Yet the discussion fails to mention that Maricopa County does not have any air quality monitoring sites in the Ahwatukee foothills (http://alert.fcd.maricopa.gov/alert/Google/v3/air.html). This is a serious flaw in the modeling assessment because the prevailing wind patterns and foothills topography will likely cause most of the emissions of pollutants to be blown into pockets of

Code	Issue	Response
2	**Public Involvement**	The section, *Summary of Past Agency and Public Involvement Pre-EIS Process*, outlines the outreach by the Maricopa Association of Governments and others since the 1980s over the South Mountain Freeway. In that outreach, through the development of the *Regional Transportation Plan*, people were provided opportunities to express concerns over the specifics of the proposed South Mountain Freeway as well as learn about the costs and design of the facility through the years. Construction cost estimates are subject to constant updates just as, for reasons noted in the comment, economic conditions are subject to change. The amount of funding set aside for the proposed action in the *Regional Transportation Plan* is in line with projected costs. Regarding the sidebar on page 1-9 of the Draft Environmental Impact Statement referenced in the comment, the text makes no reference to the proposed action. The comment asserts that the page 1-9 sidebar is an example of the Draft Environmental Impact Statement "implying that a majority of Maricopa County residents supports building the proposed South Mountain Freeway." The sidebar referenced says 1) there is "continued public support for investment in regional transportation projects," 2) "voters in 90 percent of the county's 1,058 voting precincts voted in favor of Proposition 400 and the projects it would fund," and 3) "voters in 81 percent of the 31 voting precincts in the Study Area favored Proposition 400 and the projects it would fund."
3	**Air Quality**	The air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in Guideline for Modeling Carbon Monoxide from Roadway Intersections (A-OAQPS, 1992). Inputs to the model were based on U.S. Environmental Protection Agency-recommended values or were selected to provide a conservative estimate of impacts. Modeling methodology and results were reviewed by the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments. As noted on page 4-65 of the Draft Environmental Impact Statement, over 700 receptors were modeled for carbon monoxide concentrations. Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations Part 93.123(a). The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement.

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localized air pollution above residential neighborhoods in Ahwatukee in between the freeway and South Mountain Park.

4 Comment #3: Failure to model the impact of the freeway on ground level ozone concentrations above residential neighborhoods in Ahwatukee is a serious problem as emissions generated by the freeway may very well exceed national standards for 8-hour ambient ozone concentrations. As noted earlier, the prevailing wind patterns and topography of the region are likely to cause most of the emissions to sit in air pockets above residential neighborhoods in Ahwatukee. Furthermore, these neighborhoods are highly populated by families with young children who are identified by the Environmental Protection Agency as being a "sensitive group" with respect to ozone (Federal Registrar, Vol. 64, No. 149, Wednesday, August 4, 1999, Rules and Regulations).

5 Comment #4: The lack of air quality monitors in the Ahwatukee foothills area undermines the credibility of the entire air quality assessment provided in the DEIS. Air quality monitors are needed to inform the assessment of potential effects of the freeway on air quality. The current assessment does not make a serious attempt to model air quality impacts in Ahwatukee, which contains the neighborhoods that will experience the largest negative effects of increased air pollution generated by the freeway.

6 5 Comment #5: The DEIS's overall conclusion that building the freeway will not cause an increase in violations of federal ambient air quality standards is misleading. This conclusion simply exploits the current placement of air quality monitors. By providing an incentive for truckers and non-local drivers to avoid traveling through central Phoneix, the South Mountain freeway will divert air pollution away from the areas that have air quality monitors and into areas that do not have air quality monitors, such as the Ahwatukee foothills. Ambient air quality will surely worsen in Ahwatukee and may very well violate federal standards for the criteria pollutants. Of course this will not cause any violations if there are no air quality monitors to measure the violations. This highlights the need for a more serious assessment of air pollution impacts from the proposed freeway, and it also highlights the need to place air quality monitors at several locations in the Ahwatukee foothills.

Code	Issue	Response
4	**Air Quality/ Children's Health**	As noted on page 4-76 of the Final Environmental Impact Statement, since ozone is a regional pollutant, there is no requirement to analyze potential impacts and no possibility of localized violations of ozone to occur at the project level. The Maricopa Association of Governments is responsible for developing plans to reduce emissions of ozone precursors in the Maricopa area. The Preferred Alternative is included in the *Regional Transportation Plan* that has been determined by the U.S. Department of Transportation to conform to the State Implementation Plan on February 12, 2014. A common theme in public comments on the proposed project has been the potential impacts of the project on children's health, primarily through vehicle emissions and noise. Many commenters raised concerns about the proximity of the project to schools or other aspects of the project that may affect children. In addition, the U.S. Environmental Protection Agency requested that the Final Environmental Impact Statement address Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. Throughout the Final Environmental Impact Statement, potential impacts on and subsequent mitigation for human health are disclosed and identified, as inherent in the environmental impact statement process. The Final Environmental Impact Statement incorporates an assessment of the potential impacts of the proposed project on all populations, including children. The Final Environmental Impact Statement addresses potential impacts of the project on children in the Chapter 4 environmental consequences analyses. The U.S. Environmental Protection Agency's Toxicity and Exposure Assessments for Children's Health report (see page 4-73 of the Final Environmental Impact Statement) indicated that indoor air concentrations of benzene are usually higher than outdoor levels and that indoor air in smokers' homes is a significant contributor to children's exposures. It mentioned children when identifying the effects of acute exposure to naphthalene. The Final Environmental Impact Statement acknowledges and fully discloses public scoping comments that raised the topic of health effects on neighborhoods and adjacent schools (see page 4-31 of the Final Environmental Impact Statement). The Final Environmental Impact Statement evaluates Clean Air Act criteria air pollutant concentrations in Maricopa County and the Phoenix area (see pages 4-75 to 4-77 of the Final Environmental Impact Statement). With regard to air quality impacts, the Final Environmental Impact Statement addresses children's health impacts within the broader discussion regarding health impacts under the National Ambient Air Quality Standards. Clean Air Act Section 109(b)(1) requires the U.S. Environmental Protection Agency to promulgate primary National Ambient Air Quality Standards at levels that allow an adequate margin of safety and are requisite to protect the public health. As noted by the U.S. Environmental Protection Agency in its 2013 rulemaking for particulate matter, Clean Air Act Section 109's legislative history demonstrates that the primary standards are "to be set at the maximum permissible ambient air level... which will protect the health of any [sensitive] group of the population" (78 *Federal Register* 3086 and 3090) (quoting S. Rep. No. 91-1196, 91st Cong., 2 Sess. 10 [1970]) (alterations in original). Accordingly, the Final Environmental Impact Statement National Ambient Air Quality Standards-based evaluation of criteria air pollutants includes a health-based review of sensitive populations, including children, given the National Ambient Air Quality Standards inherent consideration of those factors. Furthermore, the National Ambient Air Quality Standards-based assessment

(Response 4 continues on next page)

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7	Comment #6: Pages 4-69 and 4-70 provide a deeply flawed rationale for ignoring the impact of the freeway on human health outcomes. The DEIS claims that decision makers should not be provided with information on health outcomes of building the freeway because the magnitudes of those outcomes are judged by DOT to be highly uncertain. I will explain three problems with this logic:
8	A. Ignoring uncertainty violates federal standards for evaluating public projects, as outlined by the United States Office of Management and Budget's Circular A-4 (http://www.whitehouse.gov/omb/circulars_a004_a-4) and the United States Environmental Protection Agency's *Guidelines for Preparing Economic Analysis*. For example, OMB Circular A-4 has a special section devoted to the appropriate treatment of uncertainty in the evaluation of public projects. It clearly states that uncertainty outcomes should be quantified and this information should be provided for public review and to decision makers. For example, it instructs analysts involved in the preparation of impact statements that "*the important uncertainties connected with your regulatory decisions need to be analyzed and presented as part of the overall regulatory analysis*" and that "*by assessing the sources of uncertainty and the way in which benefit and cost estimates may be affected under plausible assumptions, you can shape your analysis to inform decision makers and the public about the effects and the uncertainties of alternative regulatory actions*" and that "*wherever possible, you should use appropriate statistical techniques to determine a probability distribution of the relevant outcome*." It also states that "*when uncertainty has significant effects on the final conclusion about net benefits, your agency should consider additional research prior to rulemaking. The cost of being wrong may outweigh the benefits of a faster decision. This is true especially for cases with irreversible or large upfront investments*."
7	B. The South Mountain Freeway is likely to have large negative health effects. The large impacts of air pollution on morbidity and mortality are well documented as is the fact

Code	Issue	Response
4 (cont.)		ensures adequate consideration of health-based issues as "[t]he requirement that primary standards provide an adequate margin of safety was intended to address uncertainties associated with inconclusive scientific and technical information ... and to protect against hazards that research has not yet identified" (78 *Federal Register* 3090). Sensitive receivers for air and noise are already included in the air quality and noise analyses in accordance with State and federal guidance. Both sections, *Air Quality* and *Noise*, beginning on Final Environmental Impact Statement pages 4-68 and 4-88, respectively, have addressed requirements under the National Environmental Policy Act. As stated on page 4-89 of the Final Environmental Impact Statement, over 220 sensitive receivers were evaluated at exterior locations from a traffic noise perspective. All of the receivers represent noise-sensitive land uses in proximity to the proposed project, including homes, schools, and parks, and these receivers would have higher noise levels than similar facilities more distant from the proposed action. Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations § 93.123(a). The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. Through analysis, the Federal Highway Administration has determined that the proposed project would not produce disproportionate impacts on children.
5	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analyses. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement. According to Environmental Protection Agency guidance, new monitors are not necessary to analyze air quality impacts.
6	**Air Quality**	The air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in Guideline for Modeling Carbon Monoxide from Roadway Intersections (A-OAQPS, 1992). Inputs to the model were based on U.S. Environmental Protection Agency-recommended values or were selected to provide a conservative estimate of impacts. Modeling methodology and results were reviewed by the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments. Included in the analyses are data on the proposed vehicles using the proposed freeway, including heavy trucks.

(Response 6 continues on next page)

Code	Comment Document

that these impacts are largest for sensitive groups such as children and seniors. This is of special concern due to the large proportion of families with young children and communities of seniors in Ahwatukee. See the EPA's (2011) *Second Prospective Study 1990-2020 of the Clean Air Act* and the associated appendices for the epidemiological consensus on health impacts and calibrated dose-response functions. The range of potential health impacts should be quantified and monetized using standard measures of the "value of a statistical life" consistent with best practices in regulatory evaluation established in the OMB and EPA guidelines. Even the lower bound on number of lives lost is likely to be sufficiently high to raise serious concerns for policy makers.

7

C. The effects of the freeway on health outcomes are no more uncertain than the effects of the freeway on commute times. Yet, there is no mention of uncertainty in commute times. Throughout the DEIS, the economic benefits of building the freeway are conveyed with a false sense of precision whereas the environmental costs are dismissed altogether because they are uncertain. This asymmetric treatment of uncertainty has the effect of biasing the DEIS in favor of building the freeway with the Pecos road alignment.

9

Comment #7: The DEIS fails to adequately address the uncertainty of benefits from building the freeway. For example, the actual reduction in commute time that would be realized if the freeway were to be build will depend on several sources of uncertainty, including but not limited to: (i) future patterns of residential development; (ii) future location choices made by firms; (iii) future residential and job location choices made by workers; (iv) future trends in telecommuting; (v) future trends in "flex-time" and the ability of workers to commute during off-peak hours; (vi) future trends in the national economy; (vii) future trends in in the international economy and trade that influence the rate of trucking through Phoenix; (viii) future trends in automobile design; (ix) the impact of building the freeway on the desirability of living in Ahwatukee; and (x) future trends in the price of gasoline, electricity, and other factors affecting commuting costs. These sources of uncertainty should be carefully analyzed and policy makers should be informed

Code	Issue	Response
6 (cont.)		As noted on page 4-65 of the Draft Environmental Impact Statement, over 700 receptors were modeled for carbon monoxide concentrations. Receptor placement met the criteria for selecting modeling locations as specified in 40 Code of Federal Regulations Part 93.123(a). The carbon monoxide analysis was updated in the Final Environmental Impact Statement. Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement.
7	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Impacts**	Comment is duly noted. The Draft Environmental Impact Statement notes matters of uncertainty throughout the entire document. Examples include study findings in the sections, *Air Quality, Noise, Visual Resources, Land Use, Displacements and Relocations, and Cultural Resources* in Chapter 4. In Chapter 3, *Alternatives*, reference is made to continued monitoring of design and cost to account for needed updates. On page 4-1, in the text box, "*Can the Impacts Change and, If So, How?,*" text is presented on how such dynamics are tracked.
9	**Environmental Analysis**	40 Code of Federal Regulations § 1500.1(b): NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. The Council on Environmental Quality regulations state information for decision making must be of high quality and based on accurate scientific analysis. The models, methods, and assumptions used throughout the Draft Environmental Impact Statement account for reasonably foreseeable future conditions and dismiss speculative considerations.

Code	Comment Document

about the statistical distribution of possible outcomes for commute times. More broadly, sources of uncertainty should be addressed throughout the discussion of benefits of building the freeway.

10

Comment #8: The DEIS systematically overstates the likely benefits of building the freeway to Phoenix commuters. The estimated benefits are based on statistics for projected future traffic patterns provided by the Maricopa Association of Governments. However, these statistics are primarily extrapolations of past trends. In other words, they are "made up". They are not derived from a consistent model of residential location choice or a realistic model of commuting choices. It is difficult to believe that many workers would make residential and job location choices that would induce them to use the new freeway. Projections for future traffic congestion also fail to incorporate future growth in the share of workers who work from home or are allowed the flexibility to commute during off-peak hours. Furthermore, estimates for the opportunity cost of time used to quantify the value of reduced commute times are not consistently linked to the actual commuters who use the freeway during peak hours, but are likely driven by high-income commuters living in places such as Scottsdale who will not use the new freeway if it is build. In addition, the models of traffic congestion in the DEIS are inadequate for estimating the impact of the freeway on commute times. The DEIS fails to provide even the most basic facts about commuting. For example, what fraction of today's metro area commuters would experience a shorter commute (in terms of physical distance) if the South Mountain Freeway were built? This information can easily be obtained from the U.S. Census Bureau's annual Public Use Microdata Sample of respondents to the *American Community Survey*, which provides information on workers' house locations, job locations, time leaving home to go to work, and travel times.

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Comment #9: Throughout the DEIS, the analysis of benefits of building the freeway is based on a false premise that the demand for transportation will be the same whether or not the freeway is built. This results in overstatement of the benefits of building the freeway. In reality, building the freeway is likely to change residential development patterns which, in turn, will increase the demand for using the freeway relative to the demand if the freeway had not been built. In other words, building the freeway will increase the demand for using the freeway due to increases in

Code	Issue	Response
10	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The models, methods, and assumptions used throughout the Draft Environmental Impact Statement account for reasonably foreseeable future conditions and rightfully dismiss speculative considerations. As examples, the Maricopa Association of Governments, as the federally designated regional transportation planning agency, is nationally recognized as a leader in air quality modeling and traffic modeling and forecasting. The models used account for the assumptions made in the comment.
11	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the projecty (see page 3-27 of the Draft Environmental Impact Statement). The model is run with and without the proposed freeway. Traffic projections are regularly updated by the Maricopa Association of Governments based on studies of travel patterns and changes in land use conditions. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011.

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driving by current residents, increases in commercial traffic, and increased migration to areas near the freeway. These "feedback effects" will increase congestion on the freeway, diminishing its benefits, especially for existing residents of Phoenix. This effect is well known to transportation economists as "The Fundamental Law of Road Congestion". Yet recognition of this effect is completely missing from the transportation models throughout the DEIS. In perhaps the most comprehensive empirical study of the causal relationship between road projects and traffic congestion, Duranton and Turner (2011) concluded that adding a new road with the characteristics of the South Mountain Freeway is unlikely to relieve congestion. See: Duranton, Gilles, and Matthew A. Turner. "The Fundamental Law of Road Congestion: Evidence from US Cities." *American Economic Review*. 101 (October 2011): 2616-2652.

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Comment #10: There is overwhelming evidence in economics journals and federal regulatory evaluations that freeways produce negative externalities that substantially diminish the quality of life for those living nearby. Some of these effects will likely be reflected in reductions (or slower growth) in property values for residential neighborhoods experiencing diminished quality of life. It is standard practice to use hedonic property value methods and contingent valuation methods to quantify these costs as part of regulatory evaluations. However, no such effort is undertaken in the draft EIS. The following impacts should be quantified and included in the EIS using best practices in methods for economic valuation of environmental impacts of public projects as outlined in EPA's Guidelines for Preparing Economic Analysis: (1) effect of air pollution on property values; (2) effect of noise pollution on property values; (3) cost of water pollution produced from freeway runoff; (4) value of lost recreation benefits to joggers and bicyclists who currently use Pecos road for recreation; (5) value of diminished recreation benefits for people using South Mountain Park due to visual disamenities, noise, dust, odors, and non-visible air pollution created by the freeway; and (6) the impact of building the freeway on crime in Ahwatukee and, in turn, the effect of increased crime on property values. This last point deserves some explanation. At present, weekly statistics from the police blotter indicate that there is virtually no violent crime or property crime in western Ahwatukee. The vast majority of Ahwatukee crimes occur in the eastern part of the town close to the I-10. The lack of crime is western Ahwatukee is likely due to the fact that, as the end of a big cul-de-sac, criminals have no

Code	Issue	Response
12	**Neighborhoods/ Communities**	The Draft Environmental Impact Statement followed standard Federal Highway Administration guidance for travel time benefits. Potential additional indirect or secondary impacts, not limited to property values, were not quantified as part of this analysis. A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pages 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

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escape route. Building the freeway will provide such an escape route and increase the attractiveness of the area to criminals as a result. Those who argue in favor of building the freeway often claim that Ahwatukee residents should have known that these effects might eventually occur as a result of the freeway when they first purchased property in the area and that, as a result, the negative externalities are already capitalized into property values. This claim is false. The conventional wisdom of real estate agents and homebuyers in Ahwatukee is that the freeway would never be built and that the original 1985 plan to build the freeway was simply a relic of "pre-Ahwatukee" regional planning. As a result, the freeway will act as a shock to the local housing market and depress property values.

13

Comment #11: In the event of heavy traffic, road work, or accidents, drivers on the South Mountain Freeway are likely to use Chandler Blvd. as a bypass. GPS devices will mechanically divert drivers off the freeway and onto Chandler. This is especially true for the Chandler Blvd segment from S. 17th Ave to Desert Foothills Parkway because this segment has 4 lanes, a speed limit of 45mph, and no stop signs or traffic lights. This will create a serious public health hazard because the aforementioned segment of Chandler goes right through the residential neighborhood of "Club West". Joggers, bicyclists, families and children use Chandler Blvd during the morning and evening commute hours for recreation and to walk/bicycle to/from school and parks. Young children on foot or on bicycle and joggers with headphones are often seen crossing the street. The lack of stop signs and crosswalks is not currently a problem because traffic is light. However, with some freeway commuters using the Chandler Blvd corridor as a bypass, there is likely to be a surge in traffic accidents and traffic-related pedestrian deaths in this family-oriented residential neighborhood. These effects are entirely ignored in the DEIS.

14

Comment #12: The DEIS violates the spirit of Presidential Executive Order #13045 by failing to identify and assess the environmental health risks and safety risks that may disproportionately affect children as a result of the freeway. An example of the environmental health risk is the increase in ambient ozone concentrations that will affect children living in Ahwatukee, particularly those who use the numerous public schools and public parks located between South

8

Code	Issue	Response
13	**Traffic**	Hazardous Materials Commodity Flow Studies and other information are used by emergency response planners (such as the Arizona State Emergency Response Commission statewide and the Maricopa County Local Emergency Planning Commission for Maricopa County) as one of the elements considered when developing Emergency Response Plans. If the plan were amended, it would be made available to the Arizona Department of Transportation. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The traffic projections for Chandler Boulevard (see Figure 3-12 on page 3-29 of the Final Environmental Impact Statement) do show a reduction with the proposed freeway when compared with conditions without the proposed freeway.
14	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. With regard to noise impacts, schools were included in the categories of activities considered in the noise pollution analysis for the project in keeping with 23 Code of Federal Regulations Part 772 (see page 4-80 of the Draft Environmental Impact Statement). As stated in the Final Environmental Impact Statement on page 4-91, sensitive receivers, including schools, would be affected by implementation of the project. These impacts, however, would be mitigated as discussed in the Final Environmental Impact Statement on pages 4-90 to 4-91. Through analysis, the Federal Highway Administration has determined that the proposed project would not produce disproportionate impacts on children.

Code	Comment Document

Mountain Park and the proposed Pecos Road alignment of the freeway. The EPA identifies children as a "sensitive group" for ambient ozone. An example of the safety risk is the increase in traffic on arterial streets that wind through residential neighborhoods in Ahwatukee, particular during periods of heavy traffic, road work, or freeway accidents when drivers will naturally use Chandler Blvd as a bypass. The traffic poses a safety risk because children frequently walk / bike / run / play on the streets that will experience increased traffic, such as Chandler Blvd from S. 17th Ave through Desert Foothills Parkway. This will increase the risk of accidental deaths of children.

Code	Issue	Response

Code	Comment Document
1	Susan Lacke Document Created: 5/21/2013 7:29:03 PM by Web Comment Form As someone who lives in the proposed Eastern Section of the Loop 202 South Mountain Freeway, I am discouraged that this is even being considered. Why can't this money be spent on sustainable efforts, such as a rail system, which will allow people to commute without the environmental impact? I would throw 100 percent of my support behind a rail project - but encouraging even more dependance on fossil fuels and destroying what little nature we have left in this city is not the way to go. It's shameful that this is even being considered. Let's start making choices that will result in a healthy environment for future generations.

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:53 PM
CALLER: JIM LACOTTA	ADDRESS: GILBERT, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in favor of the South Mountain Freeway. Thank you. Goodbye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Comments
Date: Tuesday, July 23, 2013 1:18:47 PM

F.Y.I.

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT
Communications

From: Lisa LaForest [mailto:lisalaforestphx@gmail.com]
Sent: Tuesday, July 23, 2013 1:17 PM
To: Projects
Subject: South Mountain Freeway Comments

I strongly oppose the building of South Mountain Freeway. Although this freeway has been in the works for the past 30 years, poor planning / action has occurred during this time to preserve the land for future freeway use. Instead, lots of land was sold to builders to build thousands of homes in this quite area of Phoenix. As a result a beautiful community was created. Now through ADOTs actions, this community is on the verge of being destroyed. The dynamic of this community will NOT be the same if this freeway is built. Many people who live in Ahwatukee chose this area because it is quiet, safe, and easy to get around without traffic. This area is unique in that you get a small town feel with close access to big city amenities. This freeway will significantly increase the pollution, traffic and noise and destroy every great aspect of this community.

If one of the goals is to reduce traffic in the Phoenix, then how will this freeway help? By building more freeways, traffic is NOT reduced; it's only redistributed. Why hasn't there been a concentrated effort to expand our public transportation such as the light rail system?

Code	Issue	Response
1	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
6	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

This will have a greater impact of reducing traffic by taking cars off the road instead of moving them elsewhere and increasing the area of pollution. Plus a larger more efficient public transportation system will draw more local people to visit the downtown area and other parts of the valley. And if we had a significantly better public transportation system, it will likely draw other people from around the country to consider Phoenix as a place to live because of the ease of getting around town without relying on high cost fuel cars.

9 Another concern of mine is that this "route" will ultimately be a big truck bypass, creating even more noise, pollution and traffic that what was "studied". The simulation video did not depict the big trucks passing through. This area hasn't been adequately addressed.

Overall, I think this freeway will do more harm than good. **I DO NOT want this freeway in my "backyard".** ADOT needs to seriously reconsider the impact this project will have on already well-established community areas.

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Code	Issue	Response
7	**Purpose and Need**	The purpose of the proposed action is not to reduce traffic. The analysis used to assess the purpose and need for the proposed freeway followed Federal Highway Administration guidance. The proposed freeway is needed to serve projected growth in population and accompanying transportation demand and to correct existing and projected transportation system deficiencies. See Chapter 1, *Purpose and Need*, in the Final Environmental Impact Statement. The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
8	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Purpose and Need, Truck Bypass**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 3:06 PM
CALLER: GEORGE LAFRANCE	CALLER ADDRESS: 25240 SOUTH FOXGLENN DRIVE, SUN LAKES, AZ 85248
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the planning and construction of the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Aaron Lahman

Document Created: 6/11/2013 7:17:34 PM by Web Comment Form

1 2 3 4 5 6 7

Hello. I am writing in opposition to the building of the South Mountain Freeway. I find the proposed construction of this highway deeply troubling due to a) its intrusion into sacred and historic sites of the native community of the area, b) its impact on natural areas, and c) the fact that it further commits our community to a car culture that will exacerbate sprawl, noise and air pollution, and climate change.

8 9 10

As a resident in the Phoenix area, I am quite dismayed by the lack of widespread mass transit options. This would seem to be a wonderful opportunity to redirect the billions to be spent on yet another highway toward innovative and wide-reaching transit options that encourage residents to move away from car travel and toward more sustainable transit options. This is particularly urgent as we see our area experiencing the impacts of climate change, especially in regard to rising temperatures and stress on our water supply. Continuing to promote car travel can only make these problems worse.

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Biology, Plants, and Wildlife**	
4	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.
5	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].
8	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Purpose and Need**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
10	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I live in Central Phoenix, just near Baseline and Central. As you know, Baseline is the main corridor for people who live in Laveen and work/shop in the east valley. I suspect that an interchange on the proposed freeway at Baseline will now funnel even more traffic through the area. In fact, all of the west and northwest valley will now have access to east-west roads through South Phoenix. Already when there is a problem on I-17 or I-10, Baseline becomes a parking lot. Now imagine the potential for a problem on any of the I-10, I-17, **OR** Loop 202. Baseline will bear the full brunt.

Perhaps South Phoenix, because it is home to many lower economic residents of Phoenix, is not of particular import

(over)

1

Optional

Name Claudia Laschen Email downtownlocal@hotmail.com

Address 130 E. Greenway Rd

City Phoenix State AZ Zip 85042

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Traffic**	As shown in Figure 3-12 on page 3-29 of the Final Environmental Impact Statement, traffic on Baseline Road between 17th Avenue and 48th Street would be less in 2035 with the proposed freeway than without the proposed freeway.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

to the powers that be. We certainly saw that when the city council thumbed its nose at the Baseline Master Plan and allowed developers to run rough shod over the area.

Another consideration is the Phoenix Point of Pride - South Mountain Park. The road to San Juan lookout, which is closed to traffic everyday except for one weekend per month, goes through a valley that is a quiet "haven." That, of course, will no longer be true when a freeway runs adjacent. What good is the claim to "the largest city park" if that park is perpetually bombarded with traffic noise? How is it possible that we do not have space and inclination for just one quiet retreat within the confines of this sprawling city?

I urge you to reconsider the plan to build a freeway with so much impact on South Mountain park.

2

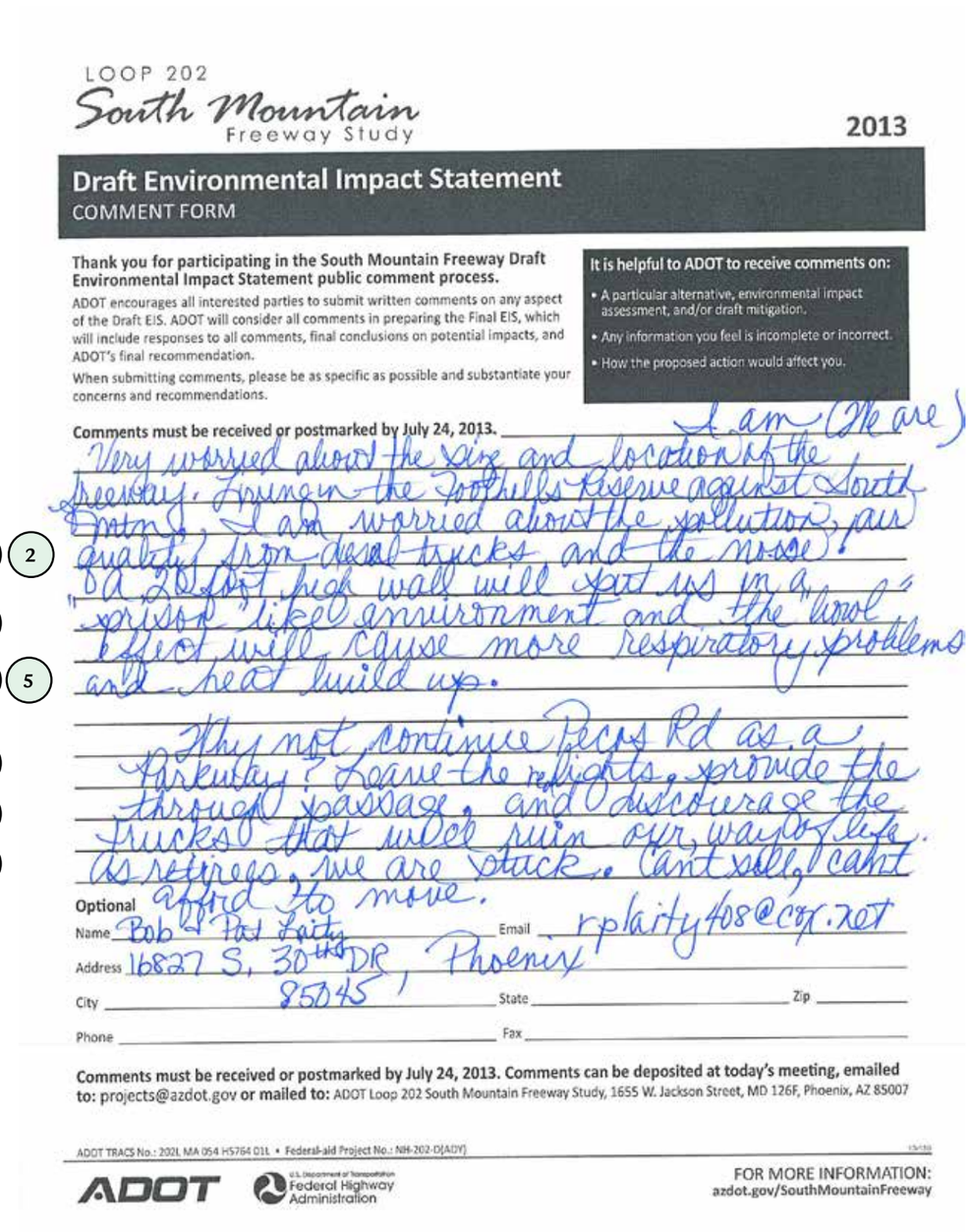
3

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-160

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	

Code	Comment Document
1 2 3 4 5 6 7 8	

LOOP 202
South Mountain Freeway Study
2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I am (We are) Very worried about the size and location of the freeway. I am in the Foothills Reserve against South Mtn. I am worried about the pollution, air quality from diesel trucks and the noise. A 20 foot high wall will put us in a "prison" like environment and the "heat" effect will cause more respiratory problems and heat build up.

Why not continue Pecos Rd as a Parkway? Leave the rights, provide the through passage, and discourage the trucks that will ruin our way of life. As retirees, we are stuck. Can't sell, can't afford to move.

Optional

Name Bob & Pat Laity Email rplaity408@cox.net

Address 16827 S. 30th DR, Phoenix

City 85045 State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT · U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
6	**Alternatives**	In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration
7	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: PLEASE BUILD THE 202 NOW
Date: Monday, May 20, 2013 10:51:38 AM

From: Kirk Lamb [mailto:kirk@dalsaz.com]
Sent: Monday, May 20, 2013 10:29 AM
To: Projects
Subject: PLEASE BUILD THE 202 NOW

1

ADOT, I've been patiently waiting for this section of Freeway to be built, 20+ years now. I think it the most critical link to alleviate truck traffic and commuter pass thru traffic from downtown I-10 and I-17. This would have provided much better benefit to Arizonans than the north portion of 303. This should have been built long time ago.

Kirk Lamb
Direct Access Legal Services, LLC.
480-464-8484 Office
480-464-8383 Fax

DIRECT ACCESS
LEGAL SERVICES

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Ddgangemi
To: Projects
Subject: Alternate Loop 202
Date: Wednesday, July 24, 2013 5:30:24 PM
Attachments: Alternate_Loop_202.pptx

Attached is my input for an alternate alignment of the South Mountain Freeway.

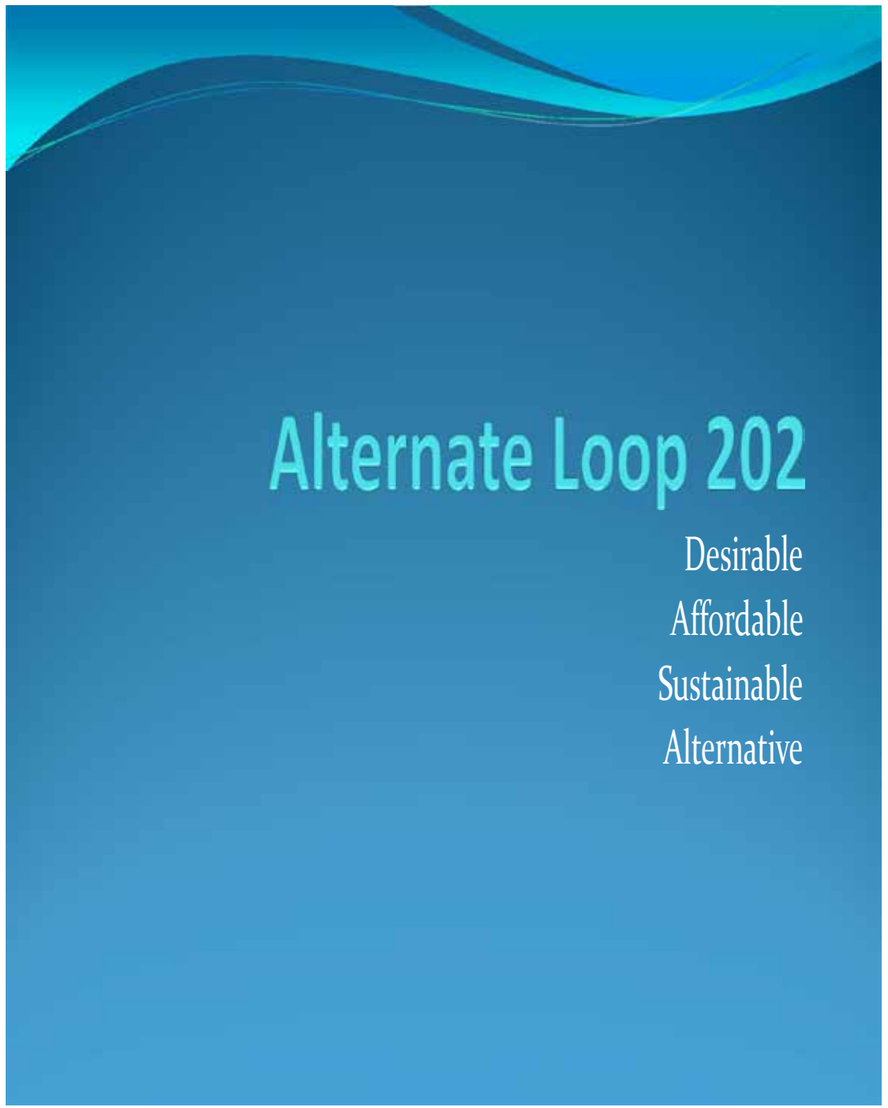
Thank you,
Jerry Lamb
(480) 620-0689

[

Code	Issue	Response

(Comment codes begin on later page)

Code	Comment Document



Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

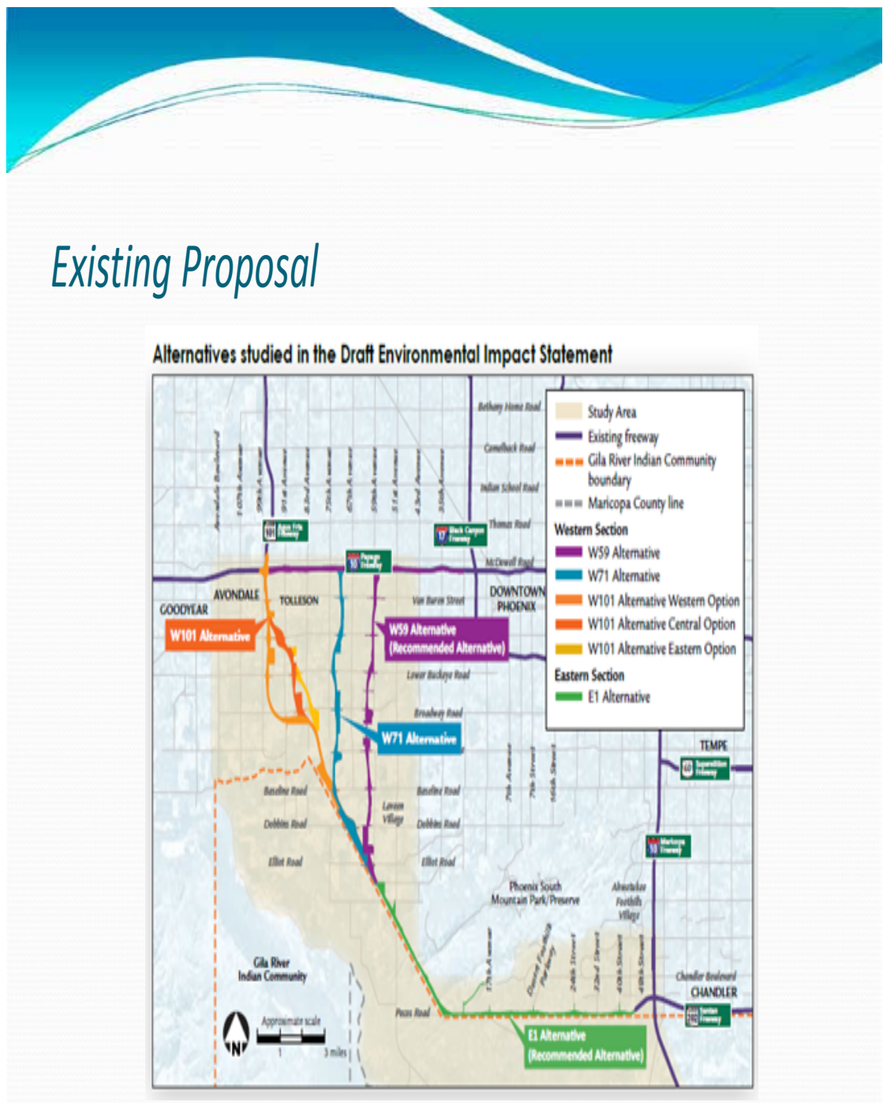
Code	Issue	Response
1	**Surface Water**	Alternative crossings of the Salt River were studied as part of the environmental impact statement process and are discussed in Draft Environmental Impact Statement pages 4-110 through 4-112. Impacts resulting from the proposed action crossing the Salt River would be addressed in a Clean Water Act Section 404 permit if an action alternative were to become the Selected Alternative. Washes, streams, rivers, and wetlands delineated as waters of the United States, or jurisdictional waters are regulated by the U.S. Army Corps of Engineers through use of Section 404 permits. When avoidance of waters of the United States is not practicable, minimization of impacts would be achieved, and unavoidable impacts would be mitigated to the extent reasonable and practicable. The permitting process for Section 404 requires Clean Water Act Section 401 certification. This certification is regulated by the Arizona Department of Environmental Quality for waters of the United States, except on tribal land, where it is regulated by the U.S. Environmental Protection Agency. For construction of the proposed action, the Arizona Department of Transportation and its contractors would be required to comply with Sections 401 and 404 of the Clean Water Act and ensure that permit conditions and mitigations would be met during construction. The general and special conditions of the Section 404 Individual Permit would minimize impacts on waters of the United States to the extent practicable.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Hazardous Materials**	
5	**Design**	The Interstate 10/Pecos Road/State Route 202 Loop system traffic interchange was constructed to be able to accommodate the proposed action and would not have to be removed.

Code	Comment Document

6
7
8

Code	Issue	Response
6	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Alternatives, Nonfreeway Alternatives**	
8	**Alternatives**	The proposed freeway would be capable of accommodating both residential and commercial traffic, just as all existing freeways in the Phoenix metropolitan area do. The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This forecast truck traffic is based on existing traffic studies and projected socioeconomic data. This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60.

Code	Comment Document



(Comment codes continue on next page)

Code	Issue	Response

Code	Comment Document

9

10

11

(Comment codes continue on next page)

Code	Issue	Response
9	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The alignment proposed in the comment is similar to freeway alignments proposed for State Route 303L south of Interstate 10 and the Hassayampa Freeway (as described in the Maricopa Association of Governments *Interstate 10/Hassayampa Valley Roadway Framework Study* and the *I-8/I-10 Hidden Valley Transportation Framework Study*). The alignment would be similar to the State Route 85/Interstate 10 Alternative evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
11	**Alternatives**	In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, a Parkway would lack sufficient capacity to meet projected travel demand. A Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, a Parkway was eliminated from further consideration. Also, the alignment proposed in the comment would be located primarily within Gila River Indian Community land. The Gila River Indian Community has not given permission to study in detail alternatives on its land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Draft Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

7

Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

Love It. Build It.

Optional

Name Philip Lambiase Email Philip Lambiase

Address 5410 W. Grenadine Road

City LAveen State Az Zip 85339

Phone 602. 361-4019 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 12-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2 3 4 5 6 7	LOOP 202 South Mountain Freeway Study 2013 **Draft Environmental Impact Statement** COMMENT FORM **Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.** ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation. When submitting comments, please be as specific as possible and substantiate your concerns and recommendations. **It is helpful to ADOT to receive comments on:** • A particular alternative, environmental impact assessment, and/or draft mitigation. • Any information you feel is incomplete or incorrect. • How the proposed action would affect you. **Comments must be received or postmarked by July 24, 2013.** (1) The pollution impact on our neighborhoods and schools would be significant. Two elementary schools would be directly behind the wall which would not hold back pollution. The Foothills slope up and the mountains would trap the pollution. (2) Noise. Again, the wall would have minimal impact because of the staircase elevation. (3) Safety: This would become a trucker route. This would increase truck traffic that would come into the Foothills and create a hazards. This truck traffic is not safe, is noisy (see #2), and would add pollution (see #1) (4) This will destroy sacred Native American land. Have we not learned from our previous mistreatment of Native Americans? **Optional** Name Michael Lamp Email michaellamp73@gmail.com Address 16047 S. 9th Pl City Phx. State AZ. Zip 85048 Phone Fax **Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to:** projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007 ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-139 ADOT U.S. Department of Transportation Federal Highway Administration FOR MORE INFORMATION: azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes, which may be elevated above the roadway, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Valley and across the country.
5	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Noise**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Air quality and noise modeling for the Draft and Final Environmental Impact Statements used this forecast truck traffic (see Final Environmental Impact Statement pages 4-68 and 4-100, respectively). Noise mitigation is designed for this predicted noise level, including the noise from trucks.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

5027

MR. LANCE: Basically, we moved to the community about three years ago. We live in the Foothills, right alongside of Pecos, so we're right next to the golf course. We purchased it before, right when we started our family. And we purchased here because of the safety and the security, the seclusion. Our big concern here now is: With Pecos becoming the interstate highway, a lot of that is going to be lost. Not only the safety aspect but the environmental aspect, the air quality, the way of life, the hiking. All of those things that we were drawn to with the Ahwatukee Foothills is going to be taken away in respect to what we were expecting when we moved in here.

So it's a big concern because, even for the families that live here and have moved here for that quality, even before the highway is open, that eight- to nine-year period where they're building this highway will also have an impact on our quality. Our air, our breathing, our noise is all going to be altered, not to mention the depreciation of our house values that come during that time if for any reason we choose to move because of what we don't have anymore.

So I don't know how to convey that in a way that's not about me but about the rest of the people in the community, as well. Not to mention, our church will have to be torn down, something that we've been a part of for now three years and won't be able to attend anymore.

Page 31

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Construction**	The construction duration for the entire 22-mile-long freeway would be approximately 5 to 6 years (see page 3-59 of the Final Environmental Impact Statement). The project would be constructed in segments similar to how other freeways in the region have been constructed. The total duration of construction for the segment along Pecos Road would only be approximately 1 to 2 years. To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement)
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. It is difficult to estimate construction-related noise levels because they depend on numerous factors, such as construction phasing, staging of equipment and materials, and work schedules. As reported on page 4-98 of the Final Environmental Impact Statement, construction noise levels during certain phases could be as high as 85 A-weighted decibels for short periods. As equipment would move on to other areas, noise levels would be lower. Where feasible, noise barriers would be constructed as early as possible during construction to shield adjacent properties from construction-related noise.
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

(Responses continue on next page)

Code	Comment Document

8

So just some of the small impacts. There's a greater good, maybe. But, based on the research I've done, there is not -- it's not going to be a faster alternative to get to the other side of the Valley. It's actually going to take a few minutes more. So the environmental impact way outweighs the need for that transportation.

I guess that's all I really need to say.

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
6	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
8	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202
Date: Friday, June 28, 2013 9:07:26 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Tannis Land [mailto:tland@shaw.ca]
Sent: Thursday, June 27, 2013 11:00 PM
To: Projects
Subject: Loop 202

Hello,
I just wanted to make some comments on the proposed extension of the 202. I am a home owner in the Foothills Reserve and do have concerns. We have owned our home for 6 years there and have enjoyed the peace and quiet the area offers. Putting a freeway through will definitely disrupt that. It will be a shame that so many houses will have to torn down and I can't figure out why they would have been allowed to build there since this extension has been talked about for so long. I also wonder what will happen to the natural habitat area that is down the street from me. I thought that was to stay undisturbed but it is in your path for the freeway. Another concern I have it that if this goes ahead, all of us will only have one way to come and go from our area. As much as we really only have one now, should for some reason that road be closed, we could still drive across the dirt where the proposed road is to go. We will have no back up plan should we have to evacuate or any other emergency. Also the concern of our property values going down. Our homes are just starting to rise in value again and this will make them drop some. My biggest concern will be the air quality and noise pollution. We are surrounded by South Mountain and the Estrellas. There is no place for the air pollution to go and the noise from the cars will just bounce off the mountains for us to listen to 24/7. I do hope the city is still trying to do some kind of deal with the reservation land or could you not use Riggs Rd? I will be a shame to see our area disrupted with this freeway.

Tannis Land
16830 S Coleman Street
Phoenix 85045

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1 2 3 4 5 6 7 8 9 10 11 12

Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
3	**Biology, Plants, Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Traffic**	The extension of Chandler Boulevard west of 19th Avenue is included in this project because reasonable access must be maintained to the neighborhoods at the west end of Pecos Road (see Figure 3-33 on page 3-57 in the Final Environmental Impact Statement). Early in the study process a traffic interchange at approximately 27th Avenue was evaluated but ultimately eliminated because of increased residential displacements and cost. The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Noise**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
9	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
10	**Noise**	As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
11	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 6:52 PM
CALLER: SHIRLEY LANDERS	CALLER ADDRESS: 9745 WEST TONAPAH DRIVE, PEORIA, ARIZONA 85382
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
Please build the South Mountain freeway. It will give us jobs and we need it for the traffic too. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Public Comments - Draft EIS South Mtn Freeway
Date: Wednesday, May 22, 2013 10:51:42 AM

From: Beth Landish [mailto:bethlandish@hotmail.com]
Sent: Tuesday, May 21, 2013 4:27 PM
To: Projects
Cc: Beth Landish
Subject: Public Comments - Draft EIS South Mtn Freeway

Attn: Study Team Panel

1

Hello. I would like to submit my comments in favor of building the South Mountain Freeway and completing the Loop 202. As a resident of Laveen, I built my house with the plan that the freeway would be built. After large shopping centers that were slated to be completed years ago backed out I started to be discouraged. It's clearly not feasible for the Laveen area to have growth without the freeway being built.

I think that the freeway would lessen traffic congestion. Since we in Laveen only have major streets like 35th Av, 51st Av, and 67th Av to reach the I-10 in the north, or taking Baseline Rd clear east to hit the I-10 there, we are constantly traveling on city streets. In addition to regular vehicle traffic, we constantly deal with semi-trucks and trailers coming through our residential areas because it's the only path they're able to take. With the South Mountain Freeway the trucks would be able to use the freeway and get off the neighborhood streets.

There is money to build this freeway. Many, many years ago it was voter approved (twice!) and it's time to make good on what the people voted for.

The people of Laveen, southwest Phoenix, and north along the proposed W59 route, would all benefit from the freeway. Not only would building the freeway create jobs, but the stores and businesses that would come along the route would also create jobs and keep shopping in our local areas.

It is time to build this freeway.

I also want to say thank you for the great resources as I was finally able to see the visual simulation of what it may look like! Since I live very close to the proposed route I've always been a bit nervous about how it would look. While nothing is perfect, I think the impact on traffic congestion of having the freeway built and the possible economic opportunities that will come with it, are all well worth it.

Please let me know if you require additional information identifying me as an Arizona,

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Phoenix, and Laveen Village resident.

Regards,
Beth A. Landish

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Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Public Comments - Draft EIS South Mtn Freeway
Date: Wednesday, May 22, 2013 10:49:46 AM

From: Beth Landish [mailto:bethlandish@hotmail.com]
Sent: Tuesday, May 21, 2013 5:11 PM
To: Projects
Cc: Beth Landish
Subject: RE: Public Comments - Draft EIS South Mtn Freeway

Hello. I'm sorry but I would like to add some more comments.

1 2 I wanted to add that I am concerned about noise and the aesthetic look of the freeway. Being that my property is very close the proposed route I fear the noise that the freeway will bring. I am hopeful that the proposed sound barriers near communities would automatically be included. I would also like to see some sort of pedestrian or biking pathways that are nearby, as not everyone drives.

3

4 I hope that ADOPT will consider how wildlife will be displaced. I know the video states that in areas animals will be able to pass below the freeway, but I want particular attention paid to how the freeway will affect them.

4

I am pro-202 but do have reservations. I don't want a Walmart outside my driveway. But I do think the freeway is needed for all the benefits it will bring.

Thank you again for your time.

Beth A. Landish
6355 W. Beverly Rd.
Laveen, AZ 85339

From: bethlandish@hotmail.com
To: projects@azdot.gov
CC: bethlandish@hotmail.com
Subject: Public Comments - Draft EIS South Mtn Freeway
Date: Tue, 21 May 2013 16:26:58 -0700

Attn: Study Team Panel

Hello. I would like to submit my comments in favor of building the South Mountain Freeway

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Visual Resources**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation's standard applications. As an example, for State Route 101 Loop (Pima Freeway) in Scottsdale, the City of Scottsdale chose to add public art to the noise barriers. The City's intent went above and beyond the Arizona Department of Transportation's guidelines of reasonable aesthetic treatment and, therefore, the Arizona Department of Transportation did not fund the aesthetic portion of the project. The Arizona Department of Transportation and the City of Scottsdale entered into an intergovernmental agreement for the purposes of allowing Scottsdale rights to design and construct artistic embellishment on the Arizona Department of Transportation-supplied noise barrier. The Arizona Department of Transportation provided the funds for construction of the noise barriers themselves, but the City of Scottsdale provided the funds to cover the aesthetic portion of the walls. Final Environmental Impact Statement page 4-171 explains the process municipalities might take to achieve the desired aesthetic treatment for noise barriers or other structures.
3	**Neighborhoods/ Communities**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
4	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

and completing the Loop 202. As a resident of Laveen, I built my house with the plan that the freeway would be built. After large shopping centers that were slated to be completed years ago backed out I started to be discouraged. It's clearly not feasible for the Laveen area to have growth without the freeway being built.

I think that the freeway would lessen traffic congestion. Since we in Laveen only have major streets like 35th Av, 51st Av, and 67th Av to reach the I-10 in the north, or taking Baseline Rd clear east to hit the I-10 there, we are constantly traveling on city streets. In addition to regular vehicle traffic, we constantly deal with semi-trucks and trailers coming through our residential areas because it's the only path they're able to take. With the South Mountain Freeway the trucks would be able to use the freeway and get off the neighborhood streets.

There is money to build this freeway. Many, many years ago it was voter approved (twice!) and it's time to make good on what the people voted for.

The people of Laveen, southwest Phoenix, and north along the proposed W59 route, would all benefit from the freeway. Not only would building the freeway create jobs, but the stores and businesses that would come along the route would also create jobs and keep shopping in our local areas.

It is time to build this freeway.

I also want to say thank you for the great resources as I was finally able to see the visual simulation of what it may look like! Since I live very close to the proposed route I've always been a bit nervous about how it would look. While nothing is perfect, I think the impact on traffic congestion of having the freeway built and the possible economic opportunities that will come with it, are all well worth it.

Please let me know if you require additional information identifying me as an Arizona, Phoenix, and Laveen Village resident.

Regards,
Beth A. Landish

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Code	Issue	Response

Code	Comment Document

regional availability. I have friends who live on the east side of town who want to get to the West Valley or points west, and this will also help them by being able to bypass downtown Phoenix completely. That's it for me. Thanks for your time.

THE FACILITATOR: Thank you, sir.

Larry Landry. Mr. Landry, you have three minutes. Here's your timer; please begin.

MR. LANDRY: Thank you. Hey, Steve. My name is Larry Landry; I live at 2409 East Solano Drive. I'm officially retired now; however, for 28, almost 30 years, I've worked on freeway issues, including the 1985 vote where the South Mountain Freeway was voted in. Ironically, the 303 was an optional freeway at that time. Look at all the money that we spent on that. 55th Street alignment, the preferred alignment, avenue alignment, is the key one, and it's been 28 years.

I know you have difficult decisions to make on the route, but this was on the map well before any homes were built in Ahwatukee, and sometimes the greater good, our air pollution is getting worse every day in every way, and if you -- you know, better than I, I-10, I-17, the Broadway curve is a parking lot all too often. We need this reliever.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

We need it yesterday. I applaud you. It's been a long effort. I've been involved with it historically, even wrote a newspaper article once on the 55th Avenue alignment, and my colleague, who is much smarter, better looking and more [unintelligible] Jim Kretin [phonetic], does say hello, he had a family issue that came up, so he's not here. So I'm the pinch hitter, I'm not as good as the first team, but I'm trying to get to the plate and do the job.

I thank you for your time. You've had a long day, so I will stop well under my limit, thank you.

THE FACILITATOR: Thank you, sir.

David Hernandez.

You've got three minutes.

MR. HERNANDEZ: Yes, sir, howdy. Three minutes. I've lived over here on 59th Avenue and Roosevelt for about 31 years, and I've got three minutes. Off over at the Indian reservation, over there in Ahwatukee, they got more consideration than 59th Avenue. But 59th Avenue, I guess traditionally is Mexican-American. It's a Mexican-American area, and so what, we'll bulldoze that area over, we'll give them more pollution, we'll reduce the quality of

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:26 PM
CALLER: CLAY LANG	CALLER ADDRESS: 224 W. WILLOW, PHOENIX, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I am in support of building that freeway. Get it built.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 12:15 PM
CALLER: WILLIAM A. LANGER	CALLER ADDRESS: 5144 E. PALOMINO ROAD, PHOENIX, AZ 85018
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway access lane.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

5041

1 MR. LANK: My name is Tim Lank and I
2 guess my comment is, since this freeway has been
3 presented as something for nonpassthrough regional
4 mobility, and the preferred route for passthrough
5 trucks is the Arizona Route 85 from Buckeye to Gila
6 Bend and Interstate 8 to Casa Grande, what I would
7 like to know is, how is ADOT going to enforce the
8 bypass of I-8 to keep traffic off this South Mountain
9 -- keep truck traffic off the South Mountain Freeway?
10 Right now and for many years, there's
11 been very small signs indicating that there's a
12 possibility of going down Arizona 85 and down
13 Interstate 8 to bypass Phoenix for passthrough
14 traffic, but the signs are very small. In addition,
15 there's no amenities on that route compared to
16 Phoenix, and it's not an improved divided highway
17 with poor entrances and exits.
18 So what I would like to find out is how
19 ADOT is going to enforce that particular route as the
20 official commercial vehicle and truck bypass around
21 Phoenix to keep commercial vehicles that are
22 passthrough off the South Mountain Freeway. Or what
23 I would expect to see at a minimum is a large
24 overhead sign on I-10 at both ends of the South
25 Mountain Freeway, or rather in Buckeye and in Casa

Page 2

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www.drivernix.com

Code	Issue	Response
1	**Alternatives**	The CANAMEX and Phoenix truck bypass (Interstate 8/State Route 85) routes are not mandatory for truck traffic; they are recommended. The Arizona Department of Transportation does not enforce these routes. It is not anticipated that these routes would be enforced as mandatory in the future.

Code	Comment Document

Grande and some active enforcement by DPS using truck logs and bills of lading from commercial truck drivers to enforce this. I guess that's it.

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Wednesday, May 22, 2013 10:56:29 AM

From: lisa lanning [mailto:lisa.phx.az@gmail.com]
Sent: Monday, May 20, 2013 11:12 PM
To: Projects
Subject: South Mountain Freeway

To whom it may concern,

1 2 3

The proposed South Mountain Freeway route through reservation lands should not be approved. The South Mountain preserve is considered sacred by O'odham Tribes and the land within the preserve should not be reallocated.

Thank you for considering this comment.

Sincerely,
Lisa Lanning

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Code	Issue	Response
1	**Alternatives**	The proposed South Mountain Freeway would not use any Gila River Indian Community land. The portion of the South Mountains that would be adversely affected are totally within the City of Phoenix.
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Section 4(f) and Section 6(f)**	

Code	Comment Document

Kenneth Lapierre Document Created: 5/16/2013 11:58:14 PM by Web Comment Form

Please enter my comments officially for no highway to be built.

(1) The environment study did not use up to date 2013 data and I am opposed of its construction.

(2) Study does not have accurate 2013 car counts and air quality figures nor was it independently verified. I think we all need to pause and have some one study this study and the politics of how it was written and unfounded in truth. There is a major issue in the study to (3) which also does not accurately add the additional impact from the build phase and from the new traffic count phase. It did not note correctly detail the truck traffic from Canada LA CA (4) and to Mexico with hazardous material going thru a park and reserve with many homes within 1-2 miles.

(5) No truck traffic counts detailed correctly since this is a truck bypass not a commuter road. So material omissions and intent to hide the truth in an official document.

(6) (2) Project and study did not address the current 2012 epa 13 day violations in the west valley and how the air quality will get worse during construction and during the 6 lanes for truck traffic. also did not show design which will impact environment along the Awatukee / Pecos section. Design does impact the environment differently and to say we will address during the (7) building phase is very unethical and unfair to home owners who have millions on the line with no legal representation. What is the design height depth walls near homes and schools and churches?

(8) You did not consider Indian petroglyphs and burial grounds in or near the path way.

(9) (10) No mention of how the heck foothill reserve residents will drive to work no outlet planned on any map. We only use Pecos and our commuting road.

(2) No mention of dust and Indian res. air quality which is bad and getting worse. Must consider current toxins in the air as of 5-14-2013 at GILA and Awatukee south of Pecos.

(1) No 2015 projections accurate in the study seems like its based on very old data.

(11) Also to have the city pre buying homes is some what unethical as well.

(12) (13) (14) Please note I am opposed since it will not allow me faster commute to downtown and will tear down hundreds of homes in my subdivision with no explanation of how it will impact home values or views and noise.

(15) (2) Need to study the possibility this project will cause phoenix to loose 1 billion in federal

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments *2012 Five Percent Plan* was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).
3	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Hazardous Materials**	
5	**Purpose and Need, Truck Bypass**	
6	**Construction**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).

(Responses continue on next page)

Code	Comment Document
	matching funds when the EPA monitoring station in the west valley east of hwy 51 have more violations than 10 per year. Also its not from dust storms... and will increase. Then with out the matching federal dollars our taxpayers have to pay this. This end up being could be the most expensive project any US city every had to pay for forever. This is not a one time expense and with our federal dollars AZ budget need to increase its funds. It could hurt the city in many ways financially and for poor planned growth.
	You should be required to accurately tell the EPA the correct this environmental study with all up to date 2013 environmental impacts... 21 million spend is potentially fraudulent based on the lack of due diligence and details omitted from insiders direction who promote the freeway. It should be reviewed and independently investigated as to who directed poor study facts and obvious material omissions of fact.
5	You have unethically disguised this truck bi-pass as a 202 highway to relieve traffic on the Broadway curve. Fix the existing hwy 10 and 202 101 first before spending billions in tax dollars.
16	Consider cheaper alternative hwy 8 expansion where less folks live.
17 18	Accurately detail the health and safety impacts to home within 1 mile of a major truck route. Study the impact to terminate movement and the wildlife destruction and native cactus plants and eco system. Isn't that what an environmental study should do rather than promote the freeway?
19 20 4	Environmental study also does not address the additional destruction of wells from subdivisions, and water drainage issues. and the increase risk of truck container spills. This is critical to those who have to stay within 1-3 miles of this.
17	This will also hurt kids in schools near by the folks / elderly with breathing issues.
21	This is discrimination to the Indian community and unethical to there rights as a minority.
22 5	And to destroy South Mountain a pristine community park (common land) what a shame especially once folks see what this project really will be a USA free trade truck bi-pass. Please stop and re-think about what we are doing with the real facts and with an accurate environmental study.
	AZ will look back on this with regret if it gets approved! Please stop and think with the real facts.

Code	Issue	Response
7	**Design**	The current level of engineering is used to determine the limits of environmental and construction impacts due to the proposed freeway. The location and profile of the freeway are evaluated to minimize potential changes to the freeway as the design level would progress. The current level of engineering is an accepted industry standard for determining impacts. (See Final Environmental Impact Statement sidebar on page 3-40 for more discussion.) Potential heights of noise walls are presented beginning on page 4-90 of the Final Environmental Impact Statement
8	**Cultural Resources**	The freeway alternatives were surveyed for archaeological sites, which include petroglyphs (rock art). The archaeological survey documented several petroglyph locations. Subsequently, the freeway alternatives were redesigned to avoid the petroglyph sites. No petroglyphs would be destroyed by implementation of the proposed freeway. Because right-of-way fencing would limit access from the proposed freeway, damage to petroglyph sites would not be facilitated (see Final Environmental Impact Statement pages 4-160 and 4-187).
9	**Construction**	Temporary construction impacts are described in the Draft Environmental Impact Statement beginning on page 4-161. The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours might be needed during construction. (See Final Environmental Impact Statement page 3-27.) In general, travel times along Pecos Road would remain unchanged during construction. After construction, motorists that currently use Pecos Road could use the freeway.
10	**Design**	The extension of Chandler Boulevard west of 19th Avenue is included in this project because reasonable access must be maintained to the neighborhoods at the west end of Pecos Road (see Figure 3-33 on page 3-57 in the Final Environmental Impact Statement). Early in the study process a traffic interchange at approximately 27th Avenue was evaluated but ultimately eliminated because of increased residential displacements and cost.
11	**Land Use**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement. The Arizona Department of Transportation purchased some right-of-way along Pecos Road when it was adopted as the freeway alignment in 1988 (see Draft Environmental Impact Statement page 3-53). Should another alternative be adopted as a result of this study, the Arizona Department of Transportation would dispose of the land that has been acquired. Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
12	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
13	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
14	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
15	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
16	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
17	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
18	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
19	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)
20	**Drainage**	Flood protection levels are dictated by the design class of the highway. In the case of the proposed South Mountain Freeway, it is designated as a Class I. Therefore, flood protection levels would be designed to the 50-year (storm) level. However, as a standard Arizona Department of Transportation practice, the floodwaters developing upstream of the culvert entrance would be reviewed at the 100-year level to ensure "headwaters" do not adversely affect existing properties. (See Draft Environmental Impact Statement page 4-102.) All bridges on major waterways such as the Salt River are designed to maintain minimum water surface elevations at the 100-year level for flood levels and built to structurally withstand the superflood, a flood expected only once in 500 years.
21	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
22	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Deb Lapierre Document Created: 5/17/2013 12:00:03 AM by Web Comment Form

(1) (2) Project and study did not address the current 2012 epa 13 day violations in the west valley and how the air quality will get worse during construction and during the 6 lanes for truck traffic. also did not show design which will impact environment along the Awatukee / Pecos section. Design does impact the environment differently and to say we will address during the building phase is very unethical and unfair to home owners who have millions on the line with no legal representation. What is the design height depth walls near homes and schools and churches?

(3)

(4) You did not consider Indian petroglyphs and burial grounds in or near the path way.

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(7) No 2015 projections accurate in the study seems like its based on very old data.

(8) Also to have the city pre buying homes is some what unethical as well.

(9) (10) (11) (12) Please note I am opposed since it will not allow me faster commute to downtown and will tear down hundreds of homes in my subdivision with no explanation of how it will impact home values or views and noise.

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This end up being could be the most expensive project any US city every had to pay for forever. This is not a one time expense and with our federal dollars AZ budget need to increase its funds. It could hurt the city in many ways financially and for poor planned growth.

You should be required to accurately tell the EPA the correct this environmental study with all up to date 2013 environmental impacts... 21 million spend is potentially fraudulent based on the lack of due diligence and details omitted from insiders direction who promote the freeway. It should be reviewed and independently investigated as to who directed poor study facts and obvious material omissions of fact.

(13) You have unethically disguised this truck bi-pass as a 202 highway to relieve traffic on the Broadway curve.
Fix the existing hwy 10 and 202 101 first before spending billions in tax dollars.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).
2	**Construction**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
3	**Design**	The current level of engineering is used to determine the limits of environmental and construction impacts due to the proposed freeway. The location and profile of the freeway are evaluated to minimize potential changes to the freeway as the design level would progress. The current level of engineering is an accepted industry standard for determining impacts. (See Final Environmental Impact Statement sidebar on page 3-40 for more discussion.) Potential heights of noise walls are presented beginning on page 4-90 of the Final Environmental Impact Statement
4	**Cultural Resources**	The freeway alternatives were surveyed for archaeological sites, which include petroglyphs (rock art). The archaeological survey documented several petroglyph locations. Subsequently, the freeway alternatives were redesigned to avoid the petroglyph sites. No petroglyphs would be destroyed by implementation of the proposed freeway. Because right-of-way fencing would limit access from the proposed freeway, damage to petroglyph sites would not be facilitated (see Final Environmental Impact Statement pages 4-160 and 4-187).

(Responses continue on next page)

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14	Consider cheaper alternative hwy 8 expansion where less folks live.
15 16	Accurately detail the health and safety impacts to home within 1 mile of a major truck route. Study the impact to terminate movement and the wildlife destruction and native cactus plants and eco system. Isn't that what an environmental study should do rather than promote the freeway?
17 18 19	Environmental study also does not address the additional destruction of wells from subdivisions, and water drainage issues. and the increase risk of truck container spills. This is critical to those who have to stay within 1-3 miles of this.
20	This will also hurt kids in schools near by the folks / elderly with breathing issues. Please dont build it!!!

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5	**Construction**	Temporary construction impacts are described in the Draft Environmental Impact Statement beginning on page 4-161. The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours might be needed during construction. (See Final Environmental Impact Statement page 3-27.) In general, travel times along Pecos Road would remain unchanged during construction. After construction, motorists that currently use Pecos Road could use the freeway.
6	**Design**	The extension of Chandler Boulevard west of 19th Avenue is included in this project because reasonable access must be maintained to the neighborhoods at the west end of Pecos Road (see Figure 3-33 on page 3-57 in the Final Environmental Impact Statement). Early in the study process a traffic interchange at approximately 27th Avenue was evaluated but ultimately eliminated because of increased residential displacements and cost.
7	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Land Use**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement. The Arizona Department of Transportation purchased some right-of-way along Pecos Road when it was adopted as the freeway alignment in 1988 (see Draft Environmental Impact Statement page 3-53). Should another alternative be adopted as a result of this study, the Arizona Department of Transportation would dispose of the land that has been acquired. Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
9	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

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10	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
11	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
12	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
13	**Purpose and Need, Truck Bypass**	
14	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
15	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
16	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

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17	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)
18	**Drainage**	Flood protection levels are dictated by the design class of the highway. In the case of the proposed South Mountain Freeway, it is designated as a Class I. Therefore, flood protection levels would be designed to the 50-year (storm) level. However, as a standard Arizona Department of Transportation practice, the floodwaters developing upstream of the culvert entrance would be reviewed at the 100-year level to ensure "headwaters" do not adversely affect existing properties. (See Draft Environmental Impact Statement page 4-102.) All bridges on major waterways such as the Salt River are designed to maintain minimum water surface elevations at the 100-year level for flood levels and built to structurally withstand the superflood, a flood expected only once in 500 years.
19	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
20	**Health Effects**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: public comment on south mountain freeway - home owner Ken lapierre foothills reserve
Date: Friday, May 17, 2013 8:50:15 AM

From: k l [mailto:kennethlapierre@gmail.com]
Sent: Thursday, May 16, 2013 9:20 PM
To: Projects; k l
Subject: public comment on south mountain freeway - home owner Ken lapierre foothills reserve

Please enter my comments officially for no highway to be built.
Ken Lapierre - home owner the crossings foothills reserve
16637 S. 27th lane
phoenix az 85045
480-621-6798

1 2 3 4 5

The environment study did not use up to date 2013 data and I am opposed of its construction. Study does not have accurate 2013 car counts and air quality figures nor was it independently verified. I think we all need to pause and have some one study this study and the politics of how it was written and unfounded in truth. There is a major issue in the study to which also does not accurately add the additional impact from the build phase and from the new traffic count phase. It did not note correctly detail the truck traffic from Canada LA CA and to Mexico with hazardous material going thru a park and reserve with many homes within 1-2 miles.
No truck traffic counts detailed correctly since this is a truck bypass not a commuter road. So material omissions and intent to hide the truth in an official document.

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Project and study did not address the current 2012 epa 13 day violations in the west valley and how the air quality will get worse during construction and during the 6 lanes for truck traffic. also did not show design which will impact environment along the Awatukee / Pecos section. Design does impact the environment differently and to say we will address during the building phase is very unethical and unfair to home owners who have millions on the line with no legal representation. What is the design height depth walls near homes and schools and churches?
You did not consider Indian petroglyphs and burial grounds in or near the path way.

7 8 9 10

No mention of how the heck foothill reserve residents will drive to work no outlet planned on any map. We only use Pecos and our commuting road.

2 1 11 12 13 14 15 2

No mention of dust and Indian res. air quality which is bad and getting worse. Must consider current toxins in the air as of 5-14-2013 at GILA and Awatukee south of Pecos.
No 2015 projections accurate in the study seems like its based on very old data.
Also to have the city pre buying homes is some what unethical as well.
Please note I am opposed since it will not allow me faster commute to downtown and will tear down hundreds of homes in my subdivision with no explanation of how it will impact home values or views and noise.

Need to study the possibility this project will cause phoenix to loose 1 billion in federal matching funds when the EPA monitoring station in the west valley east of hwy 51 have

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(Responses continue on next page)

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more violations than 10 per year. Also its not from dust storms... and will increase. Then with out the matching federal dollars our taxpayers have to pay this.
This end up being could be the most expensive project any US city every had to pay for forever. This is not a one time expense and with our federal dollars AZ budget need to increase its funds. It could hurt the city in many ways financially and for poor planned growth.

You should be required to accurately tell the EPA the correct this environmental study with all up to date 2013 environmental impacts... 21 million spend is potentially fraudulent based on the lack of due diligence and details omitted from insiders direction who promote the freeway. It should be reviewed and independently investigated as to who directed poor study facts and obvious material omissions of fact. 5
You have unethically disguised this truck bi-pass as a 202 highway to relieve traffic on the Broadway curve.
Fix the existing hwy 10 and 202 101 first before spending billions in tax dollars. 14
Consider cheaper alternative hwy 8 expansion where less folks live.
Accurately detail the health and safety impacts to home within 1 mile of a major truck route. Study the impact to terminate movement and the wildlife destruction and native cactus plants and eco system. Isn't that what an environmental study should do rather than promote the freeway? 15 16
Environmental study also does not address the additional destruction of wells from subdivisions, and water drainage issues. and the increase risk of truck container spills. This is critical to those who have to stay within 1-3 miles of this. 17
This will also hurt kids in schools near by the folks / elderly with breathing issues. 18 19
This is discrimination to the Indian community and unethical to there rights as a minority. 20

And to destroy South Mountain a pristine community park (common land) what a shame especially once folks see what this project really will be a USA free trade truck bi-pass. 21 5 22
Please stop and re-think about what we are doing with the real facts and with an accurate environmental study.

AZ will look back on this with regret if it gets approved! Please stop and think with the real facts.

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

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(Responses continue on next page)

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21	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
22	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: south mountain comments Deb lapierre
Date: Friday, May 17, 2013 8:49:55 AM

From: k l [mailto:kennethlapierre@gmail.com]
Sent: Thursday, May 16, 2013 9:30 PM
To: Projects
Subject: south mountain comments Deb lapierre

1 2 3 54

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(Responses continue on next page)

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21	This is discrimination to the Indian community and unethical to there rights as a minority.
22	And to destroy South Mountain a pristine community park (common land) what a shame especially once folks see what this project really will be a USA free trade truck bi-pass. Please stop and re-think about what we are doing with the real facts and with an accurate environmental study. AZ will look back on this with regret if it gets approved! Please stop and think with the real facts.
	Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
7	**Design**	The current level of engineering is used to determine the limits of environmental and construction impacts due to the proposed freeway. The location and profile of the freeway are evaluated to minimize potential changes to the freeway as the design level would progress. The current level of engineering is an accepted industry standard for determining impacts. (See Final Environmental Impact Statement sidebar on page 3-40 for more discussion.) Potential heights of noise walls are presented beginning on page 4-90 of the Final Environmental Impact Statement
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(Responses continue on next page)

Code	Comment Document

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(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
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22	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Patricia Talcott
To: ADOT
Cc: Patricia Talcott
Subject: ENVOY #1313677173/no on 202 highway expansion
Date: Friday, May 17, 2013 8:43:55 AM
Attachments: image001.png

Comments from the ADOT ENVOY System:

1

5/16/2013 9:13:19 PM
Please enter my comments officially for no highway to be built.
Ken Lapierre - home owner the crossings foothills reserve
16637 S. 27th lane
phoenix az 85045
480-621-6798
lapierre, ken - kennethlapierre@gmail.com

Patricia A. Talcott
Program Project Specialist II
206 S. 17th Avenue, Room 101, MD118A
Phoenix, AZ 85007
602.712.7610
www.azdot.gov

ADOT Communications

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Please enter my comments officially for no highway to be built.
Ken Lapierre - home owner the crossings foothills reserve
16637 S. 27th lane
phoenix az 85045
480-621-6798

1 The environment study did not use up to date 2013 data and I am opposed of its construction.

2 3 4 Study does not have accurate 2013 car counts and air quality figures nor was it independently verified. I think we all need to pause and have some one study this study and the politics of how it was written and unfounded in truth. There is a major issue in the study to which also does not accurately add the additional impact from the build phase and from the new traffic count phase. It did not note correctly detail the truck traffic from Canada LA CA and to Mexico with hazardous material going thru a park and reserve with many homes within 1-2 miles.

5 No truck traffic counts detailed correctly since this is a truck bypass not a commuter road. So material omissions and intent to hide the truth in an official document.

6 2 Project and study did not address the current 2012 epa 13 day violations in the west valley and how the air quality will get worse during construction and during the 6 lanes for truck traffic. also did not show design which will impact environment along the Awatukee / Pecos section. Design does impact the environment differently and to say we will address during the building phase is very unethical and unfair to home owners who have millions on the line with no legal representation. What is the design height depth walls near homes and schools and churches?

7 8 You did not consider Indian petroglyphs and burial grounds in or near the path way.

9 10 No mention of how the heck foothill reserve residents will drive to work no outlet planned on any map. We only use Pecos and our commuting road.

2 1 11 No mention of dust and Indian res. air quality which is bad and getting worse. Must consider current toxins in the air as of 5-14-2013 at GILA and Awatukee south of Pecos.

No 2015 projections accurate in the study seems like its based on very old data.

Also to have the city pre buying homes is some what unethical as well.

12 13 14 15 Please note I am opposed since it will not allow me faster commute to downtown and will tear down hundreds of homes in my subdivision with no explanation of how it will impact home values or views and noise.

2 Need to study the possibility this project will cause phoenix to loose 1 billion in federal matching funds when the EPA monitoring station in the west valley east of hwy 51 have more violations than 10 per year. Also its not from dust storms... and will increase. Then with out the matching federal dollars our taxpayers have to pay this.

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).
3	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Hazardous Materials**	
5	**Purpose and Need, Truck Bypass**	
6	**Construction**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).

(Responses continue on next page)

Code	Comment Document

This end up being could be the most expensive project any US city every had to pay for forever. This is not a one time expense and with our federal dollars AZ budget need to increase its funds. It could hurt the city in many ways financially and for poor planned growth.

You should be required to accurately tell the EPA the correct this environmental study with all up to date 2013 environmental impacts... 21 million spend is potentially fraudulent based on the lack of due diligence and details omitted from insiders direction who promote the freeway. It should be reviewed and independently investigated as to who directed poor study facts and obvious material omissions of fact.

5 You have unethically disguised this truck bi-pass as a 202 highway to relieve traffic on the Broadway curve.
Fix the existing hwy 10 and 202 101 first before spending billions in tax dollars.

16 Consider cheaper alternative hwy 8 expansion where less folks live.

17 18 Accurately detail the health and safety impacts to home within 1 mile of a major truck route. Study the impact to terminate movement and the wildlife destruction and native cactus plants and eco system. Isn't that what an environmental study should do rather than promote the freeway?

19 20 4 Environmental study also does not address the additional destruction of wells from subdivisions, and water drainage issues. and the increase risk of truck container spills. This is critical to those who have to stay within 1-3 miles of this.

17 This will also hurt kids in schools near by the folks / elderly with breathing issues.

21 This is discrimination to the Indian community and unethical to there rights as a minority.

22 And to destroy South Mountain a pristine community park (common land) what a shame especially once folks see what this project really will be a USA free trade truck bi-pass. Please stop and re-think about what we are doing with the real facts and with an accurate environmental study.

AZ will look back on this with regret if it gets approved! Please stop and think with the real facts.

➢ After the public hearing, community forums will be held at various locations in the Study Area to allow for additional opportunity to provide DEIS comment. Times and locations of the forums will be posted at <azdot.gov/southmountainfreeway> and publish in newspapers and local publications.
➢ Written comments also can be submitted via the following methods:
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➢ E-mailing comments to projects@azdot.gov

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Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 04/26/13	INCOMING CALL TIME: 5:34 PM
CALLER: KENNETH LAPIERRE	CALLER ADDRESS:
PHONE:	EMAIL: KENNETHLAPIERRE@GMAIL.COM

CALLER REMARKS/QUESTIONS:

(1) I have a comment for the record. The proposed South Mountain Freeway should not be on Pecos Road. There should be stronger negotiations with the Gila River Indian Community to have the alignment on their land. The current GRIC land between 20th Street and Chandler Boulevard is being used for farming, which is already causing an issue with dust to area residents at the Foothills Reserve. Rather than have this freeway located next to residents, swimming pools, schools, and walking trails, the freeway should be planned for the area a few miles south, where there currently is vacant land.

(2) (3) (4) I've heard that the freeway, planned for Pecos Road, will be built as closely as possible to homes with no regard to dust or noise mitigation. This should not be done.

(5) Also, wherever the freeway is constructed, it should have quality landscaping.

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	
5	**Visual Resources**	Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.

Code	Comment Document

4368

double-deck approach to the proposed freeway. Thank you.

THE FACILITATOR: Thank you.

Ken Lapierre.

MR. LAPIERRE: Hello, my name is Ken Lapierre, I live in Ahwatukee Foothills Reserve, and my initial comments here about the EPA draft study is I feel it's deficient on a couple of points. One is it's really not up to date. I'm not sure what data set was used, but if you look at, in particular, the violation of the EPA standards we have at the 43rd Avenue EPA sensor, it doesn't really look like we've acknowledged that that would get worse. My concern is that we will have a loss of federal highway funding if we violated 13 times on 43rd Avenue already and we're going to build a highway that's going to be a mile away, that's going to impact that sensor. Then we'll have more violations.

The other thing that I'm very concerned with is benzene in the air. I don't really know if you've studied the benzene levels in the Gila Indian Community, where I live in a community that borders that. I don't know if that's allowed or part of the study, but it's very toxic, people have health hazards. I work in a health advocacy group in Phoenix, and children are already experiencing asthma symptoms from the smog and the soot and the dust particulates from that area

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www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).
3	**Air Quality**	The mobile source air toxics emission modeling, including benzene, developed for the project (which factored in the U.S. Environmental Protection Agency's recent rules for the 2035 analyses) and discussed beginning on page 4-77 of the Final Environmental Impact Statement found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.
4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

2 3 5 6 7 8 9 10 11 12 13

already.

And also, I think it's important to study several air-quality standards that are in trouble right now in Ahwatukee Foothills. Certainly when we have a new highway that's going to get worse, benzene levels are going to go up maybe three or four times the amount. And to not have addressed future benzene levels, I think that's very critical. Traffic counts, of course, is going to add to that pollution. Dust particulates is a real problem right now. I don't really see much in the study about the exact level of dust particulates and how it's going to grow during the construction phase as well as after the construction phase. Toxins, the noise, the light that's going to be emitted from this highway in a community where we live.

Also, blasting through three ridges of South Mountain Park is going to be an environmental disaster. What concern do we have about the destroying parklands, destroying petroglyphs, which there are petroglyphs in that area if you go through that? The wildlife, cactus being destroyed, our subdivision wells are not being addressed in this study, and our drainage is not being addressed.

So please, please consider the health issues for children and elderly, there is an impact and it will get

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Code	Issue	Response
5	**Construction**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
6	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Visual Resources**	Light from the freeway would be produced from vehicle headlights and taillights and from fixed light poles at interchanges along the freeway. Nighttime users of the park and residents of Ahwatukee Foothills Village may see lines of seemingly crawling vehicles, each with lights front and back. Fixed freeway lighting would be provided for safety reasons only at interchange exit and entrance points. Freeway lighting at these locations would be designed to reduce illumination spillover onto sensitive light receptors such as residential areas (see page 3-58 of the Final Environmental Impact Statement).
8	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Cultural Resources**	The freeway alternatives were surveyed for archaeological sites, which include petroglyphs (rock art). The archaeological survey documented several petroglyph locations. Subsequently, the freeway alternatives were redesigned to avoid the petroglyph sites. No petroglyphs would be destroyed by implementation of the proposed freeway. Because right-of-way fencing would limit access from the proposed freeway, damage to petroglyph sites would not be facilitated (see Final Environmental Impact Statement pages 4-160 and 4-187).
10	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)

(Responses continue on next page)

Code	Comment Document

much worse on the citizens who live in Ahwatukee. Thank you very much for your time.

THE FACILITATOR: Thank you, sir.

Jacob Findlay.

MR. FINDLAY: Hello, my name is Jacob Findlay. Thank you for listening to my comments. I would just encourage the committee, as it's obvious to know the not-in-my-backyard arguments, they are typical of a project like this, but they shouldn't carry weight, given that they come with every project regardless of the time, place, contacts, whatever.

This is an infill project from the City of Phoenix, and I'm exited to see it finally come to fruition. Driving out on the 303 in the middle of the desert is a little baffling when I consider that the 202 is something which we need much more desperately, it hasn't been constructed and it looks great, but there's nothing around it. And the 303 out there, it's another issue but encourages additional sprawl, that kind of thing. The 202 as an infill project that encourages more development closer to downtown, people living close to downtown living, etc.

I live in Laveen and live there because of the proximity to downtown. This freeway will enable me to get downtown more quickly, to the services, that kind of

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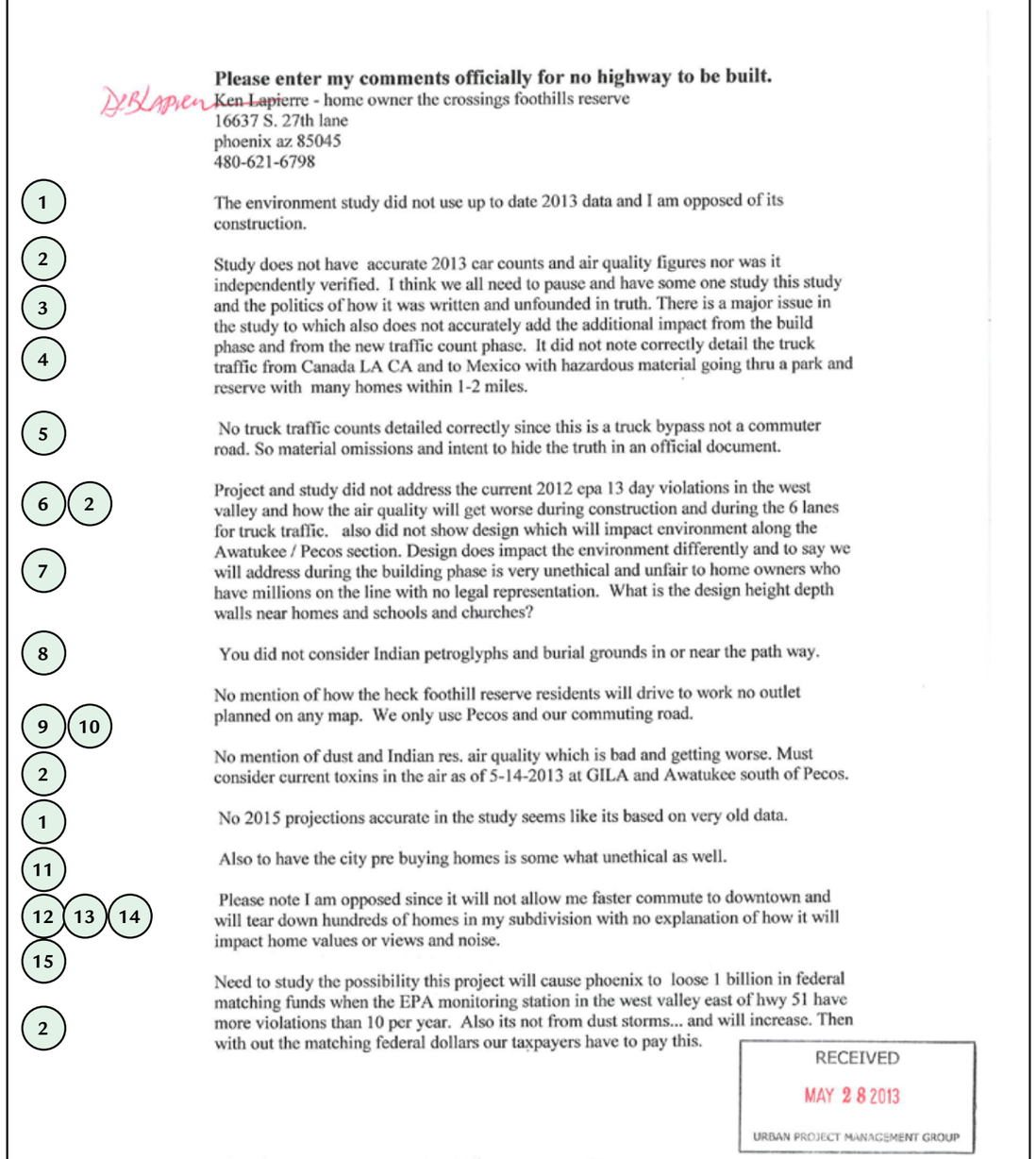
Code	Issue	Response
12	**Drainage**	Pecos road drainage is designed as a pass-through system. In other words water is allowed to drain along its natural existing pathway underneath the freeway and to Gila River Indian Community land. If an action alternative were to become the Selected Alternative, the E1 Alternative would be constructed aboveground and the existing culverts would extend to pass drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Depressing the freeway in this area would eliminate the existing culvert crossings and potentially have adverse flooding impacts on adjacent properties. Extending the existing culverts or upsizing the culverts would maintain or improve drainage flows. Doing so would ensure that there would be no adverse flooding impacts to adjacent properties. (See Draft Environmental Impact Statement pages 3-18, 4-98, and 4-107.)
13	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document



Please enter my comments officially for no highway to be built.
DJBLapierre
Ken Lapierre - home owner the crossings foothills reserve
16637 S. 27th lane
phoenix az 85045
480-621-6798

1 The environment study did not use up to date 2013 data and I am opposed of its construction.

2 3 4 Study does not have accurate 2013 car counts and air quality figures nor was it independently verified. I think we all need to pause and have some one study this study and the politics of how it was written and unfounded in truth. There is a major issue in the study to which also does not accurately add the additional impact from the build phase and from the new traffic count phase. It did not note correctly detail the truck traffic from Canada LA CA and to Mexico with hazardous material going thru a park and reserve with many homes within 1-2 miles.

5 No truck traffic counts detailed correctly since this is a truck bypass not a commuter road. So material omissions and intent to hide the truth in an official document.

6 2 Project and study did not address the current 2012 epa 13 day violations in the west valley and how the air quality will get worse during construction and during the 6 lanes for truck traffic. also did not show design which will impact environment along the Awatukee / Pecos section. Design does impact the environment differently and to say we will address during the building phase is very unethical and unfair to home owners who have millions on the line with no legal representation. What is the design height depth walls near homes and schools and churches?

8 You did not consider Indian petroglyphs and burial grounds in or near the path way.

9 10 No mention of how the heck foothill reserve residents will drive to work no outlet planned on any map. We only use Pecos and our commuting road.

2 No mention of dust and Indian res. air quality which is bad and getting worse. Must consider current toxins in the air as of 5-14-2013 at GILA and Awatukee south of Pecos.

1 No 2015 projections accurate in the study seems like its based on very old data.

11 Also to have the city pre buying homes is some what unethical as well.

12 13 14 Please note I am opposed since it will not allow me faster commute to downtown and will tear down hundreds of homes in my subdivision with no explanation of how it will impact home values or views and noise.

15 Need to study the possibility this project will cause phoenix to loose 1 billion in federal matching funds when the EPA monitoring station in the west valley east of hwy 51 have more violations than 10 per year. Also its not from dust storms... and will increase. Then with out the matching federal dollars our taxpayers have to pay this.

2

RECEIVED
MAY 28 2013
URBAN PROJECT MANAGEMENT GROUP

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Trucks**	
4	**Hazardous Materials**	
5	**Purpose and Need, Truck Bypass**	
6	**Construction**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
7	**Design**	The current level of engineering is used to determine the limits of environmental and construction impacts due to the proposed freeway. The location and profile of the freeway are evaluated to minimize potential changes to the freeway as the design level would progress. The current level of engineering is an accepted industry standard for determining impacts. (See Final Environmental Impact Statement sidebar on page 3-40 for more discussion.) Potential heights of noise walls are presented beginning on page 4-90 of the Final Environmental Impact Statement
8	**Cultural Resources**	The freeway alternatives were surveyed for archaeological sites, which include petroglyphs (rock art). The archaeological survey documented several petroglyph locations. Subsequently, the freeway alternatives were redesigned to avoid the petroglyph sites. No petroglyphs would be destroyed by implementation of the proposed freeway. Because right-of-way fencing would limit access from the proposed freeway, damage to petroglyph sites would not be facilitated (see Final Environmental Impact Statement pages 4-160 and 4-187).
9	**Construction**	Temporary construction impacts are described in the Draft Environmental Impact Statement beginning on page 4-161. The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours might be needed during construction. (See Final Environmental Impact Statement page 3-27.) In general, travel times along Pecos Road would remain unchanged during construction. After construction, motorists that currently use Pecos Road could use the freeway.

(Responses continue on next page)

Code	Comment Document

This end up being could be the most expensive project any US city every had to pay for forever. This is not a one time expense and with our federal dollars AZ budget need to increase its funds. It could hurt the city in many ways financially and for poor planned growth.

You should be required to accurately tell the EPA the correct this environmental study with all up to date 2013 environmental impacts... 21 million spend is potentially fraudulent based on the lack of due diligence and details omitted from insiders direction who promote the freeway. It should be reviewed and independently investigated as to who directed poor study facts and obvious material omissions of fact.

(5) You have unethically disguised this truck bi-pass as a 202 highway to relieve traffic on the Broadway curve.
Fix the existing hwy 10 and 202 101 first before spending billions in tax dollars.

(16) Consider cheaper alternative hwy 8 expansion where less folks live.

(17) (18) Accurately detail the health and safety impacts to home within 1 mile of a major truck route. Study the impact to terminate movement and the wildlife destruction and native cactus plants and eco system. Isn't that what an environmental study should do rather than promote the freeway?

(19) (20) (4) Environmental study also does not address the additional destruction of wells from subdivisions, and water drainage issues. and the increase risk of truck container spills. This is critical to those who have to stay within 1-3 miles of this.

(17) This will also hurt kids in schools near by the folks / elderly with breathing issues.

(21) This is discrimination to the Indian community and unethical to there rights as a minority.

(22) And to destroy South Mountain a pristine community park (common land) what a shame especially once folks see what this project really will be a USA free trade truck bi-pass. Please stop and re-think about what we are doing with the real facts and with an accurate environmental study.

AZ will look back on this with regret if it gets approved! Please stop and think with the real facts.

Def Yes

➢ After the public hearing, community forums will be held at various locations in the Study Area to allow for additional opportunity to provide DEIS comment. Times and locations of the forums will be posted at <azdot.gov/southmountainfreeway> and publish in newspapers and local publications.
➢ Written comments also can be submitted via the following methods:
➢ Online at <azdot.gov/southmountainfreeway>
➢ E-mailing comments to projects@azdot.gov

Code	Issue	Response
10	**Design**	The extension of Chandler Boulevard west of 19th Avenue is included in this project because reasonable access must be maintained to the neighborhoods at the west end of Pecos Road (see Figure 3-33 on page 3-57 in the Final Environmental Impact Statement). Early in the study process a traffic interchange at approximately 27th Avenue was evaluated but ultimately eliminated because of increased residential displacements and cost.
11	**Land Use**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement. The Arizona Department of Transportation purchased some right-of-way along Pecos Road when it was adopted as the freeway alignment in 1988 (see Draft Environmental Impact Statement page 3-53). Should another alternative be adopted as a result of this study, the Arizona Department of Transportation would dispose of the land that has been acquired. Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
12	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
13	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
14	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
15	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
16	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
17	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
18	**Biology, Plants, and Wildlife**	
19	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)
20	**Drainage**	Flood protection levels are dictated by the design class of the highway. In the case of the proposed South Mountain Freeway, it is designated as a Class I. Therefore, flood protection levels would be designed to the 50-year (storm) level. However, as a standard Arizona Department of Transportation practice, the floodwaters developing upstream of the culvert entrance would be reviewed at the 100-year level to ensure "headwaters" do not adversely affect existing properties. (See Draft Environmental Impact Statement page 4-102.) All bridges on major waterways such as the Salt River are designed to maintain minimum water surface elevations at the 100-year level for flood levels and built to structurally withstand the superflood, a flood expected only once in 500 years.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
21	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
22	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

opposed DUE to DEIS

1 2 DID not Review CAMEX TRUCK TRAFFIC
DID not Retest GILA INDIAN AIR
3 SENSORS South of PECOS.

4 DID not INCORPORATE 2005 AIR TOXIC sampling study THAT WAS PUBLICLY FILED showing levels of pollution + CANCERINGING above EPA + Healthy levels

5 DOES not study wind change + added pollution
6 FLOW FROM cutting thru mountain.
NOR TOXIC WASTE. SPILLS

Optional

Name Kent LaMarre Email

Address

City State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Air Quality**	
4	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause significant adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor.

(Response 4 continues on next page)

Code	Comment Document

Code	Issue	Response
4 (cont.)		The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
5	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
6	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

5026

MR. LAPIERRE: I'm opposed to the quality of the Draft Environmental Impact Study, due to the fact that the hazardous material and risk of trucks overturning or spills hasn't been addressed, nor has the southbound traffic -- which will obviously carry the truck route, preferred truck route from Los Angeles to Mexico -- has not been incorporated into the Draft Environmental Study properly.

The other big concern is that the study in 2001 and the study in 2005 -- which showed particulate-matter pollution, ozone, and cancerous airborne particles -- already, in 2005, exceeded the EPA standard. That particular monitoring station is located in Gila reservation, about two miles south of the Pecos Highway preferred route. That part of the study, which was determined by the Government and the Environmental Protection Agency as nonsustainable, needs to be retested and incorporated into any environmental impact study. To not incorporate that is morally, socially, and environmentally deficient and should be litigated and brought forth as a public concern over the project.

The other concern is: Cutting through ridges of South Mountain will create particulate-matter pollution to flow into the Ahwatukee residential community, which will have a direct environmental impact.

The other concerns that we have is: The noise, which is going to be echoing through the canyon into the

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Code	Issue	Response
1	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Purpose and Need, Truck Bypass**	
4	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause significant adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor.

(Response 4 continues on next page)

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Ahwatukee Foothills where residents live, has not been addressed. Yes, it is different than Highway 101. It is dramatically different than the current 202 that was built, because we have mountains on two angular sides, where sound currently echoes off of the mountains.

For example, if you were sitting in your backyard and you had a party, everyone in a four- to five-mile radius can hear the noise from your backyard. So can you imagine adding 150,000 trucks and cars going through that? The sound will be amplified naturally by the -- the mountain and the terrain, both sets of mountains: the Estrellas and the South Mountain.

Also, the destruction to habitat, such as goats, javelinas, wildlife, those little gophers that are in the ground, birds, and other animals. Even though it is minimized in this project, it's still going to be dramatically impacted.

So the other thing that's a concern is issues with health and breathing. Currently, most of the residents in Ahwatukee do see a lot of pollutions and toxins from the air. And a combination of these elements -- including benzine, ozone, dust particulates -- will be dramatically made worse by a highway, which will cause the elderly and the children in the community to have more respiratory problems and asthma problems.

In the last two years, there's been many studies

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Code	Issue	Response
4 (cont.)		The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).
6	**Air Quality**	Air quality depends on several factors such as the area itself (size and topography), the prevailing weather patterns (meteorology and climate) and the pollutants released into the air. Cuts through the South Mountains would be expected to produce microclimate differences similar to those produced by a series of buildings in a large city that produce localized wind tunnel effects. The mountain cuts, however, would not affect regional air quality.

(Responses continue on next page)

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about construction and homes and schools near highways, that had not been studied in 2008/2009 and is not incorporated into the Environmental Draft Impact Study. So how could an impact study that spent $21 million not take into consideration new health warnings by many, many agencies about the impact on asthma and the increase in autism caused by particulates from living near highways?

So, to go back to 2008, when this wasn't public information as a health risk, and not incorporate the state-of-the-art studies on health risks due to highway development is definitely deficient.

Other than that, just the concept of the fact that there's no additional high-tech sound barrier walls being put up. Having ADOT say, "Oh, we'll build you a ten-foot concrete wall," does not mitigate the noise because the noise is going to echo through the canyon because the highway is elevated.

The other thing is that it's directly affecting residents who have natural views. To elevate a highway and not really know how high and to destroy the views that people have from their homes and from their backyards in preserves are an impact.

The other thing that I want to bring out is, in the subdivision that I live, which is in the Crossings in the Foothills, our homes, on certain streets, back to what's called the Navy-protected wildlife sanctuary, which is specifically

Code	Issue	Response
7	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
8	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Health Effects**	
10	**Visual Resources**	For most of the alignments of each of the action alternatives, the proposed freeway would be elevated above the natural grade of the surrounding land. This elevated profile would allow noise to carry farther, creating noise impacts at greater distances from the freeway. Depressing the profile of the freeway below grade might reduce traffic noise levels adjacent to depressed sections. However, it would be necessary to also construct at-grade noise barriers to achieve noise reduction goals at receiver locations adjacent to depressed freeway sections (see page 4-99 in the Final Environmental Impact Statement). This strategy would reduce visual impacts associated with high noise barriers on elevated freeways, but would entail ground-level noise barriers and their associated interference with views. Thus, with either approach to noise reduction, views of nearby mountains could be disrupted. The specific impacts would depend on sightlines that would be determined by the height of any noise barriers constructed, the intervening topography, and the distance of the barriers from the residences in question.
11	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

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zoned to have no development, no trimming of trees, no touching of anything. Yet this part of the land that spills into Pecos is going to be taken over by ADOT. So the concern is: How can they just, through proper use or need for use, justify taking over what is currently a protected natural reserve?

(12)

And this area is not part of South Mountain. It's actually part of our community. It's funny how that is not even brought up in the study. Yet, if I cut down a plant in my backyard, I can get fined and get in trouble for that.

So destroying that part of the subdivision, and also not really sitting down with our subdivision, talking about the elimination of the multiple homes and what ADOT can do in terms of building, you know, either a park or some kind of, you know, offset for the damage that we're going to have to our community, is just not acceptable.

(13)

And to say that it will be in the design phase, which is after public input, is also kind of a catch 22, to say, "Oh, don't worry about that; we'll deal with it in the design phase," when we all know ADOT's stance is: You get a ten-foot wall, and that's what you see. And that's, you know, the remedy to any noise or whatever.

(14)

The other thing that's real important to us is when you add, to the toxicity in the air right now, trucks coming from Mexico, coming from LA, using the truck route. And the truck standards for pollution in Mexico are lower than the

(2)

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Code	Issue	Response
12	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
13	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
14	**Design**	The current level of engineering is used to determine the limits of environmental and construction impacts due to the proposed freeway. The location and profile of the freeway are evaluated to minimize potential changes to the freeway as the design level would progress. The current level of engineering is an accepted industry standard for determining impacts. (See Draft Environmental Impact Statement sidebar on page 3-40 for more discussion.)

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quality standards for trucks that originate in the U.S. That has to be studied as an additional impact.

This is not like the 101 and the current 202, where United States trucks travel to do local traffic. This is the transportation corridor going from other countries like Canada and Mexico. So the fact that there is lax standards on emissions in those trucks that are currently allowed to go into the U.S. and not study the toxic impact to the air quality, in a valley where this air just sits and pushes up against the mountain, is very deficient.

So, for example, on the Highway 101 we don't have trucks from Mexico that were added when it was built. We also have flat land on most of the 101, where the air pollution doesn't sit in a cloud and build up and create a toxin. It flows across.

It's the same thing when you go to Chandler and Gilbert on the 202. It's relatively flat. There's no mountains abutting or being cut through that can trap air pollution. So we're very, very concerned about that part of it, as well.

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And the other thing that I would like to put into the record is: Homeowners in this community should be offered some kind of compensation to move out of the community due to the health risk and impact that it will cause to the residents, children, and the elderly.

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Code	Issue	Response
15	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

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And if, for example, a stipend of 50,000 was given, for us to just sell out and leave the community, that should certainly be part of a $9 billion highway study and be supported by the community for those that, you know, want to get out of the way of the highway but are trapped due to the cost of moving, the cost of not being able to sell the home because homes are depreciating, not appreciating, because no one wants to live near a highway.

The other concern that we have is: What is going to happen with the access, that we enjoy now, leaving our community? We actually don't have any roads leaving out of our community. And to build another side street will just cause more congestion and more pollution buildup because people will be jammed trying to get on the highway.

So to not have that studied, when Ahwatukee is the largest subdivision in America and all of these cars get backed up, where is the part of the Draft Environmental Impact Study that says when cars are idling and emitting toxins in the air, what is going to be contributing?

You know, we talk about these studies of going out to 2035. Well, where is the pollution counts and the levels of pollution?

The other thing that's very concerning is, when you mix chemicals from trucks, unregulated or less regulated emissions from Mexico, stagnant air that's sitting and pushed

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Code	Issue	Response
16	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
17	**Design**	The extension of Chandler Boulevard west of 19th Avenue is included in this project because reasonable access must be maintained to the neighborhoods at the west end of Pecos Road (see Figure 3-33 on page 3-57 in the Final Environmental Impact Statement). Early in the study process a traffic interchange at approximately 27th Avenue was evaluated but ultimately eliminated because of increased residential displacements and cost. The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)
18	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1).

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up against the mountain, and you mix those chemicals with the current air quality that's in violation of EPA standards today, and then you mix more compounds, you're creating an unknown compound and health risk that's going to sit in the air and not flow.

It's very apparent. Anyone with a high school education can go to Ahwatukee and see the pollution and test the air quality. But yet no one has decided to do a new test station in Ahwatukee. No one has decided to revisit the 2005 study, which showed that these particles are actually cancer-causing and are in danger, back in 2005.

And can you imagine, eight to ten years after 2005, that the pollution is worse? I think anyone can, with common sense, say: Absolutely, it is.

And it should be at least studied.

That doesn't mitigate the fact that we need a highway. But we would also urge that ADOT go back to the Indian community and maybe align a highway, to create a new alignment for a highway and approach the Indian community and find out where south on their land they would consider.

There's plenty of traffic routes, that are actually through Maricopa and up through Highway 85, that are currently used as truck traffic. And we all know this highway is for truck traffic.

For social use, it does not allow anyone from

Code	Issue	Response
19	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
20	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

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Ahwatukee to get to downtown any quicker than going the other way. It just doesn't do it. You're actually going to be about 15 miles outside of downtown and going into traffic on the 10 to get to downtown. So I would propose people that are going on this new highway, to go work downtown, are going to actually create more congestion on Highway 10 because Highway 10 has not been expanded.

We also need alternate routes that go east/west, other than Pecos, in addition to this highway, so that it will relieve other traffic.

The last point that's a concern for me is the environmental EPA's testing site. Pretty much, in Laveen right now, which is south of the 10, and east of 79th Avenue is it is already in violation of the EPA standards. It has 13 air-quality violations last year, 22 particulate violations last year.

And somehow the trucking industry and the City has gotten an exemption to say that: Oh, it's storm-related.

Well, you guys have to really study an environmental impact study, how that sensor which can't be moved by the EPA is going to cause the City of Phoenix to be in air-quality violation, losing Federal highway money. So this $9 billion highway could turn into a loss of $1.2 billion a year, after the highway is built, if that sensor is in violation.

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Code	Issue	Response
21	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
22	**Design**	Construction of the proposed freeway would include widening along Interstate 10 to facilitate entrance and egress of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26 on page 3-49 and Figure 3-29 on page 3-53 of the Final Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 were developed in accordance with the Federal Highway Administration's interstate system Access Informational Guide and have received an initial determination of operational and engineering acceptability from the Federal Highway Administration.

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Everyone knows new development is going to be built in Laveen. Truck depots are being built now. Business owners, politicians are buying tracts of land. It's going to cause more toxic emissions into the environment and not less. So to reduce air-quality issues by about 5 to 10 percent, with the new highway, is going to be overridden by the increased growth, the increased traffic, the increased congestion of trucks and cars trying to get on the highway, which is going to cause that sensor to be in violation even more. And to, again, not study that is grossly negligent.

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The other thing is toxic spills and truck accidents have to be studied more. ADOT is saying that it's about 147,000 cars or trucks a day, when our independent studies have shown it's about 15 percent more than that. And it's not even considering the additional truck traffic. So we all know the Swift Transportation, located in Laveen; truck depots being built; and also land leases on Pecos -- owned by politicians who already have designs to do truck depots and rest stops -- will cause idle trucks to emit benzine and sulfur dioxide into the air because they'll be sitting at truck depots.

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And why has that not been studied as an environmental impact?

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Real critical, key things that have not been studied. And I would strongly urge that the 2005 study on particulates in the air be entered into the record for the

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final draft study, the proposal, before it gets submitted to the Government. It's grossly negligent for that not to be included.

I appreciate your time. Thanks for your comments. And I hope -- hope we have our voices heard. Thank you very much.

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO BUILD
Date: Monday, July 22, 2013 8:52:15 AM

From: Ulises Lara [mailto:youler800@gmail.com]
Sent: Monday, July 22, 2013 4:18 AM
To: Projects
Subject: NO BUILD

1

I am writing this e-mail to express my opinion on the Loop-202 extension. I don't think it is needed. Please stop it.

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Arizona has an urban-sprawl problem and we are also in an economic depression. The loop-202 extension is a waste of money and resources. We don't need it. Please Stop it.

-Ulises Lara

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
3	**Purpose and Need**	The worldwide recession that began in late 2007 generated a substantial downturn in growth rates for new housing and employment across the United States. Arizona particularly suffered the effects of this recession because, beginning in the early 2000s, Arizona in general and Maricopa County specifically experienced some of the fastest population, housing, and employment growth rates in the country. Because the need for the proposed freeway is predicated in part on projected growth, one might conclude the recession reduced that need. An economic downturn associated with a given recession is, however, generally considered a short-term phenomenon with respect to the longer-term planning horizon established for the proposed freeway. Socioeconomic indicators have steadily and consistently increased in the region since the early 1900s. The critical factors underlying these indicators remain unchanged. (See the sidebar on Final Environmental Impact Statement page 1-11.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build it!!!!!!!
Date: Wednesday, May 15, 2013 11:19:34 AM

From: Jerry LaRocca - Facilities and Mfg Manager [mailto:jlarocca@azic.com]
Sent: Wednesday, May 15, 2013 11:16 AM
To: Projects
Subject: Build it!!!!!!!

1

I vote to build the south mountain freeway. Please make it soon!

Jerry LaRocca
Mfg & Facilities Manager
Arizona Instrument LLC.
jlarocca@azic.com
602-281-1660

Green **Solutions for Moisture and Toxic Gas Analysis**

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1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO on the 202
Date: Monday, May 20, 2013 8:30:03 AM

From: M. L. [mailto:ofwah@yahoo.com]
Sent: Saturday, May 18, 2013 10:25 AM
To: Projects
Subject: NO on the 202

1 2 3

During this economic downturn we do not and should not be spending more money on roads. Demographers project that our population will be decreasing in the future and subsequently our traffic will not be getting worse.

NO on building the 202.

Marsha Larson
Glendale, AZ

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Code	Issue	Response
1	**Purpose and Need**	The worldwide recession that began in late 2007 generated a substantial downturn in growth rates for new housing and employment across the United States. Arizona particularly suffered the effects of this recession because, beginning in the early 2000s, Arizona in general and Maricopa County specifically experienced some of the fastest population, housing, and employment growth rates in the country. Because the need for the proposed freeway is predicated in part on projected growth, one might conclude the recession reduced that need. An economic downturn associated with a given recession is, however, generally considered a short-term phenomenon with respect to the longer-term planning horizon established for the proposed freeway. Socioeconomic indicators have steadily and consistently increased in the region since the early 1900s. The critical factors underlying these indicators remain unchanged. (See the sidebar on Final Environmental Impact Statement page 1-11.)
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Final Environmental Impact Statement page 3-27). Traffic projections are regularly updated by the Maricopa Association of Governments. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011. Key model inputs used to forecast travel demand included (see Table 3-7 on Draft Environmental Impact Statement page 3-27): · socioeconomic data based on the adopted general plans of the Maricopa Association of Governments members, along with population and economic forecasts and the existing and planned transportation infrastructure as identified by the Maricopa Association of Governments members · the anticipated average number of vehicle trips within the region (including those to and from the region's households) on a daily basis (this number is tracked regularly by the Maricopa Association of Governments) · the distribution of transportation modes used by travelers in the Maricopa Association of Governments region (also tracked regularly by the Maricopa Association of Governments) · the capacity of the transportation infrastructure to accommodate regional travel · the future transportation infrastructure established using *Regional Transportation Plan*-planned projects and improvements and from known arterial street network improvements assumed to be made by the County, Cities, and private developers. In June 2013, the Maricopa Association of Governments approved new socioeconomic projections for Maricopa County. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. The conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*).

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

Build the 202

We need a NOW to relieve the I-10 Traffic

Use the W 101 Alternative Control Options, need to

connect directly to the L 101

Optional

Name GARY LASHAY Email

Address 6014 W Running Deer Trail

City Phoenix AZ 85083 State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Gail Lasserre
To: Projects
Subject: Loop 202 Expansion Through Ahwatukee
Date: Friday, June 21, 2013 11:55:52 AM

Hi! My family has lived in Ahwatukee for 7 years. We love that it's quiet, private, and somewhat secluded.

We DO NOT support the addition of another freeway through our community. I-10 is providing plenty of access for those smuggling drugs and/or people to get in and out of our community.

1 2 3 4

Our drive times to other areas of the valley are fine as they are. We do not favor extending the 202, as we feel it will increase crime, pollution, and noise.

Thanks for your consideration.

Gail Lasserre
314-322-4600

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 8:01 PM
CALLER: OLGA LATONA	CALLER ADDRESS: 1601 E. SAINT ANNE AVENUE, PHOENIX, AZ 85042
PHONE: 602-268-9694	EMAIL:

1

CALLER REMARKS/QUESTIONS:

I support the South Mountain Freeway and I agree with the decision and am very happy for that. Thank you. Bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 15, 2013 8:37:38 AM

From: Lauridsen, Pamela K [mailto:pamela.k.lauridsen@intel.com]
Sent: Tuesday, May 14, 2013 11:35 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

When I bought my property in 2003 the 202 was schedule to be built - the was a huge selling point to me as I work in Chandler and I live at 77th and Broadway the 202 would have and will reduce my commute time in half. Now 10 years later the 202 still has not been approved and being constructed. It is imperative that this project begin immediately to support existing and future traffic growth in the valley. Thank you

Regards,
Pamela K. Lauridsen

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Code	Issue	Response
1	**Alternatives**	Upon completion of the environmental impact statement process, and if the Selected Alternative were to be an action alternative, the Arizona Department of Transportation would begin the design phase, which would be followed by the final right-of-way acquisition process. Then other early construction tasks such as utility relocations would begin. The corridor would be divided into multiple final design segments. Construction sequencing and duration could change based on several factors, including funding availability, traffic volumes, coordination with other major freeway projects, earthwork balancing, utility relocation schedules, and regional priorities.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway bypass
Date: Friday, June 28, 2013 9:08:09 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Gene Lauritano [mailto:genel@cadence.com]
Sent: Thursday, June 27, 2013 4:13 PM
To: Projects
Subject: South Mountain Freeway bypass

I live in Ahwatukee, and frequently use Pecos boulevard, South Mountain Park, and surrounding
areas for biking and hiking. On a typical Saturday morning, there are literally 100's of people out there, cycling along pecos, running the trails, or enjoying a beautiful hike in the solitude of
the South Mountain park and trails.

1 2 I have followed the 202-bypass discussions for many years and would like to voice my concerns –
the cost, ecological and more importantly "community" damage it will cause far exceed any benefit that adding a (primarily truck) bypass route would provide.

3 4 5 6 So I would strongly encourage ADOT to explore other options – either far south of phoenix if this is truly a truck bypass route, or a no-build option (the long-term solution to Phoenix's traffic issues will NOT be solved by building this) or even by working with the Indian nation to
get access 1-2 miles south of the existing Pecos read (where no damage will need to be done
7 8 to South Mountain park, nor will neighborhoods be destroyed).

Please feel free to let me know if you need further input. But I would like to strongly voice my

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
4	**Purpose and Need**	According to the project team's traffic analysis, without the proposed freeway, existing roads and planned road improvements would accommodate about 76 percent of the transportation demand projected for 2035, leaving 24 percent of the anticipated demand unmet. If one assumes better-than-expected performance of nonfreeway aspects of the transportation system, 13 additional percentage points of the 24 percent deficiency would be accommodated. This means that the transportation network would still have an 11 percent capacity deficiency. The same analysis with the proposed freeway in operation in 2035 concluded that the met demand would increase to 82 percent; better-than-planned scenarios noted above, if achieved, would reduce network deficiency to 5 percent. The proposed freeway would handle about half of the capacity deficiency not captured by other modes. (See Figure 3-14 on Final Environmental Impact Statement page 3-31).
5	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Alternatives, Gila River Indian Community Alignment**	
7	**Section 4(f) and Section 6(f)**	
8	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

opinion against EVER building this road through one of the most “inaccessible” (and that’s OK)
neighborhoods in Metro Phoenix.

Thanks.

Gene Lauritano
3532 E Modoc Ct
Phoenix 85044
602-692-9534

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Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/14/13	INCOMING CALL TIME: 2:17 PM
CALLER: LETICIA LAVANT	CALLER ADDRESS: 920 E. FREEMONT ROAD, PHOENIX, AZ 85042
PHONE: 602-243-7723	EMAIL:

1

CALLER REMARKS/QUESTIONS:

Hi. I just wanted to say that I would like to support the South Mountain Freeway being built. Thank you very much. Bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Objection to Loop 202 (South Mountain Freeway)
Date: Tuesday, June 25, 2013 8:51:01 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Sean Paul Lavine [mailto:splavine@me.com]
Sent: Tuesday, June 25, 2013 8:23 AM
To: Projects
Subject: Objection to Loop 202 (South Mountain Freeway)

1 2 3
4 5 6

If allowed to proceed, the Loop 202 will cause permanent damage to the ecology of the area, increase air and noise pollution and destroy the natural beauty of South Mountain. This is not acceptable to me, my family, and those directly affected.

Furthermore, this is a civil rights issue. The indigenous people of the area consider South Mountain to be a sacred landmark, and to not respect the wishes of these people sets a dangerous precedent for future relations. Again, this is not acceptable to me, my family, and those directly affected.

It is for these reasons that I object to the construction of the Loop 202 (South Mountain Freeway). Construction must not continue.

Sean Paul Lavine
Born in Phoenix in 1970

Sean Paul Lavine
Lotus Eleven Design Studio
CEO, Marketing Services Consultant
splavine@me.com
480.280.6791

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Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	
4	**Section 4(f) and Section 6(f)**	
5	**Cultural Resources**	
6	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

Code	Comment Document

4219

in a separate survey, 59 percent of likely voters living in the Ahwatukee and Laveen area support the freeway as well.

The support is there for the project, and the money to build the freeway is in the budget, as it was approved by voters twice, in '85 and in 2004. It's clearly time to begin construction on the South Mountain. Thank you.

THE FACILITATOR: Thank you, Mr. Trussell.

Ariel LeBarron.

MS. LeBARRON: Hello, my name is Ariel LeBarron, and I am a student at the School of Feasibility. I grew up here, I was born and raised. And I oppose the South Mountain Freeway, just because it would increase air pollution, and I feel there are better alternatives that we could be putting our tax money into, such as public transportation. This would increase our air quality, so that our future generations wouldn't be as affected. And I think by putting a freeway and expanding it outward is going to make people use and buy cars more, instead of trying to switch to public transportation.

I think for our future we should be focusing on better alternatives. Thank you.

1

2

Page 24

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www.drivernix.com

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	

Code	Comment Document

5246

MEMBER OF PUBLIC: Can I ask a follow-up to that?

THE FACILITATOR: Let me get through these.

Ariel LeBarron. "Can you look at public transit and transportation more closely to fit the needs of the citizens, both in the South Mountain area, but the Valley as the whole. Use the money for the freeway for this instead. Use examples from the counties and cities to create a working system that in the end could make money for the state." Is that a question or a comment?

MEMBER OF PUBLIC: Well, could you use that money for public transportation?

THE FACILITATOR: Can they use the money designated here for public transportation? I'm sorry, I didn't get that.

MR. SPARGO: Now, the regional transportation plan that was developed in 2004 did include a much more robust public transit portion when compared to what was done in 1985, and that included a lot of local and regional buses, as well as extensions to the light rail, the initial 20-mile segment.

So the region has already shown an investment into that system, but along in the

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for transit projects nor would not constructing this facility make available additional funds for transit projects.

Code	Comment Document

RTP there was also a freeway system, which working together to provide, you know, all modes of travel for the community.

With regard to the funding itself, there are some firewalls built into the regional transportation plan and it does limit the ability to both use freeway funds for transit projects, as well as to take money from transit projects and use them for freeways.

So that would be something that would have to probably be, you know, vetted at the top of MAG. It would be a decision made by them, but there are fire walls built in that would really limit or do not allow the mixing of those funds.

THE FACILITATOR: Scott Sprague. "In pre-design meetings for I-11, ADOT representatives have repeatedly stated that no part of the I-11 or scenic drive has been identified beyond a very wide 30-mile swath between Phoenix and Las Vegas. Upon approaching Phoenix, ADOT has insisted that many alignments through and around the city are still on the table. This contradicts what the map shows tonight. Please explain the disconnect."

MR. SPARGO: Can I have you repeat just the part about where the information was coming from that

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 11:45 AM
CALLER: JACKIE LEDBETTER	CALLER ADDRESS: 10726 W. SANTE FE DRIVE, SUN CITY, ARIZONA
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:

I support the freeway. I think it would make a big difference. I drive the 10 to go to work. I currently am, uh uh, I work back up for Intel through a different company. But I support it. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Yvette Ledesma Document Created: 5/21/2013 3:06:22 PM by Web Comment Form i am in support of South Mountain Freeway. This would alleve congestion as it stands today! the current highway will not support the growth and traffic of the near future.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 1:43 PM
CALLER: CHERYL LEE	CALLER ADDRESS: 11427 NORTH 24TH STREET, PHOENIX, ARIZONA 85028
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
Yes, we support the South Mountain freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Document Created: 5/23/2013 3:32:42 AM by Web Comment Form

Letter to ADOT:

(1) I live in Central Phoenix, just near Baseline and Central. As you know, Baseline is the main corridor for people who live in Laveen and work/shop in the East Valley. I suspect that an interchange on the proposed freeway at Baseline will now funnel even more traffic through the area. In fact, all of the West and Northwest Valley will now have access to east-west roads through South Phoenix. Already when there is a problem on I-17 or I-10, Baseline becomes a parking lot. Now imagine the potential for a problem on any of the I-10, I-17, OR Loop 202. Baseline will bear the full brunt.

(2) Perhaps South Phoenix, because it is home to many lower-economic residents of Phoenix, is not of particular import to the powers that be. We certainly saw that when the city council thumbed its nose at the Baseline Master Plan and allowed developers to run rough shod over the area.

(3) (4) Another consideration is the Phoenix Point of Pride—South Mountain Park. The road to San Juan Lookout, which is closed to traffic everyday except for one weekend per month, goes through a valley that is a quiet "haven." That, of course, will no longer be true when a freeway runs adjacent. What good is the claim to "the largest city park" if that park is perpetually bombarded with traffic noise? How is it possible that we do not have space and inclination for just one quiet retreat within the confines of this sprawling city?

I urge you to reconsider the plan to build a freeway with so much impact on South Mountain Park.

Claudia Leischen

Code	Issue	Response
1	**Traffic**	As shown in Figure 3-12 on page 3-29 of the Final Environmental Impact Statement, traffic on Baseline Road between 17th Avenue and 48th Street would be less in 2035 with the proposed freeway than without the proposed freeway.
2	**Environmental Justice/Lifestyle**	Low-income populations were evaluated to ensure there were not disproportionately high and adverse impacts. The Preferred Alternative would not adversely affect any census block groups with low-income populations south of the Salt River (e.g., South Mountain Village).
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	Although recreation uses are considered in the noise analysis as noise-sensitive land uses, another consideration is the reasonableness of providing noise mitigation for a particular land use. For recreational land uses, typical considerations include the number of people using the facility and the amount of time the facility is in use throughout the day. Many of the recreational uses in the western portion of Phoenix South Mountain Park/Preserve receive infrequent use, and noise mitigation would not be reasonable given the high cost of construction.

Code	Comment Document

4274

So I -- I'm here in support of the 202. Just one of your statistics, people are talking about sacred land and so forth and South Mountain preservation land, taking your statistics, it's only going take .2 percent, which is 31 acres of the 16,600 acres of South Mountain Park.

So that's completely minimal. And, anyway, thank you for my -- for considering. Thank you.

THE FACILITATOR: Thank you.

If anybody out there would like to speak, please go out front and register at the front desk and then come on back in.

Before we call the next person up, the last shuttle will be leaving for all destinations at 7:30, that's orange, green, and blue or 1, 2, and 3.

Claudia "Leeschen," Leischen.

MS. LEISCHEN: Leischen.

THE FACILITATOR: Leischen. Would you mind using this other microphone, please.

MS. LEISCHEN: I wrote my statement. I live in Central Phoenix, just near Baseline and Central. As you know, Baseline is the main corridor for people who live in Laveen and work or shop in the East Valley. I suspect that an interchange on the proposed freeway at Baseline will now funnel even

1

Code	Issue	Response
1	**Traffic**	As shown in Figure 3-12 on page 3-29 of the Final Environmental Impact Statement, traffic on Baseline Road between 17th Avenue and 48th Street would be less in 2035 with the proposed freeway than without the proposed freeway.

Code	Comment Document

more traffic through the area.

In fact, all of the West and Northwest Valley will now have access to east/west roads through South Phoenix. Already, when there's a problem on the I-17 or I-10, Baseline becomes a parking lot. Now, imagine the potential for a problem on any of the I-10, I-17, or Loop 202. Baseline will bear the full brunt. Perhaps South Phoenix, because it's home to many lower economic residents of Phoenix, is not of particular import to the powers that be. We certainly saw that when the city council thumbed its nose at the Baseline Master Plan and allowed developers to run roughshod over the area.

(2)

Another consideration is the Phoenix point of pride, South Mountain Park, the road to San Juan lookout, which is closed to traffic every day, except for one weekend per month, goes through a valley that is a quiet haven. That, of course, will no longer be true when a freeway runs adjacent. What good is the claim to the largest city park if that park is perpetually bombarded with traffic noise.

(3) (4)

How is it possible that we do not have space and inclination for just one quiet retreat within the confines of this sprawling city. I urge

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www.drivernix.com

Code	Issue	Response
2	**Environmental Justice/Lifestyle**	Low-income populations were evaluated to ensure there were not disproportionately high and adverse impacts. The Preferred Alternative would not adversely affect any census block groups with low-income populations south of the Salt River (e.g., South Mountain Village).
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	Although recreation uses are considered in the noise analysis as noise-sensitive land uses, another consideration is the reasonableness of providing noise mitigation for a particular land use. For recreational land uses, typical considerations include the number of people using the facility and the amount of time the facility is in use throughout the day. Many of the recreational uses in the western portion of Phoenix South Mountain Park/Preserve receive infrequent use, and noise mitigation would not be reasonable given the high cost of construction.

Code	Comment Document

you to reconsider the plan to build a freeway with so much impact on South Mountain Park.

THE FACILITATOR: Thank you.

Max Dunlap.

MASTER DUNLAP: Hello, my name is Max Dunlap and this freeway would help us because we could travel a lot faster, because probably now it would take about 30 minutes to get around the mountain. We would have a lot more things and wildlife, even though it could lose some space. It would have -- we could just move all the extra we have from the mountain, and just put it on another side and all the animals would have all the space they already did have.

And, well, it's also that we have so much traffic that a lot of extra smog goes into the air and with this freeway less smog would go into the air, which means less pollution. And a lot of more happy people that can just travel from place to place.

THE FACILITATOR: Thank you.

Julie Dunlap.

MS. DUNLAP: Thank you for listening to our concerns. I live in Laveen, and we've lived there for going on eight years. And we purchased our home

Code	Issue	Response

Code	Comment Document
1	Stephanie Lemek Document Created: 5/21/2013 1:57:46 PM by Web Comment Form I am in favor of the construction of the South Mountain Freeway for various reasons. It is necessary to help manage the ongoing traffic isssues that will only be exacerbated in future years. These traffic issues are not only inconvinient and costly for residents, but they also result in heavy emissions from vehicles and a negative impact on the environment. In addition, this project is within the current budget and will stimulate the economy by providing thousands of jobs over the course of the project.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Support
Date: Wednesday, May 22, 2013 10:54:20 AM

From: Stephanie Lemek [mailto:snlemek@gmail.com]
Sent: Tuesday, May 21, 2013 7:59 AM
To: Projects
Subject: South Mountain Freeway Support

Good Morning-

1

I would like to share my support for the South Mountain Freeway project. The freeway will help commuters by helping alleviate traffic jams and reducing air pollution from these consistent delays. Traffic in the area is only projected to get much worse in the next two decades without the South Mountain Freeway.

In addition to the traffic and pollution benefits, the project would great 30,000+ jobs during the 5-6 yr construction period and result in billions of investment in the Phoenix-area economy. All of this also falls within the current budget approved by voters.

Thank you for your consideration. The benefits of moving forward of the South Mountain Freeway are huge and not moving forward with the project would be at huge detriment to the Phoenix-area and its residents.

Sincerely,

Stephanie Lemek

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Freeway Extension
Date: Wednesday, May 15, 2013 1:41:22 PM

From: LESANHOME@aol.com [mailto:LESANHOME@aol.com]
Sent: Wednesday, May 15, 2013 1:24 PM
To: Projects
Subject: 202 Freeway Extension

1

Yes, I do support building the 202 freeway extension around South Mountain. This has been discussed for decades and really needs to happen!

Sylvia Lesan
904 E. Constitution Dr.
Gilbert, AZ 85296

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 3:51 PM
CALLER: FRED LETTERMAN	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 2

I oppose any more damn freeways! We do not need no more freeways! What we need to do to solve this traffic problem is to get a good light rail system, or some type of rail system – NOT, not freeways! We've had chances for 40 years to do it but the freeways haven't solved nothing since. So I will vote against it if it comes up for a vote a dozen times.

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Public Involvement**	No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period. The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: ADOT Loop 202 South Mountan Freeway Study
Date: Tuesday, April 30, 2013 8:57:12 AM

From: David Lewis [mailto:david@lukelandrealty.com]
Sent: Thursday, April 25, 2013 3:23 PM
To: Projects
Subject: ADOT Loop 202 South Mountan Freeway Study

ADOT,

I am responding concerning the request for comments about "ADOT Loop 202 South Mountain Freeway Study."

I have been in real estate since the early 70's and this project has been discussed since before I-10 was even built. The final analysis puts the loop road on the edge of the Gila Indian Reservation property, much like the Loop 101 was done in east Scottsdale. That route left all the developable land on reservation land and created a giant economic opportunity for the Tribe that cost the City of Scottsdale and State of Arizona enormously, in my opinion. There is no reason to give the Indian tribes economic opportunity, particularly when they don't want it.

1

I suggest we pay the property owners that would be affected very well for their properties and be done with the subject. Make it a toll road, or whatever, but end the subject and leave the citizens of Arizona in charge of their fate. I am sure this will please the Tribe as well.

2

Regards,

David F. Lewis

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Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Tolling**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa County region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects, including the proposed freeway. Tolls will not be involved.

Code	Comment Document
1	John Lewis Document Created: 5/21/2013 8:44:25 PM by Web Comment Form I do not think that the travel time saved for any of the proposed alignments justifies the building of this freeway. I strongly believe that the costs (both direct and indirect) do not justify this project being built either in terms of spending tax payers money or fiscal responsibility on the part of any federal or state agencey.

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 22, 2013 10:51:39 AM
Attachments: image001.png

From: John N. Lewis [mailto:Jnlewis@sundt.com]
Sent: Tuesday, May 21, 2013 1:35 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I would like to show my support for this project. This would greatly help those people like myself get to and from the east and west valley for work. Hope to see this project get started in the near future.

Thanks

John Lewis III CPC, LEED AP, Assoc. DBIA
Sundt Construction Inc.
Phoenix Biomedical Campus
Health Science Education Bldg.
Jnlewis@sundt.com
F – 480-629-0200
M – 602-723-9776

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 South Mountain Freeway
Date: Wednesday, May 22, 2013 10:47:52 AM

From: Ben and Barb Lewis [mailto:benbarb7@yahoo.com]
Sent: Wednesday, May 22, 2013 2:54 AM
To: Projects
Subject: 202 South Mountain Freeway

1
2

Please do not build this freeway 59th ave I-10 exchange will result in loss of jobs from the removing of Business and apt Builds in
this Day in age one job is two many

Thank you

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Acquisitions and Relocations**	

Code	Comment Document

From: Bob Lewis
To: Projects
Cc: Lewis, Robert (Lewis, Robert)
Subject: Feedback
Date: Tuesday, July 23, 2013 5:25:32 PM

Dear Community Outreach Team:

Our family has lived in Arizona twice for a total of 21 years. We love Arizona, especially the Ahwatukee Foothills area, which we selected as our "final resting place." However, we'd rather not have our "final resting place" come too soon !!! (We chose Ahwatukee as the place to live out our lives, because of its beauty and clean air.) We do travel often to the west valley, but are willing to endure the longer drive than having the Loop 202 built over Pecos Road, which would shorten our drives, but also, I'm sure, our lives.

1 2

That which my family is most concerned about is the quality of our air, which we know will be affected negatively by enlarging Pecos for a major freeway. I especially will be affected by the bad air quality, since I spend my entire days (from sunrise to dark) in my vegetable gardens and I have had lung problems in the past.

3

Since I've been gardening (in my retirement years) I have been the healthiest that I've ever been. But, living in the bowl created by mountain/foothill ranges in nearly all directions, I know that Phoenix's dark brown cloud will be moved over us, too, and not only in the winter months. We now have too many "no-burn days." We, our children, grandchildren and soon, great-grandchildren will be permanently affected by air pollutants. And, the 202 would be too close to several of our schools where other people's children will be affected, too, for the rest of their lives.

2

Two other problems I foresee are:

4 5 6 7

1. Loop 202 becoming full of dirty, large truck traffic, created beyond our state/local use, since it WILL be used heavily by trans-Canada/Mexico traffic.
2. From what I've read, placing Loop 202 over Pecos Rd. will not reduce much traffic on I-10, and at the same time, will restrict our leaving safely our "bedroom community" in case of nuclear pollutants released from close-by reactors on our west or other terrible large-scale disasters. 202 built over Pecos WILL eliminate critical exits from Ahwatukee which we now can use to get onto Pecos Rd., if we ever need to evacuate our community.

8

After all these years of public outcries from Ahwatukee, Native American people, and other people, why not cut our losses NOW and NOT build here? If really needed, why not build 202 much further south (e.g. on I87), which would affect many fewer people and keep the quality of life better for more people curently living here.

Perhaps too simply put, I believe the final decision is really between whether to award Leveen with economic growth or keep Ahwatukee's air clean. I guess you folks will make that decision for the rest of us.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Purpose and Need, Truck Bypass**	
6	**Purpose and Need**	Even though the region's freeways are now congested and operate poorly, conditions in 2035 would be substantially worse (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
7	**Traffic**	The E1 Alternative would affect the existing local street network. Approaches for reconfiguring the local street network include removing streets, constructing new streets, constructing the proposed freeway over existing streets, or dead-ending existing streets. Final design of local streets would be coordinated with emergency service providers, local jurisdictions, and other appropriate agencies and would continue through final design stages. See Final Environmental Impact Statement Figure 3-33, on page 3-57.

(Responses continue on next page)

Code	Comment Document
	Sincerely, Robert A. Lewis Rlewis48@cox.net

Code	Issue	Response
8	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 10:55 AM
CALLER: JUDITH LIGAS	CALLER ADDRESS: 5352 S. AMBERWOOD DRIVE, CHANDLER AZ 85248
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I would like to have the South Mountain Freeway completed so it connects to the I-10. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, July 16, 2013 10:08:14 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Marty Light [mailto:sparlight@gmail.com]
Sent: Monday, July 15, 2013 5:37 PM
To: Projects
Cc: sparlight@gmail.com
Subject: South Mountain Freeway

Good Afternoon:

1 2 3 4 5 6 7 8 9 10 11

As a long time resident of the Ahwatukee Foothills community, I am compelled to register my complete objection to having the Loop 202-South Mountain Freeway constructed.
My objections begin with the flawed and outdated data utilized in the DEIS which clearly does not accurately portray current scientific data. The impact to Ahwatukee includes a total change in the character of the community, huge property devaluations, increased air and noise pollution and the real threat of a devastating and lethal toxic chemical accident. It would cause environmental harm to the South Mountain Park are and it's delicate desert environment. It is apparent that this loop would become a major highway for the Canamex truckers and not just a commuter highway as the study would have us believe.
I stand behind PARC, the Sierra Club and Don't Waste Arizona in their objections to this unneeded, wasteful and harmful project.

Sincerely,
Martha S. Light
15024 S. 25th St.
Phoenix, AZ. 85048

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Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Acquisitions and Relocations**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Noise**	
6	**Hazardous Materials**	
7	**Section 4(f) and Section 6(f)**	
8	**Biology, Plants, and Wildlife**	
9	**Purpose and Need, Truck Bypass**	
10	**Trucks**	
11	**Purpose and Need, Lack of Support**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 (South Mountain Freeway)
Date: Wednesday, May 22, 2013 10:54:13 AM

From: Limon, Chad C [mailto:chad.c.limon@chase.com]
Sent: Tuesday, May 21, 2013 8:04 AM
To: Projects
Subject: Loop 202 (South Mountain Freeway)

One question: Is it worth it?

1 2 3 4 5 6 7 8

My answer is no. I believe that this freeway will harm my daughter's health. She has asthma and we would be within ¼ mile of the roadway. There will be primarily class 8 truck traffic on this extension. Truck traffic means harmful pollutants and noise. Building the proposed extension in unnecessary and a waste of resources. It will primarily only benefit people who do NOT live here as it gives a way around downtown to points east and west. The rise in pollution and crime coupled with the diminished property values do not make sense. It will mean less property tax revenues and added costs for the state of Arizona.

9

Please don't ruin our community of the Ahwatukee Foothills. This freeway will kill what our residents love about our community. There is no way to argue the benefits outweigh the costs.

Chad Limon | Card Services, Corporate Liability | **Chase Bank USA, N. A.**
150 W. University Dr., Bldg – G 3rd Flr., Tempe, AZ 85281, Internal Mail: AZ1-5613
Phone: 480-902-6642 Fax: 877-403-7461
Hours of availability | weekdays 7:30 am - 4:30 pm AZ Time

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Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Air Quality**	
4	**Noise**	
5	**Purpose and Need, Lack of Support**	
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
7	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
8	**Economics, Socioeconomics**	Table 4-23 on Final Environmental Impact Statement page 4-63 displays projected property tax impacts on the various affected jurisdictions from right-of-way acquisition and future land uses related to each of the action alternatives. Property tax impacts from implementing the W59 Alternative would be about twice those resulting from the E1 Alternative. The loss in annual City of Phoenix tax revenues from implementation of the E1 Alternative are discussed on page 4-65 and would, given all tax revenues for the City of Phoenix, "be nearly inconsequential."
9	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

5021

1 MR. LIMON: I'd like to put on the record that I'm
2 against the building of the South Mountain or 202 extension. I
3 feel that it's not really going to benefit many Arizona
4 residents. It's going to benefit out-of-state drivers,
5 commercial vehicles -- by your numbers, to the tune of 1194
6 commercial vehicles per hour, passing within 50 feet of my
7 home, in which I have an asthmatic daughter.
8 So, you know, what's missing there? Who's
9 benefiting? Well, Phoenix residents aren't benefiting.
10 The statement is that there will be less traffic on
11 our arterial surface streets. I don't see how that's possible.
12 I don't know anybody that takes surface streets from Ahwatukee
13 or Chandler to Laveen. So they're going to take the highway.
14 Travel time to downtown, they claim that it would
15 decrease. It would actually increase if you're taking the
16 extension; there would be an additional 10 miles.
17 And it says it will alleviate I-10 congestion. And
18 it's possible it might alleviate some of it south of town, west
19 of town. You're only going to move the truck traffic, so
20 that's -- That's not going to affect the downtown corridor,
21 since there's already a truck route that addresses that.
22 Really, traffic is caused by accidents. We don't
23 have enough volume on Phoenix freeways to really cause an
24 issue. I've lived in areas that have volume issues: Chicago,
25 New York, Boston.

1
2
3
4

Page 8

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Health Effects**	
4	**Traffic**	The statement related to reductions on arterial streets considers those arterials streets in and around the entire Study Area, not just in Ahwatukee Foothills Village. The traffic projections for Chandler Boulevard (see Figure 3-12 on page 3-29 of the Final Environmental Impact Statement do show a reduction with the proposed freeway when compared with conditions without the proposed freeway. The travel time comparison shown in Figure 3-17 on page 3-34 of the Final Environmental Impact Statement included a trip from Ahwatukee Foothills Village to Downtown Phoenix using Interstate 10, not the proposed freeway. This trip would take 5 or 6 minutes less with the proposed freeway in place when compared with conditions without the proposed freeway. The duration of level of service E or F (represents stop-and-go traffic) for the existing conditions and future conditions without the proposed freeway are shown in Figure 1-9 and 1-10 in the Final Environmental Impact Statement. In both conditions there are more than 3 hours of congested conditions during the morning and evening commuting periods on a number of the region's freeways, especially Interstate 10.

(Responses continue on next page)

Code	Comment Document

1
5

So I urge a no-build option because I don't see that it's going to benefit anybody but out-of-state drivers passing through, truck drivers including trucks coming from Mexico with different emissions standards much lower than our own.

And thank you very much.

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
5	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:46:07 AM

-----Original Message-----
From: Dane Lind [mailto:dane.lind@icloud.com]
Sent: Friday, May 10, 2013 6:13 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Past time to build...it is already too late and more will be needed even after this is built

Sent from my iPhone

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Dane Lind

Document Created: 7/24/2013 11:32:07 AM by Web Comment Form

In review of the alternate routes for this stretch of freeway, it makes absolutely no sense at all to tie it in to the I-10 Freeway any closer to the downtown area than the Loop 101 interchange between 95th and 99th avenues. By tying it in at the Loop 101 you also save the same distance for the future SR 801 running East to West to the South of I-10. The cost is not the issue, taking the bypassing truck traffic off of I-10 as it passes thru Phoenix is the issue.

1

2

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, May 20, 2013 1:07:07 PM

-----Original Message-----
From: Sally Lindsay [mailto:moongarden.sally@gmail.com]
Sent: Monday, May 20, 2013 12:31 PM
To: Projects
Subject: South Mountain Freeway

1

I am opposed to any alignment of the South Mountain freeway that allows for trespass onto the Mountain Preserve or any excavation into the South Mountain.
Sally Lindsay

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4393

the stops are, as everybody's -- all the traffic, the semi-trucks are coming from the west, California or wherever, and it all kind of bottlenecks at about 75th and doesn't clean up until about past the I-10 truck route, which is about 27th or whatever Avenue, so I can definitely see a need for this, and I'd like to see it happen, just because I'm stuck in my house out in the West Valley and have to commute to the East Valley, so that's all I have to say. Thank you.

THE FACILITATOR: Thank you.

Wes Lines. Wes Lines.

MR. LINES: Hello. Are you ready for me? I don't think I have three minutes' worth of stuff to say, but I just want to come down and put in my two cents' worth. My name is Wes Lines and I live in Laveen, I live at 51st Avenue, and I have seen -- I've lived there since 2001 and I have seen the traffic along 51st Avenue increase and increase and increase the whole time going south onto the Indian reservation and into the town of Komatke, and the road is completely overburdened and overwhelmed.

It's a county farm road, it doesn't have sidewalks or anything like that. That road is being used as a highway for people to go all the way to Tucson. You see people hitchhiking along with signs that say all the

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

way to Tucson, because that's how people get to it. That shows, in my opinion, that we need this freeway. I am in support of this freeway.

The casino is getting bigger and bigger and the idea of them putting people onto -- into this casino through 51st Avenue is just ridiculous. If you were to actually go and look at the road there's fatalities there all the time, there are crosses all over the road. I believe that we need this freeway.

And as far as the air quality -- the air quality, if there is a concern about air quality, then I believe that the freeway should go in, because that will keep the trucks moving along so they don't have to stop and start and stop and start from Baseline to Dobbins to Elliot and all the way down, which I see them do every single day. I would rather see them move that along at 50 miles an hour or 60 miles an hour or 70 miles an hour and just keep it moving along and not put the black dust up in the air. I'm 100 percent in supporting this. I have four kids that I'm raising there at 51st Avenue and Estrella, I plan on raising them there and living there for 10, 20, 30 years or possibly for the rest of my life, so I am 100 percent in support of this freeway and just wanted to come and say that.

Any questions that you gentlemen have for me?

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 2:49 PM
CALLER: ALISE LION	CALLER ADDRESS: 44 W. MONROE STREET, APT. 2805, PHOENIX, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in favor of the South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Victor Liou

Document Created: 5/20/2013 8:47:16 AM by Web Comment Form

The Loop 202 South Mountain Corridor plan has been stuck on the drawing board long enough. The money is there, people want it and it should be built as soon as possible. Let alone congestion, travel times will be reduced with this vital link between cities in the Phoenix Metropolitan Area.

Traffic will get worse between the current links in the next few years, let alone the next 20. There will be protest against building the new corridor, but being a public project, it is expected. At the end of the day, this project's benefits will outweigh the consequences by a lot. The project will be a boost to Arizona's economy and be a first class ticket out of the economic crawl that we have suffered during the crash.

1 This is an important and vital project to Maricopa County and Arizona, let's get this project done!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN PUBLIC HEARING
Public comments to reporter)
May 21, 2013
10:00 a.m.
REPORTED BY:
Bonnie Ponce, RPR
AZ Certified Reporter No. 50669

MR. LIPPEY: Mario Lippey.
So my comment would be I was concerned about -- I'm for the highway. However, where I live, which is the freeway -- the Foothills reserve area, right at the very end of Pecos, that's really close to the mountain.
And right now it's very quiet unless there are parties or loud vehicles that go through there. And those small noises bounce off the highway.
And with the highway coming so close to that area, my concern is that the noise levels will increase even if they put a barrier up. It will just bounce off the mountain.
In addition, the air pollution, again, we're right up against the mountain. The winds usually come from the south to north, anecdotally. I don't have any research.
But I'm concerned about the air quality being trapped right where we're located right up against the mountain. And I didn't read everything on the air quality, but those are my two main concerns, the air quality and the noise.

Code	Issue	Response
1	**Noise**	As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Allan Lira Rios Document Created: 5/21/2013 1:58:12 PM by Web Comment Form I agree with the proposed plan because of its impact economically. This plan took in the account of the wildlife and its enviromental impacts and they have made sure that it will not affect the land as much as all the alternatives would have. The only concern I would have would be with its cutting south mountain but the freeway could be used as a channel to increase the amount of people that can enjoy South Mountain Park. The cutting could also increase the trails that the mountain could provide. I believe that this freeway would open up many opportunities to economic development like a hospital and it would impact the Laveen town in a very positive way by bringing in a lot more businesses that will also increase the job opportunities that this community can have. I think this plan will help the Laveen area by making it a lot easier for it to get to things like Central Phoenix and Tempe. Overall I think this is a good plan and I fully put my backing behind this project.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The "channel" would allow people visual, but not physical access to Phoenix South Mountain Park/Preserve. The freeway itself would not result in additional trails because there would be right-of-way fence limiting access to the park from the freeway and there would be no pull-offs for trailheads.

Code	Comment Document
1	Nerissa Lisonbee Document Created: 5/21/2013 5:18:08 PM by Web Comment Form My husband and I are homeowners who live in Laveen at 74th Ave and Baseline. We are also registered voters. We just want it known that we are in favor of the South Mountain Freeway. Voters have continually voted in favor of the freeway being built. Please don't let us down!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Tuesday, April 30, 2013 8:53:33 AM

From: Tina [mailto:manager@thetuscanypointeapartments.com]
Sent: Friday, April 26, 2013 1:47 PM
To: Projects
Subject: Loop 202 South Mountain Freeway

1

I am not opposed to the freeway I just think the W101 western option will have the least amount of impact on the communities. I live in Laveen and am not happy about looking out my back door to see a freeway. The purpose of us living that far out was to have large animals and a country feeling.

Tina Lockwood
Community Manager
Tuscany Pointe Apartments
14830 N. Black Canyon Hwy.
Phoenix, Arizona 85053
602-863-4335 Phone
602-863-9515 Fax
manager@thetuscanypointeapartments.com
www.tuscanypointeapartmentsaz.com
www.placestorent.com

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Greg Loeben

Document Created: 6/3/2013 2:08:53 PM by Web Comment Form

1 2 3 4 5

I am writing to express my objection to the Loop 202 South Mountain Freeway Project. I understand that the idea of this new project is to relieve traffic congestion, but this is at the expense of the natural environment, Native lands, and air quality. It is my strong belief that better urban planning (e.g., better public transportation, improved pedestrian and cycling infrastructure and increased investment in central Phoenix schools) will encourage Arizonans to move closer to the city. This would improve our communities by decreasing polution, boosting local business economy (rather than that of large corporate chains, which dominate our suburbs) and creating a healthier, more active community, thus, abrogating the presumed need for this expensive and harmful project. Thank you for your consideration.

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. No Gila River Indian Community or other Native American land is to be used in development of the proposed action.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Secondary and Cumulative**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.
5	**Alternatives**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Monday, June 24, 2013 9:04:53 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: rlopez24@aol.com [mailto:rlopez24@aol.com]
Sent: Saturday, June 22, 2013 11:05 AM
To: Projects
Subject: Loop 202 South Mountain Freeway

To: ADOT

My name is Ray Lopez and I am a long time resident of Ahwatukee. I live approximately .8 miles from the proposed highway, just north of the high school. I am writing to you today to voice my concerns with the hope that something can be done to stop the highway from being built. Rarely, if ever, have I taken the time to state my position against any government or private project. However, I am strongly opposed to the highway and can not stand by without voicing my opinion.

(1) First I would like to say that the builder of our home did NOT make it clear that this highway was a real possibility 19 years ago when we had our home built. Some would say that I did not do my due diligence in researching this matter before buying, but I believe the builder was also negligent in offering us material information on the project.

This highway has a vast impact on the residents of Ahwatukee as anyone who has read a newspaper would know. The following are just a few of my concerns

(2) The church, the school and the hundreds of homes that would be destroyed,

(3) (4) The air quality for those in the neighborhoods along the highway that would have to breath in the truck fumes. The adverse effect on our children.

(5) The noise quality that would be ever present 24 hours a day.

(6) The increased traffic congestion on the streets as they look to alternate routes just to go shopping, going to a restaurant or going to the high school.

(7) The impact to South Mountain which is sacred to the GRIC.

Code	Issue	Response
1	**Acquisitions and Relocations**	Arizona real estate law requires developers to disclose adverse conditions such as construction of a future freeway in a public document (5 Arizona Administrative Register § 650, R4-28-A1203). Realtors are required to disclose to a potential buyer any information that may affect the property (see Final Environmental Impact Statement page 4-13). Individuals considering potential sale of a property should contact an attorney with any questions regarding their responsibility to disclose information about the proposed South Mountain Freeway.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Health Effects**	
5	**Noise**	
6	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
7	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

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The potential for a hazardous waste accident involving trucks carrying dangerous materials.

This highway is nothing more than an alternate truck route costing billions of dollars. Can't we negotiate with GRIC in good faith to move the highway a couple of miles south onto their land if it is truly needed?.

I hope that our voice will truly be heard and that serious consideration will be given to our concerns.

Sincerely,

Ray Lopez

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Code	Issue	Response
8	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Purpose and Need, Truck Bypass**	
10	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 10:08 AM
CALLER: SUSAN LOPP	CALLER ADDRESS: 1619 E. CARTER ROAD, PHOENIX, AZ 85042
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I would like the South Mountain Freeway to be passed.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 7:11 PM
CALLER: CATHLEEN LOUTS	CALLER ADDRESS: SURPRISE, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I whole heartedly support the South Mountain Freeway. Thank you and have a good night. To make traffic easier and for us to get around without being like a New York City environment – the more freeways the better. Thank you, bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 extension....
Date: Thursday, July 11, 2013 8:28:25 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Bill Love [mailto:madbill55@yahoo.com]
Sent: Wednesday, July 10, 2013 10:03 PM
To: Projects
Subject: Loop 202 extension....

July 10, 2013

To AZDOT:

1 Knowing the Loop 202 extension project is going to disrupt the lives of many people no matter which way it goes, *please* at least let it go to the most obviously advantageous end point -- at the junction of I-10 and the western end of Loop 101. This is the ONLY logical place for it to go for everyone's best use.

Sincerely,

William B. Love
Part-time resident at:
5062 N. Bear Ct.
Apache Junction, Arizona U.S.A. 85120
TEL: 480-646-1297

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Iuke Iucarini
To: Projects
Subject: No Build 202
Date: Wednesday, July 24, 2013 7:30:44 PM

1 2 3 4 5

This project may have looked good on paper in the early 1980's. Today it is simply not a viable option.
The cost alone should justify a No Build Option.
The proposed 202 SMF will destroy one of Phoenix's best neighborhoods, desicrate South Mountain, and add more pollution to the Phoenix Metro Area.
Add this to the fact that ADOT desires to construct a 'low-budget' freeway, in a state rife with government agency mis-management, this is not a good idea.
As a 35 year resident of Arizona I know in depth the magnitude of the entire freeway project, and cannot think of any reason a state agency would advocate such a now ridiculous (like not connecting to the 101 on the west alignment) project only leads one to conclude that where there are billions of dollars to be bid out, graft and corruption rule the day.

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Alternatives, W59 Alternative Versus W101 Alternative**	

Code	Comment Document

From: Mike Luecker
To: Projects
Subject: South Mountain Freeway
Date: Wednesday, July 24, 2013 10:08:33 PM

Regarding the Alternatives considered:

I attended the public meeting several years ago for the I-10 CD collector roads. As presented during this meeting, traffic projections/delays were significant even with the assumption of the South Mountain Freeway (SMF) as being built.

In general terms, both the SMF and I-10 CD roads are multi-billion dollar projects. Based on budget/funding issues/short-falls, it appears that building both is not foreseeable. It would appear reasonable that ADOT determine which project is more beneficial. Unfortunately, I can't find any mention of the I-10 CD collector road project within the SMF EIS. They appear to have been analyzed as independent projects, rather than determining which one would best improve traffic and reduce congestion. As I understand it, ADOT has 'scrapped' the I-10 CD road project (for reasons I'm not sure that have been presented to the public, as follow up to the public meetings that occurred several years ago). ADOT should not be moving forward with SMF just because the EIS/engineering/funding/etc is further along than the I-10 CD project.

1

From my general/cursory viewpoint, which are based on the east valley commute issues at I-10/60/I-17, the I-10 CD roadway project may improve the daily commuter traffic more than the SMF. I further do not see how the SMF will 'relieve' I-10 commuter traffic in the west valley. ADOT seems to agree with this, based on the planned/future 'I-10 Reliever project in the west valley'. I understand that SMF will complete the freeway system that has been previously planned and also reduce truck traffic within the Phx Metro interior freeway system (since SMF would serve as a truck by pass). However, if SR 85 is improved to (near) interstate standards, along with SR 303, this would eventually serve as a more effective truck bypass, the I-10 CD road project may serve as a better alternative to the SMF.

2

3

Therefore, if I-10 CD (east valley) and I-10 reliever (west valley) improve commuter traffic (as compared to SMF) and other future improvements (SR 85/303 and possibly future I-11) improve truck bypass (as compared to SMF), then why is SMF taking priority over these other projects, other than to 'complete the freeway system'?

REQUEST FOR ADDITIONAL INFORMATION & ALTERNATIVE ANALYSIS IN SMF EIS: At minimum, ADOT should explain why I-10 CD roadway project was shelved and SMF has moved forward (based on technical/traffic analyses and comparisons). In addition, I would request that the SMF evaluate the I-10 CD and I-10 Reliever projects as an alternative, which includes a life-cycle cost-benefit comparison.

1

Code	Issue	Response
1	**Alternatives**	The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Draft Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The *Regional Transportation Plan* includes other freeway projects, such as State Route 30 and State Route 303 Loop, that provide additional capacity and mobility in the region. All of these transportation facilities work as a system and rely on each other to provide optimum performance. The determination of purpose and need for the proposed project included an assumption that substantial improvements would be made to the Interstate 10 corridor between State Route 51 and U.S. Route 60 (see Final Environmental Impact Statement page 1-13). Even with these planned improvements to Interstate 10, the proposed project remains a vital component of the Regional Freeway and Highway System. In 2012, the Maricopa Association of Governments and Arizona Department of Transportation decided to cancel the ongoing Interstate 10 Corridor Improvement Study. The Maricopa Association of Governments, in coordination with Arizona Department of Transportation, recently completed the Southeast Corridor Major Investment Study (see <azmag.gov/Projects/>) and developed new multimodal concepts for addressing transportation issues in the Interstate 10 corridor. The Arizona Department of Transportation and Maricopa Association of Governments plan to initiate a new study to identify multimodal improvements in the Interstate 10 and Interstate 17 corridors (also referred to as the “Spine”).
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document
	Mike Luecker

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I Support the South Mountain Freeway
Date: Friday, May 17, 2013 8:49:44 AM

-----Original Message-----
From: l.lujan@cox.net [mailto:l.lujan@cox.net]
Sent: Friday, May 17, 2013 8:47 AM
To: Projects
Subject: I Support the South Mountain Freeway

1

I support the South Mountain Freeway. I support the 59th St. alignment. I support building it as soon as possible.

I live in Laveen and have heard people from Ahwatukee discuss not wanting "those people" in their neighborhood. I am very disappointed in that perspective. The freeway will provide access, reduce congestion in other parts of Phoenix and finally connect the east and west valley from the south. I am in support.

Thank you,
Linda Lujan

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:29 PM
CALLER: PATRICIA LUND	CALLER ADDRESS: 6533 N. 7TH AVE. #5, PHOENIX, ARIZONA 85013
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Yes, this is a message, I do support the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 4:25 PM
CALLER: CHRISTOPHER LYNES	CALLER ADDRESS: 5212 E. ROYAL ROAD, PARADISE VALLEY, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I'd like to leave me message in support of the new South Mountain freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

5002

MR. MACEWEN: All right. My name is Gary MacEwen and I'm a resident of the Foothills and I had a chance to review the draft environmental impact study, and there were several issues that I had with the study, but I really just want to talk about a couple of the main ones that I had. First, the configuration of I-10 as it enters and leaves Phoenix allows for the preferred location of the South Mountain Freeway to act as a convenient bypass for any traffic having no business in Phoenix, just passing through. This I think will result in a significant volume of passthrough traffic using the South Mountain Freeway right from the very beginning when it opens and then only getting worse from there.

I think the result of that will be a significant negative impact on the quality of life for residents along the freeway. And of particular concern to me is the use of the Pecos alignment for the E1 alternative as described in the report which in my opinion doesn't sound like it's being considered as an alternative at all. It really sounds like it's an imperative.

You know, there's the no build option, but that's the way it's put in the report. It's really not considered an option in my -- the way I

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Page 14

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www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

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read the report. The freeway and then the anticipated volume of traffic that goes with that may be a benefit to the metropolitan area as a whole, but I think it will be an excessive burden on residents of Ahwatukee Foothills. The accompanying noise, the air quality effects, the visual impacts, the significant negative impact on anyone living within miles of the freeway, not to mention the detrimental effects on property values in the area.

The suggestion of a wall as a noise barrier to me is offensive and unacceptable. So I think this bypass issue has been greatly downplayed in the draft environmental impact study, and I don't see any convincing argument that this freeway will not be used, as I've tried to describe, as a bypass.

Second, I'm not convinced that ADOT has done everything within its power to find a way to locate the freeway, at least part of the freeway, on so-called community lands. Therefore, I think ADOT must throw out the E1 alternative. And if it believes that there is no other alternative to building the freeway, the South Mountain Freeway, that it's got to go back to the community and try a little harder to find a way to locate the freeway a little farther to the south. That's all I have.

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Code	Issue	Response
5	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Noise**	
7	**Air Quality**	
8	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
9	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
10	**Noise**	Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered "acceptable" by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.
11	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
12	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway - Public Comments
Date: Wednesday, May 22, 2013 10:48:14 AM

From: Bill Mager [mailto:magersul@cox.net]
Sent: Tuesday, May 21, 2013 5:20 PM
To: Projects
Cc: PARCtheSMF@aol.com
Subject: South Mountain Freeway - Public Comments

Dear Sir or Madam,
Fundamentally I believe the South Mountain Freeway is a truck by-pass for I-10 through central Phoenix, with some helpful metro east-west connectivity. It has no place on an alignment adjacent to Ahwatukee. (1, 2)

My comments: (3, 4, 5, 6)

1. I do not believe that it belongs on the Pecos Rd alignment alongside residential Ahwatukee and through South Mountain and South Mountain Park.
2. I do not believe that 59th Avenue is the appropriate connection to I-10 on the west side. Possibly faulty modeling aside, it appears to inject tremendous traffic into a high congested point on I-10.

My thoughts on a solution: (7, 8, 9)

1. I believe the ideal connection is Riggs Rd to I10-101 in Glendale.
2. Lacking that, alternatives should be I10 Pecos, then run SOUTH of Pecos and around South Mountain, then to I10-101 Glendale.
3. Lacking that…AZ85 is your truck bypass, but then you lose southern east-west connectivity within the metro Phoenix area.

Bottom line…NO to the Pecos Road alignment.

Regards, Bill Mager

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Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, E1 Alternative**	
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives, W59 Alternative Versus W101 Alternative**	
6	**Design**	
7	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

From: Sierra Club on behalf of Omid Mahdavi
To: Projects
Subject: Oppose South Mountain Freeway
Date: Monday, May 27, 2013 11:43:56 AM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 In these hard financial tiimes please focus tax payer money on maintenance of current infrastructure around the state.

3 4 The freeway would negatively affect the environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more.

5 6 The freeway will also exacerbate urban spread and further burden Arizona's taxpayers by having more infrastructure to maintain while the long term economic outlook remains cloudy.

Please select the No Action Alternative.

Thank you.

Sincerely,

Mr. Omid Mahdavi
5257 N Via La Doncella
Tucson, AZ 85750-7074

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Biology, Plants, and Wildlife**	
5	**Secondary and Cumulative**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.
6	**Purpose and Need**	The worldwide recession that began in late 2007 generated a substantial downturn in growth rates for new housing and employment across the United States. Arizona particularly suffered the effects of this recession because, beginning in the early 2000s, Arizona in general and Maricopa County specifically experienced some of the fastest population, housing, and employment growth rates in the country. Because the need for the proposed freeway is predicated in part on projected growth, one might conclude the recession reduced that need. An economic downturn associated with a given recession is, however, generally considered a short-term phenomenon with respect to the longer-term planning horizon established for the proposed freeway. Socioeconomic indicators have steadily and consistently increased in the region since the early 1900s. The critical factors underlying these indicators remain unchanged. (See the sidebar on Final Environmental Impact Statement page 1-11.)

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 6:57 PM
CALLER BRIAN & KELLY MALONE	CALLER ADDRESS: 13422 W. HYACINTH DRIVE, SUN CITY WEST, ARIZONA 85375
PHONE: 623-546-3938	EMAIL:

CALLER REMARKS/QUESTIONS:

1 We are both in favor of the 202 extension. Thank you very much, please get it done. Thanks bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 5:05 PM
CALLER: LUSTER MALONE	CALLER ADDRESS:
PHONE: 602-840-3117	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in support of the freeway. Let's build this thing.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Finish the 202 south of South Mountain
Date: Monday, May 20, 2013 8:36:30 AM

-----Original Message-----
From: Bets [mailto:happybets@manera-inc.com]
Sent: Friday, May 17, 2013 9:01 PM
To: Projects
Subject: Finish the 202 south of South Mountain

1

Elizabeth Manera

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 12:38 PM
CALLER: DAVID MANLEY	CALLER ADDRESS:
PHONE: 602-741-2686	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the planning and construction of the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 3:52 PM
CALLER: DAVID MANLEY	CALLER ADDRESS:
PHONE: 602-300-9585	EMAIL:
CALLER REMARKS/QUESTIONS: I support the building of the South Mountain Freeway. Bye.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:10 PM
CALLER: CATHY MANSIETTE	CALLER ADDRESS: 145 N. RIATA STREET, GILBERT, AZ 85234
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Just leaving the message to say that I support this Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

Great information
Thorough analysis
Excellent video presentation
Knowledgeable staff answered all my questions

1 Would love to see it built.

Optional

Name David Marcus Email

Address

City State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4311

the freeway -- the city or whatever. But anyway, thank you.

* * *

MR. PALERMO: My name is Joe Palermo. I'm in favor of the Loop 202 South Mountain Freeway. I commute daily for work on the I-10 through downtown, and I believe that the Loop 202 will significantly help the flow of traffic through downtown.

Additionally, I believe that the traffic that is stuck in idling in downtown contributes significantly to the poor air quality of our metropolitan area. And I believe that traffic will inevitably increase over the coming years. And while we have this opportunity to build the 202 freeway, we should proceed forward, rather than be behind the curve and potentially find ourselves in a gridlock situation.

Additionally, I am an environmental consultant as my career. And I believe that this will help me and my family with opportunity to potentially be part of this important infrastructure project. And so additionally I'm in favor of it, not only for reasons for the city, but also for myself personally. Thank you.

* * *

MR. MARINO: Christopher Marino, and I'm for the freeway. I have lived in Ahwatukee for since

1

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1996, and the need is very prevalent. Especially when I-10 happens to be closed, it's a zoo getting out of Ahwatukee into the Phoenix area. Other times, even going to the west side takes forever. This freeway really would help out the whole situation.

I've lived near a freeway in Tempe as I was growing up, I didn't grow an extra arm or anything like that, so freeways are okay. I don't believe that putting it on the Gila River Indian Reservation should be explored any further. The routes have been there for years; people who bought houses in the path should have done their homework. And it's a need -- it's a necessity. It's not even a need; it's a necessity in that area, and it needs to be built today. That's all I've got.

* * *

MR. NORRIS: I'm in favor of building. I've worked for the City of Phoenix for almost 20 years, retired. But I watched this project and I hope that it still will be -- should have been constructed 20 years ago. Congestion around the Broadway Curve is a major problem getting back and forth from the East Valley. This would take off major trucks and people that don't need to go through Central Phoenix. They would have an alternative to go around, get off on Pecos, and then get

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:49 PM
CALLER: JACKIE MARIQUE	CALLER ADDRESS: 7311 S. 21ST DRIVE, LAVEEN, AZ 85041
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I just wanted to voice that I'm for the freeway. I would like to see it come up through Laveen and connect to the I-10 and would like for this project to continue. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Wednesday, May 15, 2013 12:36:55 PM

From: Alice Maro [mailto:amaro@graphicideals.com]
Sent: Wednesday, May 15, 2013 12:32 PM
To: Projects
Subject: South Mountain Freeway

1 2 3 4

This road has been postponed for so long-please do not let ruin the housing along Pecos and at the end of Pecos Rd-
If possible please build it on the reservation so that families, schools, business and a church will need to relocate.

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Land Avliability
Date: Tuesday, July 23, 2013 10:38:08 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT Communications

From: Gene Maro [mailto:gmaro@graphicideals.com]
Sent: Tuesday, July 23, 2013 9:41 AM
To: Projects
Subject: Land Avliability

1
2 3

It has come to light that City Council Reps have a vested interest in the Freeway not going on Indian Land but on privately owned land??//!!!
Please check who will benefit from the destruction of homes, schools and churches while ADOT does NOT work a deal with the tribes.

Gene Maro, Owner
gmaro@graphicideals.com

Graphic Ideals
4631 E. Thomas Road
Phoenix, Arizona 85018
Phone: (602) 381-8080
Fax: (602) 381-8117

Graphic Ideals "Complete production printing since 1990"
Gene Maro, owner
4631 E Thomas Rd • Phoenix, AZ 85018 • 602 381 8080 • 602 381 8117 FAX • www.graphicideals.com
gmaro@graphicideals.com • Like us on Facebook!

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Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Purpose and Need**	This request is outside the scope of the proposed project.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:19 PM
CALLER: KEN MARONA	CALLER ADDRESS: 102345 WEST [VOICEMAIL UNCLEAR], SUN CITY, AZ
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:

I do believe that the extension of the freeway would diminish congestion, a faster way for people coming from the south to get to the west valley. It's been proposed seemingly since 1980 and I never seen why it hasn't been done because it's something that would really work. Anyways, thank you for your time.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: Loop 202 South Mt. Comment #1316263470
Date: Wednesday, June 12, 2013 8:32:46 AM
Attachments: image001.png

Here is another comment concerning the S. Mt. project:

6/11/2013 5:24:32 PM
To Whom It May Concern:

1 2 3 4 5

I'm writing today to express my adamant protest of the proposed South Mountain Freeway. Not only would this proposed Freeway bring an enormous amount of air and noise pollution to the Community of Ahwatukee and it's residents, it would also bring the possibility of hazardous waste accidents, mammoth congestion for local traffic, and ruin the appearance and value of my property.

6 7

In addition, the impact of the proposed South Mountain Freeway is environmentally unjust and disproportionately high to the 70,000 or so residences of the Ahwatukee and Gila River Indian Community populations.

Please accept this email as my formal protest of this proposed freeway.

Sincerely,
Kelli Marshall

Thanks,

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Hazardous Materials**	
4	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1).
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Environmental Justice/Lifestyle**	The Arizona Department of Transportation and Federal Highway Administration have engaged all population segments to ensure access to the environmental impact statement process. Assisted by this involvement, analytical results indicate the proposed action would provide net benefits to all populations in the Study Area in general by reducing traffic congestion, enhancing accessibility, and supporting local economic development plans.

Code	Comment Document

RECEIVED

JUN 17 2013

AZ Dept of Transportation
Director's Office

June 11, 2013

Arizona Department of Transportation
Administration Building
206 S 17th Ave
Phoenix AZ 85007

RE: Proposed South Mountain Freeway

To Whom It May Concern:

1 2 3 4 5

I'm writing today to express my adamant protest of the proposed South Mountain Freeway. Not only would this proposed Freeway bring an enormous amount of air and noise pollution to the Community of Ahwatukee and it's residents, it would also bring the possibility of hazardous waste accidents, mammoth congestion for local traffic, and ruin the appearance and value of my property.

6 7

In addition, the impact of the proposed South Mountain Freeway is environmentally unjust and disproportionately high to the 70,000 or so residences of the Ahwatukee and Gila River Indian Community populations.

Again, please accept this letter as my formal protest of this proposed freeway.

Sincerely,
Kelli Marshall
14261 S Cholla Canyon Dr
Phoenix AZ 85044-6196

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Hazardous Materials**	
4	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1).
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6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Environmental Justice/Lifestyle**	The Arizona Department of Transportation and Federal Highway Administration have engaged all population segments to ensure access to the environmental impact statement process. Assisted by this involvement, analytical results indicate the proposed action would provide net benefits to all populations in the Study Area in general by reducing traffic congestion, enhancing accessibility, and supporting local economic development plans.

Code	Comment Document
1	Dean Marten Document Created: 5/21/2013 2:02:07 PM by Web Comment Form The project will create 30,000 jobs during the five to six year construction peiod and result in a $2 billion investment in the Phoenix-area economy. It is time to build the South Mountain Freeway!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

The construction community is here to help preserve the environment just like everyone else. We feel the impact is minimal compared to the benefits this highway will provide, less traffic in the middle of phoenix, added art moments along the highway and keeping the areas around the highway clean and being involved in the community.

1

Optional

Name DEAN MARTIN Email

Address

City State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 3:32 PM
CALLER: BOB MARTIN	CALLER ADDRESS: 6839 N. 12TH WAY, PHOENIX, AZ
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I definitely support building this freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/30/13	INCOMING CALL TIME: 12:06 PM
CALLER: JULIA MARTIN	CALLER ADDRESS:
PHONE: 602-718-5214	EMAIL:

CALLER REMARKS/QUESTIONS:

1 My comment regarding the South Mountain Freeway is first you guys should do something about the poor condition of the existing freeways before you guys build a new freeway. Fix the existing freeways then we can talk about building a new freeway. Thanks. Bye.

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 1:53 PM
CALLER: PATRICIA MARTIN	CALLER ADDRESS: 10601 WE. BALLOVER DRIVE, SUN CITY, ARIZONA 85351
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the road. I think we really, really need it. Thank you goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 11:04 AM
CALLER: REVEREND DR. JAMILVIA MARTIN	CALLER ADDRESS: 334 [UNCLEAR] MONTE WAY, PHOENIX, AZ 85042
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in support of the freeway for South Mountain area. It would help the community greatly.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Comments
Date: Monday, July 15, 2013 8:04:38 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: stephanie.y.martin@gmail.com [mailto:stephanie.y.martin@gmail.com] **On Behalf Of** Stephanie Martin
Sent: Saturday, July 13, 2013 7:48 PM
To: Projects
Subject: South Mountain Freeway Comments

Dear Sir/Madam:
Please take into consideration the following comments with regards to the Draft Environmental Study which is currently open for public comment.

-As a resident of the Ahwatukee Foothills, I am very concerned about and opposed to the proposed plans to build the South Mountain Freeway along the current proposed path along Pecos Road. The Foothills area is unique in the Phoenix region in that it is one of the few areas that is predominantly residential in nature. The proximity to South Mountain Park offers unique views, and buffers the area from some of the Air Quality issues that plague downtown Phoenix. By proposing to build the freeway long the proposed path, I am concerned that it will adversely affect the character of the region, and greatly reduce the air quality and significantly increase the noise pollution in the area. Reduction in air quality will especially affect local residents who are already suffering air-quality related health issues, but it will also significantly affect the large number of children whose schools are in close proximity to the proposed path. Based on a review of the existing data, I strongly believe that routing the proposed freeway, which will largely act as a Phoenix Bypass and truck-route, further to the south and away from the South Mountain area is a much preferred alternative.

Specific concerns with the DEIS:
1) Regarding the Qualitative Hot Spot Analysis for PM2.5 and PM10 Nonattainment and Maintenence areas: The hotspot analysis must demonstrate that the proposed project will not "cause or contribute to any new violation of any standard in any area; increase the frequency or severity of any existing violation of any standard in any area..." No portions of the hot spot analysis provided specifically addresses the proposed path near the Ahwatukee foothills. In addition, some of the factors that should be considered as noted in the EPA's Guideline on completing this hotspot analysis are not addressed at all within the DEIS - some of these

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	
5	**Health Effects**	
6	**Purpose and Need, Truck Bypass**	
7	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
8	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study.

(Response 8 continues on next page)

Code	Comment Document
11 12	include comments and analysis regarding the fact that South Mountain itself (and other local topography) creates a signficant barrier to dispersal of PM2.5 and PM10 particulates. The analysis also appears to not significantly address the issue of increased truck traffic along this route due to the fact that it will act primarily as a bypass to downtown Phoenix. Assumptions made regarding truck traffic fail to address the significant amount of international traffic whose emissions are not regulated by the US government. The hotspot analysis also fails to include evaluation of local meteorology, climate and seasonal data - specifically issues with atmospheric inversions and prevailing wind in combination with local topography that may restrict PM2.5 and PM10 particulate dispersal. The provided analysis within the DEIS also does not appear to include analysis with regards to re-entrained road dust as required for all PM10 hot-spot analyses.
11	
10	2) No PM2.5 analysis was provided - while the region may not yet be classified as being in non-attainment, it is likely that Phoenix is in non-attainment for PM2.5. While the qualitative analysis was not required per the letter of the law, it should be done to be in compliance with the spirit and intent of the law.
13	3) Within the qualitative analysis for PM10, the DEIS indicates "four service traffic interchanges were identified for review..." Including one along Desert Foothills Parkway - however no data or summary could be found for this analysis at this location within the document.
14	4) Within the hotspot analysis some numbers and estimated percentages for heavy trucks provided at 2-7%. It is not clear how this assumption was derived, nor does it take into account % of vehicles that may not be federally regulated as they may be coming from across the border where emissions restrictions are not as stringent. The analysis further concludes that "under the 2035 action scenario, the percentage of trucks would remain at the 2020 level..." It is not clear how this assumption is valid and further detail on how these numbers were derived would be appreciated.
15	
16	5) "The transportation conformity rule also requires that the analysis consider the year of expected peak emissions from the project" - it is not explained within the document how the peak is determined and what assumptions are made in identifying the year of expected peak emissions.
17	6) Data provided is dated, and argues that most of the exceedances were caused by high-wind exceptional events - more recent data is available and should be utilized. Phoenix has significantly changed since 2009, the year whose data was used to draw conclusions in this analysis. Why not use all available data and demonstrate that it is repeatable year after year? The analysis further carries on to make claims that "Fugitive dust sources are the largest contributors to ambient concentrations of PM10; Deisel exhaust is not a major contributor to ambient concentrations of PM10; and The proposed improvements would reduce travel time and congestion on the freeways and arterial streets in the area, thereby reducing exhaust emissions of PM10" None of these claims are supported with data referenced. Not only that, but the last claim regarding proposed improvements reducing travel time and congestion merely presumes that congestion may be reduced in some regions - however the traffic has to go somewhere, so it will increase in other areas. This claim also does not appear to take into account population growth in the area, which will further increase overall traffic. If the South Mountain Freeway is expected to reduce traffic around the Broadway Curve, the claim is nonsensical - Studies of traffic from Ahwatukee and points south that contribute to the
18	
19 20	

Code	Issue	Response
8 (cont.)		In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
9	**Air Quality**	Emissions from road dust and additional sources were considered in the quantitative project-level particulate matter (PM_{10}) hot-spot analysis prepared for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
10	**Air Quality**	A particulate matter ($PM_{2.5}$) analysis is not required since the area is in attainment for the particulate matter ($PM_{2.5}$) National Ambient Air Quality Standard.
11	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
12	**Air Quality**	Diesel exhaust from trucks is not a major contributor to concentrations of particulate matter (PM_{10}) in this area. Dust is the largest contributor in Maricopa County. Review of particulate matter (PM_{10}) data collected by the Maricopa County Air Quality Department suggests that locations adjacent to industrial, mining, or agricultural areas generally have the highest concentrations (see Final Environmental Impact Statement page 4-72). Locations adjacent to freeways typically have particulate matter (PM_{10}) concentrations within standards.

(Responses continue on next page)

Code	Comment Document
21	congestion at the Broadway Curve region indicate that most people are driving to jobs in Tempe and Downtown Phoenix. Diverting this traffic along the proposed south mountain freeway for these drivers makes no sense.
15	7) With regards to the comments on heavy-duty deisel emissions standards - these standards only apply to vehicles registered in the USA. It is inappropriate to presume that none of the traffic will be from across one of our international borders - either from Mexico or from Canada. Pollutants from these vehicles where less stringent emissions standards are applied must be taken into account in this analysis. With no current designated path for the CANAMEX corridor around Phoenix, this analysis becomes even more critical.
22	8) With regards to the tier II emissions standards: The analysis is predicting a decrease in nitrogen oxide emissions by 61% and VOC emissions by 24% between 2004 and 2030 - it is not clear how these values were derived. While sulfur levels were mandated to meet a certain level, has data been collected to validate that these levels have been met? In addition, what assumption is being used for the distribution of vehicle age on the roadways?
23	9) Within the DEIS, a study from Denver with regards to traffic-related air pollution was used to draw conclusions with regards to modeled levels of MSATs vs actual measurements - The summary does not discuss how accurate the various models were when compared to actual measurements - it only seems to indicate that dispersion model results were generally lower than monitored concentrations - in other words, the model underpredicted the actual levels of MSATs. It is unclear whether a) actual measured concentrations of MSATS remained below risk values, b) actual measured concentrations dropped off sharply within 50 meters of roadways c) how much higher the actual MSAT concentrations tended to be along highways vs the modeled concentrations.
5	10) it is clearly stated within the summary regarding a Critical Review on Emissions, Exposure, and Health Effects that "Overall, researchers felt that there was sufficient evidence for causality for the exacerbation of asthma" - Building this freeway so close to a residential area, and so close to schools will put residents and children especially at greater respiratory illness risk. Other studies corroborate this data, indicating that children that live next to freeways can develop permanent lung damage.
13	11) In the conclusions section the DEIS indicates that "the qualitative analysis of PM conducted for the proposed action was based on a review of monitoring site that would most closely resemble two interchange locations along the proposed action and the projected characteristics of the two proposed interchanges". Selecting two interchange locations is okay, however the analysis was not completed in an area that would likely see the most significant change. There is no current air monitoring along the Pecos Corridor - this area currently sees limited residential traffic as the Ahwatukee Foothills is an isolated community - building South Mountain Freeway along this path will significantly change and alter the type and volume of traffic in the area. The analysis needs to be provided to clearly demonstrate that there would be no exceedance of PM10 or PM2.5 standards. In addition, the analysis of the 2 locations ultimately reviewed for the DEIS is not readily found within the document for review.
24	Aside from the environmental and potential health effects of building this freeway, I am not in favor of cutting into South Mountain Park. While no official hiking trails exist in the proposed path, the land can easily be explored and enjoyed by hikers and other

Code	Issue	Response
13	**Air Quality**	Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
14	**Traffic**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the proposed freeway in 2035 (see Final Environmental impact Statement pages 3-64 and 4-72). The forecast truck traffic is based on existing traffic studies and projected socioeconomic data. This percentage is similar to current traffic conditions on Interstate 10 between State Route 101L and Interstate 17 and on US 60. Commercial trucks would use the proposed freeway. As with all other freeways in the region, trucks would use it for the through transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary users of the proposed freeway would be automobiles. Vehicle classification counts (2007) from the Arizona Department of Transportation for Maricopa County show passenger vehicles and other nontruck vehicles make up over 90 percent of all traffic on the regional freeway system, and it is expected these percentages would not vary with the proposed freeway. Further, it is not expected that the entire 21 percent of through truck traffic (by tonnage) using Interstate 10 would divert from Interstate 10 to use the proposed freeway (see Final Environmental Impact Statement page 3-64). Trucking destinations in the Phoenix metropolitan area would still prompt trucks to enter congested areas. Choosing to travel on the proposed freeway versus Interstate 10 would not produce substantial travel time benefits. Therefore, it is expected that “true” through truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
15	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
16	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, the year of highest particulate matter (PM_{10}) emissions is expected to be the year of highest vehicle miles traveled, 2035. According to the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area, the largest single source category is paved road dust, including track-out, at 20 percent. By contrast, on-road mobile vehicle exhaust, tire wear, and brake wear contribute 6 percent. The relative contribution of these emissions is expected to represent about the same contribution in the future; therefore, the highest projected vehicle miles traveled occur in the design year, 2035. The analysis year(s) was determined through the process established by the Arizona Department of Transportation interagency consultation procedures [40 Code of Federal Regulations § 93.105(c)(1)(i)]. The selection of 2035 as the peak year of emissions is appropriate.

(Responses continue on next page)

Code	Comment Document

2 25

recreationalists. In addition, the Ahwatukee Foothills was not designed to be compatible with an adjacent freeway to the south - if there were any hazardous spills (especially those that may result in a gaseous or airborn particulate plume) along this stretch of freeway, the local surface streets do not enable swift evacuation of the area.

I am submitting these comments in opposition to the freeway, and am also requesting further analysis and clarification of the data as required around the effects on the Air Quality as a result of this project.

Respectfully Submitted,

Stephanie Martin
16423 S 4th St
Phoenix, AZ 85048

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Code	Issue	Response
17	**Air Quality**	The project team strove to use the latest data wherever available. When new data became available, they were incorporated into the analyses. For example, the air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in *Guideline for Modeling Carbon Monoxide from Roadway Intersections* (A-OAQPS, 1992). Inputs to the model were based on U.S. Environmental Protection Agency-recommended values or were selected to provide a conservative estimate of impacts. Modeling methodology and results was reviewed by the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments.
18	**Purpose and Need**	Dispersing congested traffic to freeways that provide improved levels of service translates into improved fuel economy, faster travel times, and decreased air pollution. Even though the region's freeways are now congested and operate poorly, conditions in 2035 would be substantially worse (see Draft Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
19	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the projecty (see Draft Environmental Impact Statement page 3-27). Traffic projections are regularly updated by the Maricopa Association of Governments. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011. Key model inputs used to forecast travel demand included (see Table 3-7 on Draft Environmental Impact Statement page 3-27): · socioeconomic data based on the adopted general plans of the Maricopa Association of Governments members, along with population and economic forecasts and the existing and planned transportation infrastructure as identified by the Maricopa Association of Governments members · the anticipated average number of vehicle trips within the region (including those to and from the region's households) on a daily basis (this number is tracked regularly by the Maricopa Association of Governments) · the distribution of transportation modes used by travelers in the Maricopa Association of Governments region (also tracked regularly by the Maricopa Association of Governments) · the capacity of the transportation infrastructure to accommodate regional travel · the future transportation infrastructure established using *Regional Transportation Plan*-planned projects and improvements and from known arterial street network improvements assumed to be made by the County, Cities, and private developers. In June 2013, the Maricopa Association of Governments approved new socioeconomic projections for Maricopa County. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. The conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*).

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
20	**Purpose and Need**	The travel time comparison shown in Figure 3-17 on page 3-34 of the Draft Environmental Impact Statement included a trip from Ahwatukee Foothills Village to Downtown Phoenix using Interstate 10, not the proposed freeway. This trip would take 5 or 6 minutes less with the proposed freeway in place when compared with conditions without the proposed freeway.
21	**Purpose and Need**	An analysis of the origins and destinations of projected freeway users is presented in Figure 3-18, on page 3-36 of the Final Environmental Impact Statement. Freeway users are defined as those motorists who pass through the bend of the freeway (around the South Mountains). So, this does not count motorists in Laveen Village who go to Interstate 10 (Papago Freeway) and motorists in Ahwatukee Foothills Village who go to Interstate 10 (Maricopa Freeway). The results of the origin-destination analysis show that 73 percent of the traffic going around the South Mountains has origins or destinations in the area within or around the Study Area and supports the conclusion that the proposed action would serve east–west mobility consistent with commuting movements.
22	**Air Quality**	The data presented were based on the U.S. Environmental Protection Agency's MOBILE6 national defaults, including the national default vehicle fleet mix and U.S. Environmental Protection Agency's fuel control programs.
23	**Air Quality**	All national emission and dispersion models are validated before general use. However, models may certainly over- or under-predict depending on many factors. More importantly, however, is that there are many sources of mobile source air toxics other than mobile sources. As noted on page 4-72 of the Final Environmental Impact Statement, emissions from on-road sources are the largest contributors (by weight) of only two of the seven priority mobile source air toxics. As a result, levels of mobile source air toxics near roadways are often determined by these other sources.
24	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
25	**Hazardous Materials**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Public Comments: Loop 202 Draft EIS
Date: Monday, July 15, 2013 1:44:38 PM
Attachments: image001.png
Public Comments.docx

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Todd [mailto:todds_hiking_guide@yahoo.com]
Sent: Monday, July 15, 2013 1:44 PM
To: Projects
Subject: Public Comments: Loop 202 Draft EIS

Please see the attached document.

Thank you,

Todd Martin
16423 S. 4th St.
Phoenix, AZ 85048

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

July 15, 2013

South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

RE: Public Comment on the Draft Environmental Impact Statement for the Loop 202 South Mountain Freeway Study

Public Comment on the Draft Environmental Impact Statement for the Loop 202 South Mountain Freeway Study

Per Chapter 4 page 65 of the EIS transportation projects require an analysis that "… must document that no new local PM10 violations will be created and the severity or number of existing violations will not be increased as a result of the project" (FHWA 2001a). This issue is addressed through a "hotspot analysis" in PM2.5 and PM10 nonattainment and maintenance areas" found on pages 65-68 of the EIS. It is on this analysis that my comments will be directed.

First a few preliminary observations. The draft EIS states that:

> Four service traffic interchanges were identified for detailed review based on LOS and/or high traffic volumes during the evening peak hour of travel. They were Van Buren Street, Southern Avenue, Desert Foothills Parkway, and 40th Street. The 83rd Avenue interchange was included with the W101 Alternative because no interchange is planned at Southern Avenue with the W101 Alternative.

1 **Comment:** This detailed review for PM10 is found not found in the draft EIS. The tables following the above statement relate to CO only. Given that the above occurs beneath the heading of "Particulate "Matter" the assumption would be that PM10 is the pollutant of interest in the discussion.

2 **Comment:** It should be noted that no air monitors (either state or county) exist along the proposed route, in particular in the Awahtukee area, south of South Mountain. In the absence of specific monitoring data the actual impact of the freeway to the air shed cannot be measured.

Comment: Air monitoring should be performed to ensure "that no new local PM10 violations will be created and the severity or number of existing violations will not be increased as a result of the project". The qualitative analysis is insufficient given that the area is in non-attainment of the PM10 standard (and likely non-attainment of PM2.5 as well). Since monitors are affected by local emissions sources, this exercise provides no meaningful insight into the impact that a freeway will have on local air quality since the confounding variables make statistical correlation of particulate readings with proximity to a highway impossible.

3 **Comment:** A quantitative analysis for PM2.5 should be performed given the fact that the area may also be designated non-attainment for this pollutant as well.

Since no quantitative data is available, the draft EIS performs a "qualitative PM10 hot-spot conformity analyses". The qualitative analysis compared ambient concentrations of PM10 at five MCAQD PM10 monitoring sites in the Phoenix area.

PM10 Monitoring Locations, Results, and Nearby Road Characteristics, 2009

Site Name (Location)	Maximum 24-Hour PM10 Value	2nd Maximum 24-Hour PM10 Value	Number of Exceedances of PM10 Standard	Annual Average (ug/m3)	Nearest Freeway	Distance from Freeway

Code	Issue	Response
1	**Air Quality**	Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
2	**Air Quality**	Data from various Maricopa County Air Quality Department monitoring sites were used in the air quality analyses. Siting, operation, and recording information from monitoring sites are the responsibility of the Maricopa County Air Quality Department. See <maricopa.gov/aq/>. The monitoring information used in the air quality analyses is discussed in greater detail in the air quality technical report prepared for the project which is available on the project Web site at <azdot.gov/southmountainfreeway>. The results of the analyses are summarized in the Final Environmental Impact Statement. According to Environmental Protection Agency guidance, new monitors are not necessary to analyze air quality impacts.
3	**Air Quality**	A particulate matter ($PM_{2.5}$) analysis is not required since the area is in attainment for the particulate matter ($PM_{2.5}$) National Ambient Air Quality Standard.

Code	Comment Document

	(ug/m3)	(ug/m3)				
Urban locations near freeways (<½ mile)						
Central Phoenix (16th Street/Roosevelt)	153	130	0	34.5	I-10 SR 51 SR 202L	¼ mile ¾ mile ¾ mile
Greenwood (27th Avenue/I-10)	229	123	1	41.2	I-10 I-17	200 feet ½ mile
Urban locations distant from freeways (>½ mile)						
Durango Complex (27th Avenue/Durango Street)	277	161	3	44.5	I-17	¾ mile
West 43rd Avenue (43rd Avenue/Broadway Road)	317	213	7	50.7	I-17	2½ miles
Rural Locations						
Buckeye (Highway 85/Maricopa County 85)	439	400	3	38.9	I-10	4 miles

The EIS states:

> The qualitative analysis compared ambient concentrations of PM10 at five MCAQD PM10 monitoring sites in the Phoenix area. These sites represented urban areas near freeways, urban areas distant from freeways, and rural areas.

And concludes:

> The sites near freeways typically have ambient concentrations below the NAAQS.

Comment: The 2009 data above is not the most current data available. The 2011 data, in fact, shows different results for these same monitors.

Code	Issue	Response

Code	Comment Document

PM10 Monitoring Locations, Results, and Nearby Road Characteristics, 2011

Site Name (Location)	Maximum 24-Hour PM10 Value (ug/m3)	2nd Maximum 24-Hour PM10 Value (ug/m3)	Number of Exceedances of PM10 Standard	Annual Average (ug/m3)	Nearest Freeway	Distance from Freeway
Urban locations near freeways (<½ mile)						
Central Phoenix (16th Street/Roosevelt)	308	307	8	39.5	I-10 SR 51 SR 202L	¼ mile ¾ mile ¾ mile
Greenwood (27th Avenue/I-10)	388	254	7	42.2	I-10 I-17	200 feet ½ mile
Urban locations distant from freeways (>½ mile)						
Durango Complex (27th Avenue/Durango Street)	436	277	8	48	I-17	¾ mile
West 43rd Avenue (43rd Avenue/Broadway Road)	396	292	7	47.9	I-17	2½ miles
Rural Locations						
Buckeye (Highway 85/Maricopa County 85)	385	296	9	43.7	I-10	4 miles

The data above is more typical monitor data and shows higher concentrations near freeways.

Comment: The draft EIS states "The sites near freeways typically have ambient concentrations below the NAAQS." Of the monitors closest to the freeway, the 2009 data shows several NAAQS exceedances:

Site Name (Location)	2009 Number of Exceedances of PM10 Standard
Locations near freeways (<1 mile)	
Mesa	0
North Phoenix	0
Durango Complex	3
Dysart	1
Central Phoenix (16th Street/Roosevelt)	0
Greenwood (27th Avenue/I-10)	1
West Phoenix	1

More than half the monitors located less than a mile from a freeway exceeded the NAAQS PM10 standard in 2009. These exceedances appear to be "typical" given that more exceeded than did not.

Code	Issue	Response

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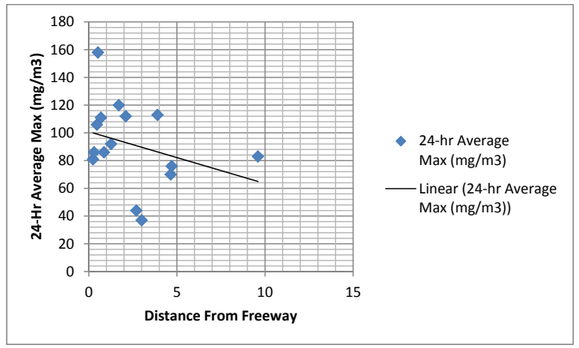
Comment: In addition to the above, plotting the 24-hr average maximum values of the various monitors vs distance from a freeway yields a strong positive correlation between distance an PM10 concentration (2010 data). The freeway would be expected to increase local PM10 concentrations.



Site Name	24-hr Average Max (mg/m3) 2010 Data
Buckeye	113
Central Phoenix (continuous)	106
Durango Complex	111
Dysart (continuous)	81
Glendale (continuous)	92
Greenwood	158
Higley (continuous)	83
Mesa	86
North Phoenix	44
South Phoenix (continuous)	120
South Scottsdale	37
West Chandler (continuous)	76
West 43rd Ave	112
West Phoenix	86
Zuni Hills	70

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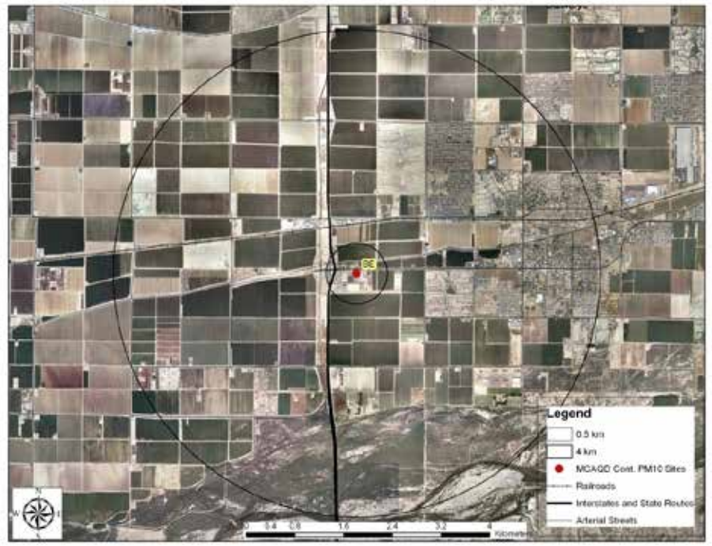
Comment: The use of the Buckeye monitor as representative of rural locations in a qualitative examination of PM10 vs highway distances skews the results. The Buckeye monitor is surrounded by fugitive dust sources from agricultural operations and is in no way representative of ambient PM10 concentrations in developed areas. The Desert Foothills area would be considered rural, but the Buckeye monitor is in no way representative of the Foothills area. See aerial view below:



Agricultural operations are exempt from air quality rules and activities that involve disturbance of the soil generate large quantities of dust.

Comment: A more representative monitor should be chosen for the rural selection so that the particulate impact of the freeway is being compared, as opposed to the completely unrelated emissions that result from farm fields. It's not clear what monitor was used as a surrogate for the Desert Foothills area, but there is no explanation in the draft EIS as to which monitor is used, or why such monitor accurately represents emissions in the area. In no way is the Buckeye monitor representative of a typical rural area.

Comment: The urban locations (specifically the use of the Durango monitor) is also non-representative since this monitor historically reads high given its proximity to several significant industrial sources. A different monitor should be chosen that is more representative of an urban location (but that is not predominantly impacted by local emitters).

Comment: None of the monitors selected accurately represents the area at Desert Foothills Parkway. Desert Foothills Parkway is located quite far from any highway and the Buckeye monitor would not be representative of the area (Desert Foothills Parkway is residential, it is not agricultural).

4
5

Comment: The hotspot analysis is not sufficient to provide information regarding the likely degradation of air quality in the Awahtukee area and at Desert Foothills Parkway. Given that this is a residential area consisting of families with children, the fact that many schools lie along the proposed Pecos route (including: Casa Vida, Kyrene de los Lagos Elementary School, Kyrene Akimel A-al Middle School, Kyrene de la Estrella Elementary School, Kyrene de la Sierra

Code	Issue	Response
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	

Code	Comment Document

School, and the Keystone Montessori Charter School) and that recreation within the largest municipal park (South Mountain) lies downwind of the proposed highway, degradation of air quality in the area needs to be specifically assessed. For a number of reasons, the monitors evaluated in the draft EIS are not representative of Foothills air quality. These include:

- The fact that current air quality in the Foothills area is not monitored. A comparison with an existing monitor cannot occur since the current quality has not been assessed.
- Given the local conditions in the Awahtukee area (prevailing winds from the southwest to northeast) and the fact that South Mountain provides an impediment to dispersion of pollutants (highway emissions will be back up against the mountain), there is no other area with a monitor that is representative of local conditions.

6

Conclusion: the hotspot analysis that was performed is insufficient since no representative area was chosen (nor is one available since the currently monitored locations are not representative of the Foothills area). Instead, an air quality study should be performed for the proposed project location per the *Transportation Conformity guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas* Chapter 4.1.B.

1

Comment: The *Transportation Conformity guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas* requires that a hot-spot analysis include the following:

1

- A description of the existing conditions pertaining to the project and project locations.

This was not done for the Foothills area. In addition, "analysts and reviewers should be aware of existing air quality conditions so that they can understand the relative impact that the proposed project is likely to have". No information as to the existing air quality in the Desert Foothills area is provided and no monitors exist in the area. The document suggests the following approaches:

- Summarize PM2.5 or PM10 design values from nearby monitors in the nonattainment or maintenance area. Determine if a monitoring station is near the project that will provide data on local air quality conditions, including PM2.5 and PM10 concentrations. Monitors closer to the project location, but still within the nonattainment or maintenance area are preferable to those further away. In the absence of a nearby monitor, other appropriate monitors in the nonattainment or maintenance area can also be used. Interagency consultation would be used to select appropriate monitors for a given project, when monitoring information is necessary for a hot-spot analysis.

Comment: The Desert Foothills area has no nearby monitors. The above was not done.

- Consider reviewing data from monitoring stations located in other PM2.5 or PM10 nonattainment or maintenance areas that may have similar traffic and environmental conditions to the proposed project and location.

Comment: This was not done. Also, there are no areas with similar environmental conditions to the Desert Foothills area.

- Describe future estimated air quality for the attainment year, years beyond the attainment year, and any changes in PM2.5 or PM10 concentrations needed to meet attainment and maintenance schedules. Expected changes in air quality at the project location may result in changes in the background concentration and the likelihood that a given project may create or worsen an air quality problem.

Comment: This was not done. Future air quality of the Desert Foothills area cannot be assessed since no monitors exist that measure the current conditions.

- Consider PM2.5 or PM10 source apportionment studies when available.

Comment: This was not done.

- Consider future emissions trends that could affect air quality concentrations at the project's location, such as a stationary source, port, or other new source of PM2.5 or PM10 emissions.

Comment: This was not done.

- It is appropriate to also cite published scientific studies or other information regarding regional or local trend data on PM2.5 or PM10 concentrations, when such data is available and applicable to a given project and location.

Comment: This was not done.

Code	Issue	Response
6	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

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Comment: The *Transportation Conformity guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas* requires that "Built and natural environments" be taken into consideration:

- This description would include whether the character of the project area is urban, suburban or rural, and whether adjacent buildings or topography create barriers to dispersal of PM2.5 or PM10. Relevant development trends and land use patterns should be addressed if they have a bearing on potential PM2.5 or PM10 emissions and concentrations in the vicinity of the project (e.g., a new area or stationary emissions source, increased rail traffic resulting from a rail terminal, increased truck traffic due to a port or intermodal freight terminal, or due to industrial or agricultural purposes).

The topography of South Mountain, given its location and the direction of prevailing winds creates a barrier to dispersal of PM10. This was not taken into consideration in the analysis.

Comment: The *Transportation Conformity guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas* requires that "meteorology, climate and seasonal data" be taken into consideration:

- This description could address atmospheric inversions, prevailing wind direction and speed, as they impact PM2.5 or PM10 concentrations in the project area, if appropriate.

This was not done.

1

General Comments:

Comment: Chapter 4 page 69 states "Diesel exhaust is not a major contributor to ambient concentrations of PM10". That may be true, but highway traffic is a major contributor (see Figure 4-22 page 62). All sources of PM10 generated by a highway, not just diesel exhaust, must be taken into account.

Comment: The hot-spot analysis requires that "the total emissions burden of direct PM10 emissions which may result from the implementation of the projects (including re-entrained road dust and construction emissions)" be included in the analysis. This was not done. The draft EIS does not take re-entrainment into account.

Comment: A hot-spot analysis must consist of "an estimation of likely future localized PM2.5 or PM10 pollutant concentrations and a comparison of those concentrations to the relevant air quality standards". A hot-spot analysis assesses the air quality impacts on a scale smaller than an entire nonattainment or maintenance area, including for example, congested roadway intersections and highways or transit terminals." The analysis performed does not estimate potential localized PM10 impacts in the Foothills area along the section of "highway" running south of the South Mountain Park. Nor can it, since no representative monitor exists.

Comment: The *Transportation Conformity guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas* states "EPA believes that conformity requirements are met if areas demonstrate that no new or worsened violations occur in the year(s) of highest expected emissions – which includes the project's emissions in addition to the background regional emissions." Because the "highest expected emissions" need to be assessed, more recent data than 2009 should be used in the hot-spot analysis.

Comment: The hot-spot analysis does not serve its intended purpose. It does not provide any useful information as to whether the freeway will create new local PM10 violations or whether the number of existing violations will increase as a result of the project.

Sincerely,

Todd Martin
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Phoenix, AZ 85048
E-mail: todds_hiking_guide@yahoo.com

Code	Issue	Response

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South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

Re: Public Comments regarding the proposed South Mountain Freeway

July 13, 2013

Dear Sir/Madam:
Please take into consideration the following comments with regards to the Draft Environmental Study which is currently open for public comment.

1 2 3 4 5 6 7 8

-As a resident of the Ahwatukee Foothills, I am very concerned about and opposed to the proposed plans to build the South Mountain Freeway along the current proposed path along Pecos Road. The Foothills area is unique in the Phoenix region in that it is one of the few areas that is predominantly residential in nature. The proximity to South Mountain Park offers unique views, and buffers the area from some of the Air Quality issues that plague downtown Phoenix. By proposing to build the freeway long the proposed path, I am concerned that it will adversely affect the character of the region, and greatly reduce the air quality and significantly increase the noise pollution in the area. Reduction in air quality will especially affect local residents who are already suffering air-quality related health issues, but it will also significantly affect the large number of children whose schools are in close proximity to the proposed path. Based on a review of the existing data, I strongly believe that routing the proposed freeway, which will largely act as a Phoenix Bypass and truck-route, further to the south and away from the South Mountain area is a much preferred alternative.

Specific concerns with the DEIS:

9 10 11 12 11 10 13

1) Regarding the Qualitative Hot Spot Analysis for PM2.5 and PM10 Nonattainment and Maintenence areas: The hotspot analysis must demonstrate that the proposed project will not "cause or contribute to any new violation of any standard in any area; increase the frequency or severity of any existing violation of any standard in any area..." No portions of the hot spot analysis provided specifically addresses the proposed path near the Ahwatukee foothills. In addition, some of the factors that should be considered as noted in the EPA's Guideline on completing this hotspot analysis are not addressed at all within the DEIS - some of these include comments and analysis regarding the fact that South Mountain itself (and other local topography) creates a signficant barrier to dispersal of PM2.5 and PM10 particulates. The analysis also appears to not significantly address the issue of increased truck traffic along this route due to the fact that it will act primarily as a bypass to downtown Phoenix. Assumptions made regarding truck traffic fail to address the significant amount of international traffic whose emissions are not regulated by the US government. The hotspot analysis also fails to include evaluation of local meteorology, climate and seasonal data - specifically issues with atmospheric inversions and prevailing wind in combination with local topography that may restrict PM2.5 and PM10 particulate dispersal. The provided analysis within the DEIS also does not appear to include analysis with regards to re-entrained road dust as required for all PM10 hot-spot analyses.

2) No PM2.5 analysis was provided - while the region may not yet be classified as being in non-attainment, it is likely that Phoenix is in non-attainment for PM2.5. While the qualitative analysis was not required per the letter of the law, it should be done to be in compliance with the spirit and intent of the law.

3) Within the qualitative analysis for PM10, the DEIS indicates "four service traffic interchanges were identified for review..." Including one along Desert Foothills Parkway - however no data or summary could be found for this analysis at this location within the document.

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	
5	**Health Effects**	
6	**Purpose and Need, Truck Bypass**	
7	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
8	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study.

(Response 8 continues on next page)

Code	Comment Document
14	4) Within the hotspot analysis some numbers and estimated percentages for heavy trucks provided at 2-7%. It is not clear how this assumption was derived, nor does it take into account % of vehicles that may not be federally regulated as they may be coming from across the border where emissions restrictions are not as stringent. The analysis further concludes that "under the 2035 action scenario, the percentage of trucks would remain at the 2020 level..." It is not clear how this assumption is valid and further detail on how these numbers were derived would be appreciated.
15	
16	5) "The transportation conformity rule also requires that the analysis consider the year of expected peak emissions from the project" - it is not explained within the document how the peak is determined and what assumptions are made in identifying the year of expected peak emissions.
17	6) Data provided is dated, and argues that most of the exceedances were caused by high-wind exceptional events - more recent data is available and should be utilized. Phoenix has significantly changed since 2009, the year whose data was used to draw conclusions in this analysis. Why not use all available data and demonstrate that it is repeatable year after year? The analysis further carries on to make claims that "Fugitive dust sources are the largest contributors to ambient concentrations of PM10; Diesel exhaust is not a major contributor to ambient concentrations of PM10; and The proposed improvements would reduce travel time and congestion on the freeways and arterial streets in the area, thereby reducing exhaust emissions of PM10" None of these claims are supported with data referenced. Not only that, but the last claim regarding proposed improvements reducing travel time and congestion merely presumes that congestion may be reduced in some regions - however the traffic has to go somewhere, so it will increase in other areas. This claim also does not appear to take into account population growth in the area, which will further increase overall traffic. If the South Mountain Freeway is expected to reduce traffic around the Broadway Curve, the claim is nonsensical - Studies of traffic from Ahwatukee and points south that contribute to the congestion at the Broadway Curve region indicate that most people are driving to jobs in Tempe and Downtown Phoenix. Diverting this traffic along the proposed south mountain freeway for these drivers makes no sense.
18	
19 20	
21	
15	7) With regards to the comments on heavy-duty diesel emissions standards - these standards only apply to vehicles registered in the USA. It is inappropriate to presume that none of the traffic will be from across one of our international borders - either from Mexico or from Canada. Pollutants from these vehicles where less stringent emissions standards are applied must be taken into account in this analysis. With no current designated path for the CANAMEX corridor around Phoenix, this analysis becomes even more critical.
22	8) With regards to the tier II emissions standards: The analysis is predicting a decrease in nitrogen oxide emissions by 61% and VOC emissions by 24% between 2004 and 2030 - it is not clear how these values were derived. While sulfur levels were mandated to meet a certain level, has data been collected to validate that these levels have been met? In addition, what assumption is being used for the distribution of vehicle age on the roadways?
23	9) Within the DEIS, a study from Denver with regards to traffic-related air pollution was used to draw conclusions with regards to modeled levels of MSATs vs actual measurements - The summary does not discuss how accurate the various models were when compared to actual measurements - it only seems to indicate that dispersion model results were generally lower than monitored concentrations - in other words, the model underpredicted the actual levels of MSATs. It is unclear whether a) actual measured concentrations of MSATS remained below risk values, b) actual measured concentrations dropped off sharply within 50 meters of roadways c) how much higher the actual MSAT concentrations tended to be along highways vs the modeled concentrations.
5	10) it is clearly stated within the summary regarding a Critical Review on Emissions, Exposure, and Health Effects that "Overall, researchers felt that there was sufficient evidence for causality for the exacerbation of asthma" - Building this freeway so close to a residential area, and so close to schools will put residents and children especially at greater respiratory illness risk. Other studies corroborate this data, indicating that children that live next to

Code	Issue	Response
8 (cont.)		In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
9	**Air Quality**	Emissions from road dust and additional sources were considered in the quantitative project-level particulate matter (PM_{10}) hot-spot analysis prepared for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
10	**Air Quality**	A particulate matter ($PM_{2.5}$) analysis is not required since the area is in attainment for the particulate matter ($PM_{2.5}$) National Ambient Air Quality Standard.
11	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
12	**Air Quality**	Diesel exhaust from trucks is not a major contributor to concentrations of particulate matter (PM_{10}) in this area. Dust is the largest contributor in Maricopa County. Review of particulate matter (PM_{10}) data collected by the Maricopa County Air Quality Department suggests that locations adjacent to industrial, mining, or agricultural areas generally have the highest concentrations (see Final Environmental Impact Statement page 4-72). Locations adjacent to freeways typically have particulate matter (PM_{10}) concentrations within standards.

(Responses continue on next page)

Code	Comment Document

freeways can develop permanent lung damage.

13 11) In the conclusions section the DEIS indicates that "the qualitative analysis of PM conducted for the proposed action was based on a review of monitoring site that would most closely resemble two interchange locations along the proposed action and the projected characteristics of the two proposed interchanges". Selecting two interchange locations is okay, however the analysis was not completed in an area that would likely see the most significant change. There is no current air monitoring along the Pecos Corridor - this area currently sees limited residential traffic as the Ahwatukee Foothills is an isolated community - building South Mountain Freeway along this path will significantly change and alter the type and volume of traffic in the area. The analysis needs to be provided to clearly demonstrate that there would be no exceedance of PM10 or PM2.5 standards. In addition, the analysis of the 2 locations ultimately reviewed for the DEIS is not readily found within the document for review.

24 Aside from the environmental and potential health effects of building this freeway, I am not in favor of cutting into South Mountain Park. While no official hiking trails exist in the proposed path, the land can easily be explored and enjoyed by hikers and other recreationalists. In addition, the Ahwatukee Foothills was not designed to be compatible with an adjacent freeway to the south - if there were any hazardous spills (especially those that may result in a gaseous or airborn particulate plume) along this stretch of freeway, the local surface streets do not enable swift evacuation of the area.

2 25

I am submitting these comments in opposition to the freeway, and am also requesting further analysis and clarification of the data as required around the effects on the Air Quality as a result of this project.

Respectfully Submitted,

Stephanie Martin
16423 S 4th St
Phoenix, AZ 85048

Code	Issue	Response
13	**Air Quality**	Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
14	**Traffic**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the proposed freeway in 2035 (see Final Environmental impact Statement pages 3-64 and 4-72). The forecast truck traffic is based on existing traffic studies and projected socioeconomic data. This percentage is similar to current traffic conditions on Interstate 10 between State Route 101L and Interstate 17 and on US 60. Commercial trucks would use the proposed freeway. As with all other freeways in the region, trucks would use it for the through transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary users of the proposed freeway would be automobiles. Vehicle classification counts (2007) from the Arizona Department of Transportation for Maricopa County show passenger vehicles and other nontruck vehicles make up over 90 percent of all traffic on the regional freeway system, and it is expected these percentages would not vary with the proposed freeway. Further, it is not expected that the entire 21 percent of through truck traffic (by tonnage) using Interstate 10 would divert from Interstate 10 to use the proposed freeway (see Final Environmental Impact Statement page 3-64). Trucking destinations in the Phoenix metropolitan area would still prompt trucks to enter congested areas. Choosing to travel on the proposed freeway versus Interstate 10 would not produce substantial travel time benefits. Therefore, it is expected that “true” through truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
15	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
16	**Air Quality**	As noted on page 4-76 of the Final Environmental Impact Statement, the year of highest particulate matter (PM_{10}) emissions is expected to be the year of highest vehicle miles traveled, 2035. According to the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area, the largest single source category is paved road dust, including track-out, at 20 percent. By contrast, on-road mobile vehicle exhaust, tire wear, and brake wear contribute 6 percent. The relative contribution of these emissions is expected to represent about the same contribution in the future; therefore, the highest projected vehicle miles traveled occur in the design year, 2035. The analysis year(s) was determined through the process established by the Arizona Department of Transportation interagency consultation procedures [40 Code of Federal Regulations § 93.105(c)(1)(i)]. The selection of 2035 as the peak year of emissions is appropriate.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
17	**Air Quality**	The project team strove to use the latest data wherever available. When new data became available, they were incorporated into the analyses. For example, the air quality assessment for impacts from carbon monoxide followed the U.S. Environmental Protection Agency guidelines in *Guideline for Modeling Carbon Monoxide from Roadway Intersections* (A-OAQPS, 1992). Inputs to the model were based on U.S. Environmental Protection Agency-recommended values or were selected to provide a conservative estimate of impacts. Modeling methodology and results was reviewed by the Federal Highway Administration, Arizona Department of Transportation, and Maricopa Association of Governments.
18	**Purpose and Need**	Dispersing congested traffic to freeways that provide improved levels of service translates into improved fuel economy, faster travel times, and decreased air pollution. Even though the region's freeways are now congested and operate poorly, conditions in 2035 would be substantially worse (see Draft Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
19	**Traffic**	The Federal Highway Administration and the U.S. Environmental Protection Agency approved the air quality conformity determination that includes the Maricopa Association of Governments regional travel demand model that produced the traffic projections used in the traffic analysis for the project (see Draft Environmental Impact Statement page 3-27). Traffic projections are regularly updated by the Maricopa Association of Governments. The traffic projections in the Draft Environmental Impact Statement are from a model adopted in 2011. Key model inputs used to forecast travel demand included (see Table 3-7 on Draft Environmental Impact Statement page 3-27): · socioeconomic data based on the adopted general plans of the Maricopa Association of Governments members, along with population and economic forecasts and the existing and planned transportation infrastructure as identified by the Maricopa Association of Governments members · the anticipated average number of vehicle trips within the region (including those to and from the region's households) on a daily basis (this number is tracked regularly by the Maricopa Association of Governments) · the distribution of transportation modes used by travelers in the Maricopa Association of Governments region (also tracked regularly by the Maricopa Association of Governments) · the capacity of the transportation infrastructure to accommodate regional travel · the future transportation infrastructure established using *Regional Transportation Plan*-planned projects and improvements and from known arterial street network improvements assumed to be made by the County, Cities, and private developers. In June 2013, the Maricopa Association of Governments approved new socioeconomic projections for Maricopa County. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. The conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*).

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
20	**Purpose and Need**	The travel time comparison shown in Figure 3-17 on page 3-34 of the Draft Environmental Impact Statement included a trip from Ahwatukee Foothills Village to Downtown Phoenix using Interstate 10, not the proposed freeway. This trip would take 5 or 6 minutes less with the proposed freeway in place when compared with conditions without the proposed freeway.
21	**Purpose and Need**	An analysis of the origins and destinations of projected freeway users is presented in Figure 3-18, on page 3-36 of the Final Environmental Impact Statement. Freeway users are defined as those motorists who pass through the bend of the freeway (around the South Mountains). So, this does not count motorists in Laveen Village who go to Interstate 10 (Papago Freeway) and motorists in Ahwatukee Foothills Village who go to Interstate 10 (Maricopa Freeway). The results of the origin-destination analysis show that 73 percent of the traffic going around the South Mountains has origins or destinations in the area within or around the Study Area and supports the conclusion that the proposed action would serve east–west mobility consistent with commuting movements.
22	**Air Quality**	The data presented were based on the U.S. Environmental Protection Agency's MOBILE6 national defaults, including the national default vehicle fleet mix and U.S. Environmental Protection Agency's fuel control programs.
23	**Air Quality**	All national emission and dispersion models are validated before general use. However, models may certainly over- or under-predict depending on many factors. More importantly, however, is that there are many sources of mobile source air toxics other than mobile sources. As noted on page 4-72 of the Final Environmental Impact Statement, emissions from on-road sources are the largest contributors (by weight) of only two of the seven priority mobile source air toxics. As a result, levels of mobile source air toxics near roadways are often determined by these other sources.
24	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
25	**Hazardous Materials**	

Code	Comment Document

South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007

July 13 2013

Public Comment on the Draft Environmental Impact Statement for the Loop 202 South Mountain Freeway Study

Per Chapter 4 page 65 of the EIS transportation projects require an analysis that "... must document that no new local PM10 violations will be created and the severity or number of existing violations will not be increased as a result of the project" (FHWA 2001a). This issue is addressed through a "hotspot analysis" in PM2.5 and PM10 nonattainment and maintenance areas" found on pages 65-68 of the EIS. It is on this analysis that my comments will be directed.

First a few preliminary observations. The draft EIS states that:

> Four service traffic interchanges were identified for detailed review based on LOS and/or high traffic volumes during the evening peak hour of travel. They were Van Buren Street, Southern Avenue, Desert Foothills Parkway, and 40th Street. The 83rd Avenue interchange was included with the W101 Alternative because no interchange is planned at Southern Avenue with the W101 Alternative.

1 **Comment:** This detailed review for PM10 is found not found in the draft EIS. The tables following the above statement relate to CO only. Given that the above occurs beneath the heading of "Particulate "Matter" the assumption would be that PM10 is the pollutant of interest in the discussion.

Comment: It should be noted that no air monitors (either state or county) exist along the proposed route, in particular in the Awahtukee area, south of South Mountain. In the absence of specific monitoring data the actual impact of the freeway to the air shed cannot be measured.

Comment: Air monitoring should be performed to ensure "that no new local PM10 violations will be created and the severity or number of existing violations will not be increased as a result of the project". The qualitative analysis is insufficient given that the area is in non-attainment of the PM10 standard (and likely non-attainment of PM2.5 as well). Since monitors are effected by local emissions sources, this exercise provides no meaningful insight into the impact that a freeway will have on local air quality since the confounding variables make statistical correlation of particulate readings with proximity to a highway impossible.

2 **Comment:** A quantitative analysis for PM2.5 should be performed given the fact that the area may also be designated non-attainment for this pollutant as well.

Since no quantitative data is available, the draft EIS performs a "qualitative PM10 hot-spot conformity analyses". The qualitative analysis compared ambient concentrations of PM10 at five MCAQD PM10 monitoring sites in the Phoenix area.

Code	Issue	Response
1	**Air Quality**	Although a qualitative analysis of particulate matter (PM_{10}) was presented in the Draft Environmental Impact Statement, a quantitative project-level particulate matter (PM_{10}) hot-spot analysis is included in the Final Environmental Impact Statement. The results of the air quality updates are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.
2	**Air Quality**	A particulate matter ($PM_{2.5}$) analysis is not required since the area is in attainment for the particulate matter ($PM_{2.5}$) National Ambient Air Quality Standard.

Code	Comment Document

PM10 Monitoring Locations, Results, and Nearby Road Characteristics, 2009

Site Name (Location)	Maximum 24-Hour PM10 Value (ug/m3)	2nd Maximum 24-Hour PM10 Value (ug/m3)	Number of Exceedances of PM10 Standard	Annual Average (ug/m3)	Nearest Freeway	Distance from Freeway
Urban locations near freeways (<½ mile)						
Central Phoenix (16th Street/Roosevelt)	153	130	0	34.5	I-10 SR 51 SR 202L	¼ mile ¾ mile ¾ mile
Greenwood (27th Avenue/I-10)	229	123	1	41.2	I-10 I-17	200 feet ½ mile
Urban locations distant from freeways (>½ mile)						
Durango Complex (27th Avenue/Durango Street)	277	161	3	44.5	I-17	¾ mile
West 43rd Avenue (43rd Avenue/Broadway Road)	317	213	7	50.7	I-17	2½ miles
Rural Locations						
Buckeye (Highway 85/Maricopa County 85)	439	400	3	38.9	I-10	4 miles

The EIS states:

> The qualitative analysis compared ambient concentrations of PM10 at five MCAQD PM10 monitoring sites in the Phoenix area. These sites represented urban areas near freeways, urban areas distant from freeways, and rural areas.

And concludes:

> The sites near freeways typically have ambient concentrations below the NAAQS.

Comment: The 2009 data above is not the most current data available. The 2011 data, in fact, shows different results for these same monitors.

PM10 Monitoring Locations, Results, and Nearby Road Characteristics, 2011

Site Name (Location)	Maximum 24-Hour PM10 Value (ug/m3)	2nd Maximum 24-Hour PM10 Value (ug/m3)	Number of Exceedances of PM10 Standard	Annual Average (ug/m3)	Nearest Freeway	Distance from Freeway
Urban locations near freeways (<½ mile)						
Central Phoenix (16th Street/Roosevelt)	308	307	8	39.5	I-10 SR 51 SR 202L	¼ mile ¾ mile ¾ mile
Greenwood (27th Avenue/I-10)	388	254	7	42.2	I-10 I-17	200 feet ½ mile
Urban locations distant from freeways (>½ mile)						
Durango Complex (27th Avenue/Durango Street)	436	277	8	48	I-17	¾ mile
West 43rd Avenue (43rd Avenue/Broadway Road)	396	292	7	47.9	I-17	2½ miles
Rural Locations						
Buckeye (Highway	385	296	9	43.7	I-10	4 miles

Code	Issue	Response

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85/Maricopa County 85)						

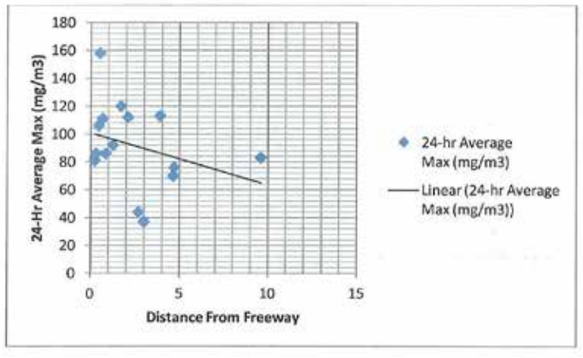
The data above is more typical monitor data and shows higher concentrations near freeways.

Comment: The draft EIS states "The sites near freeways typically have ambient concentrations below the NAAQS." Of the monitors closest to the freeway, the 2009 data shows several NAAQS exceedances:

Site Name (Location)	2009 Number of Exceedances of PM10 Standard
Locations near freeways (<1 mile)	
Mesa	0
North Phoenix	0
Durango Complex	3
Dysart	1
Central Phoenix (16th Street/Roosevelt)	0
Greenwood (27th Avenue/I-10)	1
West Phoenix	1

More than half the monitors located less than a mile from a freeway exceeded the NAAQS PM10 standard in 2009. These exceedances appear to be "typical" given that more exceeded than did not.

Comment: In addition to the above, plotting the 24-hr average maximum values of the various monitors vs distance from a freeway yields a strong positive correlation between distance an PM10 concentration (2010 data). The freeway would be expected to increase local PM10 concentrations.



Site Name	24-hr Average Max (mg/m3) 2010 Data
Buckeye	113
Central Phoenix (continuous)	106
Durango Complex	111
Dysart (continuous)	81
Glendale (continuous)	92
Greenwood	158
Higley (continuous)	83
Mesa	86

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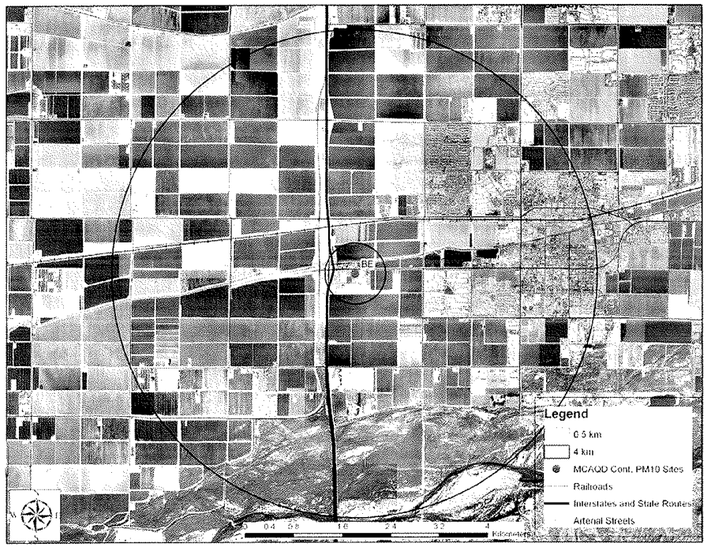
North Phoenix	44
South Phoenix (continuous)	120
South Scottsdale	37
West Chandler (continuous)	76
West 43rd Ave	112
West Phoenix	86
Zuni Hills	70

Comment: The use of the Buckeye monitor as representative of rural locations in a qualitative examination of PM10 vs highway distances skews the results. The Buckeye monitor is surrounded by fugitive dust sources from agricultural operations and is in no way representative of ambient PM10 concentrations in developed areas. The Desert Foothills area would be considered rural, but the Buckeye monitor is in no way representative of the Foothills area. See aerial view below:



Agricultural operations are exempt from air quality rules and activities that involve disturbance of the soil generate large quantities of dust.

Comment: A more representative monitor should be chosen for the rural selection so that the particulate impact of the freeway is being compared, as opposed to the completely unrelated emissions that result from farm fields. It's not clear what monitor was used as a surrogate for the Desert Foothills area, but there is no explanation in the draft EIS as to which monitor is used, or why such monitor accurately represents emissions in the area. In no way is the Buckeye monitor representative of a typical rural area.

Code	Issue	Response

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Comment: The urban locations (specifically the use of the Durango monitor) is also non-representative since this monitor historically reads high given its proximity to several significant industrial sources. A different monitor should be chosen that is more representative of an urban location (but that is not predominantly impacted by local emitters).

Comment: None of the monitors selected accurately represents the area at Desert Foothills Parkway. Desert Foothills Parkway is located quite far from any highway and the Buckeye monitor would not be representative of the area (Desert Foothills Parkway is residential, it is not agricultural).

3
4

Comment: The hotspot analysis is not sufficient to provide information regarding the likely degradation of air quality in the Awahtukee area and at Desert Foothills Parkway. Given that this is a residential area consisting of families with children, the fact that many schools lie along the proposed Pecos route (including: Casa Vida, Kyrene de los Lagos Elementary School, Kyrene Akimel A-al Middle School, Kyrene de la Estrella Elementary School, Kyrene de la Sierra School, and the Keystone Montessori Charter School) and that recreation within the largest municipal park (South Mountain) lies downwind of the proposed highway, degradation of air quality in the area needs to be specifically assessed. For a number of reasons, the monitors evaluated in the draft EIS are not representative of Foothills air quality. These include:

- The fact that current air quality in the Foothills area is not monitored. A comparison with an existing monitor cannot occur since the current quality has not been assessed.
- Given the local conditions in the Awahtukee area (prevailing winds from the southwest to northeast) and the fact that South Mountain provides an impediment to dispersion of pollutants (highway emissions will be back up against the mountain), there is no other area with a monitor that is representative of local conditions.

5

Conclusion: the hotspot analysis that was performed is insufficient since no representative area was chosen (nor is one available since the currently monitored locations are not representative of the Foothills area). Instead, an air quality study should be performed for the proposed project location per the *Transportation Conformity guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas* Chapter 4.1.B.

1

1

Comment: The *Transportation Conformity guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas* requires that a hot-spot analysis include the following:

- A description of the existing conditions pertaining to the project and project locations.

This was not done for the Foothills area. In addition, "analysts and reviewers should be aware of existing air quality conditions so that they can understand the relative impact that the proposed project is likely to have". No information as to the existing air quality in the Desert Foothills area is provided and no monitors exist in the area. The document suggests the following approaches:

- Summarize PM2.5 or PM10 design values from nearby monitors in the nonattainment or maintenance area. Determine if a monitoring station is near the project that will provide data on local air quality conditions, including PM2.5 and PM10 concentrations. Monitors closer to the project location, but still within the nonattainment or maintenance area are preferable to those further away. In the absence of a nearby monitor, other appropriate monitors in the nonattainment or maintenance area can also be used. Interagency consultation would be used to select appropriate monitors for a given project, when monitoring information is necessary for a hot-spot analysis.

Comment: The Desert Foothills area has no nearby monitors. The above was not done.

- Consider reviewing data from monitoring stations located in other PM2.5 or PM10 nonattainment or maintenance areas that may have similar traffic and environmental conditions to the proposed project and location.

Comment: This was not done. Also, there are no areas with similar environmental conditions to the Desert Foothills area.

- Describe future estimated air quality for the attainment year, years beyond the attainment year, and any changes in PM2.5 or PM10 concentrations needed to meet attainment and maintenance schedules. Expected changes in air quality at the project location may result in changes in the background concentration and the likelihood that a given project may create or worsen an air quality problem.

Comment: This was not done. Future air quality of the Desert Foothills area cannot be assessed since no monitors exist that measure the current conditions.

- Consider PM2.5 or PM10 source apportionment studies when available.

Code	Issue	Response
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Health Effects**	
5	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

Code	Comment Document

Comment: This was not done.

- Consider future emissions trends that could affect air quality concentrations at the project's location, such as a stationary source, port, or other new source of PM2.5 or PM10 emissions.

Comment: This was not done.

- It is appropriate to also cite published scientific studies or other information regarding regional or local trend data on PM2.5 or PM10 concentrations, when such data is available and applicable to a given project and location.

Comment: This was not done.

Comment: The *Transportation Conformity guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas* requires that "Built and natural environments" be taken into consideration:

- This description would include whether the character of the project area is urban, suburban or rural, and whether adjacent buildings or topography create barriers to dispersal of PM2.5 or PM10. Relevant development trends and land use patterns should be addressed if they have a bearing on potential PM2.5 or PM10 emissions and concentrations in the vicinity of the project (e.g., a new area or stationary emissions source, increased rail traffic resulting from a rail terminal, increased truck traffic due to a port or intermodal freight terminal, or due to industrial or agricultural purposes).

The topography of South Mountain, given its location and the direction of prevailing winds creates a barrier to dispersal of PM10. This was not taken into consideration in the analysis.

Comment: The *Transportation Conformity guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas* requires that "meteorology, climate and seasonal data" be taken into consideration:

- This description could address atmospheric inversions, prevailing wind direction and speed, as they impact PM2.5 or PM10 concentrations in the project area, if appropriate.

This was not done.

1

General Comments:

Comment: Chapter 4 page 69 states "Diesel exhaust is not a major contributor to ambient concentrations of PM10". That may be true, but highway traffic is a major contributor (see Figure 4-22 page 62). All sources of PM10 generated by a highway, not just diesel exhaust, must be taken into account.

Comment: The hot-spot analysis requires that "the total emissions burden of direct PM10 emissions which may result from the implementation of the projects (including re-entrained road dust and construction emissions)" be included in the analysis. This was not done. The draft EIS does not take re-entrainment into account.

Comment: A hot-spot analysis must consist of "an estimation of likely future localized PM2.5 or PM10 pollutant concentrations and a comparison of those concentrations to the relevant air quality standards". A hot-spot analysis assesses the air quality impacts on a scale smaller than an entire nonattainment or maintenance area, including for example, congested roadway intersections and highways or transit terminals." The analysis performed does not estimate potential localized PM10 impacts in the Foothills area along the section of "highway" running south of the South Mountain Park. Nor can it, since no representative monitor exists.

Comment: The *Transportation Conformity guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas* states "EPA believes that conformity requirements are met if areas demonstrate that no new or worsened violations occur in the year(s) of highest expected emissions – which includes the project's emissions in addition to the background regional emissions." Because the "highest expected emissions" need to be assessed, more recent data than 2009 should be used in the hot-spot analysis.

Comment: The hot-spot analysis does not serve its intended purpose. It does not provide any useful information as to whether the freeway will create new local PM10 violations or whether the number of existing violations will increase as a result of the project.

Code	Issue	Response

Code	Comment Document

Respectfully Submitted

Todd Martin

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Code	Issue	Response

Code	Comment Document

Suzanne Martin Document Created: 7/24/2013 6:57:08 PM by Web Comment Form

1 2 3 4 5 6

I am very concerned about the increased pollution in Ahwatukee that would result from the expansion of the Loop 202 freeway. A parkway extension (for passenger automobiles only) may be beneficial to the residents. However, any extension intended to reroute interstate traffic out of central Phoenix would increase pollution, increase respiratory problems in residents, decrease quality of life, and lower property values. Ahwatukee is a beautiful community and should not be ruined by using the Loop 202 to reroute interstate trucking traffic.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The concept of keeping the facility an arterial street is similar to the Arizona Parkway concept evaluated for the proposed project. The reasons that alternative was eliminated from further study are presented on page 3-19 of the Final Environmental Impact Statement. Any alternative alignment that goes around the South Mountains would partially be located on Gila River Indian Community land. Permission to study such alternatives has not been granted by the Gila River Indian Community government (see Figure S-11 on page S-39 of the Final Environmental Impact Statement). Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Health Effects**	
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years ((see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
6	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

Colin Martin

Document Created: 7/24/2013 7:33:38 PM by Web Comment Form

1 2 3

Extending the 202 west past South Mountain would be nice for normal traffic going to and from central phoenix. However, the idea of the big semi trucks using it as an alternate route is a little upsetting. The pollution and noise it would create right by my house isn't worth the benefits of having the 202 extended. I'd much rather live with it as it is now then have all the trucking traffic going by my neighborhood.

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:39:09 AM

-----Original Message-----
From: Art Martinez [mailto:aem5981@yahoo.com]
Sent: Saturday, May 11, 2013 7:03 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

aem5981@yahoo.com

Sent from my iPhone

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

outside, like high school kids and -- practicing baseball, football, soccer, or whatever. It's not advantageous to them.

Let's see. The other item of concern that I noted was in the study they provided us, they talked about a noncontinuous sound and noise and dust wall along the side of the highway. I think it needs to be throughout the area near the crest where it's most effective rather than down at the property line where the highway is supposed to be up to a 23-foot level, would be way over it unless they built an atrociously tall wall. So it would be better to put it up near the side of the road. But it needs to cover all communities along it, not selective ones or areas just like the school.

That's all I had to add over what I said in there, so...

Okay? Thank you very much.

MR. MARTINEZ: H-e-n-r-y, Henry. Martinez, M-a-r-t-i-n-e-z.

I understand that this is voted on by the people of Phoenix to get the 202. We were offered three different places where it could be put in. And as of June 2006, ADOT changed their mind. They didn't give us that fourth option, the option of today where it's at 59th Avenue. Because here it's at -- sorry --

1

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

2

55th Avenue, also 71st, and the 101. That was back before June 2006. So then it was changed, like I say, in October 2009, to go into the 59th Avenue. But you -- ADOT already bought all the land south of the I-10, because they didn't even put houses in it. They put a quota where there's no houses.

UNIDENTIFIED SPEAKER: On what street?

MR. MARTINEZ: Over on Broadway and Southern.

UNIDENTIFIED SPEAKER: Describe where our house is.

MR. MARTINEZ: Oh, where our house is, that's just too bad. We're the first house that gets taken down for the exit going south.

UNIDENTIFIED SPEAKER: From the I-10 to --

MR. MARTINEZ: Right.

UNIDENTIFIED SPEAKER: -- the transition to 59th.

MR. MARTINEZ: We live right here, this white area in there. So it's going to take our house away.

UNIDENTIFIED SPEAKER: The entire upper side of our block, our street, all the way to --

MR. MARTINEZ: The corner of 62nd Avenue and Belleview, B-e-l-l-e-v-i-e-w.

Code	Issue	Response
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

UNIDENTIFIED SPEAKER: Street.

MR. MARTINEZ: This here has already been bought out. Here you can see houses on both sides. None here, because they already bought it out. They already predetermined this. It wasn't like -- come in and tell us where we were wrong. It's already been done. It's a done deal.

So this, to me, is all a farce, because why would you buy all this land -- there's nothing in it, no houses -- and then say come over and we'll talk about maybe changing it? I don't think so. There ain't nothing they can do after they bought it. They're not going to sell it back to people that want to put houses there, because there's no builder that will do that.

Also, there -- nobody's ever come to talk to us or one on one or anything like that. I'm a single-dwelling owner. And they sent us this to come here.

UNIDENTIFIED SPEAKER: Through the mailman.

MR. MARTINEZ: Yeah, through the mailman.

UNIDENTIFIED SPEAKER: Just a little flier.

MR. MARTINEZ: And that's it. We -- we don't have to talk to anybody. We're both handicapped, on a fixed income. And in two years, prices are going to be up. No matter what you give us for our house, it's not

2

Code	Issue	Response

Code	Comment Document

2

going to be enough to buy a new one. So where will we go? What will we do?

3

And also, here, "ADOT Buying Some Houses in Freeway Path, Ahwatukee." Yeah. They make more money than I do or I ever did. Their houses cost more. But they're the ones that are getting the break. I don't understand that either. Nobody's ever talked to me. Nobody will ever return my calls when I asked about this.

And this was in the paper. I'm not making it up. But nobody talks to you about it. Nobody lets you know what options you have. So that's not right. It's not right. Why are the people that have $200 and 400,000 homes getting a break? I have a $80,000 home. Nobody's ever said anything.

So that's what I'm disappointed in. And that's why I'm here, trying to vent.

2

UNIDENTIFIED SPEAKER: And they can't tell us what kind of process there is when they do come to us and say, we're going to buy out your property. You know, what else is incurred in that? Is it moving expenses? What? You know, nobody's sent us an official letter to say --

MR. MARTINEZ: I --

UNIDENTIFIED SPEAKER: -- anything about what's really taking place and how it's going to work.

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Code	Issue	Response
3	**Environmental Justice/Lifestyle**	The Arizona Department of Transportation and Federal Highway Administration have engaged all population segments to ensure access to the environmental impact statement process. Assisted by this involvement, analytical results indicate the proposed action would provide net benefits to all populations in the Study Area in general by reducing traffic congestion, enhancing accessibility, and supporting local economic development plans.

Code	Comment Document

MR. MARTINEZ: And my disability and hers, we can't lift a couch. You know, we're going to have trouble moving our dining room set. We're going to have trouble moving, period.

UNIDENTIFIED SPEAKER: Boxes.

MR. MARTINEZ: We lived in that house for 26 years.

UNIDENTIFIED SPEAKER: Yeah. That was --

MR. MARTINEZ: So --

UNIDENTIFIED SPEAKER: -- going to be our forever house. And --

MR. MARTINEZ: Right.

UNIDENTIFIED SPEAKER: -- when we retired, we invested, you know, monies into fixing things that would last a long time that -- you know, air-conditioners, fencing, all those kind of improvements that we figured, you know, we're going to be here for a long time now, or hopefully a long time, and we would be investing our money into our property. And those things, we don't think they're going to, you know, compensate for fairly, because the market value is way down.

3

And we just are concerned that -- how are we going to find another place that we can afford?

MR. MARTINEZ: Right. Because like I say, in two or three years, housing market is going to be up

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again, you know. It's rising now. So if I sold today, I might possibly be able to get another loan, a double loan, to buy a new home, because the prices today are going up. And --

UNIDENTIFIED SPEAKER: But starting all over again.

MR. MARTINEZ: Right.

UNIDENTIFIED SPEAKER: And you know, the process of, you know --

MR. MARTINEZ: And --

UNIDENTIFIED SPEAKER: -- acquiring another home.

MR. MARTINEZ: Found out that in the housing market today, that investors are buying almost every home found on the market, and within two or three days, because they have the funds to do that. We don't. We have to go through financing and everything.

And then they say, well -- they don't want to hear about your problems. They said, just show me you can do it. And that's really hard. And if the market keeps going up, when you do buy our house, we won't be able to afford another one.

Also, another thing is, that meeting that we went to, the first one, we were only allowed to write down a sentence, a question. One question. I wrote down,

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Code	Issue	Response
4	**Public Involvement**	Public comments are a vital component in the decision-making process. Public comments have been solicited from project inception and through key milestones in the environmental impact statement process. The interests and needs of the public, along with all other social, economic, and environmental issues and impacts, must be fully analyzed and included in the Draft and Final Environmental Impact Statements. Comments made during development of the Draft Environmental Impact Statement have been used to adjust plans, explore new questions, or make changes—all within the scope of the National Environmental Policy Act. Public comments received on the Draft Environmental Impact Statement were reviewed and addressed in the Final Environmental Impact Statement. Public comments received on the Final Environmental Impact Statement will also be considered and addressed as appropriate. More information about the entire public involvement process up to publication of the Draft Environmental Impact Statement is available in Chapter 6, *Comments and Coordination*, of the Final Environmental Impact Statement.

Code	Comment Document

"What are you going to pay for our homes?" I was told fair market value at the date of acquisition. There is no fair market value in this market. And that's what irritates me the most.

If they had told me, here, we'll buy your house three years ago, I would have made out like a bandit. Everybody did. But no, not anymore. Now it's, you're going to lose big time. That's the market value. And to me it's just -- I'm venting, because I have nothing else. Nothing I can do.

UNIDENTIFIED SPEAKER: The thing is, is when they voted on it too, they had proposed places that they were going to put the lane -- you know, the exit lines. And then they -- so people voted on it, said, oh, yeah, that sounds fair, you know. These -- these are areas that are still out and not developed very much.

But then once they change it and move it in to, well, they're going to wipe out homes that are already established and that, that changes the whole picture. We didn't get to vote on that part, you know, as, you know, we've been told by other people that we should all -- everyone in the neighborhood should get a lawyer to represent us and -- you know. But most of the people that live in our neighborhood are probably immigrants or --

MR. MARTINEZ: Hispanic --

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Code	Issue	Response
5	**Public Involvement**	No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period. The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400.

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UNIDENTIFIED SPEAKER: Hispanic --
MR. MARTINEZ: -- illegals.
UNIDENTIFIED SPEAKER: -- illegals that have come --
MR. MARTINEZ: And they don't want to have nothing to do with a lawyer or coming, standing up for any rights or anything, because they'd be removed. I stand up, I go home.
UNIDENTIFIED SPEAKER: And --
MR. MARTINEZ: Well, we're stuck --
UNIDENTIFIED SPEAKER: -- those little girls' shoes that they send -- that the mailman drops off, they have like one little thing in Spanish. So they don't know what the heck's going on.
MR. MARTINEZ: Nobody on our street's here. Yeah.
UNIDENTIFIED SPEAKER: And there's at least --
MR. MARTINEZ: There's my house on the cul-de-sac. All right? I have a pool. It's been there a while. I should re-plaster it. But I'm not going to invest money to do that and have ADOT come and tear it down, you know. We wound up painting it. And that cost us $440 just to paint it. But it's something that has to be done rather than --

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UNIDENTIFIED SPEAKER: We don't know how far --

MR. MARTINEZ: -- $2,000 --

UNIDENTIFIED SPEAKER: -- to go with our maintenance, you know, of our property.

MR. MARTINEZ: -- $2,000 for re-plastering. So you know, like I say, I don't want to do anything on it. I don't even want to cut the grass. But still, we have enough pride to keep it green, you know, our house nice.

So it's just so disappointing that nothing was said before, you know, when they changed it back in -- what was it? -- 2009.

UNIDENTIFIED SPEAKER: And we did speak to --

MR. MARTINEZ: Yeah. And nobody told us till last year.

UNIDENTIFIED SPEAKER: We did speak to a councilman at the last meeting that we attended was at Cesar Chavez High School. And some of the concerns my husband had, he said, oh, yeah, call my office, and I'll respond to your questions. I'll talk to you, you know, tell your what your alternatives are, and you know, we'll see what we can do to help you.

We left -- called, left messages. He never

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returned our call, never made an effort. Didn't even send a note in the mail or -- or anything to that point, you know. So that doesn't really look good as far as trying to reach out to get --

MR. MARTINEZ: Yeah. Anybody we've talked to has not responded. No back contact.

There was even a reporter there from I think the Mesa Tribune, 'cause it was on the south side where the meeting was. And she gave me her card. She never responded, you know, to say anything about it.

But I'd like to know, is there anybody here in this building that I can talk to about this here? "ADOT Buying Some Houses in Freeway Path, Ahwatukee." I don't live in Ahwatukee. But still, I'd like to talk to somebody, tell -- have them tell me go to hell or, you know, forget it. You don't make enough money. You never did. Your house isn't worth anything.

2

UNIDENTIFIED SPEAKER: And we were -- heard that there's -- I mean, I heard that there was some type of hardship case -- I guess they would consider certain people, property, whatever. They don't specify what --

MR. MARTINEZ: Yeah.

UNIDENTIFIED SPEAKER: -- constitutes a hardship case.

MR. MARTINEZ: Well, here's a --

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UNIDENTIFIED SPEAKER: So --
MR. MARTINEZ: -- paragraph --
UNIDENTIFIED SPEAKER: -- who qualifies for that?
MR. MARTINEZ: -- "for homeowners who qualify, ADOT's hardship program is a financial godsend."
I don't think they ought to put God in there, because every time I think about ADOT, I put god in it too. And that's irritating.
Is there anybody that you know of here that --
UNIDENTIFIED SPEAKER: She probably doesn't know. She's just taking down our -- our gripes.
Even our mailman, he says that he's concerned, because he says that means his route -- because on that -- on the route, it's going to take out two apartment complexes also. So he says that all the houses that he services on our street all the way to 59th Avenue, which is maybe, what, a quarter of a mile, something like that, about 50 houses there, and then two sets of 350 tenants in the apartment buildings, those are going to be gone. So he says that his workload will be cut. And there's no way he can -- and that means cutting his hours and his income.
So you know, he was very concerned about it,

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and he doesn't even live there. So it's not that it just affects people on our street and...

I mean, we know that it's for the betterment of the whole community, but where they've placed it -- if anybody's driven down the I-10 west or come into Phoenix from the stack at the 101 on, they know it's gridlock, you know, in the mornings and late afternoons and stuff. So why not put it out farther before all that bogs down right there?

MR. MARTINEZ: They already --

UNIDENTIFIED SPEAKER: You know?

MR. MARTINEZ: -- bought the land for 59th.

UNIDENTIFIED SPEAKER: Well --

MR. MARTINEZ: This is --

UNIDENTIFIED SPEAKER: Put something else there.

MR. MARTINEZ: This is February 2010. And it shows where the -- it's going to go from -- this is 59th. And it's already showing that they already bought the land there. It's not like something new. And this is back in 2010.

UNIDENTIFIED SPEAKER: Supposedly they were just trying --

MR. MARTINEZ: Yeah.

UNIDENTIFIED SPEAKER: -- trying to still

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Code	Issue	Response

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6

get it settled with the --

MR. MARTINEZ: Why didn't they have this meeting back in 2009, when they were going to make up their minds and they did? You know, instead of having it three years later. Well, guess what? We're going to have a meeting. It's already -- the decision's already been made. So don't bother coming. And that's the feelings I have it.

And I thank you for listening to my rant and rave. I had to vent.

MR. GOULD: All right. I'm willing to give my name. Doesn't matter. My name is Dave Gould, G-o-u-l-d. I live on 2422 East Mountain Vista Drive, which is off 24th Street. If you get off Chandler and go down 24th, take a left immediately, I'm the fifth house in.

So now I'm -- I have a couple of real big issues. Got a lot of issues, really.

Coming from one of the cleanest states in the union to one that does not have good air control, as we all know, pollution control, because you're in this valley, it's just going to be even worse where we are. And the noise pollution, the air pollution from the diesel trucks is just amazing that will be coming.

Now, this gentleman over here with the

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Code	Issue	Response
6	**Public Involvement**	In November 2005, three 8-hour public meetings were held throughout the Study Area to obtain public input on the alternatives for the proposed freeway. During the meeting, people were able to review maps with aerial photography of the proposed alignments, speak one-on-one to the Arizona Department of Transportation Right-of-Way Group representatives and engineering and environmental staff, and attend a presentation and question-and-answer session (see page 6-14 of the Final Environmental Impact Statement). In February 2010, the Arizona Department of Transportation hosted a public information meeting at Sunridge Elementary School to discuss the shift from the W55 to the W59 Alternative. The purpose of this meeting was to inform area residents about the change that had been approved as part of the revised *Regional Transportation plan* (see page 6-21 of the Final Environmental Impact Statement).

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 4:58 PM
CALLER: JOHN MARTINSON	CALLER ADDRESS: 6038 NORTH 52ND PLACE, PARADISE VALLEY, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Thursday, May 23, 2013 1:49:16 PM

From: Dominic T. Mascia [mailto:Dtmascia@sundt.com]
Sent: Thursday, May 23, 2013 1:33 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I feel that moving forward with the 202 South Mountain Freeway would not only help create jobs but it would help reduce congestion. It not only gives interstate traffic an alternative to traveling through downtown but help reduce traffic on most of the other freeways in the system. By taking traffic off of arterial roadways will help reduce air pollution caused by idling vehicles and reducing trip times. By construction this roadway and giving the valley's freeway system more capacity it will also help draw business and residents to the valley.

The project has been approved by voters in Prop 400 and will help keep the local economy moving the in the right direction and create job. Please keep the project moving forward and help the valley to say a great place to live.

Thank you,

Dominic

SUNDT
Dominic T. Mascia, Employee Owner
Office: 480.293.3216
Fax: 480.293.3507
Cell: 602.206.9276
dtmascia@sundt.com
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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
05/15/13	9:19 AM
CALLER: GERALDINE MASK	CALLER ADDRESS: 4621 S. 19TH STREET, PHOENIX, AZ 85040
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I support the freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments on DEIS for proposed South Mountain Freeway
Date: Monday, July 22, 2013 8:40:33 AM

FYI

From: Patti Mason [mailto:pkm6@cox.net]
Sent: Saturday, July 20, 2013 5:52 PM
To: Projects
Cc: PARCtheSMF@aol.com
Subject: Comments on DEIS for proposed South Mountain Freeway

July 20, 2013

TO: South Mountain Study Team
Arizona Department of Transportation (ADOT)
1655 West Jackson Street, MD 126F
Phoenix, Arizona 85007
projects@azdot.gov

(1) As a citizen of Phoenix, a resident of Ahwatukee, a voter, and a member of Protecting Arizona Resources and Children (PARC), I am writing to state my opposition to the proposed expansion of Loop 202/South Mountain Freeway (SMF), and urge the ADOT to NOT BUILD on Pecos Road.

In the intervening years since the project was first approved in 1985, the community of Ahwatukee was allowed to grow and expand to become a thriving neighborhood in Phoenix, with excellent schools that attracts new residents, and a good place to raise families.

When the original funding and support for this project dissipated, the project should have been scrapped, and a new plan should have considered the growth of Maricopa County since 1985, with developments to the south such as Queen Creek. Pecos Road is no longer the southern extreme of the region, but rather one of three major avenues through Ahwatukee with schools, homes, and churches bordering it.

(2) (3) The transportation needs of Phoenix, given the rising pollution levels in this city with increased EPA warnings and rising costs of fuel, would be better served by the implementation of a north-south light rail. The EPA has previously said that federal transportation funds could be withheld if Arizona cannot meet acceptable air quality standards, determining that pollution spikes cannot be attributed to simply dust storms: "Arizona currently is not meeting the national standard for particulate matter, PM-10 (one-seventh the width of a human hair). Major concerns for human health from exposure to PM-10 include: effects on breathing and respiratory systems, damage to lung tissue, cancer, and premature death. The elderly, children, and people with chronic lung disease, influenza, or asthma, are especially sensitive." (*Phoenix Business Journal*, May 25, 2010). Add the (4) (5) (6) (7) blasting of South Mountain, the bedrock blasting on the E-1 "alternative" identified by the ADOT, in the construction of the freeway itself, and the subsequent vehicular pollution, and you have a recipe for increased health risks, health costs, decreased federal funding, and overall decrease in quality of life itself.

Moreover, "a 2008 study of Maricopa County by the Arizona Department of Environmental Quality and Arizona State University found a correlation between elevated amounts of particle pollution and asthma-related absences at nearby schools." (*Ahwatukee Foothill News*, February 18, 2010.) At least three schools are within 500 meters of the proposed freeway route on Pecos Road. Not only does the proximity of the proposed freeway to homes and schools create a health risk for schoolchildren and residents, but the nature of the topography in the community itself could affect how the air pollution generated from the (3) (8)

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).
3	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Health Effects**	
5	**Air Quality**	The contractor submits a written blasting plan to the Arizona Department of Transportation prior to beginning any blasting work. The Arizona Department of Transportation Resident Engineer then ensures that the contractor has followed all requirements for a blasting permit. Prior to blasting, the areas where rock fragments may fall is mapped to ensure there will be no property damage. Residents in the area are notified of any blasting activity (see Draft Environmental Impact Statement page 4-115). Blasting is avoided if standard earthmoving equipment can be used.
6	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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9	freeway stagnates between South Mountain and the Estrellas. The passage of Proposition 400 in 2004 for a Regional Transportation Plan was not a mandate to continue this ill-fated project. At the time of the vote, the advertising and messaging to the voters was largely about the light rail system. Voters approved the funding for new transit systems, improvements to existing roads, and construction of new freeways. But the Loop 202 extension was presented as under study with various alternative routes, and with alleged discussions with the Gila River Indian Community (GRIC). This citizen was informed, upon phoning the ADOT, when contemplating moving to Ahwatukee in 2002 that the proposed freeway project from 1985 would have to be re-envisioned if funding became available, given the growth of the community, and it was anticipated it would be relocated further south on land belonging to the GRIC. Only later, did I learn that at that time GRIC would not even allow their land to be surveyed or studied for this purpose. In retrospect, this seems to have been ADOT wishful thinking spoken as fact. As we are all aware, various negotiations did begin and stop with GRIC, and they have voted for a no-build option, an option not offered to the citizens of Phoenix in their advisory groups. Their opposition, like ours, reflect concerns not only about pollution but also destruction of ancestral and sacred land. While then Phoenix Mayor Gordon was on record (at the ADOT website) as lauding the infrastructure ensured by Prop 400's passage, he is also on record as saying that he did not support the Pecos Road alignment. (*Ahwatukee Foothill News*, March 9, 2007). There has never been a mandate for the construction of Loop 202 on Pecos Road, and yet, it continually is presented as the only possible route. Other alternatives such as the SR 85/I-8 truck bypass are dismissed in the Draft Environmental Impact Statement (DEIS) as not meeting "the proposed action purpose and need as a regional transportation network." This is a wanting explanation of its elimination from consideration; empty words to fill the pages. While the DEIS discounts the idea that the proposed South Mountain Freeway will be a truck bypass, or alternative to the Canamex route, there are no proposed restrictions to prevent trucks from Mexico, with high-sulfur diesel from choosing this route past schools and homes. There is also no serious discussion in the DEIS about hazardous waste accidents resulting from an accident on the proposed freeway. The layout of Ahwatukee itself – "the world's largest cul-de-sac" – means that any evacuation necessary would be difficult to execute. Will trucks carrying hazardous cargo be rerouted? There is certainly no discussion or plan for this contingency. This freeway will be destructive to the Ahwatukee community, to the sacred South Mountain (of the O'odham tribes) and the generally beloved South Mountain in the largest urban park nationally. It will be a financial disaster as well as an environmental one. MAG's insistence on building this boondoogle will result in the allocation of regional funds to purchase expensive homes in Ahwatukee for destruction and in costs to blast the mountain, with other projects going unfunded. The DEIS notes, in response to feedback for more light rail, that "no funds are available or anticipated to support a combined system through the Study Area." Despite the public's approval of a regional transit plan, the "plan" cannot consider light rail because it has allocated all of its funding toward implementing the outdated freeway. Not only alternative alignments, but alternative uses of transportation monies to meet the region's infrastructure needs have all been eliminated here in order to present this project as something that is inevitable. It is not. The impact will not only be this community—in terms of increased noise and air pollution, risks of greater environmental disasters with unregulated truck traffic, and loss of tax revenues with home, church, and business destruction, lowered property values of remaining homes, and increased crime—but have effects on the entire region. Those who voted for a regional transportation plan may have believed that other areas of the region would also be well served, as opposed to one area being ill-served. Solutions to the traffic congestion, for instance, in the Broadway Curve area, would be better found in engineering projects wisely addressed by civic planners than in a truck bypass in Ahwatukee. Not only would the community of Ahwatukee be blighted by the extension of 202, the entire region would suffer the consequences of this ill-spent allocation of the transportation funds. Taxpayer funding will be wasted, as ADOT and MAG continue to push for 25-year old plans to be implemented, with no forward-looking planning.
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Code	Issue	Response
7	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
8	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
9	**Alternatives**	Funding for continuing study of the proposed action was part of Proposition 400 and has resulted in the Final Environmental Impact Statement. Consideration has been given in this continuing study to alternative routes and to potential opportunities to site the South Mountain Freeway on Gila River Indian Community land. However, siting the proposed freeway on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
10	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Cultural Resources**	
12	**Alternatives, E1 Alternative**	
13	**Purpose and Need, Truck Bypass**	
14	**Trucks**	
15	**Hazardous Materials**	

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Code	Comment Document

23 Suggestion for a depressed freeway instead of an at-grade rolling profile to possibly reduce some of the noise and visual impacts were quickly dismissed, primarily due to cost factors. In other words, there is not sufficient funds to protect the neighborhood through improved engineering plans, to do the job right. The suggestion that there would be more residential displacements is not contrasted against whether the residents whose homes are saved to front an at-grade rolling freeway would perhaps have rather been spared this atrocity. And, the final piece of "logic" offered by the DEIS that even with a depressed freeway, there would still be visual and noise impacts that would require mitigation is not an argument for the rolling profile, but for a no build option!

24 The proposed rolling profile would limit the access necessarily, and one proposed elimination would be at 32nd Street. This would serve to increase traffic on Liberty Lane, already congested in school opening and closing hours, to enable transportation to these schools. The schools and houses "saved" by the cost-cutting measures for freeway construction would suffer greatly.

25 Conclusions drawn concerning "2035 traffic conditions" in the DEIS are based on faulty reasoning as well. To suggest that nonfreeway alternatives would "capture only a small percentage of the capacity deficiency" does not consider that the alternative could be the wiser use of scarce resources to fund light rail and other forms of transportation that do not rely upon the one person-one car formula now that congests our regions and ensures more and more air pollution advisories. Rather this argument can only envision a future that is exactly like the present, and the Loop 202 would just be another congested area to further depress the living quality for Phoenix. Surely, the creators and perpetrators of the 1985 plan will have moved on by 2035, and we can only hope that the civic planners in 2035 are not left with a terrible mess to try to rectify.

3 The No Action alternative is included in this DEIS, unlike in the Citizen's Advisory Group discussions, only because NEPA requires the comparison of alternatives. Again, the logic employed for assessing the impacts of No Action assume that No Action means only not building the freeway, and not the use of the funds for the freeway to be used for alternative means of transportation to meet future needs. The argument that other transportation planning might need to be reassessed if this plan is not implemented is a circular argument, in which one is being told that no action is "inconsistent" because MAG and ADOT intend to build this freeway. The No Action option, a misnomer that should be written as "No Build" does "not satisfy" MAG's and ADOT's needs to implement this out-of-date plan. We do not need this lengthy document to understand this much.

2 Similarly, in the discussion of the impact of the proposed freeway on the cultural and historical resources, while it is admitted that all build options will cause negative impacts, and the "No Action" alternative leaves these undisturbed, the DEIS is quick to point out that "continuing urban development from projected growth in the Study Area" could result in losses as well. That's like telling the jury in a murder trial that if a murder victim had not been killed by the defendant, he might have been hit by a car anyway trying to get away.

24 Although the DEIS has as ADOT's mission "to provide a safe, efficient, cost-effective transportation system that links Arizona to the global economy [Mexican truck traffic?], promotes economic prosperity, and *demonstrates a respect for Arizona's environment and quality of life*" [my italics added], this project to extend the Loop 202, the South Mountain Freeway, fails miserably on all counts. The demonstration of respect would be laughable, indeed, if it were not such a serious threat to the residents of this area.

11 16 Sincerely,

Patricia Mason

16833 S. 24th Place
Phoenix, AZ 85048

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Code	Issue	Response
16	**Section 4(f) and Section 6(f)**	
17	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
18	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
19	**Economics, Socioeconomics**	Table 4-23 on Final Environmental Impact Statement page 4-63 displays projected property tax impacts on the various affected jurisdictions from right-of-way acquisition and future land uses related to each of the action alternatives. Property tax impacts from implementing the W59 Alternative would be about twice those resulting from the E1 Alternative. The loss in annual City of Phoenix tax revenues from implementation of the E1 Alternative are discussed on page 4-54 and would, given all tax revenues for the City of Phoenix, "be nearly inconsequential."
20	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
21	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
22	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
23	**Design**	Depressing the proposed Pecos Road sections would entail installation of pump stations to drain the main line freeway. A depressed freeway would also need a drainage channel to capture the off-site flows to prevent their entering the freeway. Pump stations were not used because of the high cost of construction and maintenance needed for their operation. The preferred freeway configuration would have the E1 Alternative aboveground and the existing culverts extending to pass the drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Depressing the freeway in this area would eliminate the existing culvert crossings and potentially have adverse flooding impacts on adjacent properties. Extending the existing culverts or upsizing the culverts would maintain or improve drainage flows. This would ensure that there would be no adverse flooding impacts on adjacent properties. (See Draft Environmental Impact Statement pages 3-15 and 3-18.) To reduce impacts by depressing the proposed freeway in the Eastern Section, the Arizona Department of Transportation would: · need to spend an additional $400 million for right-of-way acquisition and construction · displace an additional 300 residences · maintain additional pump stations and detention basins for the life of the freeway · observe noise-related impacts requiring mitigation (i.e., noise barriers and their associated costs and visual impacts) Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study.
24	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
25	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments on DEIS for SMF
Date: Monday, July 22, 2013 8:49:15 AM

FYI

From: Hugh Mason [mailto:Hugh.Mason@asu.edu]
Sent: Sunday, July 21, 2013 1:44 PM
To: Projects
Cc: PARCtheSMF@aol.com
Subject: Comments on DEIS for SMF

Dear ADOT:

I am a citizen and resident of Phoenix and the Ahwatukee area, and Associate Professor at Arizona State University School of Life Sciences. I am writing to ADOT regarding its draft environmental impact study (DEIS) for the South Mountain freeway (SMF). I would like to register my strong opposition to the building of the SMF. I am a member of Protecting Arizona's Resources and Children (PARC), and fully support its efforts to prevent the building of SMF. I have great concerns about the DEIS, as presented below.

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One of my main concerns is that the DEIS greatly underestimates the impact of the SMF on the air quality for residents living nearby. The DEIS minimizes the potential pollution that will be caused by trucks burning diesel fuel, especially those coming from Mexico having fuel that is poorly regulated and high in contaminants like sulfur. The DEIS suggests that the "truck bypass" route on I-8 and SH-85 will be preferred by truckers. However, this route is substantially longer than the proposed SMF, and is thus unlikely to be viewed as economically feasible. Due to the geographic features along the E1 Pecos road corridor, concentration of the vehicle emissions is likely to compound toxicity issues in this area. The extreme proximity of several schools to the E1 route puts a huge number of children at risk of health problems due to air pollution.

7 8

The E1 route would require massive cuts in the ridges of South Mountain on the west side. This action is unfeasible for two main reasons. All of the Native American tribes in the area consider South Mountain to be sacred, and the proposed action would desecrate the land. Although that reason alone is enough to abandon the plan, another factor is more important to most of us: air quality. The blasting required for the SM ridge cuts (and other cuts along the E1 route) would generate huge amounts of airborne particulate matter. The fine dust generated by construction (especially PM10 particles that can be inhaled deeply) will produce respiratory problems for people in the area. Moreover, it will threaten federal funds for transportation that require control of air quality. Maricopa County has had great difficulty maintaining PM10 standards, and the construction of the SMF would certainly make it more difficult, if not impossible.

9 10 6

11

The DEIS makes dire predictions for adverse effects on the regional economy if the

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Purpose and Need, Truck Bypass**	
4	**Alternatives**	Choosing to travel on the proposed freeway versus Interstate 10 would not produce substantial travel time benefits. Therefore, it is expected that "true" through truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
5	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
6	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Section 4(f) and Section 6(f)**	
8	**Cultural Resources**	
9	**Construction**	The contractor submits a written blasting plan to the Arizona Department of Transportation prior to beginning any blasting work. The Arizona Department of Transportation Resident Engineer then ensures that the contractor has followed all requirements for a blasting permit. Prior to blasting, the areas where rock fragments may fall is mapped to ensure there will be no property damage. Residents in the area are notified of any blasting activity (see Draft Environmental Impact Statement page 4-115). Blasting is avoided if standard earthmoving equipment can be used.

(Responses continue on next page)

Code	Comment Document
12	"no action" option is chosen. However, we must remember that the SMF plan was first proposed more than 25 years ago, when fuel was relatively cheap and few people saw any problem with continuation of the freeway transportation paradigm. Data on climate change and greenhouse gases in the atmosphere have steadily accumulated over the years, to the point that it is obvious that we need a transportation paradigm shift in order to address the problems we face. We must reallocate most of our resources away from freeway construction and invest them in technologies that will minimize adverse environmental effects. I strongly advocate light rail expansion throughout the valley. Thus, not building the SMF should not be called "no action", because there are other actions that can be funded with the resources.
13	I strongly urge the ADOT to abandon the SMF plan and intensify studies of other transportation options that are more environmentally friendly. Sincerely, Hugh S. Mason

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Code	Issue	Response
10	**Safety and Health**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
11	**Economics, Socioeconomics**	From the Draft Environmental Impact Statement, page 4-57: "Depending on which action alternative might be implemented—if any—travel time savings estimated through 2035 would range from $3 billion to $3.3 billion (in 2010 dollars); furthermore, approximately 15 million hours of travel time would be saved annually. Conversely, under the No-Action Alternative, substantial travel time savings in hours and dollars would not be realized." Property tax revenues retained by not converting existing land uses to a transportation use would be nearly inconsequential for a city the size of Phoenix. (Table 4-23 on Final Environmental Impact Statement page 4-63 displays projected property tax impacts on the various affected jurisdictions from right-of-way acquisition and future land uses related to each of the action alternatives. Property tax impacts from implementing the W59 Alternative would be about twice those resulting from the E1 Alternative. The loss in annual City of Phoenix tax revenues from implementation of the E1 Alternative are discussed on page 4-54 and would, given all tax revenues for the City of Phoenix, "be nearly inconsequential.")

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
12	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].
13	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 15, 2013 3:14:06 PM
Attachments: image003.png

From: Alisa E. Master [mailto:aemaster@sundt.com]
Sent: Wednesday, May 15, 2013 3:00 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Please keep improving transportation infrastructure in Phoenix metropolitan area to help alleviate the national-joke-traffic-congestion in the Baked Apple!

Alisa Master, Employee Owner
Sundt Construction, Inc.
Office: 520.750.4651
Fax: 520.750.4414
Mobile: 520.237.2325
aemaster@sundt.com
Please consider the environment before printing documents.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Johnnie Mata Document Created: 6/20/2013 9:04:43 AM by Web Comment Form This freeway is a must build section of roadway. It would help with the traffic in the downtown area. We have waited to long to get this project started.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202
Date: Wednesday, May 22, 2013 10:53:40 AM

From: Tom and Sharon Mattern [mailto:azmattern@cox.net]
Sent: Tuesday, May 21, 2013 4:31 AM
To: Projects
Subject: Loop 202

I would like to comment on Loop 202.
I live in Ahwatukee and use the trails on South Mountain frequently.
It would be tragic for Phoenix to ruin the largest city park in the country.
There is no reason to use Pecos road when Riggs road is a better solution.
The mountain would not be affected if Riggs was used thus drastically reducing the environmental impact to our city. Government is suppose to protect our open spaces not run freeways through them.
Many groups such as the girl and boy scouts use South Mountain as a valued open space which gives us a place for our younger population to experience nature and learn how to protect it. It would be a disgrace if the city of Phoenix destroys the park.
Why isn't there a feasibility study on using Riggs road?
Should it not be an obligation of the city to do this feasibility before destroying a city park?
Is the city not obligated to maintain the park for the future use of its citizens?
When the park was dedicated do you think the people that worked so hard to preserve that space wanted it used as a highway?
PLEASE STOP THE EXPANSION OF LOOP 202 onto Pecos Road.
Move the highway to Riggs Road.
Please provide me with confirmation that you received my email.

Sharon Mattern
12618 South 38th Street
Phoenix, AZ 85044

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
3	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

5011

1 MS. MATTERN: This is Sharon Mattern and
2 I just don't want to see the park destroyed. It's
3 used by the Boy Scouts and the Girl Scouts and many
4 other groups, Indian guides and the apprentice
5 movement, and it's one of the largest city parks in
6 the nation and I would really like it not to be
7 destroyed with the highway cutting right through it
8 or to the side of it or to the bottom of it.
9 I think Riggs Road should be relooked at
10 as an alternative. The road already goes to 51st
11 Avenue. It would be a better alternative for
12 everyone.
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Page 25

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www.drivernix.com

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Proposed 202
Date: Tuesday, May 14, 2013 9:35:56 AM

From: Jen Matthews [mailto:jengal2116@yahoo.com]
Sent: Monday, May 13, 2013 7:55 PM
To: Projects
Subject: Proposed 202

ADOT,

1 2 3 4 5

Please take a serious moment to consider how our children will be effected by the proposed 202. I fear the possible threats of spills from large transportation trucks could cause serious health issues. The pollution will take away from the beautiful South Mountain that we enjoy taking bike rides, hikes and walks on many days and nights a week. Its a real shame for my husband and I to even contemplate that we will have to uproot our family and the home we've loved and made memories in because of the drastic landscape change that will leave nothing behind to be desired. Ahwatukee will see a huge decline in home ownership and small businesses. There is more to this freeway than meets the eye.

Jen Matthews
Phoenix home owner

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Code	Issue	Response
1	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Health Effects**	
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
5	**Economics, Socioeconomics**	There is no evidence that the proposed facility would cause people to leave the area. The regions' benefits would remain, and improved access to residences and businesses would make them more desirable.

Code	Comment Document

Jen Matthews

Document Created: 6/13/2013 2:00:17 PM by Web Comment Form

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I am writing in regards to the proposed 202. I fear the possible threats of spills from large transportation trucks could cause serious health issues. The pollution will take away from the beautiful South Mountain that we enjoy taking bike rides, hikes and walks on many days and nights a week. No to mention the health of my family. Its a real shame for my husband and I to even contemplate that we will have to uproot our family and the home we've loved and made memories in because of the drastic landscape change that will leave nothing behind to be desired. Ahwatukee will see a huge decline in home ownership and small businesses. There is more to this freeway than meets the eye. I hope ADOT can see that the freeway is apposed due to the allignment on Pecos road and if it was moved closer to Riggs, it would be a no brainer.

Code	Issue	Response
1	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Health Effects**	
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
5	**Economics, Socioeconomics**	There is no evidence that the proposed facility would cause people to leave the area. The regions' benefits would remain, and improved access to residences and businesses would make them more desirable.
6	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
7	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Jen Matthews
16654 S. 27th Drive
Phoenix, AZ 85045

June 10, 2013

ADOT Loop 202 South
Mountain Freeway Study
1655 W. Jackson Street
MD 126F
Phoenix, AZ 85007

Dear ADOT or To Whom It May Concern:

1 2 3 4 5 6 7 8 6 9

I am writing in regards to the proposed 202. I really fear the possible threats of spills from
large transportation trucks (especially those coming from Mexico that do not abide to the low sulfur diesel) could cause serious health issues. The quality of air that my family will breath will take a dramatic fall and sacrifice our health on a constant, daily basis. The pollution will take away from the beautiful South Mountain that we enjoy taking bike rides and walks on many days and nights a week. It's a real shame for my husband and me to even contemplate that we will have to uproot our family and the home we've loved and made memories in because of the drastic landscape change that will leave nothing behind to be desired. Ahwatukee will see a huge decline in home ownership and small businesses. I also fear that the community and schools will be exposed to more common areas (South Phoenix) and our crime rates will inevitably grow. One of the reasons we purchased a home in Ahwatukee was the seclusion, low crime and community feel. This too, will be dramatically different. There is more to this freeway than meets the eye. I hope ADOT can see that the freeway is opposed due to the alignment on Pecos road.

Sincerely,

Jen Matthews
concerned homeowner

Code	Issue	Response
1	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	
3	**Trucks**	
4	**Health Effects**	
5	**Air Quality**	
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Economics, Socioeconomics**	There is no evidence that the proposed facility would cause people to leave the area. The regions' benefits would remain, and improved access to residences and businesses would make them more desirable.
8	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
9	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Claude Mattox Document Created: 5/21/2013 5:24:14 PM by Web Comment Form This freeway segment was part of the original 1985 Freeway proposal that was approved by the voters of Maricopa County. Due economic pressures and political favors the process we are now experiencing has been delayed. This freeway needed to be built twentty years ago, as everyone expected. The quagmire now has to do with a lack of political will to move forward. It is not about one community of Phoenix, nor about the adjacent Gila River community, it is about the entire transportation system of Maricopa County and all the residents of the county. As we voted in 1985, this freeway needs to be built to save time, fuel and to accomodate the future growth the valley and this area will continue to experience.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 freeway
Date: Monday, May 20, 2013 8:22:06 AM

-----Original Message-----
From: Del May [mailto:del4mc@aol.com]
Sent: Monday, May 20, 2013 6:22 AM
To: Projects
Subject: Loop 202 freeway

1

Please build the loop 202 extension through the South Mountain region. While I no longer need to commute to work via I-10, the community really needs this highway.

Thank you
Delbert May
Sent from my iPad

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Monday, May 20, 2013 8:26:48 AM

From: deborah mayfield [mailto:sweetd_31315@yahoo.com]
Sent: Saturday, May 18, 2013 8:25 PM
To: Projects
Subject:

1

We need to have the 202 freeway built here in South Phoenix. Sine I have lived here I noticed that there has been no effort put into this community unlike Chandler, Mesa and Gilbert. What is the problem...

Deborah

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 3:27 PM
CALLER: ROBERT MCATEE	CALLER ADDRESS: 4327 E. CHOLLA STREET, PHOENIX, ARIZONA
PHONE: 602-368-9323	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I do support the freeway. I think it would sure help the congestion on the existing I-10 West and serve everybody well and also help the local economy. You can confirm this if you like by calling me. Thank you very much. Goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4207

add additional comments, in the very next room to my right are court reporters. You are welcome to go and provide any and all comment that you want in that process as well. This is for an open comment. It is not a Q&A with the panel. They are here to listen to your comments, but they are indeed comments.

So at this point, we'd like to go ahead and get started. And we have one pre-registered person who has arrived, and that person is Maxine Lakin.

MS. McCARDY: No, I'm first.

THE FACILITATOR: I'm sorry. Joanne McCardy will go first. And as you see your name in the queue, you're welcome to come up to each microphone, so we'll get started.

So, Joanne, if you would like to get started, please.

MS. McCARDY: While I can't present a video, I would like to do an audio. (Audio of sirens being played.) This is the sound of first responders trying to get to the scene of an overturned tanker along the Pecos truck bypass involving four students on the way to school. It's also the sound of the fire trucks trying desperately to get to a home that's burning, but can't because it's stuck in

1
2

Page 4

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	

Code	Comment Document

traffic. That's the sound of emergency personnel trying to get to a 911 call, but can't due to traffic.

The sound of truck bypass will go through your homes, your child's bus stops, schools, all these are being diverted off the truck route due to the congestion of an accident. Do you smell that? You can't now, but oh, you will, the toxic fumes left behind by trucks idling on roadways during an accident, or just morning congestion trying to merge onto another interstate. Let me remind you that the "I" in I-10 stands for "interstate." If you stand on the overpass at the I-10 and Chandler Boulevard, you will see a constant flow of trucks traveling to and from Mexico and California.

I have here a VHS tape and an eight-track tape. Do you remember back about 25, 30 years ago, when these were used? Do you still use them today? Do you still have the devices that play these? Do you remember when the State had this crazy idea about building a truck bypass along the Pecos Road alignment about that same time? Well, let me tell you what's happened in that time since that idea. A beautiful community was formed, houses and churches were built. Some people call it, at least the tax

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Trucks**	

Code	Comment Document

collectors call it "Phoenix," but the people of Ahwatukee call it "Ahwatukee," house of your dreams. My question is now, over 30 years since this crazy idea was proposed, do you want to destroy houses and crush people's dreams? Why hasn't anyone in the 30 years come up with a better solution? Why isn't State Route 86, which connects to the 8 and then to the I-10, being considered as an alternate route? This truck route will have an increasing crime rate in the area, and that's a given fact.

If you think the government was negligent in helping the banks instead of the people in tanking property values in 2008, wait, you haven't seen what's going to happen if Arizona representatives are ready to flush their real estate values down the toilet. We can rename it "Ahwatoilet" and "Latrine," because both of these places will be worthless places to live if this truck bypass is built.

In closing, my heartfelt prayers go out to the citizens of Oklahoma who were devastated by the tornados yesterday. The federal government should be allocating funds like rebuilding communities like that. The State of Arizona should be ashamed and embarrassed to take money from the federal government to build what they consider truck

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Code	Issue	Response
6	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
7	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the Route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
8	**Neighborhoods/ Acquisitions**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
9	**Acquisitions and Relocations**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

10
5

routes. If you stand here and tell me that the plan all along, and the State knowingly and willingly let these houses and churches be built so it can collect taxes, in the meantime, all knowing that you're going to take federal government money and to use this, shame on you.

Let's just say someone had an idea 30 years ago, it wasn't created, and no one longer wanted it. In fact, something has already been in its place and it's called a community

THE FACILITATOR: Excuse me, Ms. McCardy, you've gone through the three-minute time period.

MS. McCARDY: I have 22 seconds.

THE FACILITATOR: No, you've gone over.

MS. McCARDY: Oh, it's going up? One last thing. I urge you to find another solution and talk of this as a mistake of your predecessors by not acting on it 30 years ago like they should have.

THE FACILITATOR: Thank you, Ms. McCardy. Is Maxine Lakin here?

MS. LAKIN: Yes.

THE FACILITATOR: Did I pronounce the name properly?

MS. LAKIN: Yes.

THE FACILITATOR: Thank you.

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www.drivernix.com

Code	Issue	Response
10	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/14/13	INCOMING CALL TIME: 2:16 PM
CALLER: STAN MCCARTEE	CALLER ADDRESS: 2709 N. NEBRASKA STREET, CHANDLER, AZ 85225
PHONE: 480-892-7708	EMAIL:
CALLER REMARKS/QUESTIONS: Hi. I do support the South Mountain Freeway. Thank you. Goodbye.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 1:53 PM
CALLER: DEBORAH MCCARTHY	CALLER ADDRESS: 16235 N. 162ND AVE., SURPRISE, ARIZONA
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I'm in favor of the South Mountain freeway project.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Corey McCarthy
To: Projects
Subject: Loop 202 DEIS Comment
Date: Tuesday, July 23, 2013 8:21:50 PM

AZDOT,

I believe the Loop 202 has far reaching consequences beyond that of just the DEIS. While the DEIS addresses the issues of air quality, wildlife, and noise pollution it seems to fall short in addressing the issues it will cause in the surrounding community. I have recently moved to the Phoenix area, in particular, Ahwatukee because I received several recommendations. I chose this area because it was supposedly one of the best in the valley. I am DEEPLY REGRETFUL that I have chosen to live in PHOENIX. I plan to move from the area as soon as practical due to this project.

C. McCarthy

1

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

1 JOANN MCCARTY: The one thing I did want to
2 mention was, regarding Proposition 400 -- and the
3 officials constantly say, back in 2004, Proposition 400
4 was voted in for this freeway. However, Proposition 400
5 included the extinction of the light rail, it included
6 regional bus routes, it included new dial-a-ride buses
7 and stops and it included improved bus stops, including
8 pull-out shelters.
9 It was not necessarily the freeway or truck bypass on
10 route 202 for the continuation of that proposed loop, as
11 it is a 30-year old idea that should never be built.
12
13 DANIELLE SPRING: I'm a part of the community
14 river of the Gila community. I live in District 6 in
15 the village of co-op. I live on 67th Avenue and
16 Elliot and I am appalled by the loop 202 extinction
17 being pursued through the South Mountain. I don't
18 believe the EIS has proper address on this freeway. I
19 don't even see that they are acknowledged as living
20 there, even though we have lived there for thousands and
21 thousands of years before Christ was born -- our people
22 have lived there.
23 We are not a tribe that was relocated though the
24 "Trail of Tears" or anything like that. We have always
25 lived here. We were created here. We have always been

Code	Issue	Response
1	**Alternatives**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
2	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

Am very concerned about the proposed loss of agriculture. As a 3rd Generation AZ, growing up with cotton
Citrus
Cattle
where are these industries going to be replaced. This loss of industry must all be considered in long-term economic impact. We are losing our diversity.

Optional

Name M MEhesney Email Marventura1@aol.com

Address 625 N 11th Ave

City Phx State AZ Zip 85007

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Agriculture**	Congress enacted the Farmland Protection Policy Act to minimize the extent to which federal programs contribute to unnecessary and irreversible conversion of farmland to nonagricultural uses and to ensure that federal programs are administered in a manner that, to the extent practicable, is compatible with State and local governments and with private programs and policies to protect farmland. The environmental impact statement process has adhered to the stipulation set forth in this Act. Urbanization in the Maricopa Association of Governments region has been occurring for years and will continue to do so with or without the proposed freeway (compare Final Environmental Impact Statement Table 4-2, on page 4-3, with Table 4-4, on page 4-7; see also Final Environmental Impact Statement page 4-161). For instance, much of the land along the Preferred Alternative in the Western Section is already slated for commercial and industrial uses.

Code	Comment Document
1	JAMES MCDANIEL Document Created: 6/21/2013 12:55:36 PM by Web Comment Form "NO" ON THE 202 EXTENSION Please add me to the tally of people who DO NOT want the 202 extension to be built. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO Loop 202 through Ahwatukee
Date: Friday, June 21, 2013 11:23:24 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Jim McDaniel [mailto:jimmcd_az@yahoo.com]
Sent: Friday, June 21, 2013 10:43 AM
To: Projects
Subject: NO Loop 202 through Ahwatukee

1 2 3

I am sending this email to indicate to whomever is involved in making the possible extension of the 202 aware that I am another "NO" vote.
For a myriad of reasons (e.g. noise pollution, air pollution, destruction of part of South Mountain), I am strongly against running a freeway though Ahwatukee.
Please add my name to the tally of those opposed to the freeway extension.
Thank you,
Jim McDaniel

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Code	Issue	Response
1	Noise	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	Air Quality	
3	Section 4(f) and Section 6(f)	

Code	Comment Document

From: Sierra Club on behalf of Ann Mcdermott
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, June 05, 2013 1:49:13 PM

Jun 5, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 Please maintain the integrity of South Mountain Park.

Sincerely,

Ms. Ann Mcdermott
261 W Maya Dr
Litchfield Park, AZ 85340-4653
(623) 584-3088

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Freeway route
Date: Friday, May 10, 2013 10:10:37 AM

From: Evelyn McDonald [mailto:emcdonald613@q.com]
Sent: Friday, May 10, 2013 10:00 AM
To: Projects
Subject: Freeway route

1

When this freeway was 1st planned the west valley was not as built up as it is today. Using old plans it not realistic as this was done with the I-17 and look at the mess it has turned out to be. You want to dump 140,00 cars as day into the busiest part of I-10 west. You will be creating the same nightmare the I-10 has at the Tempe curve or the I-10, I-60 interchange had. This freeway should not to connect prior to the 101. The 303 would be even better if the real intent is to move the traffic around Phoenix and the busy spots of the valley. Someone need to check out the fast growing southwest valley.

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 11:01 AM
CALLER: RONALD DAVID MCDONALD	CALLER ADDRESS: 4140 NO 78TH STREET, APT. 2229, SCOTTSDALE, AZ 85251
PHONE: 480-948-9626	EMAIL:

CALLER REMARKS/QUESTIONS:

I want to leave a comment about the EIS Environmental Study draft on the South Mountain Freeway. I am very much in favor of the west 101 Alternative because of the continuity with the freeway system. I think this is extremely important and West 101 Alternative makes sense. I've spent over 4 decades working in transportation planning up and down the west coast and here in Phoenix and so I would very much like to have my informed opinion expressed in favor of the West 101 Alternative. Thank you so much for taking my comment. Thank you for taking this message. I hope the comment is meaningful and accepted by you. Goodbye.

1

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, April 30, 2013 8:53:43 AM

From: Jim McDuffie [mailto:jim.mcduffie@hotmail.com]
Sent: Friday, April 26, 2013 3:10 PM
To: Projects
Subject: South Mountain Freeway

Dear AZDOT;

1 I am FOR the South Mountain Freeway project. I want to see it go forward. I live in Laveen and feel the freeway would be good for Laveen and good for the State.

Jim McDuffie
6026390640
5612 West Euclid Ave
Laveen

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

JAMES MCDUFFIE: I am all for the new freeway. I really want to see it going forward, and the sooner the better.

* * * *

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 South Mountain.
Date: Monday, May 20, 2013 8:41:50 AM

From: Randall McGaugh [mailto:randallmcgaugh@aol.com]
Sent: Friday, May 17, 2013 7:17 PM
To: Projects
Subject: 202 South Mountain.

1

I travel through central Phoenix each day I go to work. With traffic flowing I can make my trip in about 40 minutes.(early morning hours) I believe the 202 South Mountain freeway will allow that commute during heavy traffic instead of the 60 minutes of stop and go traffic. (5 PM) I also believe that will eliminate many accidents that occur in heavy traffic. There is so much traffic that flows between the stack and the mini stack that eliminating any traffic from downtown will be a good decision. I know there are many concerns about building this extension. I thank you for you efforts to move this project forward.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Amanda McGennis

Document Created: 5/21/2013 8:35:29 PM by Web Comment Form

Jobs, Jobs, Jobs... Its what the region needs and what the Loop 202 South Mountain Freeway can deliver if given the green light to proceed. Unemployment in Arizona has remained unchanged for the last 3 months and stagnant for the last 3 years. Building the Loop 202 South Mountain Freeway will create approximately 30,000 new jobs, generate 2 billion dollars in local goods and services throughout the life of the project breathing new life into a region that has been slow to come back after the recession.

The Loop 202 South Mountain Freeway will provide congestion relief, reduce travel times across the valley and assist in improving the overall air quality of the region.

1

It has been voter approved twice, once in 1985 and again in 2004. Its time to start building and stop talking about it.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop[202 South Mt
Date: Monday, May 20, 2013 8:27:08 AM

From: Robert McGinnis [mailto:rmcginnis2002@yahoo.com]
Sent: Saturday, May 18, 2013 8:05 PM
To: Projects
Subject: Loop[202 South Mt

1

Folks
I want to add my voice to those in support of the 202 South Mt bypass. Phoenix should be a friendly place for those who come to stay or visit, as well as those passing thru. This addition to our freeway system will help both.
Thanks
Robert McGinnis
Chandler, AZ

Bob McGinnis: rmcginnis2002@yahoo.com

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

From: Patrick McGrath
To: Projects
Subject: South Mountain Freeway
Date: Sunday, May 26, 2013 10:54:50 AM

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i live just off Pecos and 40th Street, across from the Park and Ride. I am in favor of the freeway being built, and I wish you would get moving on it. I lived in Tucson until 2001, when I came to Ahwatukee. Tucson has in my opinion the worst system of getting around town as any I've lived in, and that includes most of my life in Chicago. One of the reasons is that although they wanted growth, and tried consistently to lure businesses there, they go on and on about protecting the desert, and don't want the traffic, blah blah blah. So here they are with one freeway that skirts one end of town. If you want to get across town, you have to drive their terribly crowded surface streets. They are an embarrassment to midsize to large metropolitan areas.

I say build the freeway where it's the most economical. Do your best to make it look nice. Put a nice big sound wall up alongside it, but get it done. We need the benefits it will bring. Yes, there will be some downside to the aesthetics of our neighborhood, but if we allow growth without a decent way to get around we'll end up just like Tucson.

Patrick McGrath

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 2:55 PM
CALLER: BARBARA MCGRATH	CALLER ADDRESS: 12027 S. 46TH STREET, PHOENIX, AZ 85044
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I would like to leave a message that I am in support of the South Mountain Freeway. We need that freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Kimberlyn McGreall
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 1:14:12 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

We don't need another freeway!

(2) (3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including a HIGH SPEED RAIL between Tucson and Phoenix.

The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(2) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mrs. Kimberlyn McGreall

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	3435 E Arroyo Chico Tucson, AZ 85716-5814 (520) 299-5521

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:38 PM
CALLER: TOM MCCAY	CALLER ADDRESS: 9406 E. SUNRIDGE DRIVE, SUN LAKES, AZ 85248
PHONE: 480-802-4379	EMAIL:
CALLER REMARKS/QUESTIONS: Please register my vote for the South Mountain Freeway project. Thanks.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Roger Mckee
To: Projects
Subject: Comment in Support of South Mountain Freeway
Date: Monday, May 27, 2013 10:15:38 AM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

This freeeway should have been built twenty years ago,
Traffic on Interstate 10 between the two points where the South Mountiain Freeway will intersect it is extremely heavy, with congestion, accidents, and air pollution from cars moving slowly and inefficiently along the I-10.

The new freeway will reduce air pollution and traffic congestion, and will ultimately improve the quality of life with shorter drive times.

The Sierra Club and some other groups opposing the freeway would like to eliminate freeways and roads and go back to the "greener days" of horseback and bicycles.

WE have wasted millions "studying" the need for an impact of the freeway, while anyone who understands transportation or urban planning can tell you we need this transportation corridor yesterday!

Sincerely,

Mr. Roger Mckee
6542 N 7th Ave
Unit 29
Phoenix, AZ 85013-1154
(602) 864-3369

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Sierra Club on behalf of Ross Mckenzie
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, June 12, 2013 3:07:10 AM

Jun 12, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to

3 effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more

5 vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a

7 freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Ross Mckenzie
3298 E Foothills Dr
Apt C
Sierra Vista, AZ 85635-4289

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: PRO 202
Date: Wednesday, May 22, 2013 10:54:01 AM

From: McKinley, Staci [mailto:Staci.McKinley@usairways.com]
Sent: Tuesday, May 21, 2013 10:13 AM
To: Projects
Subject: PRO 202

1

I am pro 202 (and extending the light rail to {at least} 27th Ave ☺)!

Staci McKinley
Sr. Analyst, Sales and Marketing Finance
US Airways

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO on South Mountain 202 Freeway!
Date: Wednesday, May 22, 2013 10:54:33 AM

-----Original Message-----
From: Karen McMaster [mailto:ksminphx@aol.com]
Sent: Monday, May 20, 2013 7:34 PM
To: Projects
Subject: NO on South Mountain 202 Freeway!

1 2 3 4 5 6 7 8

As an Ahwatukee resident for 22 years, we have known about the possibility this freeway could be built but are definately opposed to the construction of the South Mountain 202 freeway along the Pecos alignment. We currently have good air quality and all the truck traffic will pollute our clean air and hazardous materials will be transported past our community. A grade school will back up to the freeway where children will be playing and breathing the air. Not to mention the church and hundreds of homes that will be torn down thus the loss of property taxes. Ahwatukee Foothills is already a big cul de sac and if construction of this freeway commences, it will cripple the community with the loss of Pecos as a route out of the community.

We recommend this freeway NOT be built at all.
Thank you.

Sent from my iPad

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Hazardous Materials**	
4	**Health Effects**	
5	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Economics, Socioeconomics**	Table 4-23 on Final Environmental Impact Statement page 4-63 displays projected property tax impacts on the various affected jurisdictions from right-of-way acquisition and future land uses related to each of the action alternatives. Property tax impacts from implementing the W59 Alternative would be about twice those resulting from the E1 Alternative. The loss in annual City of Phoenix tax revenues from implementation of the E1 Alternative are discussed on page 4-54 and would, given all tax revenues for the City of Phoenix, "be nearly inconsequential."
8	**Traffic**	The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 3:58 PM
CALLER: MARY MCMENEMY	CALLER ADDRESS: 1704 W. HARVARD AVENUE, GILBERT, AZ 85233
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Larry McMillan
To: Projects
Subject: Suggestion gor the 202 West Freeway
Date: Tuesday, June 04, 2013 6:54:43 PM

Greetings,

Suggesting—

1 Taking the present S. 101 Freeway from the connection point with the S. 202 (at Pecos Rd)---Continue the 101, along Price, - South---angling South-West using open lands to the Riggs Road and then along Riggs Rd (west) across Hwy 10 (at Riggs Rd.)—Continuing West along Riggs Rd. to the Estrella Mountains, in the South Levine, AZ area----Tunnel West through the Estrella Mountains to the West Side and Continue (NW) Along the Estrella Mountains Northward to connect with the present 303 at Hwy 10.

This would Route a good share of the East-West Trucking Traffic as well as Traffic period--- from the South and West-- and Bypass Phoenix connecting to Hwy 10 at the Riggs Rd Exit area and or the western 303 areas.

This would take care of the Sun Lakes Areas, Southern Chandler, Gilbert and any traffic that would want to connect to the West side of Phoenix or Bypass if wanted.

It would eliminate the costly inhabited areas that are now settled between the South Mountain and the Estrella Mountains and also eliminate the already overcrowded traffic problems from downtown Phoenix to the 303 areas.

A costly Tunnel, of course, but the Job creation, etc. and etc. could be offset with a "Toll Road" suggestion---

I believe Phoenix already has a company that provides Tunnel Boring Equipment?

2 The Indian Land would have to be of concern, but here again the Benefits to

Code	Issue	Response
1	**Alternatives**	The alternative suggested in the comment would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Most of the alternative suggested in the comment would be located on Gila River Indian Community land. The Gila River Indian Community has not given permission to study in detail an alternatives on its land. Therefore, tribal sovereignty must be considered. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process. Tunnelling through the Sierra Estrella would result in significant impacts and the cost would be of an extraordinary magnitude. For similar reasons as identified for the Riggs Road Alternative and the Interstate 10/State Route 85 Alternatives, the suggested alternative would not meet the purpose and need for the proposed action (see page 3-9 of the Final Environmental Impact Statement). For all of the reasons above, the suggested alternative would be eliminated from further study.
2	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

"Everyone" could be a factor?

Many mixed feelings with the proposals so far and I'm sure also here as well, but maybe worth the "thought"?

Thanks for the consideration and Much Hope for us All

Sincerely,

Larry McMillan
480-7256-0906
Or E-mail at Lmcmillan6@cox.net

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Tuesday, July 16, 2013 10:41:21 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Deborah McMillion [mailto:deborah@hotelmidnight.com]
Sent: Tuesday, July 16, 2013 10:36 AM
To: Projects
Subject: Loop 202 South Mountain Freeway

Comment on the Draft EIS and Preferred Alternative selection

1 2

I would hope that the idea of chopping off the end of the South Mountain Preserve would be so onerous that no one would sanction it. There is a better solution to leaving that as our legacy. That a freeway is more important than the value of having that left intact. It is not just the Gila River Indian Community, it is all who live here, who moved here to be near that view and who honor preserving it that way.

Thank you,
Deborah McMillion
homeowner in Ahwatukee for 25 years/Arizona for 54 years.

3524 E. Verbena Drive
Phoenix 85044

_____

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/14/13	INCOMING CALL TIME: 10:27 AM
CALLER: CYNTHIA MCNALLY	CALLER ADDRESS: 7817 W. ENCINAS LANE, PHOENIX, AZ 85043
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
My husband and I support the freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Andrew McNeish Document Created: 7/21/2013 10:34:44 PM by Web Comment Form I am a concerned Ahwatukee resident and would like to see that the South Mountain Freeway is stopped. If that is not possible I believe it should be routed south of the Gila Reservation.

Code	Issue	Response
1	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the Route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

-----Original Message-----

From: Carolann [puppyluv@mcqcrew.com]

Sent: Thursday, July 18, 2013 09:57 AM Eastern Standard Time

To: Petty, Karla (FHWA); AZscheduling@flake.senate.gov; contactus@phoenix.gov

Subject: NO to LOOP 202 alternatives 59th Ave/ 63rd ave & 71st Ave

To Whom it may Concern:

1 I am writing this to oppose the Loop 202 expansion at 59th Ave/63rd ave (as well as at 71st Ave.) This may be your preferred route but it certainly is NOT mine. I live in Laveen on 65th Drive and do not want a freeway in my front yard.

My husband and I moved to our little slice of Heaven ,Laveen in 2001 little over a year after we moved here we got married, and most of our neighbors came to the wedding.Since than we have been to other neighbors' (or should I say, our extended family) weddings, birthday parties, barbeques, house warming parties, Thanksgiving, Christmas, Halloween and sadly funerals.

Our neighbors welcomed us with open arms. We could not have been happier, and have paid it forward ever since. We wave to folks that drive through, we welcome new neighbors. We all know one another, and we look out for one another in this neighborhood.We liken our selves to "Mayberry." If one lives in Laveen you are very lucky and thankful.

2 We do not want ADOT to build a freeway through our neighborhood. We do not want to see some of our "family" lose their homes, or have a freeway in their front/back yards. We have grass and trees, birds, livestock, horses, frogs, dogs, cats...you name it we have it... (Wild & domestic) We do not want to lose our natural habitat, nor do we want to see any of the animals and plants (there are many of both) loose (lose) their natural habitats. Our air will be polluted (even more than it is now) our water in the well & river bottom may be destroyed, or irrigation (we have water rights that are very unique & we are grandfathered) will be no longer. Our yards will be desimated, more natural habitats will be completely destroyed. Our green grass and trees will die. We moved out here for the country atmosphere, the green grass & trees. Horses & cattle graze upon the grass. The crime rate will increase, (studies show crime always goes up in the close proximity of a freeway)as well as our noise pollution & light pollution will be horrible & unbearable.

3 4 5 6 7 8 9

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	The Laveen Village area is anticipated to have a built-out population of over 105,000 (see Final Environmental Impact Statement page 4-5). This proposed level of development places increasing demand on the road network. The City of Phoenix's General Plan for Laveen Village has designated areas along the proposed freeway for commercial development that cannot support the projected densities without implementation of the proposed freeway. Without the proposed freeway, the conversion of land from undeveloped and agricultural uses to residential, commercial, and industrial land uses would likely continue, placing a greater demand on surface streets (see Final Environmental Impact Statement page 4-14).
3	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)

(Responses continue on next page)

Code	Comment Document
4 10	We as a community enjoy our peace and quiet, our skies with the visible stars, no roaring cars on a freeway, or threat of hazmat material polluting our air and water. The fear idea of a freeway blasting right by our homes and charter school is terrifying, unthinkable, unimaginable!! It wasn't in the documents of the house plat that any freeway was imagined for this area or we would not have purchased our home here.
11	
12	ADOT did an "environmental study" years ago and did not think there would be an impact on our community. Since when does ADOT conduct these studies? This is a conflict of interest!Two different LLC's are trying to buy votes/signatures for $2000.00 to the let them build this freeway, sounds like a bribe to me. We are also aware that the Canadian/Mexican truck route could be part of the trucks coming through and that is quite a concern to us, more trucks and extremely hazardous materials. The Mexican government doesn't requirethe inspections that USA trucks are required to have for safety and proper labeling of contents. The Sierra Club has done studies and can prove that their would be an impact on this community. The animals (including humans) and plants would suffer tremendously.
13	There is NO need to put (force) this freeway right through our (or anyone's) neighborhood.Putting people and animals at risk is not the right thing to do...not for any amount of money. Ruining our Village, our families, our lives is not acceptable. The planners and engineers need to consider another route, either go farther west and find ways to avoid ruining homes, or DO NOT build. When we found Laveen, we fell in love with this Village, as we drove through this beautiful area people waved to us as we passed by and dogs wagged their tails. We drove through Laveen for over a year looking at homes wishing some day we could be part of this paradise.One wonderful day we went to an open house (just for kicks) and knew we belonged. We bid on the house and since that day our dreams came true we got the house! We belong! NO on the LOOP 202 Expansion at 59th Ave/63rd AVe Alternative...And No at 71st Ave as well...NO!!!!!!! Please hear our very concerned voices! Sincerely, Carolann McQueary

Code	Issue	Response
6	**Surface Water**	Impacts resulting from the proposed action crossing the Salt River would be addressed in a Clean Water Act Section 404 permit if an action alternative were to become the Selected Alternative (see Final Environmental Impact Statement pages 4-118 through 4-120). Impact acreage would be calculated. Section 404 of the Clean Water Act establishes a program to regulate the discharge of dredged and fill material into waters of the United States, including wetlands. Activities in waters of the United States that are regulated under this program include fills for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports), and conversion of wetlands to uplands for farming and forestry. The U.S. Army Corps of Engineers administers the Section 404 program. Washes, streams, rivers, and wetlands delineated as waters of the United States, or jurisdictional waters, by the U.S. Army Corps of Engineers are regulated through use of Section 404 permits. When avoidance of waters of the United States is not practicable, minimization of impacts would be achieved, and unavoidable impacts would be mitigated to the extent reasonable and practicable. The permitting process for Section 404 requires Clean Water Act Section 401 certification. This certification is regulated by the Arizona Department of Environmental Quality for waters of the United States, except on tribal land, where it is regulated by the U.S. Environmental Protection Agency. Each future residential, commercial, and local and county transportation development resulting in impacts on jurisdictional waters is subject to Sections 401 and 404. For construction of the proposed action, the Arizona Department of Transportation and its contractors would be required to comply with Sections 401 and 404 of the Clean Water Act and to ensure that permit conditions and mitigation measures would be met during construction. The general and special conditions of the Section 404 Individual Permit would minimize impacts on waters of the United States to the extent practicable. Canals that connect to jurisdictional waters downstream are also considered jurisdictional waters. Impacts on canals would be calculated and addressed in a Section 404 permit if an action alternative were to become the Selected Alternative (see Final Environmental Impact Statement pages 4-118 through 4-120). Drainage plans would be completed to minimize impacts on drainage facilities. The impact on canals would be mitigated by pipe conveyances under the freeway.
7	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
8	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Visual Resources**	Light from the freeway would be produced from vehicle headlights and taillights and from fixed light poles at interchanges along the freeway. Nighttime users of the park and residents of Ahwatukee Foothills Village may see lines of seemingly crawling vehicles, each with lights front and back. Fixed freeway lighting would be provided for safety reasons only at interchange exit and entrance points. Freeway lighting at these locations would be designed to reduce illumination spillover onto sensitive light receptors such as residential areas (see page 3-58 of the Final Environmental Impact Statement).

(Responses continue on next page)

Code	Comment Document
	I hope I helped. Leslie

Code	Issue	Response
10	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Neighborhoods/ Communities**	Prospective home buyers after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
12	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
13	**Purpose and Need, Lack of Support**	

Code	Comment Document
1	Ed Mears Document Created: 5/21/2013 4:11:01 PM by Web Comment Form I strongly recommend building the highway with the W101 interchange at I-10. To connect the new 202 loop to I-10 east of the Loop 101 would create additional congestion on I-10 between Loop 101 and the intersection at W71 or W59. This will be as bad as the convergence of I-10 and US60, SR43 and the I-10/I-17 interchanges. The total economic impact is not clear in the study if the W71 or W59 alternatives are selected with respect the additional freeway loading on I-10 from 101 to either interchange (how much more freeway is necessary to be built on I-10 to handle this convergence?). Also, the economic impacts to the areas along W101 are not clear regarding the total property valuation increases along the corridor. A similar correlation would be the 202 San Tan and Red Mountain areas, where property within a mile of the freeway has increased in value since highway completion. Any loss of property tax revenue from takes will be offset by adjacent property value increases. Look to Chandler and their success with both Price and San Tan freeways. PLease do this project right, build one of the W101 alternatives.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

1

I'm Ed Mears; I work for Pulice Construction and Project Development; Pulice Construction was founded here in Phoenix 57 years ago this week, and we employ over 500 folks in the highway construction business. And we do support this project going forward. We recommend that we move through the EIS process as quickly as possible to help keep our employees gainfully employed and building for the Valley, our local employees.

I enjoy the work we do. We enjoy working for ADOT and the Maricopa County officials in these projects that we're able to develop. And that's our position that we support this project and I'd just say build, build, build. Thank you.

THE FACILITATOR: Dale Huish. Dale. He may have just registered.

Dale Huish. Did I pronounce that right, sir?

MR. HUISH: That's correct.

My name is Dale Huish; I live in Gilbert, and for the last four years, I'm the majority owner of Pecos Storage, which is on the south side of Pecos Road right at the 32nd Street interchange. About 40 percent of our customers come from the Ahwatukee area. The other 60 percent are from neighboring

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Chantal Medina Document Created: 5/21/2013 1:51:36 PM by Web Comment Form I support the 202 being built, because it will increase the community exchange from Laveen into Down town. It will make it easier for large groups of people to travel.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4390

Bay State Milling Company, 421 South 99the Avenue. I want to go on record fully supporting the South Mountain corridor freeway with the alignment, recommended alignment going down 59th Avenue. Thank you.

THE FACILITATOR: Thank you.

Reyes Medrano.

MR. MEDRANO: Good afternoon. Reyes Medrano, I'm the City manager of the City of Tolleson at 9555 West Van Buren. Mr. Burdick, good to see you, sir, it's been too long.

We're here to accompany Mr. Frank, who is one of our primary business partners and employers in Tolleson, and also to issue our support for the 59th Avenue alignment to intersect with the South Mountain freeway. Thank you.

1

THE FACILITATOR: Thank you.

If you'd like to speak, please go to the registration desk out front.

Joe Palermo.

MR. PALERMO: Good afternoon, gentlemen. My name is Joe Palermo, I want to speak on behalf of support for the Loop 202 freeway project. In my opinion, I travel the I-10 corridor daily to work and it's often very much a burden to me to see traffic at a complete standstill and gridlock in downtown. And in my opinion,

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:44:34 AM

-----Original Message-----
From: Joe Mee [mailto:joemee@aol.com]
Sent: Friday, May 17, 2013 5:38 PM
To: Projects
Subject: 202

1

Build it NOW

Sent from my iPad

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 4:11 PM
CALLER: MIKE MEETAH	CALLER ADDRESS: CHANDLER, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I was just calling to give my voice that I support the freeway, the South Mountain extension. I have lived in Phoenix before. I currently live in Chandler, Arizona. I have been a resident for 30-some years and I totally support the South Mountain, not sure what it is called, the 202 extension or whatever you are calling it, but I support the freeway redevelopment expansion at South Mountain. Alright, thank you. That was it. Again, Mike Meetah, registered voter. Been in the Valley for over 40 years and I support it. Thanks. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: SG Mefford
To: Projects
Subject: South Mountain Freeway
Date: Saturday, June 08, 2013 8:32:15 AM

Dear Sirs:

I live in Ahwatukee and against the South Mountain Freeway proposed on Pecos Rd for the following reasons:

1

1. South Mountain Preserve means that it will be "preserved", not cut through it when you want to. This is a
promise to the people. Do not break the promise.

2 3

2. The pollution caused by construction and traffic will have long term negative affects on the population, especially
school children near the proposed freeway.

4 5

3. Your primary purpose of the South Mountain Freeway is that it will be a by-pass for I-10 and Phoenix. Build a
by-pass freeway on Riggs Rd-Beltline Rd connecting to 51st Ave.

5

4. Do not use an obsolete proposal. Build on Riggs Rd - Beltline Rd and connect to 51st Ave.

Thank You

Steve Mefford

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Health Effects**	
4	**Purpose and Need, Truck Bypass**	
5	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:36:52 AM

-----Original Message-----
From: Janet Mehling [mailto:picturethis52@yahoo.com]
Sent: Monday, May 13, 2013 5:58 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Complete the 202 but need better public transportation system.

Sent from Janet's IPad

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: The Mehling Family
To: Projects
Subject: ADOT Loop 202 South Mtn Freeway
Date: Wednesday, July 24, 2013 7:02:10 AM

(1) (2) (3)

South Mountain is the largest municipal park in America; it is not a freeway, nor should it ever be a freeway. Some things are more important than catering to long-distance commuters - - - like mountains, open land, parks, Native American history and culture, children, schools, air quality, and preserving quality of life. What's next? A freeway cutting through Camelback? Through the Grand Canyon? Both of those options would save drivers time too.

When our family moved to the East Valley in 2001, a gallon of gasoline cost 99-cents. I shudder to think how low it was in 1985 when this freeway was conceived. But that is ancient history. Now we know that it is socially and environmentally irresponsible to commute long distances on a daily basis in a privately owned vehicle. We should not be catering to those who live in the East Valley and work in the West Valley, or vice-versa.

(4) (5) (6) (7) (3)

In the 12 years I have lived in the East Valley, I can honestly say I have never witnessed traffic congestion other than morning & evening rush hours or in the case of an accident. And even during those rush hours, I have not witnessed absolute grid-lock - - - more like a slowdown that cost 7 to 10 minutes of my time at the most. Is 7 to 10 minutes of time worth the noise, traffic, visual, and air pollution ADOT intends to wreak upon South Mountain and the Ahwatukee Foothills? NOT!

(8)

We all know that the biggest slow-down in the East Valley is the Broadway curve, so why doesn't ADOT focus on fixing that problem instead of creating an expensive and destructive freeway through our most pristine land?

~ C. L. Mehling

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Air Quality**	
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
7	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Purpose and Need**	In 2035, the average daily traffic on the proposed freeway is projected to range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-62). The estimated volume depends on location. The purpose and need for the South Mountain Freeway are not solely to relieve congestion on Interstate 10 (Maricopa Freeway). Facilitating mobility in the Maricopa Association of Governments region does not mean just relieving congestion on the Broadway Curve (see Final Environmental Impact Statement page 1-21). Among other criteria, the proposed freeway is to permit the entire Regional Freeway and Highway System to function as designed. Optimal function of that design includes completing all the segments of the Loop 202 system (see Final Environmental Impact Statement pages 3-35 and 3-37). With implementation of the South Mountain Freeway, many motorists would be able to get from Point A to Point B, a route that never included needing to use Interstate 10.

Code	Comment Document

From: The Mehling Family
To: Projects
Subject: ADOT Loop 202 South Mtn Freeway
Date: Wednesday, July 24, 2013 7:32:41 AM
Attachments: Loop 202 sex offender freeway.png

Our family calls the ADOT's proposed freeway the "Loop 202 Sex Offender Freeway". Look at the attached registered sex offender maps from the four nearest West Valley zip codes ADOT intends to link with Ahwatukee (ATTACHMENT).

1 2 3 4

So far, everyone has talked about the noise pollution, air pollution and sight pollution of the proposed freeway, and all of those will surely be a detriment to our quality of life. But no one has talked about the crime it will bring to Ahwatukee – a community that doesn't even have a local police precinct - - only a substation.

When we first moved to the Ahwatukee Foothills 12 years ago, we mapped out all of the 'crimes of opportunity' that appeared in the "Police Blotter" in the *Ahwatukee Foothills News* publication. What we found was that the vast majority of this type of crime occurred east of 32nd Street, and heavily around 48th Street. While a few criminals did venture into the foothills area west of 32nd Street, most perpetrators recognize the need for a quick get-away, which is cumbersome in a community shaped like a cul-de-sac. But now ADOT wants to flood our community with FOUR freeway entrances/exits?!?! WHY? We don't want them!!! We don't want all the felons and sex offenders from the West Valley to have quick access in and out of our neighborhoods.

5 6

People who purchased homes in the Ahwatukee Foothills are perfectly happy living in a safe, quiet, cul-de-sac community. We are perfectly willing to drive 4 miles or more to the nearest freeway. We are perfectly satisfied with the thought that our community is not a thoroughfare between two destinations. THAT'S WHY WE LIVE HERE.

7 8 5 9 4

Sure, ADOT is going to purchase all the homes and businesses that need to be destroyed to build this ill-conceived freeway, but are they going to compensate the rest of us for our significant losses in property values and quality of life? Are they going to ensure the safety of our children and our homes? Are they going to foot the bill for the substantially larger police presence that will be required?

10 11 12

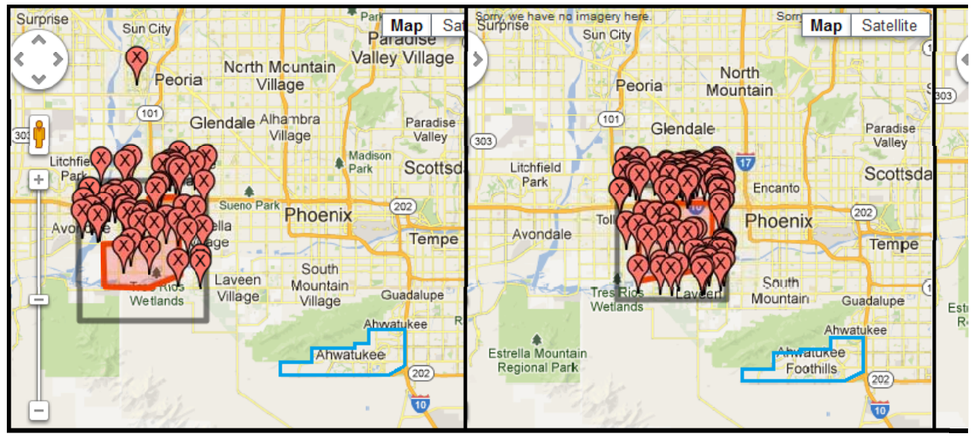
This freeway plan is antiquated, irresponsible, and unnecessary, but if you can't put the money to better use on a more relevant plan, such as mass transit, then at the very least, remove all those freeway entrances and exits from our community!

Sincerely,
Ed, Carin & Marina Mehling

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
4	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
6	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
8	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

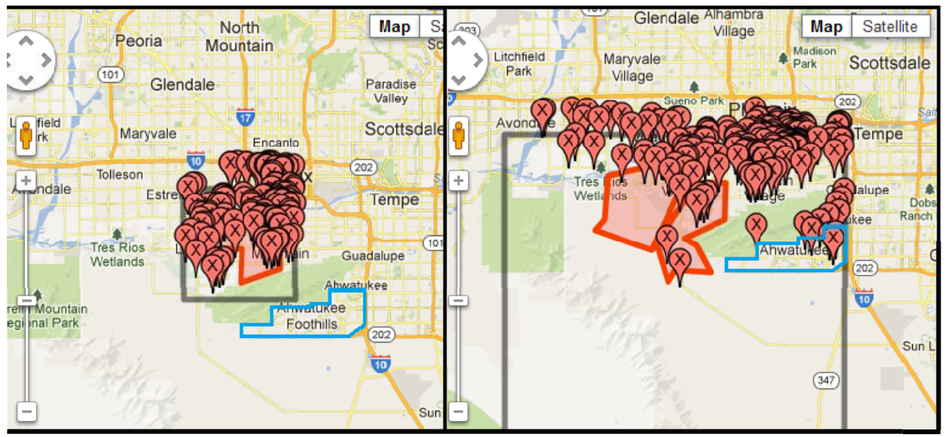
(Responses continue on next page)

Code	Comment Document



Code	Issue	Response
9	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Purpose and Need, Old Plan or Use of Old Data**	
11	**Alternatives, Gila River Indian Community Alignment**	
12	**Design**	The locations of the planned traffic interchanges were determined in coordination with the City of Phoenix. The current plan balances the need to minimize impacts on the adjacent community with the need to provide acceptable access to the region's transportation system.

Code	Comment Document



Code	Issue	Response

Code	Comment Document

From: C. L. Mehling - RedRox Condo
To: Projects
Subject: ADOT Loop 202 South Mtn Freeway
Date: Wednesday, July 24, 2013 8:02:16 AM

I am from the Bay Area and my husband is from San Diego. We witnessed, first hand, that additional freeways do not alleviate traffic congestion – quite the opposite. One only has to look at Los Angeles to see that freeways are NOT the answer. Transportation solutions that embrace progressive measures and frown upon long, daily commutes are most effective.

Before leaving California, we also witnessed some of these progressive measures. In San Jose, it was a Light Rail system that took people to the campuses of some of the largest Silicon Valley employers, as well as sports and concert venues. In San Diego it was the Trolley, which takes travelers to popular sightseeing destinations, downtown, and to and from the Mexican border. These were welcome and progressive improvements to the transportation system that show a good deal of forward thinking and responsibility – qualities that are severely lacking from the outdated 1985 freeway conceived by ADOT.

1 2

Here are some other ideas that are more up-to-date than ADOT's proposed freeway through our beloved community and municipal park:

3 4 5 6

- Expand the existing Phoenix bypass route (we know one exists because we do not take I-10 to get to San Diego).
- Fix the Broadway curve – it's really the ***only*** point of congestion in the East Valley.
- Install more park-and-ride lots.
- Add a rapid bus at midday for people who work half-days downtown, serve on jury duty, or just want to go downtown without getting stranded until 5PM.
- Expand the Light Rail system with a North/South route
- Expand mass transit service to the major employers like Intel, Honeywell, and the like.
- Work with some of the major employers in the valley about offering incentives to their workforce to limit the distance they commute, take mass transit and/or telecommute.
- Expand mass transit to the stadium in Glendale.

Lastly, I'd like to point out that in the Bay Area, no one drives to see a baseball game, football game, or concert - - - mass transit has been getting folks to and from these venues for over 30 years. I realize Arizona is only 100 years old, but surely, we can take a look around at what has and hasn't worked in other states and learn some valuable lessons?

~ C. L. Mehling

Code	Issue	Response
1	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
2	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Section 4(f) and Section 6(f)**	
4	**Alternatives**	There is an existing route (Interstate 8 and State Route 85) that provides a bypass of the Phoenix metropolitan area. Signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. This route continues to be available for interstate and interregional travel.
5	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
6	**Purpose and Need**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.

Code	Comment Document

From: Designs by C. L. Mehling
To: Projects
Subject: ADOT Loop 202 South Mtn Freeway
Date: Wednesday, July 24, 2013 8:03:00 AM

According to its Official Municipal Website, "[Phoenix] now ranks as one of the fastest-growing cities in the nation." The website boasts that, "Phoenix offers just about everything in the way of sports, recreation, arts, culture, dining, lodging and financial opportunities." But what wasn't mentioned?
Phoenix Sky Harbor International Airport is the fifth busiest in the world for passenger traffic, takeoffs and landings, handling more than 36 million travelers. The $600 million expansion of the Phoenix Civic Plaza is meant to position Phoenix as a top destination for 85 percent of all conventions. But what glaring inconvenience could potentially impede those rosy projections and all those travelers?
What is conspicuously missing from the 5th largest population in the U.S. that would actually enhance business, tourism, and property values while reducing the congestion on our freeways, the pollution in our air, *and* our dependence on foreign oil?
More freeways??? NO! Mass Transit!!!
Bringing freeways, air pollution and crime into our neighborhoods, butchering the largest city park in the world and paving over land held sacred by native cultures is ***not*** something to boast about! It ***won't*** legitimize Phoenix as a 'real' city, and it ***won't*** perpetuate our 3 major industries of high-tech manufacturing; tourism; and, construction. But mass transit ***is***, ***can*** and ***will***. It's the only answer that resolves ***all*** the issues and the only responsible way for ADOT to spend our tax dollars.
Sincerely,
The Mehling and Pierce Families of Ahwatukee

1 2 3 4 5

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Cultural Resources**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: AHWATUKEE SOUTH MOUNTAIN FREEWAY
Date: Wednesday, July 10, 2013 3:06:09 PM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Pete Meier [mailto:petemeier@cox.net]
Sent: Wednesday, July 10, 2013 2:42 PM
To: Projects
Subject: AHWATUKEE SOUTH MOUNTAIN FREEWAY

1 A LOT OF US IN AHWATUKEE HAVE BEEN WAITING FOR THIS FREEWAY FOR A LONG TIME (SINCE 1985) LET'S BUILD IT ALREADY !!! I'M SO TIRED OF THE TREE HUGGERS AND INDIANS BATTING THIS AROUND. ENOUGH ALREADY BUILD IT AND HOOK INTO THE REST OF THE VALLEY'S TRANSPROTATION SYSTEM. PETE MEIER 602-690-3361.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: south mountain freeway study:Comments
Date: Wednesday, May 22, 2013 10:56:30 AM

From: Geogana Meiner [mailto:laveenchic@yahoo.com]
Sent: Monday, May 20, 2013 4:30 PM
To: Projects
Subject: south mountain freeway study:Comments

Ok, for those of you that don't seem to know it, the land along the 59th alignment has mostly been purchased, there is bed rock (foundation) for a bridge crossing at 59th and the river. Where the W 101 alt (River is very wide there and more sand and river rock then bed rock) and the 71 alt will have a lot of homes that it will displace, schools businesses ...the 59th alignment was the original route that was planned, go back to it, it will be the cheapest and best route....We knew 20 years ago that it was the best route. we need a south loop to both sides of I-10, it will ease congestion and make life and the traffic problems on Baseline Road better, no backups on Baseline from about 6:30 am to 8:30 am and 6:00 to 7:00 pm between 19th Ave to 67th Ave Monday through Friday....We have paid for the land, there was a reason they bought it...How about we do something right and get it built Now.....

1

Georgana Meiner
6426 W. Baseline road
Laveen, Arizona, 85339

"Beware of a woman who can read, she can think too!"

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. The growth created by this road outway the negative impact. This can only improve the neibachoods. Create more jobs. W59 +E1

1

Optional

Name NATALIE MELL Email

Address

City State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 The W59 and E1 Alternatives will relieve congestion, provide additional jobs, and bring growth and development to the effected regions. This is a great idea!

Optional

Name Natalie Mell Email nmell93@gmail.com

Address 1332 W Topeka Dr

City Phoenix State AZ Zip 85027

Phone 602-561-0875 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 10:55 AM
CALLER: ERNEST MELLOWS	CALLER ADDRESS: 753 E. GLACIER DRIVE, CHANDLER, ARIZONA 85249
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I approve on the South Mountain freeway expansion.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:29:24 AM

-----Original Message-----
From: emellum@cox.net [mailto:emellum@cox.net]
Sent: Saturday, May 18, 2013 11:33 AM
To: Projects
Subject: 202

1

WE SUPPORT THE BUILDING OF THE 202. ERNIE AND CAROL MELLUM

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Sybil Melody
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 11:44:07 AM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The charm of Arizona is the wide open vistas - not freeways. The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(5) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(6) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

(7) Sincerely,

Ms. Sybil Melody
PO Box 321
Jerome, AZ 86331-0321
(928) 639-0158

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Wednesday, May 22, 2013 10:54:10 AM

From: George Mendez [mailto:geo_m33@yahoo.com]
Sent: Monday, May 20, 2013 9:43 PM
To: Projects
Subject:

1

As a lifelong resident of the Phoenix area, I have seen the city grow to a huge metropolis. Unfortunately, the freeway system has never kept pace with the rapid growth. The 202 needs to be completed as do other freeways to meet the demand of all residents and visitors. Please hear the voices of those who drive on our roads and lets build the 202. Thank you.

George Mendez

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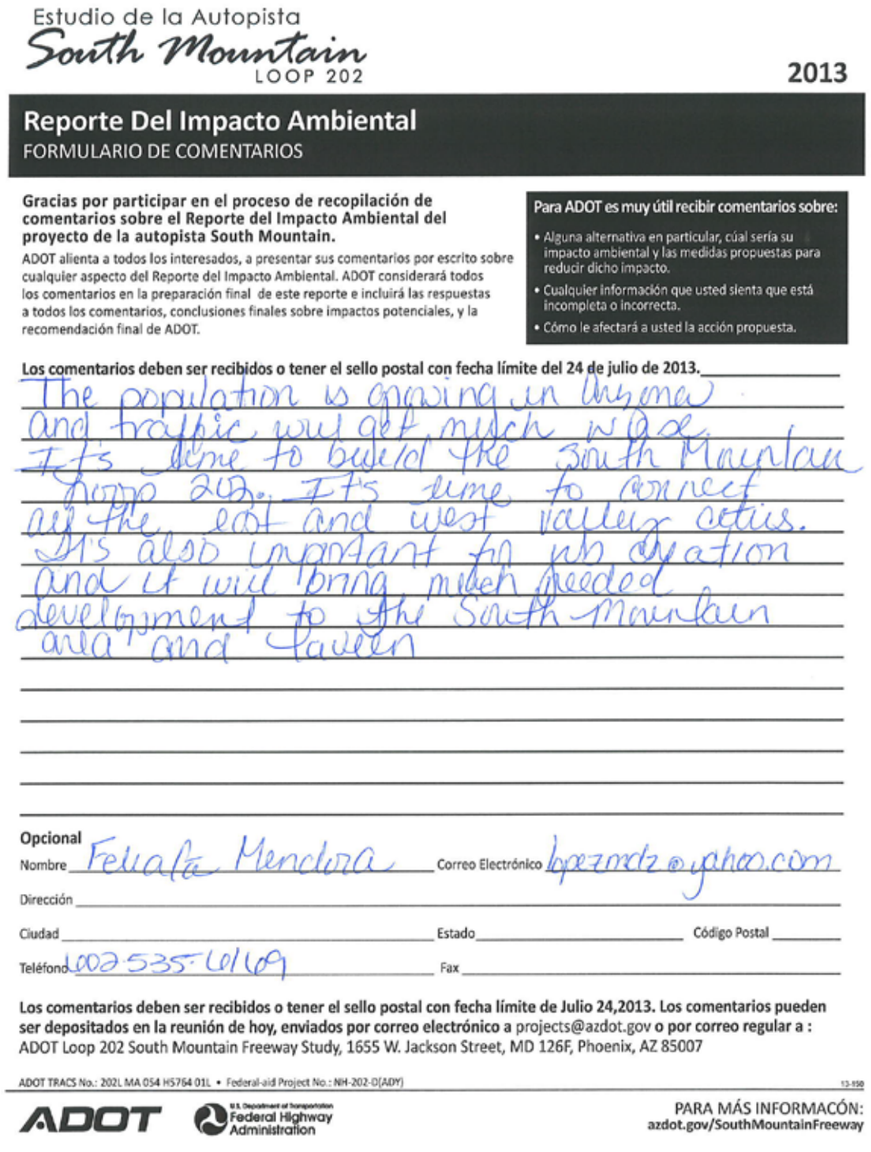
Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

Estudio de la Autopista
South Mountain
LOOP 202

2013

Reporte Del Impacto Ambiental
FORMULARIO DE COMENTARIOS

Gracias por participar en el proceso de recopilación de comentarios sobre el Reporte del Impacto Ambiental del proyecto de la autopista South Mountain.

ADOT alienta a todos los interesados, a presentar sus comentarios por escrito sobre cualquier aspecto del Reporte del Impacto Ambiental. ADOT considerará todos los comentarios en la preparación final de este reporte e incluirá las respuestas a todos los comentarios, conclusiones finales sobre impactos potenciales, y la recomendación final de ADOT.

Para ADOT es muy útil recibir comentarios sobre:

- Alguna alternativa en particular, cúal sería su impacto ambiental y las medidas propuestas para reducir dicho impacto.
- Cualquier información que usted sienta que está incompleta o incorrecta.
- Cómo le afectará a usted la acción propuesta.

Los comentarios deben ser recibidos o tener el sello postal con fecha límite del 24 de julio de 2013.

The population is growing in this area and traffic will get much worse. It's time to build the South Mountain Loop 202. It's time to connect all the east and west valley cities. It's also important for job creation and it will bring much needed development to the South Mountain area and Laveen

Opcional

Nombre Feliciá Mendoza Correo Electrónico lopezmdz@yahoo.com

Dirección

Ciudad Estado Código Postal

Teléfono 602 535-6169 Fax

Los comentarios deben ser recibidos o tener el sello postal con fecha límite de Julio 24,2013. Los comentarios pueden ser depositados en la reunión de hoy, enviados por correo electrónico a projects@azdot.gov **o por correo regular a :**
ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-950

ADOT U.S. Department of Transportation Federal Highway Administration

PARA MÁS INFORMACÓN:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Feedback re South Mountain Freeway
Date: Monday, June 24, 2013 9:03:42 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Sarah Menne [mailto:smenne777@cox.net]
Sent: Saturday, June 22, 2013 7:50 PM
To: Projects
Subject: Feedback re South Mountain Freeway

(1) I have lived in Ahwatukee for 29 years and was told we'd have a freeway south of S. Mountain when my family originally moved into this area. It's about time we finally built it! With the growth in the Valley and the way traffic is congesting during rush hour, this additional freeway is absolutely necessary. While I'd prefer to "not" have the added pollution a freeway brings, Phoenix is growing and I know of few other major cities who do not have a freeway circling the City so cross-state travelers can avoid downtown areas, especially during rush hour traffic. I'll never forget missing the circle around Houston, TX and getting stuck in their downtown rush hour traffic, making my trip almost an hour longer on the way from Phoenix to San Antonio and then on to Arkansas and Alabama.

(2) (3) I have always admired those people who live in the foothills north of Pecos who work in Phoenix for being willing to drive so far to enter Phoenix downtown or uptown from the Ahwatukee Foothills area. And I'm sure part of the willingness is the isolation of our Ahwatukee/Foothills area. I have to admit that I dread the added traffic and likely added burglaries as the area becomes easier to exit with a freeway closer.

(4) (5) I've seen a lot of changes in this area since 1984. And, while I understand the hesitation of homeowners who live just north of Pecos, I do not understand why the potential of moving or living so close to a freeway was not anticipated – this freeway has been in the planning stages for 30 years or longer. It should have been built 10-20 years ago. If anyone didn't want to live near the projected freeway, they shouldn't have bought homes right off Pecos. What I have never fully understood is why the City/State allowed homes to be built in the projected freeway area – homes that now must be bought and removed.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
4	**Acquisitions and Relocations**	It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).
5	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

This freeway situation reminds me of the fact that when my family moved to Phoenix in 1959, we had the only area of I-10 that wasn't yet completed for coast to coast travel. It wasn't until traffic became so terribly congested that our citizens finally voted to complete our section of I-10. I hope we are not so foolish this time and do no wait until traffic during rush hour practically stands still before we finally agree to the completion of the South Mountain Freeway.

Sarah Menne,
Ahwatukee

Pray for **Spiritual Renewal** in **America** and **Around** the **Globe**
*"The **prayer** of a righteous man is powerful and effective" (James 5:16b NIV)*

* *

"The Joy of the Lord is my Strength"

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"Jesus Loves You"

* *

It is You who light my lamp, the Lord, my God, lights up my darkness.
~ Psalm 18:28

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Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 9:41 AM
CALLER: JUDITH MENTI	CALLER ADDRESS: 9320 E. ARROWVALE DRIVE, SUN LAKES, AZ 85248
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
The community needs the proposed Loop 202. Thanks for this opportunity to comment.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:06 PM
CALLER: CHARLENE MERCADO	CALLER ADDRESS: 2429 N. 125 DRIVE, AVONDALE, AZ 85392
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I would like to voice my support for the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Mark Mercer Document Created: 7/16/2013 10:50:30 PM by Web Comment Form

It has been reported that the design and construction of the South Mountain Freeway will be based on a "value engineering" approach. More specifically, the freeway will be built at or above grade. This is one of the reasons that I am opposed to the freeway. In my opinion, this will significantly exacerbate the noise that the freeway will impose on adjacent neighborhoods. In addition, the freeway traffic will be much more of an eyesore than if it were built below grade. If I am not mistaken, there are very few other sections of freeway in the valley that exist above grade when they run close to residential areas. It seems that the South Mountain Freeway planners have grossly downplayed the detrimental impact that the freeway will have on adjacent neighborhoods. I think that it would be appropriate for the freeway planners to use the same design approach for the South Mountain Freeway as they have for other recently constructed valley freeways.

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2
3

Code	Issue	Response
1	**Design**	Depressing the proposed Pecos Road sections would entail installation of pump stations to drain the main line freeway. A depressed freeway would also need a drainage channel to capture the off-site flows to prevent their entering the freeway. Pump stations were not used because of the high cost of construction and maintenance needed for their operation. The preferred freeway configuration would have the E1 Alternative aboveground and the existing culverts extending to pass the drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Depressing the freeway in this area would eliminate the existing culvert crossings and potentially have adverse flooding impacts on adjacent properties. Extending the existing culverts or upsizing the culverts would maintain or improve drainage flows. This would ensure that there would be no adverse flooding impacts on adjacent properties. (See Final Environmental Impact Statement pages 3-15 and 3-18.) To reduce impacts by depressing the proposed freeway in the Eastern Section, the Arizona Department of Transportation would: · need to spend an additional $400 million for right-of-way acquisition and construction · displace an additional 300 residences · maintain additional pump stations and detention basins for the life of the freeway · observe noise-related impacts requiring mitigation (i.e., noise barriers and their associated costs and visual impacts) Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. A depressed freeway option was evaluated in the Final Environmental Impact Statement and is described on pages 3-15 and 4-99. Although depressing the freeway would reduce noise levels, noise walls would be needed to further reduce noise to meet the Arizona Department of Transportation noise policy. Whether the freeway is built aboveground with tall walls or belowground with shorter walls, the final mitigated noise levels would be nearly the same at nearby residences. The major disadvantage of building a depressed freeway would be the increased construction cost and the possible acquisition of additional right-of-way for pump stations and retention basins.
3	**Visual Resources**	For most of the alignments of each of the action alternatives, the proposed freeway would be elevated above the natural grade of the surrounding land. This elevated profile would allow noise to carry farther, creating noise impacts at greater distances from the freeway. Depressing the profile of the freeway below grade might reduce traffic noise levels adjacent to depressed sections. However, it would be necessary to also construct at-grade noise barriers to achieve noise reduction goals at receiver locations adjacent to depressed freeway sections (see page 4-99 in the Final Environmental Impact Statement). This strategy would reduce visual impacts associated with high noise barriers on elevated freeways, but would entail ground-level noise barriers and their associated interference with views. Thus, with either approach to noise reduction, views of nearby mountains could be disrupted. The specific impacts would depend on the geometrics of the height of any noise barriers constructed, the intervening topography, and the distance of the barriers from the residences in question.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:39:14 AM

-----Original Message-----
From: David Merrell [mailto:dmerrell11@icloud.com]
Sent: Saturday, May 11, 2013 6:50 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I fully support building this next section of the 202 freeway loop. We need to stay ahead of the population growth with our building infrastructure. Please do not sit idle and let our freeways become as congested as LA.

Sent from my iPhone

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2	Lisa Metcalf Document Created: 6/30/2013 1:57:41 PM by Web Comment Form I am excited about Loop 202 South Mountain. I am just curious about the date this project will actually begin and how this route would actually affect my property. Whatever route South Mountain Loop 202 takes, I am totally supportive; even if I am displaced.

Code	Issue	Response
1	**Construction**	The record of decision is anticipated in 2014 and construction could begin as early as 2015.
2	**Design**	Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:17 PM
CALLER: STEVE METHIAS	CALLER ADDRESS: 4265 E. BLUE SPRUCE LANE, GILBERT, AZ 85298
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I would like to leave a message in support of the South Mountain Freeway extension. Thank you. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:38:58 AM

-----Original Message-----
From: Carson Metzger [mailto:carsonmetzger@yahoo.com]
Sent: Saturday, May 11, 2013 7:57 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Lets finish this!

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 Extension Pecos
Date: Wednesday, June 19, 2013 9:05:37 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Brad Metzger [mailto:brad.metzger1@gmail.com]
Sent: Wednesday, June 19, 2013 9:04 AM
To: Projects
Subject: Loop 202 Extension Pecos

I have 2 questions:

1

2 3

1. What will be the hazardous waste policy for this section of the freeway?
2. How can you be sure that the trucks coming from Mexico and Eastern U.S. who currently use the I-10/I-8/AZ85 shortcut to bypass Phoenix, will now forget that route and all trucks will use the new section to bypass Phoenix?

Thank You

Brad Metzger

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Code	Issue	Response
1	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Trucks**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 10:39 AM
CALLER: GUPTON MEYER	CALLER ADDRESS: 831 E. JACOBS STREET, CHANDLER, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I fully support the project of the freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Don Meyer Document Created: 7/24/2013 5:29:30 PM by Web Comment Form

This should not be built .... as a home owner in Ahwatukee, I moved here because the air is cleaner than on north side of south mountain due to prevailing winds from southwest... This expressway will pollute the air horribly and I will sell my home and move... ALSO, $1.9 BILLION for a road that serves very little purpose ??? We have enough highways in Phoenix... Better to put those dollars into school system.... The only people who will benefit are homeowners who purposely bought homes in path of new road, knowing they will be bought by state for high dollar profit and road contractors... This is VERY sad...

1 2 3 4 5

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
5	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Ben Meyer
To: Projects
Subject: Thought on the highway build
Date: Wednesday, July 24, 2013 12:38:13 PM
Attachments: Highway.rtf

Thank you for asking for input. See attachment.
--
Ben Meyer
bmmeyer1974@gmail.com
@Benmeyer5

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

"If we came across a mysterious cube in a forest, and I asked, "Is it good", you would not be able to provide an answer as one would not know it's purpose." Fredrich Nietzsche

Although I find the information related to the Highway project comprehensive, thorough and informative, I must say I stand opposed to the construction. The highway project would no doubt be a boon to the economy and in a time of a borderline depression/recession, no doubt this time among all others would be the ripest time to begin a project such as this. Although the pricetag is high, $2.5 billion (roughly $10,000 per foot of highway), it is not out of line. Recently built highways overseas and in others states cost about the same, some more, some less. The issue I take with it lies in the assertion change equals progress. Recent studies on major highway and builds overseas indicate the collosal highway designs and structures do the opposite of what one might think they do. They fracture communities, they are large god-like megolithic structures, called by the Indians 'concrete rivers' and rather than allow for a lessening of the stress involved in the daily commute, they add to the disintigration by building things rather than relationships. Recent studies of workers who while working are able to look out their window and see a natural setting versus a building indicate the worker who sees the buildings have a much higher level of stress and a much lower level of productivity. Contrary to intuitive thought, building 'things' also makes relationships harder to build. One can simply reflect on the quote, 'Men build too many walls and not enough bridges.' One might assume with the convenience of a road to get around easier, the stressors of city living might be easier to stomach, but with any creation of any thing, one must remember, other things come with it and based on what is decided, those decisions impact the lives of many others. The lessening of the uniqueness of the south side of the city would be major. Currently, Ahwatukee and maybe Paradise Valley are the only communities in the city that are quiet and removed from the hustle and bustle of the city and at night the stars can be seen sans the lights from the cityscape of Phoenix and the surrounding metropolis. This is a true treasure for those who live in these communities (myself among them), once a highway is built, one cannot build a light to shine to see the stars better, or flip a switch to darken the city lights as it were. If we are interested in convenience, how about we do something about the current lack of highway from the San Tan Valley to the big city? Or, how about we compare what could be done with this money with other types of convieniences, like totally erradicating homelessness in the city? Or, ensuring every Vet has basic needs. I bet that would cost less and do alot more to increase the convienience of those across the entire state. How about we look at the companies that skirt on corporate taxes (believed to be about $1.6 trillion dollars worth), if Arizona represents 1/50th of that amount as yet uncollected, that would pay for the highway construction by itself not to mention leave the state $700 million to do other things with. Countless other things that might be better of to be done without even so much as a cost to Joe Taxpayer in fact. These are things that the posed question, "Build or not?' cannot answer based on it's premise.

I like very much you have illustrated the potential value and cost in dollars of a project such as this so well in advance of the current time. As part realist and part optimist, I think the benefit of about 100 other types of expenditures and energies would leave the city with a more comprehensive gameplan to alleviate inconvenience and improve the quality of living. One way might be to look at ways to develop affordable real estate in downtown Phoenix, so as to attract those who might be

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
3	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.

Code	Comment Document

working there in 20 years, so they can live *in* the city, rather than commute from south side before worrying about the driving habits of those six years yet to be born (16 years old to drive, plus 6 years equals year 2035). I used to work in Laveen and I drove 45 minutes from Ahwatukee around the mountain to get there. I would drive twice that far, an hour and a half before I would endorse building a highway through one of the nicest towns in Arizona and perhaps the country.

Thank you for the opportunity to give my input,

Ben Meyer

Ahwatukee Resident

Code	Issue	Response

Code	Comment Document

Robert Mickelson Document Created: 5/21/2013 2:54:44 PM by Web Comment Form

I support the construction of the South Mountain Freeway.

The decision on the South Mountain Freeway has gone on for too long - more than 25 years. I recognize that the freeway impacts different groups of people in different ways. However, any adverse impacts on nearly all of the people living on the south side of South Mountain Park could have been avoided by those very people. They knew when they chose to live there that the freeway was already planned. I also recognize that the portion of the freeway that crosses South Mountain Park impacts sacred land of some Native Americans. However, a very small portion of those lands are impacted, and it would seem that if appropriate (as discussed with the Gila River Indian Community) architectural elements that emphasize the sacred nature of the area are incorporated into the project, those impacts could be mitigated. Transit options have also been discussed. The final design of the facility should include not closing out future opportunities for developing transit in the corridor.

1 2

3

The issue of air quality is always raised by freeway development, because it fosters new development. The problem with that argument is that the Valley is destined to grow - after all the Phoenix metro area lies in the middle of the Sun Corridor. That means more travel, and this is a mobile community where people want to use their automobiles. The solution to the air quality problem lies with replacing petroleum energy with clean energy in vehicles, not allowing congestion to increase which leads to reduced air quality.

Finally, The arguments against the South Mountain Freeway are similar to those used against I-10 through Phoenix and the Piestewa Freeway. There are no complaints about those facilities today. They are seen as major positive impacts on transportation and development in the region.

In conclusion, the South Mountain Freeway is needed improve transportation in the Phoenix Metropolitan area and will positively impact many more people than it will negatively impact.

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Alternatives, Nonfreeway Alternatives**	

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 2 This proposed freeway will destroy many of the aspects of my community that I value. The drive west on Pecos Road is a pleasure right now. To turn it into a freeway is irresponsible when you compare the price tag to the ROI. The pieces of the mountain behind our home provides respite for my family. It also provides unique interactions with wildlife including coyotes that come down from the mountain. A "quick commute" is not what I value. I value the peace + serenity + quality of life that this freeway will negatively impact

1

Optional

Name Mary Lou Miele Email mlmiele@cox.net

Address 1331 E. Redwood Lane

City Phoenix State Zip 85048

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-198

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Wesley Miles
To: Projects
Subject: Draft EIS comments regarding the Loop 202 South Mountain Freeway
Date: Wednesday, July 24, 2013 4:52:32 PM

To Whom It May Concern:

I am a Gila River Indian Community (GRIC) member and resident of District 6, near Laveen, Arizona. I am of Akimel O'odham, Dine, and Apache descent. I am commenting on the South Mountain Freeway Loop 202 extension Draft Environmental Impact Statement (DEIS) as a member and representative of my immediate family, who have resided near the impact area since 1986. We strongly oppose the South Mountain Freeway, and wholly support the No Build alternative. This includes any on-reservation and off-reservation proposed alignment, past or present. We view the freeway as harmful to O'odham and Pee Posh culture, as well as the physical well-being of GRIC and surrounding communities. While we recognize the origins for this transportation route have been planned since the early 1980s, we feel low-build or no-build alternatives have never been seriously considered by the Maricopa Association of Governments or other agencies.

As a federal undertaking, it's clear ADOT has taken steps to analyze differing impacts and costs between proposed alignments, as noted in the DEIS—however this is not enough. We urge the ADOT and Federal Highway Administration to not build the South Mountain Freeway, thus preserving South Mountain as a whole, protect civil rights of Americans, and consider new alternatives (low-build ideas such as a parkway to 51st avenue or through South Phoenix). The cost of this freeway is too great, both in terms of monetary outlay and socio-cultural erosion. If transportation cost-benefits analysis suggests a freeway is needed in this area, then efforts should be put toward other projects such as additional freeway lanes on I-10, increased light-rail and bus routes, or even revisiting a freeway located in Hidden Valley.

Thank you for your time.

Sincerely

Wesley D. Miles

P.O. Box 148

Laveen, AZ 85339

520-233-1633

wdmiles79@gmail.com

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Section 4(f) and Section 6(f)**	
4	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
5	**Alternatives**	In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
6	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Purpose and Need**	The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Final Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The determination of purpose and need for the proposed project includes an assumption that substantial improvements would be made to the Interstate 10 corridor between State Route 51 and U.S. Route 60 (see Final Environmental Impact Statement page 1-13). The Maricopa Association of Governments, in coordination with the Arizona Department of Transportation recently completed the Southeast Corridor Major Investment Study (see <azmag.gov/Projects/>) and developed multimodal concepts for addressing transportation issues in the Interstate 10 corridor. Even with these planned improvements to Interstate 10, the proposed project remains a vital component of the Regional Freeway and Highway System.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:36:57 AM

-----Original Message-----
From: Jason Miller [mailto:denalian71@yahoo.com]
Sent: Monday, May 13, 2013 5:45 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

We have been paying for this freeway since 1985 and we still don't have it! Time to get off the 'fence' and build it! It only gets more costly everyday nothing gets done. Jason miller

Sent from my iPad

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Finish the last link, please!
Date: Monday, May 20, 2013 8:46:41 AM

-----Original Message-----
From: Jason Miller [mailto:denalian71@yahoo.com]
Sent: Friday, May 17, 2013 5:22 PM
To: Projects
Subject: Finish the last link, please!

1

Sent from my iPad

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	**From:** Projects **To:** ADOT **Subject:** FW: 202 **Date:** Monday, May 20, 2013 8:41:41 AM **From:** Keith Miller [mailto:r.keith.miller@att.net] **Sent:** Friday, May 17, 2013 7:18 PM **To:** Projects **Subject:** 202 Build the darn freeway; it is long over due. Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Lisa Miller

Document Created: 6/24/2013 9:59:50 AM by Web Comment Form

(1) As an Ahwatukee resident, it first must be discussed how poorly this project has been handled since the beginning. Why would you allow development in areas where a freeway was being planned? Planning/zoning by ADOT, Maricopa County and the City of Phoenix are all guilty of the dilemma we have right now.

(2) (3) (4) (5) Now that the city/county/state officials have created such a horendous situation, it is your duty to come up with the best scenario for your tax paying citizens. One of those options is to not build, but progress will win. So then you need to come up with a win-win with the Gila River Indian community and move the proposed freeway south and not try to buy homes at undervalued prices and create more losses for the hundreds of homeowners and church members. We've had enough losses on the values of our homes in the past 7-8 years. We don't need more.

(6) (7) We have not even discussed the air quality and noise that will be brought to our section of the valley. As most people who read this study, unless you do this for a living or have someone explain the whole thing to you, no one can understand any of it.

(8) To sum up the vote from this homeowner of 4 tax paying residents, FIND A SOLUTION THAT IS SOUTH OF THE PECOS PLANNED PATH. I know you think you have tried, but you obviously haven't tried hard enough. As state/county/city officials that is your duty.

Code	Issue	Response
1	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
2	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Acquisitions and Relocations**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138-47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Noise**	
8	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mtn Loop 202
Date: Monday, June 24, 2013 9:04:32 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Scott L Miller [mailto:slmiller26@gmail.com]
Sent: Saturday, June 22, 2013 12:10 PM
To: Projects
Subject: South Mtn Loop 202

As an Ahwatukee resident, it first must be discussed how poorly this project has been handled since inception in 1985. It was "in the books" since then and development has been allowed since in areas that are in the right of way to the freeway. Planning/zoning by ADOT, Maricopa County and the City of Phoenix are all guilty of the dilemma we have right now.

(1) (2) (3) (4) (5) (6) (7)

Now that the city/county/state officials have created such a toxic situation, it is your duty to come up with the best scenario to make it right. One of those options is to not build, but I live in the real world and know progress always wins. So then you need to come up with a win-win with the Gila River Indian community and move the proposed freeway south and not try to buy homes at undervalued prices and create more losses for the hundreds of homeowners and church members.

We have not even discussed the air quality and noise that will be brought to our section of the valley. As most people who read this study, unless you do this for a living or have someone explain the whole thing to you, no one can understand most of it.

(8)

To sum up the vote from this homeowner of 4 tax paying residents, FIND A SOLUTION THAT IS SOUTH OF THE PECOS PLANNED PATH. I know you think you have tried, but there is a solution that needs to be uncovered. As state/county/city officials that is your duty.

Scott Miller
Slmiller26@gmail.com

Code	Issue	Response
1	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
2	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Acquisitions and Relocations**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138-47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Noise**	
8	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

From: Marcy Miller
To: Projects
Subject: South Mountain Freeway
Date: Tuesday, July 23, 2013 8:16:56 PM

Dear ADOT,

1 I am in favor of the proposed Loop 202. As a resident of Laveen, I believe it would ease congestion along Baseline and bring vital business to our area.

Sincerely,
Marcy Miller

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 expansion is great
Date: Thursday, May 23, 2013 11:18:03 AM

-----Original Message-----
From: Erin Million [mailto:erinmil88@yahoo.com]
Sent: Thursday, May 23, 2013 10:50 AM
To: Projects
Subject: 202 expansion is great

1

I would like to express my support for this project which will greatly assist those like myself living and raising a family in Laveen. I support the recommended route. Please move this project forward!!

Thank you,
Erin Million

Sent from my iPhone

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Highway
Date: Monday, May 20, 2013 8:45:53 AM

From: Mary Mills [mailto:mil6518@aol.com]
Sent: Friday, May 17, 2013 5:15 PM
To: Projects
Subject: 202 Highway

1

I support building the 202 Highway. I do not support building it on Indian Land. I personally think that would be a mistake.

Mary Mills

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Allen Mills Document Created: 5/21/2013 2:45:55 PM by Web Comment Form As an Arizona native and someone who has lived in the Valley for 50 years, I strongly support the construction of the South Mountain Freeway. I believe it will improve our quality of life be reducing congestion and commuter times as well as improve air quality through less vehicle idling. Finally, it will create a large amount of new jobs, which this Valley sorely needs during these difficult economic times. Thank you for your consideration.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Elizabeth Mills Document Created: 6/5/2013 8:24:33 PM by Web Comment Form I support the construction of the South Mountain Freeway. It will bring much needed relief to the Valley's traffic congestion as well as give a significant boost to the local economy.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

speak next, please move forward.

MR. MILLS: Thank you for your time. As someone who was born and spent his entire life in Arizona, I strongly support the South Mountain, even when it was initially voted upon in the mid '80s. I think it's a huge -- it would be a huge component in relieving traffic congestion, particularly in the central part of the Valley, greatly aid the commuter traffic from the West Valley over to the Southeast Valley.

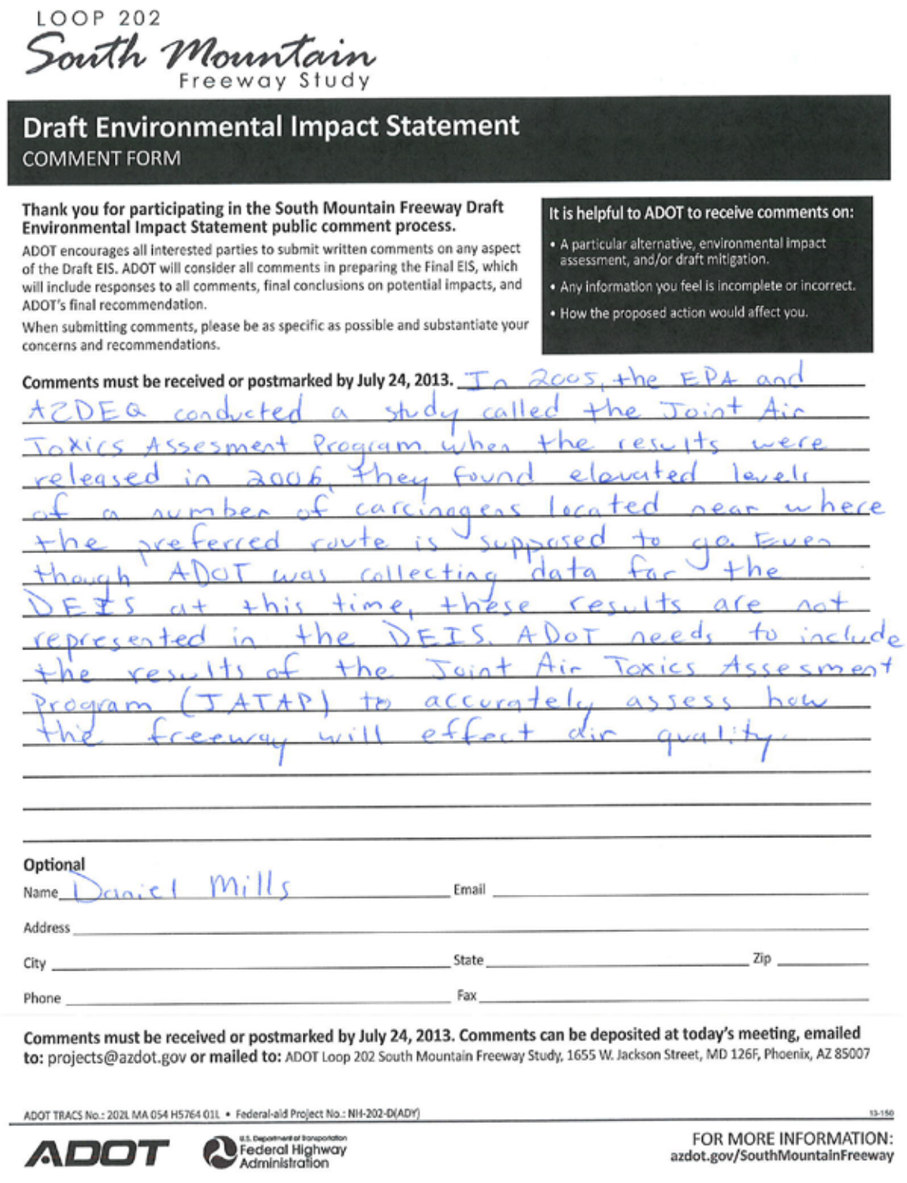
And then also, in these pretty tough economic times, taking into account the construction industry, it'll bring immense value to the construction industry. Thank you for your time.

THE FACILITATOR: Thank you.

Debbie Zapatka.

MS. ZAPATKA: Hi, I'm Debbie Zapatka and I live in Laveen, and we've lived there for five years now with the hope of the 202 coming in, and it was kind of promised when we moved there. Our development in the area, we have empty shopping centers just sitting there, we really need economic development, and the only way for that to happen really is to get the 202 in, as well as our area has no hospital and a hospital will not come in unless the 202 gets in. And I don't even know where the closest hospital is, it's probably 99th Avenue and

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. In 2005, the EPA and AZDEQ conducted a study called the Joint Air Toxics Assesment Program when the results were released in 2006, they found elevated levels of a number of carcinogens located near where the preferred route is supposed to go. Even though ADOT was collecting data for the DEIS at this time, these results are not represented in the DEIS. ADOT needs to include the results of the Joint Air Toxics Assesment Program (JATAP) to accurately assess how the freeway will effect air quality.

Optional

Name Daniel Mills Email

Address

City State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The mobile source air toxics emission modeling developed for the project (which factored in the U.S. Environmental Protection Agency's recent rules for the 2035 analyses) and discussed beginning on page 4-77 of the Final Environmental Impact Statement found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.

Code	Comment Document

5025

1 MR. MILLS: In 2005, there was a study between the
2 EPA and the Arizona Department of Environmental Quality called
3 the Joint Air Toxics Assessment Program. When the results of
4 the study were released in 2006, they found elevated levels of
5 known carcinogens, including benzine and formaldehyde and a
6 number of others. These were above the standards allowed by
7 the EPA.
8 And this study was not represented in the Draft EIS
9 and has not been mentioned or talked about by ADOT in any of
10 their studies concerning how the freeway will affect air
11 quality. And, if the Draft EIS finds that the freeway is
12 supposed to alleviate air quality overall, throughout the
13 Valley, then how do these results from this particular study
14 factor into that if they're not represented?
15 Again, how do they reason that putting a freeway
16 into an area that already has elevated levels of carcinogens,
17 as opposed to alleviate those carcinogens, especially since in
18 2006 when these results were released, ADOT was conducting the
19 study for the Draft EIS. So these should have been results
20 that were mentioned or represented in the study, yet they are
21 not.
22 And, furthermore, one of the air-monitoring sites
23 that the EPA and the Arizona Department of Environmental
24 Quality used to publish these results was at Broadway and
25 Central Avenue, located only a couple of miles away from where

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Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The mobile source air toxics emission modeling developed for the project (which factored in the U.S. Environmental Protection Agency's recent rules for the 2035 analyses) and discussed beginning on page 4-77 of the Final Environmental Impact Statement found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.

Code	Comment Document

1 the preferred alternative for the freeway is. So, obviously,
2 these elevated levels of carcinogens are very close and in
3 areas where the freeway is supposed to go.
4 So I think that they should talk about that and how
5 the Joint Air Toxics Assessment Program fits into the reasoning
6 of how air quality is supposed to be affected by the freeway.
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Code	Issue	Response

Code	Comment Document

From: Daniel Mills
To: Projects
Subject: South Mountain Freeway DEIS comment
Date: Tuesday, July 23, 2013 6:18:07 PM

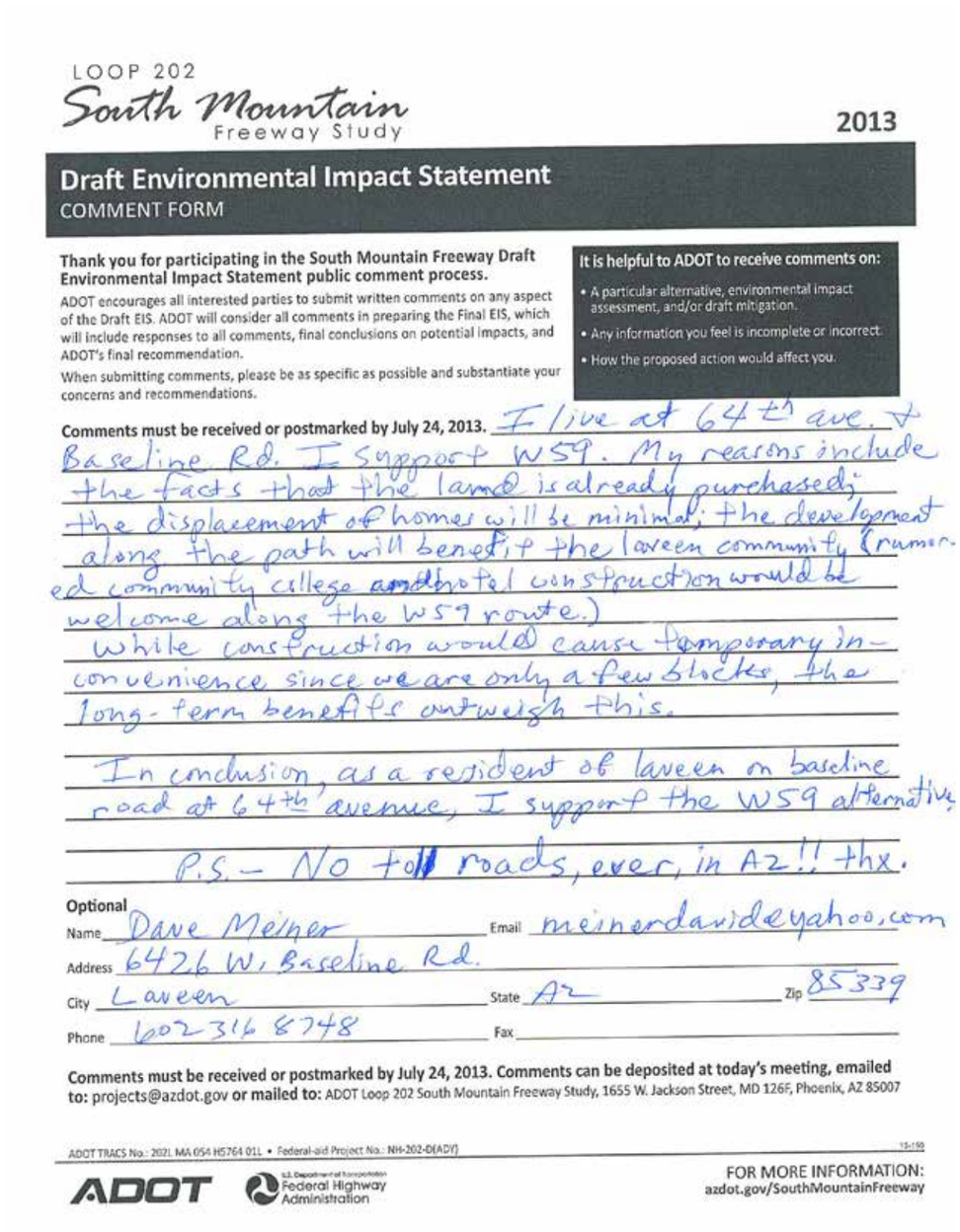
Hello,

I would like to submit a comment for the South Mountain Freeway DEIS. After reviewing the DEIS, there appears to be a lack of attention paid to how future development as a result of the freeway will be met with demand for water. Numerous studies exists concluding that the Colorado River, the major source of water for the region is becoming increasingly endangered as a result of sprawling development, precisely the type that the South Mountain Freeway is slated to create.

If the major water source for the region is becoming increasingly stressed, how does ADOT then reconcile future development in the area will be met with demand for this resource, considering future projections based on the most recent and reliable data?

Thank you

Code	Issue	Response
1	**Surface Water**	It is inappropriate to introduce the role—if any—of the proposed freeway in influencing water needs related to development and in increasing local population. The freeway's purpose is to respond to current and projected deficiencies in regional transportation capacity.
2	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

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When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

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- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. I live at 64th ave. & Baseline Rd. I support W59. My reasons include the facts that the land is already purchased; the displacement of homes will be minimal; the development along the path will benefit the Laveen community (rumored community college and hotel construction would be welcome along the W59 route.)

While construction would cause temporary inconvenience since we are only a few blocks, the long-term benefits outweigh this.

In conclusion, as a resident of Laveen on baseline road at 64th avenue, I support the W59 alternative.

P.S. – NO toll roads, ever, in AZ!! thx.

Optional

Name Dave Meiner Email meinerdavide@yahoo.com

Address 6426 W. Baseline Rd.

City Laveen State AZ Zip 85339

Phone 602 316 8748 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4260

I love the idea of running paths and, of course, bike riding trails alongside the freeway. I just don't know if that's in the budget, but frankly I think rubberized pavement should be. So those are my statements and I thank you for your time.

THE FACILITATOR: Thank you, ma'am. Raven Barehand.

Raven Barehand.

As we're waiting for the next speaker, I'd like to remind you again, please refrain from clapping or making comments regarding any speaker's position on any of this, out of respect for their position.

If there's anyone in the auditorium that would like to speak, please make sure that you register at the front desk. Your name will appear on the screen; we will call you up in the order that you register.

Katran Mingo.

Good afternoon. You have three minutes; here's the timer. You may begin.

MS. MINGO: Okay. Thank you very much. My name is Katran Mingo; I'm a resident of Laveen. Thank you for hearing us today. It is time to build the South Mountain Freeway. Valley commuters have

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

waited in traffic jams long enough. The freeway will cut traffic congestion across the metro area, reduce air pollution, and save drivers time and money. If we don't build the South Mountain Freeway, traffic in the region will get much worse over the next two decades. According to ADOT's own study, traffic on I-10 between Ahwatukee and Goodyear will grow 28 percent. Another 103,000 cars will use the Broadway curve each day. Another 38,000 cars will jam the tunnel every day. Morning and evening commute times will increase 39 percent to 82 percent. Traffic congestion on six streets will increase 46 percent. The same report indicates the project also will reduce air pollution by reducing the time vehicles will spend stuck in traffic.

The project will create 30,000 jobs during the five- to six-year construction period and result in a 2 billion investment in the Phoenix area economy. The money to build the freeway is in the budget. It was approved by voters twice, first in 1985 and again in 2004. There is no more important project to the area's commuters and workers than the South Mountain Freeway project. We must build it now. Thank you.

THE FACILITATOR: Thank you.

Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. I SUPPORT THE CONSTRUCTION OF THE LOOP 202 - SOUTH MOUNTAIN FREEWAY. A COMPLETED MULTI-MODAL TRANSPORTATION SYSTEM IS ESSENTIAL THE FUTURE ECONOMIC GROWTH, COMMUTER SAFETY AND AIR QUALITY ISSUES OF THE PHOENIX METROPOLITAN AREA.

CURRENTLY, ROUTES THROUGH PHOENIX ARE CONGESTED AND DANGEROUS. MUCH OF THAT TRAFFIC WOULD OPT TO BYPASS PHOENIX ON THE SOUTH MOUNTAIN ALIGNMENT

THIS WOULD BENEFIT LOCAL RESIDENTS AND SAVE MONEY AND TIME FOR BUSINESS

Optional

Name MARK MINTEN Email MMINTEN@AZBUILDERS.ORG

Address 5932 E. PHELPS ROAD

City SCOTTSDALE State AZ Zip 85254

Phone 602.769.0281 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Document Created: 7/24/2013 6:16:03 PM by Web Comment Form

I am a homeowner in the Pecos & 32nd Street area, and my house will be directly affected by the Loop 202 extension plan. Either my house will be in the right-of-way, or I'll have a sound barrier going through my back yard. My neighborhood is not the high-rent district of northern Ahwatukee. I've always done my part by paying homeowner's dues and taxes, never missing a mortgage payment, and keeping my front property landscaped and clean – to the point of indirectly coaxing my neighbors to have some pride in their properties, too. But it's been hard, in a neighborhood that has been under threat since it was built.

(1) Why did the City of Phoenix allow residential developers to use land that was slated for a freeway footprint, anyway? Chandler and Gilbert zoned their land commercial, and are benefiting from it far more, now.

(2) (3) (4) (5) I knew when I purchased my house in 2000 that there was a chance I might lose it, but I'd hoped that ADOT could work out a deal with the Gila River Indian Community to build the freeway a mile or two south (and thus protect South Mountain Park's west end), or set the proposed bypass route along the more-efficient Highway 85 and Interstate 8 route that many trucking companies already use. When I moved in, Pecos Road was a quiet two-lane road and a community nexus for runners, bikers, and horseback riders. As just a four-lane road, it is now always busy and often unsafe (we've had many fatal accidents along Pecos.)

(6) (7) (8) (9) (10) I can't imagine how crowded, noisy, and unsafe it will be as a freeway. I've seen too many health and safety studies to not be worried about the immense increase in pollution from heavy commercial vehicles, which will be the ones most likely to use this extension. As a private vehicle connection, the Loop 202 will be too far west to get East Valley residents into central Phoenix, and not far enough west to take hazardous truck traffic around the growing Southwest Valley.

(11) We could do so much more with our limited transportation funding. This extension will be outdated by the time it is finished, and it will have ruined three communities in the process.

Sincerely,

Stephen Mintz

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
2	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Section 4(f) and Section 6(f)**	
4	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
5	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Noise**	
7	**Safety and Health**	The proposed South Mountain Freeway's eight-lane section is shown on Final Environmental Impact Statement page 3-58, with discussion and remarks that the freeway would be consistent with the design of other freeways in the region and would thereby improve driver expectancy and safety. The sidebar on Final Environmental Impact Statement page 3-59 discusses the safety features of auxiliary lanes (used at traffic interchanges) for facilitating acceleration and deceleration, thereby reducing potential conflicts with through-traffic and travelers merging onto or exiting from the proposed freeway.
8	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Health Effects**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
10	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Alternatives**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:47:40 AM

From: Miracle, Laymond [mailto:laymond.miracle@usairways.com]
Sent: Friday, May 17, 2013 4:02 PM
To: Projects
Subject: 202

1

Please, let's get the 202 build so the traffic in the south and east valley can be improved greatly. I-10 is now just short of being a large parking lot. I have to drive thru this traffic every day

L. Miracle
Sun City AZ
85351

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SMF Comment
Date: Wednesday, June 26, 2013 8:09:20 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: lmisturini@cox.net [mailto:lmisturini@cox.net]
Sent: Tuesday, June 25, 2013 5:56 PM
To: Projects
Subject: SMF Comment

Good Afternoon,

I recently attended the forum held on June 18th at the Foothills Golf club. After reviewing the video and asking many questions of staff members I have come to the conclusion that this freeway would be an environmental abomination. The particulate matter would seriously jeopardize the health of children and seniors. Smog would likely accumulate along the south mountain ridge and surrounding area which would become a health hazard to both residents and wildlife. The extremely high environmental and taxpayer cost greatly outweigh any possible benefits. I believe there are other more environmentally friendly and cost effective alternatives including a light rail extension. Arizona and Phoenix deserve better.

1 2 3 4 5

Thank you for your consideration.

Louis and Teresa Misturini
2726 W. Cottonwood Lane
Phoenix, AZ 85045
480.460.2160

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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

Code	Comment Document
	I live near 42nd and Liberty Ln. in Ahwatukee and am a member of PARC.
1	What strikes me most about the DEIS is the lack of issues addressed, and the lack of current statistics. These omissions almost seem purposeful, to me.
	I have attended meetings on this "parkway, toll-way, freeway" issue since discussions in the late 80's/early 90's. In the beginning, ADOT argued that local (Ahwatukee) drivers needed it to get to jobs in downtown Phoenix. Surveys showed that not to be the case. Then the argument to get traffic off I-10 and the Broadway curve came.
	This (in my opinion) was when the ADOT really became partially truthful. They really wanted to get the traffic away from the pollution sensor at 43rd/Broadway. Clean up the air in metro Phoenix.
2	The ADOT has never admitted to this being a truck by-pass. But to my logic, that is the reality. There are chronic issues about air quality (PM and ozone) in the metro Phoenix area. High sulfur diesel pollution from trucks originating from Mexico won't meet CARB standards. This legislation was enacted to comply with the Clean Air Act. Data/standards were discussed when this was passed. Yet, this data is never mentioned in the DEIS. The additional air pollution has negative health impacts & is completely omitted. Particulate matter during the construction phase (blasting south mountain, & around the river bed) will be enormous. This could mean future loss of highway funds. But it will mean loss of good air quality in the Ahwatukee/Laveen areas. We have multiple schools with in yards of this project down Pecos Rd..
3 4 5 6	
7 5 8	In 2005/2006 extensive air monitoring was conducted by the EPA & ADEQ for toxic chemicals. Where are the updates??? They are only enclosing this old data. But even then, results found high levels of vehicular emissions---formaldehyde, benzene, butadiene, acetaldehyde were above standards. Adding more traffic emissions would logically only add to this health problem. Dioxin has been found to damage reproductive health, cause cancer, and worsen diabetes. Ahwatukee has no industries using or omitting toxic chemicals. Therefore we have no hazmat transportation issues or risks. But data is collected on and analyzed about hazmat on highways. This data (again) is omitted in the DEIS.
9	There are super-fund sights near the west side proposed path. The economic impact & taxpayer monies to correct or know the impact of these lands in construction are not evident in this study.
10 11	Earlier, I mentioned the traffic congestion at the Broadway curve that ADOT wants to decrease. But the design only seems like it will add or move the traffic on I-10 between 59th and 51st Ave. where it already is extreme. This effect of traffic seems like an omission.
12 13	It would seem the DEIS lacks addressing the plan to blast through South Mountain. There are or might be violations of the American Indian Religious Freedom Act.

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Air Quality**	
4	**Trucks**	
5	**Health Effects**	
6	**Construction**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
7	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The mobile source air toxics emission modeling developed for the project (which factored in the U.S. Environmental Protection Agency's recent rules for the 2035 analyses) and discussed beginning on page 4-77 of the Final Environmental Impact Statement found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.

(Response 8 continues on next page)

Code	Comment Document
14 15	I see nothing in the DEIS addressing the water wells below Pecos Road. These wells furnish water to the lakes in Ahwatukee. There is no data for alternative water sources. There is no data about moving utilities now under Pecos Rd.
16 4	ADOT studied noise levels in 2003/2004 during non-peak traffic hours. Ambient noise levels were 44-56 dBA. With the proposed elevated (above grade) sections of this freeway, it might be hared to keep noise below the 64 dBA state requirement. If this is a CANAMEX corridor, then noise could be even greater than ADOT projections on 10yr. old data.
17	What is scary is that a lot of questions won't be addressed until the design phase according to ADOT. This seems short sighted and backward. How do you manage/budget/plan with so many questions. The costs will be higher than the 20' noise abatement walls!
18	When construction is in progress access on Pecos will be limited or none. This takes us back to traffic on Chandler Rd. for years. Talk about gridlock. The fact that schools/traffic will have no access to the freeway seems counter productive to moving residents. There are no Hazmat evacuation procedures in place.
19 8	
20	Today, costs of right of way acquisition, of homes & businesses, utility relocations, & underground mining repairs are vaguely estimated at near 200 million BEFORE construction!!!!!! What a waste of taxpayer monies.
1	This can be a NO BUILD decision. I just ask that current information be the guide in this decision. And I see that lacking in the current DEIS.

Dorothy Mitchell

Dorothy Mitchell
4205 E Liberty Ln.
Phoenix, Az. 85048

Code	Issue	Response
8	**Hazardous Materials**	The West Van Buren Water Quality Assurance Revolving Fund site was identified and considered during development of the Draft Environmental Impact Statement (see pages 4-153 and 4-165 of the Draft and Final Environmental Impact Statements, respectively, and the Draft Initial Site Assessment prepared for the proposed project). These sites are primarily groundwater-impact sites, and groundwater is found at a depth of over 60 feet below the footprint of the Preferred Alternative. Given the separation distance between the adversely affected medium (groundwater) and the construction zone (near-surface in these locations), the project team determined that these sites would not pose a risk to construction or to the general public once the facility were completed. This assessment has been clarified in the Final Environmental Impact Statement on page 4-165.
9	**Hazardous Materials**	The corridor analysis revealed sites that would need further assessment during the property acquisition phase of the project, if an action alternative were to become the Selected Alternative. The Arizona Department of Transportation employs a phased approach to site assessment that allows time for cleanup of any sites found to have hazardous waste issues. The project team concluded from the level of analysis conducted during the environmental impact statement process that the types of sites likely to be acquired contain common hazardous waste issues like underground storage tanks, asbestos and lead paint in buildings, and other commonly found issues (see Draft Environmental Impact Statement page 4-153). The Arizona Department of Transportation maintains a process for addressing these issues in accordance with all applicable environmental laws and regulations.
10	**Traffic**	Discussions of traffic on arterial streets considers those arterials streets in and around the entire Study Area, not just in Ahwatukee Foothills Village. The traffic projections for Chandler Boulevard (see Figure 3-12 on page 3-29 of the Final Environmental Impact Statement do show a reduction with the proposed freeway when compared with conditions without the proposed freeway. The travel time comparison shown in Figure 3-17 on page 3-34 of the Draft Environmental Impact Statement included a trip from Ahwatukee Foothills Village to Downtown Phoenix using Interstate 10, not the proposed freeway. This trip would take 5 or 6 minutes less with the proposed freeway in place when compared with conditions without the proposed freeway. The duration of level of service E or F (represents stop-and-go traffic) for the existing conditions and future conditions without the proposed freeway are shown in Figure 1-9 and 1-10 in the Draft Environmental Impact Statement. In both conditions there are more than 3 hours of congested conditions during the morning and evening commuting periods on a number of the region's freeways, especially Interstate 10.
11	**Design**	The proposed connection to Interstate 10 (Papago Freeway) at 59th Avenue would include substantial improvements (widening) along Interstate 10 to provide adequate operations on Interstate 10 in the area of the junction and to allow traffic moving to and from the South Mountain Freeway to enter and exit the Interstate 10 main line (see page 3-49 of the Final Environmental Impact Statement). The design of the proposed Interstate 10 and South Mountain Freeway system traffic interchange at 59th Avenue has received preliminary acceptance from the Federal Highway Administration, subject to completion of the National Environmental Policy Act process.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
12	**Construction**	The contractor submits a written blasting plan to the Arizona Department of Transportation prior to beginning any blasting work. The Arizona Department of Transportation Resident Engineer then ensures that the contractor has followed all requirements for a blasting permit. Prior to blasting, the areas where rock fragments may fall is mapped to ensure there will be no property damage. Residents in the area are notified of any blasting activity (see Draft Environmental Impact Statement page 4-115). Blasting is avoided if standard earthmoving equipment can be used.
13	**Cultural Resources**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment*, *Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
14	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
15	**Utilities**	If an action alternative were to become the Selected Alternative, during construction residents shall be notified at least 24 hours in advance of any temporary outages needed for utility relocations by the Arizona Department of Transportation or the utility company that owns the facility (see Draft Environmental Impact Statement page 4-162). The Arizona Department of Transportation typically coordinates and collaborates closely with the utility companies and the contractors to prevent any temporary outages.
16	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (ver. 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes, which may be elevated above the roadway, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Valley and across the country.
17	**Design**	The current level of engineering is used to determine the limits of environmental and construction impacts due to the proposed freeway. The location and profile of the freeway are evaluated to minimize potential changes to the freeway as the design level would progress. The current level of engineering is an accepted industry standard for determining impacts. (See Draft Environmental Impact Statement sidebar on page 3-40 for more discussion.)
18	**Traffic**	The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Final Environmental Impact Statement page 3-27.)
19	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange was eliminated based on undesirable residential displacements and cost. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
20	**Geology**	A search of the Arizona Mineral Industry Location System database, examination of aerial photographs and topographic maps, and field investigation were completed to identify mineral resources and mines in the Study Area. These efforts identified one gold mining claim, six unknown mining claims, and several mining features in the vicinity of the South Mountains. None of these mining claims or features are located within the proposed freeway alignment.

Code	Comment Document

From: Sierra Club on behalf of Scott Mittelsteadt
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 12:05:40 PM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

OPPOSE!

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(5) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(6) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

(7) Sincerely,

(8) Mr. Scott Mittelsteadt
14602 N 19th Ave Unit 112
Phoenix, AZ 85023-7104

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	(602) 653-0735

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

MR. MOCKUS: Perfect. Thank you.

Thank you for your time and opportunity to speak. It's been 35 years since the idea of the 202 link has been put on the books, and I can't understand why all the questions and concerns regarding this roadway have not been addressed for that length of time. It makes me really wonder how other roadway and roadway improvements have been brought up and approved and built within reasonable amounts of time, and this goes on and on and on.

Actually, I'm going to speculate that most every other major roadway project has been built since the time this one has been proposed. Is this bureaucracy at its worst or is it just a slight to our community and a lack of concern for a community desperately in need of easier, safer, and more economical means of commute.

We now have construction of the 303, which I'm sure has not been on the books for 30 years, flying along and due to be completed within the next two years. This roadway, in comparison, does not begin to alleviate the congestion and travel time that this 202 extension will for the community of Laveen and surrounding communities, yet it was planned, developed, and built in less than 30 years.

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

As you can tell, I'm a proponent for this project, I look forward to the development and ease of travel it will bring to our community and also surrounding communities.

There are those who may oppose its construction for many reasons, some just and some not so just. And those that are just plain out there, plain nonsensical. I ask that you take a look at the need of the community as a whole and put yourself in our place to see how the benefits for an entire community outweigh the views of those with personal and monetary reason, and continue to construct construction of this very important artery, bringing life blood to our communities.

Sometimes I begin to believe that our diversity may be the reason our community has to wait 30 years for something that other communities get immediately. Please prove me wrong and proceed immediately with construction. I also ask that construction begin from the southeast and proceed to the northwest, allowing the passage from Laveen to the East Valley to open as soon as possible.

1

They had done this for the 303 from I-17 to Happy Valley Road, while the remainder is still being constructed. I also believe no road should be

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Code	Issue	Response
1	**Construction**	Final Environmental Impact Statement page 3-59 lays out the preliminary construction sequencing if the Preferred Alternative were to become the Selected Alternative: "The proposed construction implementation plan would schedule construction of the corridor to begin at the Interstate 10 (Papago freeway) system traffic interchange and continue south to approximately Baseline Road. Additional construction would begin near the Interstate 10 (Maricopa Freeway) system traffic interchange and continue along Pecos Road, through the South Mountains, and end at approximately 51st Avenue. Finally, these two roadway lengths would be connected by constructing the remaining freeway segments between Baseline Road and 51st Avenue."

Code	Comment Document

built unless there is a sidewalk or a trail for pedestrian and bike traffic next to it, so a person should be able to travel any way you can. Now is the time to make that possible.

In closing, I ask that we build the road now. 30 years is long enough and as we all know, costs have gone up substantially and will continue to rise with each day, week, month, year, or, in this case, three decades, we wait.

When first proposed, it was with the future needs in mind. Well, the future has arrived. It is time to act. We cannot wait any longer.

Thank you very much. I appreciate you listening.

THE FACILITATOR: Thank you, Mr. Mockus.

Just one note. For those of you who are, I understand it's very difficult sometimes in working with prepared notes to keep in mind the time here. So if you would, from time to time, if you are working from notes, please take time out to double-check the time. You're doing a great job and we appreciate that. Thank you.

Sandy Bahr.

MS. BAHR: Thank you. My name is Sandy Bahr. I'm the chapter director for the Sierra Club

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain 202
Date: Monday, May 20, 2013 8:41:13 AM

From: Sean Mohr [mailto:sean.mohr@yahoo.com]
Sent: Friday, May 17, 2013 8:14 PM
To: Projects
Subject: South Mountain 202

1

I approve of this construction project

Sean!

We must accept finite disappointment but never give up on infinite hope - Dr Martin Luther King

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Jmolina
To: Projects
Subject: URGENT - South Mountain Freeway Comments
Date: Wednesday, July 24, 2013 6:53:55 PM

Dear All,

I am writing to, once again, express my opposition to and concern over the proposed South Mountain Freeway. My family and I have been residents of Ahwatukee for over 15 years. After investigating the information available these are my opinions:

1 2 3 4 5 6 7 8 9 10 11 12

* It is irrefutable that neighborhoods, including my own, schools, churches, and many businesses will be negatively impacted by air pollution, light pollution, noise pollution by both the construction and the existence of the proposed South Mountain 202 Freeway.
* A significant portion of South Mountain, sacred land, will be destroyed.
* CANAMEX Truck Bypass will introduce new, potent pollution to the valley
* This freeway is a waste of significant taxpayer dollars that could be better spent elsewhere
* Ahwatukee is filled with individuals and families that care deeply about their community. It's more than a community - it's a huge family. I have never lived in a place like it and would never want to leave. However, the proposed freeway, will now force my family to be uprooted.

My family and I are requesting a 'no build' or 'no action' alternative to the current plans.

Thank you for your time and consideration.

Kind regards,
Juan Carlos Molina
www.g1graphic.com

Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Economics, Socioeconomics**	Businesses that would be directly and adversely affected by the Preferred Alternative, if it were the Selected Alternative, would be mitigated through relocation or site purchase at fair market value. Construction of the proposed facility would likely generate additional business and jobs in the corridor upon implementation because of the improved access it would provide.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas. The viewing distances and relative sizes of the "lights in the night" would be comparable. The open views of the desert and of the Sierra Estrella would remain unchanged.
6	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Section 4(f) and Section 6(f)**	
8	**Cultural Resources**	
9	**Purpose and Need, Lack of Support**	
10	**Trucks**	
11	**Purpose and Need, Truck Bypass**	
12	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

From: Kristen Molina
To: Projects
Subject: South Mountain Freeway - Comment
Date: Wednesday, July 24, 2013 3:09:07 PM
Importance: High

Dear All,

I am writing to, once again, express my opposition to and concern over the proposed South Mountain Freeway. My family and I have been residents of Ahwatukee for over 10 years, living in the Mountain View Community. After investigating the information available these are my opinions:

1 2 3 4 5 6 7 8 9 10 11 12

- It is irrefutable that neighborhoods, including my own, schools, churches, and many businesses will be negatively impacted by air pollution, light pollution, noise pollution by both the construction and the existence of the proposed South Mountain 202 Freeway.
- A significant portion of South Mountain, sacred land, will be destroyed.
- CANAMEX Truck Bypass will introduce new, potent pollution to the valley
- This freeway is a waste of significant taxpayer dollars that could be better spent elsewhere
- Ahwatukee is filled with individuals and families that care deeply about their community. It's more than a community – it's a huge family. I have never lived in a place like it and would never want to leave. However, the proposed freeway, which once was planned to run through my backyard (literally), will now force my family to be uprooted.

My family and I are requesting a 'no build' or 'no action' alternative to the current plans.

Thank you for your time and consideration.

Sincerely,

Kristen Molina

2753 W. Redwood Lane
Phoenix, AZ 85045

Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Economics, Socioeconomics**	Businesses that would be directly and adversely affected by the Preferred Alternative, if it were the Selected Alternative, would be mitigated through relocation or site purchase at fair market value. Construction of the proposed facility would likely generate additional business and jobs in the corridor upon implementation because of the improved access it would provide.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas. The viewing distances and relative sizes of the "lights in the night" would be comparable. The open views of the desert and of the Sierra Estrella would remain unchanged.
6	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Section 4(f) and Section 6(f)**	
8	**Cultural Resources**	
9	**Purpose and Need, Lack of Support**	
10	**Trucks**	
11	**Purpose and Need, Truck Bypass**	
12	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:46:14 AM

-----Original Message-----
From: Sylvia Mondero [mailto:m0nday@aol.com]
Sent: Friday, May 10, 2013 11:24 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Please build the south Mt.freeway. The 202.

Sent from my iPhone

_____

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
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Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

* * *

MR. MONTEILH: My comment is since you're doing that stretch of freeway from the present end of the 202 to the I-10, I'm wondering if ADOT is willing to put riding trails along that trail, because there is some space. There's huge horse ownership in Laveen, and people like to ride horses. So when you're creating more traffic in that area, that opens up that whole area for them to ride, walk, bike, and that's great recreation to keep citizens moving.

That's my comment.

THE COURT REPORTER: Thank you. Did you want to leave your name?

MR. MONTEILH: You're welcome. My name is Louis Monteilh, M-o-n-t-e-i-l-h.

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Code	Issue	Response
1	**Traffic**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 3:02 PM
CALLER: JENNY MONTEON	CALLER ADDRESS: 8127 N. 18TH PLACE, PHOENIX, ARIZONA 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I'd like to propose that the South Mountain freeway be built. And I approve of that. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 1:56 PM
CALLER: WILLIAM MONTGOMERY	CALLER ADDRESS: 9202 N. 2ND AVENUE, PHOENIX, ARIZONA 85021
PHONE: 602-943-6781	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I was calling in support of the freeway, the Ahwatukee freeway. And I just wanted to place my support of the new freeway. Thank you, bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 9:39 AM
CALLER: MARILYN MOONEYHAM	CALLER ADDRESS: 1242 E. MCNAIR DRIVE, TEMPE, AZ 85283
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Please build the South Mountain Freeway. The area needs this freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Fred Moore Document Created: 5/21/2013 2:44:24 PM by Web Comment Form This project is important to the citizans of Arizona, it will create jobs, and reduce truck traffic going through the valley.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Randall Moore Document Created: 5/21/2013 3:40:10 PM by Web Comment Form I AM For the 202 XTention "On-Rez-Alignment" if the State of Arizona has the time to, I own land on the Gila River reservation and may possibly have it under the 202 Loop,BUT the safety of the car drivers is paramount ! Putting drivers at work in less time, parked vehicle, from 9am-5PM KEEPS POLLUTION outta the AIR.(ie.meaning getting these drivers quicker to work from home)BUT, if the Gila River Reservation realizes the OPPORTUNITIES at hand set down by the State of Arizona, and take advantage of these Long-Term Opportunities for their kids and grand-children and Elders . . . .

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Russell Moore Document Created: 5/21/2013 8:22:45 PM by Web Comment Form Much needed to respond to the growth of our community and preservation of our quality of life.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Wednesday, May 29, 2013 8:25:20 AM

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Mary Moore
Sent: Tuesday, May 28, 2013 5:01 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2)(3) If you build more roads, more drivers will come! Soon, the proposed new freeway would be as congested as I-10 and I-17. Instead of seeking short-term solutions, ADOT needs to plan for and invest in long-term transportation solutions, particularly mass transit. The only way to effectively reduce congestion and mobilize people is to reduce the number of vehicles utilizing our roads, not encourage more people to drive on our roadways.

(4)(5) This proposed South Mountain Freeway would have long-term negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks.
As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6)(7) My greatest concern is that the freeway will negatively affect our environment. South Mountain Park, the largest city park in our nation, was created to protect resources and to benefit our communities. As a frequent hiker, I am concerned that blasting through a portion of the park will destroy wildlife and habitat, cut off animal movement corridors, and eliminate valuable public spaces. It would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will only exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction will force residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center. This will not improve our quality of life.

(1) Please urge ADOT to select the No-Build Alternative.

Sincerely,

Ms. Mary Moore
1630 W Gail Dr
Chandler, AZ 85224-4045
(480) 558-6197

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:52 PM
CALLER: JACK MOORE	CALLER ADDRESS: 1445 S. PARK ROSE CIRCLE, GILBERT, AZ 85296
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support this freeway and hope it's done soon. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

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I support the South Mountain freeway. I've seen a lot of economic development and an enhanced community as a result of the freeways that have been built here. I think they're beautiful the way ADOT does it and I strongly encourage acceptance of this. Thank you.

THE FACILITATOR: Thank you.

I'll try Ana Morago again.

MS. MORAGO: Hi, my name is Ana Morago, I am from Gila River Indian Community. Well, this is kind of -- I've been doing this for two years now, urging ADOT not to build the freeway at all, because we hold the South Mountain sacred to four tribes, actually: Akimel AuAuthm, Akimel O'odham, Tohono O'odham, and Ak Chin. These tribes all hold this ground sacred, and if you blast through this mountain you're going to be dealing with four tribes trying to save the mountain as well as the wildlife and the plant life that live on there.

I read the EIS last night talking -- or trying to get ideas for talking points, and one that we really need to look at is the water. Water is the source of all life. When I read it, there's hazardous materials are going to be going underground, water wells, lots of wells, surface water is going to be contaminated as well as polluted, as well as our Sonoran Desert tortoise as a newly endangered species list now, as well the Mexican

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Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants, and Wildlife**	
3	**Hazardous Materials**	The corridor analysis revealed sites that would need further assessment during the property acquisition phase of the project, if an action alternative were to become the Selected Alternative. The Arizona Department of Transportation employs a phased approach to site assessment that allows time for cleanup of any sites found to have hazardous waste issues. The project team concluded from the level of analysis conducted during the environmental impact statement process that the types of sites likely to be acquired contain common hazardous waste issues like underground storage tanks, asbestos and lead paint in buildings, and other commonly found issues (see Draft Environmental Impact Statement page 4-153). The Arizona Department of Transportation maintains a process for addressing these issues in accordance with all applicable environmental laws and regulations. The West Van Buren Water Quality Assurance Revolving Fund found within the proposed footprint would not be within the construction zone, which is known to contain six contaminants in the groundwater at a depth of 30 to 60 feet.
4	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.) If an action alternative were to become the Selected Alternative, during project implementation a Stormwater Pollution Prevention Plan that would establish best management practices for sediment and erosion control would be completed. These best management practices would be in place and maintained for the duration of construction to ensure that erosion and pollution from sediment and other pollutants running downstream would be minimized. The proposed project would require water quality certification under Section 401 of the Clean Water Act (see Draft Environmental Impact Statement pages 4-110 through 4-112). To reduce the potential impact of contaminants such as oil, grease, soil, and trash, settling basins would be used to collect water and allow materials to settle. The basins could also serve to contain chemical spills resulting from vehicle accidents. Each basin would be designed to contain a certain rainfall runoff volume before allowing discharge If an accident were to occur, and the basins were dry at the time of the accident, the spill volume, in most cases, could be accommodated. These settling basins would require periodic cleaning (see Draft Environmental Impact Statement page 4-99).

(Responses continue on next page)

Code	Comment Document

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spotted owl and the burrowing owl will lose their habitat on the mountain.

I keep going back to a meeting I went to when people keep saying that we don't know how to preserve our land. Well, our ground that we have in Gila River has been there for so many generations, we do not touch it, we do not mess with it, we are just people that preserve the land, that keep the land strong as it is right now.

Sorry for getting emotional, because I do this for my family; my little nephew, he's on the other side of the mountain and he's going to be the one who is going to be most affected by the pollutants that are going to be by the freeway, by the construction, by the road, by the cars, vehicles, everything, he's going to be affected and he's only three years old, five years old, and it's -- I don't know what to say, it's just crazy. Thank you. Please don't build this freeway.

6

THE FACILITATOR: Thank you.

If you'd like to speak, please go out to the registration desk, get registered, and we'll have your name up here. Thank you.

Again, if you'd like to speak, please register out front.

Cade Rowley. Did I get the name right?

MR. ROWLEY: Close enough.

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Code	Issue	Response
5	**Surface Water**	If an action alternative were to become the Selected Alternative, during project implementation a Stormwater Pollution Prevention Plan that would establish best management practices for sediment and erosion control would be completed. These best management practices would be in place and maintained for the duration of construction to ensure that erosion and pollution from sediment and other pollutants running downstream are minimized. The proposed project would require water quality certification under Section 401 of the Clean Water Act (see Draft Environmental Impact Statement pages 4-110 through 4-112). Drainage studies have been conducted; culverts would be maintained, and new culverts would be installed to maintain flows under the freeway (see Draft Environmental Impact Statement pages 3-58 and 4-101). Surface water could be altered from runoff drainage; seeding the disturbed soils with native vegetative species would help to minimize runoff and erosion. Best management practices associated with the project Stormwater Pollution Protection Plan would also help minimize runoff. To control construction-related pollution discharges to waters of the United States as defined in the Clean Water Act, the Arizona Department of Transportation would prepare erosion and sediment control plans, details, and specifications using best management practices from the Arizona Department of Transportation Erosion and Pollution Control Manual for Highway Design and Construction and the Arizona Department of Transportation Post-Construction Best Management Practices Manual for Highway Design and Construction.
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

take my home. Honestly, I don't want to be around if a freeway is not built. This corridor is extraordinarily important to congestion and to the future of Ahwatukee.

Ladies and gentlemen of the committee, the two polls I want to submit to the record today, the voters have spoken three times on this issue: Once in 1985, one in 2004, and again with the poll that we submitted or will be submitting here today. We must bring this EIS to its conclusion; 12 years of study, this corridor flies in the face of the voters who voted this project in. There is no more important project to area commuters and workers in the southbound freeway project. We must build it now. Thank you very much.

THE FACILITATOR: Thank you, Mr. Martin.

I'd like to invite our next speaker, Joseph Morago.

Welcome, Mr. Morago. You have three minutes.

MR. MORAGO: For the record, it's Joseph Morago. Good afternoon, my name is Joseph Morago. I was born and raised in Arizona, I'm a Native American from Akimel AuAuthm tribe, a member of Gila River Alliance for a Clean Environment, as well as PARC. I'm here today to state my opposition for the proposed South Mountain Loop 202 freeway. After reviewing the DEIS, I was shocked to learn how little information is present in

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

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this draft. Your data is inaccurate and outdated. The 2005 joint air-toxins-assessment program study was not included. Risk from hazardous cargo being transported on that route was not properly addressed or included. The issues of particulate matter and the air quality problems that Maricopa already faces have not been properly addressed, and the health and safety of our children, elderly, and people with weak immune systems have not been addressed.

In 2003 a health-assessment study was conducted by the University of Southern California. They were addressing the health effects of living around the freeway and what these potential health effects could be. The study proves that asthma rates will go up, risk of heart disease, cancer, and birth defects, all of this goes up.

To the residents of Laveen talking about needing a hospital and other infrastructure to ease the burden of living in the Southwest Valley, I'm here to tell you that this freeway will not solve these issues. It will still have the pollution, health will get worse, and not to mention you're polluting the environment and destroying the natural beauty of South Mountain.

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Which brings me to my next concern is the cultural significance of South Mountain. Archeologists

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Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The mobile source air toxics emission modeling developed for the project (which factored in the U.S. Environmental Protection Agency's recent rules for the 2035 analyses) and discussed beginning on page 4-77 of the Final Environmental Impact Statement found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.
3	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Cultural Resources**	

Code	Comment Document

in the '70s and the '80s have studied, documented, and written books about petroglyphs and other artifacts discovered on the South Mountain over the past 40 years. The Gila River Indian Community elders, cultural resources department, community members have told MAG, ADOT, and the State of Arizona of the cultural significance of this mountain and what it means to us. I consider this racial discrimination. You are discriminating against our people and what they believe in.

8

This is not the first time Maricopa County has done this. They are doing this to North Mountain Church, who has already moved because of the freeway, they did that when they expanded the airport, there's the church in the middle of -- just in the middle of the city between 16th and 24th Street because of progress. This needs to stop. This will not help the community, this will not benefit the people, not to mention what it'll do to the environment and the plants and animals and the natural habitat. I thank you for your time.

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THE FACILITATOR: Thank you, Mr. Morago.

We'd like to welcome our next speaker, Mr. Robert Knight.

Welcome, Mr. Knight. You have three minutes.

MR. KNIGHT: Thank you. My name is Robert Nick

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Code	Issue	Response
8	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
9	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

5052

MR. MORAGO: My name is Joseph Morago. I am a Gila River Community member living in District 3. This is a comment for the DEIS. The main thing that I want -- or I have several points that I want to touch on.

There was one thing that I wanted to touch on, is, first of all, is the environmental effects of this freeway. According to the -- the DEIS, I didn't see much talk about the JTAP study. Also, the study that was conducted by Gila River DEQ, as far as air quality and the way that this freeway will affect. I didn't see much in the way of how it will affect plants and animals and their natural habitat.

There has been reports -- The Capitol Times reported that it would affect the migration. Sierra Club has said that it would -- that 50 percent of animals don't survive if their natural migration routes are interrupted.

There is a lot of plants that are affected. And scientists at the University of Arizona are studying the death of saguaro cactus due to environmental effects, and this freeway will definitely affect that.

The second thing I want to address is the -- is the health effects of -- of this freeway. First of all, the potential effects. Asthma rates will go up. There are studies now that diabetes is related to environment. Diabetes rates will go up. Pulmonary -- Pulmonary cardiovascular diseases will go up. All these health effects, these are the potentials

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Code	Issue	Response
1	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The mobile source air toxics emission modeling developed for the project (which factored in the U.S. Environmental Protection Agency's recent rules for the 2035 analyses) and discussed beginning on page 4-77 of the Final Environmental Impact Statement found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.
2	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Health Effects**	

Code	Comment Document

that will go up.

Current effects. We have -- Right now, Gila River has one of the highest diabetes rates in the world. Going through some of the other neighborhoods in Phoenix, the neighborhoods of color, there will also be adverse health effects to these people.

Allergies, bronchitis, asthma, all sorts of breathing effects are what will occur and the effects that are happening now. And these will only get worse with this freeway, with the pollution. And the pollution will be stuck in between the two mountains of the South Mountain and the Estrella Mountains and this corridor between the two, between the two mountain ranges, that they will -- that the effects will be devastating.

Pollution is already starting to come into Gila River. You're talking about hundreds of thousands of cars on a daily basis. You're talking about it possibly being a truck route, with trucks coming from Mexico, plus going across the country, east to west, north to south. And all of this, all of this traffic will be passing through this corridor.

And it will -- it will be -- You know, the health effects, the future health effects, are incalculable. There is nothing that really addresses these effects in this DEIS.

There is limited information on the -- You know, the University of California has already come out with studies,

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Code	Issue	Response
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
5	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Trucks**	

Code	Comment Document

saying on how freeways affect people, by living within a thousand yards, a quarter mile, a half mile, a mile, and the effects that, the closer that you are to the freeway, the more effects that -- adverse health effects that you will have.

The second issue that I want to pinpoint is -- has to deal with the cultural impacts and lifestyle impacts. South Mountain is a sacred mountain to the Gila River Indian Community, among other tribes: The Tohono O'oodham tribe; the CRIT tribe, which is the Colorado River Indian Tribe; Salt River; Ak-Chin; Quechan Tribe, and they're from -- they're from Yuma.

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All of these -- All of these tribes have acknowledged the cultural significance.

A Phoenix archeologist, a former Phoenix archeologist, wrote a book in around 1990 about the -- the petroglyphs that are in -- located in South Mountain.

Cultural Resources from the Gila River Indian Community has identified a source of cultural significant places.

Some of these petroglyphs date back to the Hohokam era, which we are direct descendants from. We have had studies that prove that that's our lineage, that these are, in fact -- that those are our ancestors.

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So those are the -- Those are the cultural effects that -- that this freeway will impact.

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Code	Issue	Response
7	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Cultural Resources**	The freeway alternatives were surveyed for archaeological sites, which include petroglyphs (rock art). The archaeological survey documented several petroglyph locations. Subsequently, the freeway alternatives were redesigned to avoid the petroglyph sites. No petroglyphs would be destroyed by implementation of the proposed freeway. Because right-of-way fencing would limit access from the proposed freeway, damage to petroglyph sites would not be facilitated (see Final Environmental Impact Statement pages 4-160 and 4-187).

Code	Comment Document

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Okay, lifestyle effects for Natives, for Native Americans. There's places that we hold sacred ceremonies. There are places where we go and collect native plants for ceremonies, such as the greasewood. We call it shegoi in our native language. And these are native plants.

Right now, it's the -- in the month of June is the harvest season for the saguaro cactus fruit.

And so that's -- These are things that are affected, not to mention the, you know, the hikes and the retreats, the stuff that we do -- that we do on South Mountain.

As far as non-Natives, non-Native Americans, South Mountain has many hiking trails. We have cyclists that ride their bikes through this area. We have joggers that run in the mountains. You know, there's -- There's a lot of people that use this.

And, although they -- Although they say that it's a small -- Although they say it's a small percentage of the mountain, you know, we have talked to non-Natives that say that they -- you know, if the freeway goes through, they will not ride their bikes in this area. They will not. That's one of the reasons that they do come out here, was that they're -- that they're able to do it.

Another thing that is -- The last thing that I want to say is the dangers and the hazards of this freeway. Not only -- Not only the health effects that I've stated before,

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Code	Issue	Response
9	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

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but -- and the environmental effects, but I'm worried about hazardous materials and chemicals that are going to be transported on this freeway.

There's -- The thing that I noticed from the video that disturbed me the most is that -- is there's very few exits on the freeway. There's sections, there's miles, where there is no exit and -- exit or entrance. There are -- Through the majority -- Through the eastern part, through the E1 Alignment, the east part, the east portion, the east portion of the freeway, there's no frontage roads. If you are on the freeway and there is an accident, there is no way to get off. There is nowhere to go. There is exits every few miles, and then they're not very close together.

According to the video, there is one on 40th Street; there is one on 42nd Street. There is a big gap between -- let me see that. There is a gap between 24th Street and 17th Avenue.

That's a very big stretch not to have any -- any way to get off of the freeway. And, if you have a hazardous-material incident on the freeway, it could possibly lead to loss of life because there is no way to evacuate that area. There is no way to evacuate the City of Phoenix. If it's closer to 51st Avenue where it cuts -- this area, where we're presently located, there's no way to evacuate this area if there is a hazardous chemical spill. If it creates a plume

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Code	Issue	Response
10	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Design**	The locations of the planned traffic interchanges were determined in coordination with the Gila River Indian Community and City of Phoenix. The current plan balances the need to minimize impacts on the adjacent community with the need to provide acceptable access to the region's transportation system. The interchange locations for the proposed freeway are (see Figure 3-28, on Draft Environmental Impact Statement page 3-51): · Interstate 10 (Maricopa Freeway)/State Route 202L Traffic Interchange · 40th Street · 24th Street · Desert Foothills Parkway · 17th Avenue · 51st Avenue · Elliot Road · Dobbins Road · Baseline Road · Southern Avenue · Broadway Road · Lower Buckeye Road · Buckeye Road · Van Buren Street · Interstate 10 (Papago Freeway)/State Route 202L Traffic Interchange

Code	Comment Document

of gas, of any kind of release, it will float forever, float wherever the winds are blowing it. They'll literally blow in the direction. And there is no way to get out of this area.

So the potential for loss of life is very -- is extremely high. It could create a disaster, not to mention the dangers that it holds to the -- to the first responders. It's going to take a while for the first responders to get to these accidents, to get to these places.

And there's not enough planning in it to -- There is really no mention of, in the DEIS, of an effective way to evacuate this area should -- especially along the E1 Alignment. There is really -- which borders Ahwatukee, which borders South Phoenix, which borders the Gila River Indian Community. There is -- There is no way to get away from anything that should potentially happen.

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And those are the dangers, not only to the dangers of the environment afterwards, you know, just because, once a chemical is released, it will get into the plants. It will get into the ground. It could possibly potentially contaminate ground water.

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They talk about our -- I saw on the video, about a canal system or drainage system that could go awry. This could potentially be contaminated by whatever hazardous incidents that could potentially happen with this freeway.

And because of all of these -- the health effects;

Code	Issue	Response
12	**Hazardous Materials**	The proposed freeway has been designed to have basins adjacent to the roadway for collecting and metering drainage. In the case of an accident, these basins could, in most cases, contain the spill volume and protect the groundwater. This aspect of the design is discussed on Draft Environmental Impact Statement page 4-99.

Code	Comment Document

the environmental effects; the cultural and lifestyle effects; and the dangers of having hazardous materials, as well, that would be transported on this freeway -- I am against this freeway and I feel that it should not be built.

And I will continue to fight to keep this freeway from being built, at all, not just on Gila River, but off Gila River or wherever it's located. I am totally against the Loop 202 Freeway. And I will fight to keep it from being built.

Thank you.

(The public hearing proceedings concluded at 12:01 p.m.)

Code	Issue	Response

Code	Comment Document

of it, but nobody thought of it.

All of the east/west highways, interstate highways end in a zero, I-40, I-10, I-20, I-50, I-60. All of the north/south ones end in usually a five, but they don't have to be a five. All of the diagonals are three numbers that usually end in either a five or zero. Look at the map sometime. You'll see what I'm talking about.

Where did the idea come from?

Well, when Eisenhower was in Germany in World War II Hitler had built these highways to move troops, materials, and whatnot. Eisenhower brought this idea back to the U.S. and did the same thing. The original reason for building the interstate system was to be able -- we were still in the cold war -- was to be able to move men and material. All the design specifications for bridges were to hold up tanks, not haul a truckload of furniture, but haul up these big low boys that had tanks on the back of them so when they drove across it the bridge wouldn't fall in.

Well, there's your history lesson. Thank you.

MR. MORALES: I'll keep it short. I'm concerned about the archeological sites. South Mountain is our most sacred of all sacred mountains. Elder

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 Brother came down from God. God brung him down. Elder
2 Brother is like Jesus Christ, son of man. We're
3 monolithic tribes. We believe in one God. God brought
4 Elder Brother, his son, to show us how to live our life,
5 the four seasons of life. He was come down to South
6 Mountain. South Mountain is where he lives, Elder
7 Brother lives.
8 We have beautiful petroglyphs. I know for
9 a fact in that area where they are going to have a
10 freeway, there are archeological sites. When you go
11 hiking that mountain, there's areas where it says "No
12 Public Access," and if you go behind those no public
13 access, you'll see elaborate petroglyphs, sacred sites,
14 elaborate village life, big, beautiful. Those things
15 have been there -- you see children's hands. You can put
16 your hand where little kids were there. That could have
17 been your great, great, great, great, great, great
18 grandfather's hands, you know.
19 It would be heartbreaking to see that
20 happen, you know. That mountain is in our four-night
21 song ceremony we have. South Mountain is in that song.
22 I just want to know -- I understand we've got to have
23 advancement. I know we got to have technology. But I
24 want to know if that's going to go through, what are they
25 going to do about our sacred sites? What are they going

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The freeway alternatives were surveyed for archaeological sites, which include petroglyphs (rock art). The archaeological survey documented several petroglyph locations. Subsequently, the freeway alternatives were redesigned to avoid the petroglyph sites. No petroglyphs would be destroyed by implementation of the proposed freeway. Because right-of-way fencing would limit access from the proposed freeway, damage to petroglyph sites would not be facilitated (see Final Environmental Impact Statement pages 4-160 and 4-187).

Code	Comment Document

1 to do? I understand, if the freeway goes through, I just
2 want those sacred petroglyphs, I want them to be
3 protected.
4 I know everything south of Baseline Gila
5 River takes care of. Everything north of Baseline Salt
6 River takes care of. I want to be assured our sacred
7 sites will be protected. I would rather not have the
8 freeway go through at all, but I want to know -- I got to
9 have our sacred sites. I got to have our sacred sites.
10 Those are our ancestors. Our ancestors.
11 (Mr. Morales is speaking in a foreign
12 language.)
13 I speak our language. That's very
14 important to me.
15 That's totally -- you might as well just
16 put feces all over everything.
17 What's the word I'm looking for? What's
18 the word I'm looking for?
19 I'm just a little emotional right now.
20 Those are our links to our past. We can put our hands
21 where our great, great grandfathers did as kids. You see
22 elaborate village life, how things work, how they did
23 things.
24 That's all I want to say. I just want to
25 know what they are going to do with archeological sites.

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Code	Issue	Response

Code	Comment Document

I would rather it not go through it. When we do our songs, especially at night when we do our songs and we talk about Estrella Mountain, we talk about Red Mountain, who wants to see an ugly freeway? When we do our songs, especially at night, we talk about Estrella Mountain, we talk about Red Mountain, we talk about the Four Peaks and we're doing all-nighters singing all night praising our sacred mountains. Then we'll see a freeway going through; you know what I mean?

You wouldn't want -- It would be like taking the Vatican and building a freeway through the Vatican. That's what it's like to me and to a lot of my people.

I know a lot of people are talking about civil disobedience when the road goes up, you know. They're talking about civil disobedience. And I'll be there with them. I'm a veteran.

That's all I want to say.

UNIDENTIFIED SPEAKER: I'm in the Dusty Lane community. It doesn't matter which way the freeway goes. Our house will be bought out. So it's a good thing because of the flow of traffic. I used to actually drive cross country, big rigs, so I've always thought it would be a good idea to be able to bypass Phoenix. I used to take 51st to Riggs Road to go around, to bypass

Code	Issue	Response

Code	Comment Document

4415

the proposed alternative to build the freeway. Thank you.

THE FACILITATOR: Thank you.

Phillip Morales.

Use this microphone, please.

MR. MORALES: Good evening. Thank you for letting me speak. I'm kind of emotional right now, but I'm a veteran, I'm a Gila River Community member, I speak my language, I'm very related to my culture.

South Mountain is the most sacred mountain we have for the Akimel and O'odham people. And I know that's -- I'm from District 6 and I know that that freeway's going to go through our cultural sites. Elaborate petroglyphs that our great-, great-, great-, great-grandfathers kids' hands put their hands on there. You know, I could put my hand on there, I know I'm touching their hands from hundreds of years ago.

Suhu, man of the maize, you all know was -- this was the son of God, like Jesus Christ, it was son of our mountain tribes, we are all related to one God. He came down from heaven, we call him elder brother Suhu, he came and lived in South Mountain and he showed us how to live our life, the four stages of life: How to respect, how to learn your language, your first love, when you have a family do it right, then your third sage is to become

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Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The freeway alternatives were surveyed for archaeological sites, which include petroglyphs (rock art). The archaeological survey documented several petroglyph locations. Subsequently, the freeway alternatives were redesigned to avoid the petroglyph sites. No petroglyphs would be destroyed by implementation of the proposed freeway. Because right-of-way fencing would limit access from the proposed freeway, damage to petroglyph sites would not be facilitated (see Final Environmental Impact Statement pages 4-160 and 4-187).

Code	Comment Document

childlike again become (speaks in foreign language), become a baby like again, take care of your elders, show them -- you know, but as an elder you have a responsibility to share your knowledge and wisdom. And when you finish all that, you get to go home to heaven, you go back home to Suhu, our God, when you've done all that stuff right.

There's elaborate sacred sites; elaborate petroglyphs on South Mountain. You go hike those trails, it says no public access. Well, you go behind those chains and you'll see elaborate petroglyphs there. You know, you go oh, can you do this, can you do this. We have four ceremonial songs, it goes through our four sacred mountains, four nights to all of our sacred mountains, and we sing there and we're looking at our mountain at night, we have an all-nighter, we sing, we're praying; we got to have a freeway going through our mountain?

You know, this is our mountain, everybody's mountain, this is where we -- this is where our ancestors are. You wouldn't build a freeway through the Vatican City, would you, desecrate that? That's how we feel. I'm very emotional about this. I'm a veteran, I know what it's like to fight for this country.

And my time is up, but I just want to know what

Code	Issue	Response

(Comment codes continue on next page)

Code	Comment Document

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are you going to do about our cultural sites? I know our rule has something to do with that, but I want to know is our petroglyphs, is our sacred sights going to be protected? Are they going to be moved somewhere else? That's what I want to know. Thank you very much.

THE FACILITATOR: Thank you.

An announcement, please. The last bus will be running in about five minutes at 7:30 for all destinations, orange, green, and blue, routes one, two, and three. Thank you.

Ashley Grace.

Ashley, could you please come to this microphone.

MS. GRACE: Thank you for letting me speak. I'm a recent addition to Phoenix, I moved here about a year and a half ago and I'm a military spouse. South Mountain, I think, is more important the way it is as a tourist attraction as one of, you know, Phoenix's points of pride, the largest -- the largest city park in the United States, as a place for wildlife. If you put an interstate through the middle of it, even if you conserve most of the area for wildlife, they won't be able to cross between and that creates big problems. You know, javelina and bobcats and everything else that is out there, they don't really have a very easy time crossing

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 4:51 PM
CALLER: LEILANI MORALES	CALLER ADDRESS: 1319 EAST ORANGEWOOD AVENUE, PHOENIX, ARIZONA 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I would like to leave a message regarding the interstate process through Pecos Road. I think this would greatly, you know, reduce the congestion that we see around the airport. Also around the 60 and the I-10 and more importantly right in to central Phoenix I-10. I hope that this is important enough for people to take a real look at. And you can contact me. Please send two of whatever information to fill out as I am married and my spouse would probably like to comment on it also. Thank you for your time.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Pro 202
Date: Wednesday, May 22, 2013 10:48:02 AM

-----Original Message-----
From: Olga Moralez [mailto:olga_isa@msn.com]
Sent: Tuesday, May 21, 2013 8:34 PM
To: Projects
Subject: Pro 202

My family and I moved to Laveen in 2009 and we absolutely love it and are here to stay. We cannot wait for the completion of the 202. It will make Laveen an even better place to live with more access to places like Ahwatukee and Chandler and a faster commute to the I 10. Not to mention the business growth that will come to Laveen with the freeway.

We are for it and can't wait!

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We prefer the 101 alternate :-)

Thanks,

Olga Moralez

Sent from my iPhone

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:01 PM
CALLER: BETH MORRIS	CALLER ADDRESS: 2337 E. GELDING DRIVE, PHOENIX, ARIZONA 85022
PHONE: 602-314-6906	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am leaving this message in support of construction of the South Mountain freeway. If you need to contact me for any reason. I appreciate your time and listening to this message. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4229

our world encompasses; it transcends everything that we do.

And so with that in mind, I, as a community member, apologize for the disrespect that you get, for the disrespect that ADOT gets in everything. We should not be that way. We should practice a better way to be with you.

And that's what I want to thank you about for today. Thank you.

THE FACILITATOR: Thank you. Terry Morris.

MR. MORRIS: Hello, I'm Terry Morris. I'm a fourth-generation Arizonan, and listening to Mr. Perez just now changed my train of thought a little bit. I had -- my main concern about this project is the -- I believe the lack of attention to the Indian communities in the Maricopa County, as evidenced by the lack of posters in the other room. There's a lot of information over there in the other room, but not very much that I can see that pertain to the impact on the Native American communities.

I'm also very concerned about the threatened and endangered wildlife that can be affected. I am an avid hiker, and there are not very many preserve hikes left, where you're not in the

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Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants, and Wildlife**	

Code	Comment Document

direct visual proximity to a freeway. Dreamy Draw, you know, where I'm at in the North Valley, the freeways are pretty much encircling. And so I believe that in that South Mountain Park is the largest municipal park in the world, and is very unique in its makeup, that that also hasn't been given enough weight in the study on this. I -- I see that the EIS was -- was somewhat involved in the ancient canal system. My grandfather worked with SRP on the original canals here in the Valley, and I believe that it wasn't my knowledge, and I haven't seen any information, that the tribe itself had done those -- the studies on all the sites that would be affected. I didn't see it in the information out here. I might be wrong about that. But I also think that -- that the impacts of that, you know, should be more -- more visible and not just be the relief of the congestion.

And my last point is, you know, the air quality part of this project, you know, the report suggests that it will decrease it, and I think it could be decreased easily in other ways than this project. Thank you.

THE FACILITATOR: Thank you.

Rueben Jenkins.

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Code	Issue	Response
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Pro-202 So. Mtn loop
Date: Tuesday, July 16, 2013 10:07:50 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: ztime77@gmail.com [mailto:ztime77@gmail.com] On Behalf Of James Morris
Sent: Monday, July 15, 2013 9:19 PM
To: Projects
Subject: Pro-202 So. Mtn loop

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YES! Do the 202 South Mountain loop!

It's needed, it's wanted.

thanks
James

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: YES on So. Mtn Loop 202 !!!!
Date: Thursday, July 18, 2013 10:39:03 AM

F Y I

-----Original Message-----
From: ztime77@gmail.com [mailto:ztime77@gmail.com] On Behalf Of James Morris
Sent: Thursday, July 18, 2013 10:38 AM
To: Projects
Subject: YES on So. Mtn Loop 202 !!!!

1

Let's create JOBS for AZ!!!! and help the congestion!

Build the South Mtn 202 loop !!

thanks,
James

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: MOREY MORRIS
To: Projects
Subject: Loop 202 South Mtn Freeway
Date: Wednesday, July 24, 2013 5:50:00 PM

1

I am in support of building the South Mountain section of Loop 202. I have been a resident of Phoenix living in the Ahwatukee area since 1988. I have seen the buildup of homes and the increase congestion on the ONLY way out of Ahwatukee (I-10) and the untold costs in delays in freeway stop and go traffic.
We as citizens of Arizona need to look at what is best for all of the motoring public, not just those that think they will be harmed by a freeway going in on the border between Gila River and Phoenix.
People that moved into the area and bought homes and built businesses and churches along the 202 path knew well ahead that a future freeway was destined for the area. These people need to take responsibility for their actions, and not blame others for their mistakes in buying and building in the path.
I am upset that the Gila River neighbors did not see the great potential for economic growth in having the freeway go into their land. Look at what happened to Salt River on the 101.
Please understand that I am one of several thousands of people that have been quiet to the support of the freeway.
If there is any future thoughts about this area and to allow for better traffic flow, build the 202 in the South Mountain area and make it happen soon!
thanks

Morey Morris 602-680-8514-cell

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 3:02 PM
CALLER: JENNIFER MORRISON	CALLER ADDRESS: 11340 EAST PORTAL AVENUE, MESA, ARIZONA 85212
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the voter approved South Mountain freeway. I believe that no further studies should be done if everything's good we should go forward.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Wednesday, May 22, 2013 10:56:28 AM

From: Maggie Moseley [mailto:magz916@yahoo.com]
Sent: Tuesday, May 21, 2013 3:06 AM
To: Projects
Subject:

1

I strongly urge the extension of the 202 out to Laveen. I have travelled from the 1-10 to 27th Ave and/or 51st Ave (I have daughters on each of those streets) along Baseline and it is a pain in the neck. Seems like I am constantly stopping for red lights!
Being able to travel to Laveen by freeway would be such a blessing! PLEASE APPROVE THIS MEASURE!!!
Respectfully, Maggie Moseley

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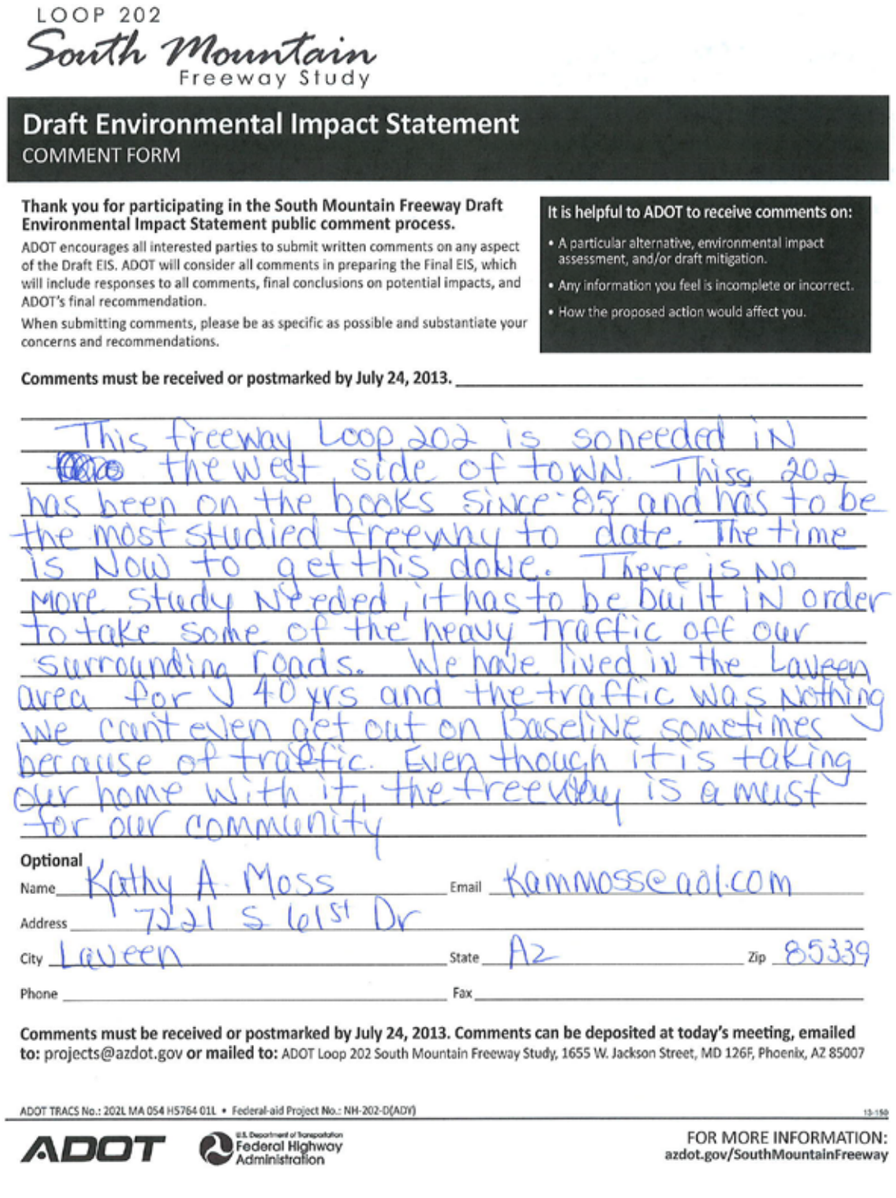
.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

This freeway Loop 202 is soneeded in the west side of town. Thiss 202 has been on the books since 85 and has to be the most studied freeway to date. The time is Now to get this done. There is no more study Needed, it has to be built in order to take some of the heavy traffic off our surrounding roads. We have lived in the Laveen area for 40 yrs and the traffic was Nothing we cant even get out on Baseline sometimes because of traffic. Even though it is taking our home with it, the freeway is a must for our community

Optional
Name Kathy A Moss Email kammoss@aol.com
Address 7221 S 61st Dr
City Laveen State AZ Zip 85339
Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 HS764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

just completely bogus, because nobody visits that portion of the park anyway. It's very insignificant.

You know, if they want -- otherwise, how did Squaw Peak -- or actually Piestewa Freeway -- how did that get through. When you go through there, you see big ridges on either side of the freeway. So they -- you know, look, how about that? Either that, why don't we just take out that road and replace it to what it was before?

But to say a few ridges of the least-used portion of the park would be devastating, it just -- it's just, what do you say, really stupid, I would say.

And that's what I wanted to add; it's just insignificant.

MICHAEL MOSS: I live in the path of the freeway, in Laveen. And I have lived there most of my life. And the traffic over the last ten years has just doubled on the surface streets: on 16th, on Baseline Road, 51st Avenue, 67th Avenue, 91st Avenue.

So many people when the freeway I-10 plugs up, they go to the surface streets. And there's accidents and there's just major traffic. They go to the surface streets. They ditch off of I-10. If they're going to the east, they ditch off at 91st or 67th Avenue, which takes them to Baseline Road. And

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

then Baseline Road, they go to areas they're looking for going to the east.

Baseline Road just is horrendous, and so is 51st Avenue. They get off at 51st. 51st Avenue can go around the reservation and even connect back on I-10 again. So they use that as a bypass.

If the freeway was built, that would give them an option to go down I-10 to southbound freeway and follow that around and relieve a lot of traffic that we are experiencing off the surface streets in Laveen. It's just horrendous and getting worse every day.

Same thing to the east. People that -- experience around the Broadway Curve or around Ahwatukee, traffic is jamming up. They ditch off at Riggs Road and can go through the reservation and back around right through 51st Avenue, again, right into the community of Laveen, jamming up all the surface streets.

Or they can continue through there and hit Baseline, and they come west on Baseline. And, of course, that jams -- comes into the community of Laveen and jams all of that up also.

So from east or to west -- regardless of what direction that the traffic is going in on I-10 -- when

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

I-10 plugs up, they all hit the surface streets, and the surface streets from South Phoenix to Laveen just get jammed up. A lot of accidents are starting to happen, more serious accidents than ever before.

So I am in favor of building the freeway. I have been in the path of the freeway since '85 when it was designed, and we voted for it in '86. And we are still waiting to see whether this is going to be built or not. But I would strongly suggest that the freeway be built.

Thank you very much.

ANONYMOUS: Well, we are for it, wish it would happen. I have been following it since 1985. Nothing has happened that we can see. And I live on 51st, off of 51st Avenue. And right now the traffic is horrendous. Two miles down south of where I live, the Vee Quiva will open its new phase in July with seven restaurants and a resort, which they don't have right now. So it already -- 51st Avenue will be a freeway. And that's our concern.

We want the freeway.

ETHEL WILLIAMS: The main thing I would like to do is say that my whole family -- not my whole family, but two-thirds of us, three-fourths of us, moved to Laveen because of all the things they promised

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 5:04 PM
CALLER: ABE MOYD	CALLER ADDRESS: 8722 W. ENCANTO BOULEVARD, PHOENIX, AZ 85037
PHONE: 623-936-6802	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I do approve the new freeway system.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Mike Mullarkey
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 7:15:09 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) (7) The freeway would also negatively affect our environment. South Mountain Park is the largest city park in our nation! It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(7) I'm moving from Tucson to Phoenix soon, and knowing South Mountain Park is waiting for me is a big draw. Please don't destroy part of this park to create another mistake of a freeway.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mike Mullarkey

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

917 N Hoff Ave
Tucson, AZ 85705-7840
(520) 884-1491

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document
1	Document Created: 7/24/2013 10:57:36 AM by Web Comment Form Stop building automobile dominant environments. Think outside the Freeway! We need to stop somewhere...why not here. The public will use other means of transportation if it is available like public transit,or safe, such as bicycles and/or walking. Lets make a better enviornment starting with ending the freeway madness.

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Bambi Muller
To: Projects
Subject: Do not expand freeways
Date: Wednesday, July 24, 2013 8:44:42 AM
Attachments: AVG Certification.txt

1 2

We need to look at other transportation options that do not create urban sprawl and require automobile dominate environments. Stop the madness!

Think outside of the freeway! South Mountain Freeway is a bad idea.

Bambi Muller
Trails Planner
Town of Cave Creek
Office 480-488-6609
Fax 480-488-2263
bmuller@cavecreek.org
www.cavecreek.org

Starting July 1, 2012 Town Office hours are 7:00–5:00 M-TH

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

4268

Hill from ADOT.

So we'd like to get started here. When you come up here, come up to either microphone. You'll have three minutes. There's a timer down here in front of you. And please feel free to state your business.

Joe Murphy.

MR. MURPHY: Hi.

THE FACILITATOR: Come on up, Joe. Timer here is three minutes.

MR. MURPHY: Okay. My name is Joe Murphy, I've lived in the City of Phoenix for about 33 years now. My attitude about the freeway is that people who live along it will be multiversely [sic] affected according to the Don't Waste Arizona and Sierra Club studies that they've done. Should be the people most listened to, not the politicians who don't live in those areas, the politicians who don't represent the people in those areas. [Unintelligible] two city council members who are both running for that city council district are opposed to this. They're opposed to it because people who live there that are most affected healthwise don't want the freeway built there. The folks on the reservation, they voted it down twice. I think my, you know, my own opinion is

1

Page 95

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(Comment codes begin on next page)

Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

they need to be listened to rather than people who don't live in that area. I've been around long enough that I know the Sierra Club and Don't Waste Arizona, when they worked against medical waste incinerators in the Laveen and South Phoenix area. People [unintelligible] because their studies then were very important to stopping those incinerators. Now, however, some of the same people who worked to stop those incinerators seem to think this freeway is a great idea, because it saves them five minutes' driving. So that's crazy to me. It's still the health of the individuals that are more important, the children who are going to school and the people living and working in the area along where this freeway will be built. It needs to be put somewhere where it's not as dangerous healthwise for the people living there.

Thanks.

THE FACILITATOR: Thank you.

Don Steuter.

MR. STEUTER: Thank you.

Use this one?

THE FACILITATOR: Yes, please.

MR. STEUTER: My name is Don Steuter.

Thanks for this opportunity to talk to you about the

1

Code	Issue	Response

Code	Comment Document
1	William Murray Document Created: 7/24/2013 11:03:59 PM by Web Comment Form We are opposed to the freeway and do not wish it built along the pecos rd corridor.

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

As a Az. resident of many years I have seen the need for streets & Fwys grow as the population has grown & land development spread over the years. Public transit as well as street & Fwy building address the need to cut travel time to & access to the places we all want or need to go.

As a resident and environmentalist & historian I would advocate incorporating the smallest ECO Foot print as possible, being careful not harm sacred sites and as little disturbance to wildlife as possible also.

I don't think a no build is the answer, so I prefer the option of displacing as few homes & businesses, etc. as you can, and the least expensive build as well. If the is money left over it should be kept for

1

Optional

Name K. Myer Email

Address 724 E Whitton Ave

City Phx State Az Zip 85014

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: Fwy maintainence that will be needed. I also don't want to be taxed any further for this project.
We all know that you wont please everyone no matter what you do, so look over the comments & options and do the best you can to tick off as few of us as possible, O.K?!

Thank you, K. Myers ☺

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response

Code	Comment Document

Kelsey Myers Document Created: 7/24/2013 11:49:50 PM by Web Comment Form

I am STRONGLY AGAINST the building of this freeway.

One of the characteristics that I love most about Ahwatukee is the feeling that it is a small community hidden within a huge city. You usually see at least one person that you know when you venture out into the area. It feels like a small town with the way that everyone is connected and seems to know each other. I moved into the area in 1994 when I was just a child, and I have been lucky enough to watch it blossom into a wonderful community.

There are many aspects of this freeway that will negatively impact the surrounding area and environment of Ahwatukee. If this freeway is built, it will only perpetuate urban sprawl that is already disturbingly prevalent in Phoenix. Urban sprawl increases the amount of paved surfaces in the city and contributes to the urban heat island, which leads to hotter temperatures. This freeway will also cause increased air pollution, and health problems (such as asthma) will rise as a result of this. Additionally, this increased air pollution is extremely unhealthy for the students at the nearby elementary, middle, and high schools as well as the residents living nearby. Many diesel trucks from Tucson will also use this route in their travels and will further contribute to pollution. Noise pollution will also increase and disturb the locals.

1 2 3 4 5 6 7 8

Not many people want to live near freeways, so consequently, the value of the homes in the area will decrease and people who have the means to move away will do so. Does one see many nice communities right by freeways? No. This population that will be able to move away happens to be most of Ahwatukee, as it is a fairly affluent community. As these people move away, lower income populations will replace them, and the overall value of the area will slowly but surely decrease as the years go by. This will strongly affect the local economy in a negative way.

Another negative characteristic of this freeway is the size of it. It will cut through precious desert land, as well as the South Mountain preserve, and forever disturb the integrity and ecosystems of the land. Once the desert is destroyed, there is no going back. People travel great distances to be able to hike South Mountain and the surrounding trails, so if this is disturbed, this aspect of tourism will decline.

9 10

This freeway will not save that much time in getting around the city; if it is built, more people will utilize it and the traffic will become the same as the other freeways in Phoenix.

11

This freeway will destroy the beauty and integrity of Ahwatukee and its surrounding Sonoran desert.

I URGE YOU TO NOT BUILD THE FREEWAY.

12 13

This freeway will forever change the dynamics of the community of Ahwatukee, a place where I grew up and dearly love. The detrimental effects outweigh all other aspects of the project- it will increase air and noise pollution, disturb the unique Sonoran desert ecosystem, and bring the value of the community down (which in turn decreases the housing and tourism value of the area, ultimately affecting the economy). Ahwatukee will remain the happy

14

Code	Issue	Response
1	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Health Effects**	
5	**Air Quality**	
6	**Purpose and Need, Lack of Support**	
7	**Noise**	
8	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

(Responses continue on next page)

Code	Comment Document
	community that everyone loves if things remain as they are. PLEASE DO NOT BUILD THE FREEWAY!

Code	Issue	Response
9	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Biology, Plants, and Wildlife**	
11	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
12	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
13	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
14	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Joseph Myers
To: Projects
Subject: Loop 202 South Mountain Freeway Study
Date: Wednesday, July 24, 2013 2:51:24 PM

1 2 3 4 5 6 7 8 4 9

Hello,
It seems that any alternative routes for the South Mountain freeway have been eliminated. I still think that the 85 route south of here will make an excellent alternative. The right of way already exists.If freeway access for people living near Pecos road is an issue, why not improve that road and extend it West, eventually connecting to the 85 extension that comes around to the west. This will eliminate houses, businesses and churches being bulldozed and it will be less expensive. It will also exclude large trucks, because they will be using the 85 extension. It seems the environmental impact statement does not include the humans that already live here. These people will be uprooted and the ones left will endure light, noise and exhaust pollution night and day forever. The people that live here and go to school here do so because it is beautiful and the schools are excellent. What happens when these people do not live here anymore? What will happen to the quality of the schools when property values go down in comparison to other school districts? Who will want to live here and for how long?
It seems to me that this has been dragging on too long and now someone in the last few years has made a concerted push to just get it done. The circumstances in the area have changed since the eighties, we need to change with the times. This affects more people negatively then positively and should be stopped.

Thank you.

Joseph Myers
16239 South 25th Street
Phoenix, AZ 85048

Code	Issue	Response
1	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
2	**Alternatives**	The comment proposes to extend Pecos Road to the west as a parkway or arterial street. In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, this alternative would lack sufficient capacity to meet projected travel demand. The alternative would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
5	**Visual Resources**	Light from the freeway would be produced from vehicle headlights and taillights and from fixed light poles at interchanges along the freeway. Nighttime users of the park and residents of Ahwatukee Foothills Village may see lines of seemingly crawling vehicles, each with lights front and back. Fixed freeway lighting would be provided for safety reasons only at interchange exit and entrance points. Freeway lighting at these locations would be designed to reduce illumination spillover onto sensitive light receptors such as residential areas (see page 3-58 of the Final Environmental Impact Statement).
6	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Air Quality**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
9	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 3:05 PM
CALLER: MARILYN MYLEM	CALLER ADDRESS: 5351 E. EXETER BOULEVARD, PHOENIX, AZ 85018
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I agree with the new freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2	Laura Nacopoulos Document Created: 6/23/2013 2:04:33 AM by Web Comment Form I live at 2635 E Redwood lane. It is not on your new map my whole neighborhood is gone. When were you going to tell us??? A week before you knock it down. What is the time line where are we supposed to go? What's next? When we went to the meeting we were told if we were in a property that was effected we would of been notified. We moved here from out of state last year. Thought we found our dream home. I guess it has turned out to be a nightmare on Redwood lane!!! WTF!!!!!!

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.) While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement. It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:11 PM
CALLER: BEVERLY NEAL	CALLER ADDRESS: 7247 S. 55TH DRIVE, LAVEEN, AZ 85339
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am for the South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4376

THE FACILITATOR: Thank you.

May I remind everyone if you'd like to come up and speak, please go out and register out front.

Scott Neely. Mr. Neely, could you come to this microphone, please.

MR. NEELY: That one? Hello, gentlemen. My name is Scott Neely, I live in the East Valley. I've been in the Valley for 15 years now; actually, on and off since '86. And first I'd like to say that having lived in several other states, I think our freeway system in the Valley is quite good and it's quite nice to travel around the town now on our freeway system, compared with 1986, '87, '88.

Understanding that quite a study has been done now and the alignments have been identified, I would like to be in support of moving the trucks personally out of the middle of town and in the middle -- off of the main freeway through the middle of town. And as I understand, there's been a consideration for widening I-10 through the middle of town from basically the Broadway curve to I-17. I would rather see this freeway built as it's been cited through the, you know, the present 202 E-1 and the 59th alignment, just so that we don't go forward with widening the I-10; I would not be in favor of that approach. Basically, that was really all I wanted to

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

say.

THE FACILITATOR: Thank you.

MR. NEELY: Thank you.

THE FACILITATOR: Vicky Oliver.

MS. OLIVER: Hi, my name is Vicky Oliver and I'm for the 202 project because I think it will bring employment opportunities to our area, which we definitely need, and also will help the commute for a lot of people coming in the area. And also, it's been proven that freeways cut down pollution and also traffic accidents, and it'll keep some of the traffic off of our city streets.

THE FACILITATOR: Thank you.

Jake Speck.

MR. SPECK: Good afternoon. My name is Jake Speck, I'm here in support of the 202. I think this project is a great benefit to the community for a lot of different reasons: Reducing traffic, revitalizing economy, bringing over 30,000 jobs to the community, as well as a significant investment. I think it will attract potential employers as well, which would be great for growing the economy going forward.

After looking at the EIS, I think the potential impacts are vastly outweighed by the benefits this project brings, and I believe that now is the time to go

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 2:55 PM
CALLER: JIM NEELY	CALLER ADDRESS: 4618 E. TURQUOISE AVENUE, PHOENIX, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I'm calling to urge you to build the freeway, again. It's been approved twice, let's do this dumb thing. That's the one that goes around South Mountain. Thanks and goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/10/13	INCOMING CALL TIME: 10:21 AM
CALLER: BRAD NEER	CALLER ADDRESS: 3249 E. CAMELBACK ROAD, PHOENIX, ARIZONA 85018
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 And I do support the proposed South Mountain freeway. I think it's essential for the long term growth of the city. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:14 PM
CALLER: MICHELLE NEILSON	CALLER ADDRESS: 11445 S. BANNOCK STREET, PHOENIX, AZ 85044
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I just wanted to voice my support of the South Mountain Freeway. I am hoping that the freeway will continue and progress and thank you very much.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 10:10 AM
CALLER: SANDY NEILSON	CALLER ADDRESS: 11574 WEST COCOPAH STREET, AVONDALE, AZ 85323
PHONE: 623-266-9789	EMAIL:

1

CALLER REMARKS/QUESTIONS:

I would like to leave a message. I am in favor of this freeway to be connected to the west valley. It has been greatly needed for this past decade and I was sadly disappointed when it was put on hold a while ago, so I am all in favor of having it come through. It will allow another avenue to cut through down south towards Tucson or the Gilbert area without having to go through the middle of Phoenix with all the traffic. Thank you very much.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: YES to 202 South Mountain Freeway
Date: Wednesday, May 22, 2013 10:52:13 AM
Attachments: Jenn Nelson_Vote YES to 202.docx

From: Jennifer Nelson [mailto:jennznelson@yahoo.com]
Sent: Tuesday, May 21, 2013 9:57 AM
To: Projects
Subject: YES to 202 South Mountain Freeway

1 Attached is my feedback and vote of YES to the Loop 202/South Mountain Freeway.

Jenn Nelson
Email: jennznelson@yahoo.com
Text or Call: 602-791-3956

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

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May 20, 2013

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD126F
Phoenix, AZ 85007

Attention to: study team panel

I am writing in support and vote YES to the Loop 202 South Mountain Freeway, specifically the W59 alternative.

As a Laveen resident I am forced to deal with congested traffic along on the Baseline corridor from 99th Ave to I10 . The severe lack of retail shopping, restaurants, medical facilities, and entertainment forces revenue and tax dollars to be driven outside of Phoenix as residents frequent Avondale, Tolleson, Chandler, Scottsdale, and Tempe to shop, dine, etc. This freeway and the socio-economic infrastructure it will bring to our community is desperately needed!

After researching this issue, allow me to share some of the reasons I urge you to approve this freeway expansion:

- 64.3% of likely voters in Maricopa County support construction of this freeway
- In a separate study, also commissioned by We Build Arizona, 59% of likely voters in Ahwatukee and Laveen Support this freeway as well.
- It is time to end the commuter traffic jams and congestion we experience not having easy access to the freeway and connection of the East/West Valley.
- If we don't build the South Mountain freeway, traffic in the region will get much worse over the next two decades. According to ADOT's own study:
  - Traffic on the I-10 between Ahwatukee and Goodyear will grow 28%
  - Another 103,000 cars will use Broadway Curve each day
  - Another 38,000 cars will jam the Tunnel every day
  - Morning and evening commute times will increase 39% to 82%
  - Traffic congestion on city streets will increase 46%
- The same report indicates the project will also reduce air pollution by reducing the time vehicles spend stuck in traffic
- The project will create 30,000 jobs during the five to six year construction period and result in a $2Billion investment in the Phoenix-area economy.
- The money to the build the freeway is in the budget, it was voted on and approved TWICE (1985 & 2004 respectively),we voted for the 1/2cent tax increase in 2004 to support the build.
- There is no more important project to the area's commuters and workers than the South Mountain Freeway project. Please vote to Build It NOW!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Please consider the following request when making your YES vote:

- Design and construction of community value additions such as **attractive sound barriers** and a **bike/running/pedestrian path**along the length of the freeway as well as the use of Rubberized asphalt as per the ADOT's "Quiet Pavement Pilot Program" initiated in 2002.
- We have award winning examples in Tucson, AZ which received an excellence award in 2002 by the Federal Highway Administration (FHWA) for the Diamondback bicycle/pedestrian bridge as well as it's Intelligent Transportation Systems excellence award for ITS public-private partnership.
- Other examples are the Schuylkill Expressway in Philadelphia, the Rockville Parkway in DC, and the San Antonio,TX Freeway systems ranked best among largest US urban areas.

Thank you in advance for your vote of YES to support of this freeway!

Sincerely,

Jennifer Z. Nelson

Jennifer Z. Nelson
5502 W Glass Ln
Laveen, AZ 85339
jennznelson@yahoo.com
602-791-3956

Code	Issue	Response

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: S. Mountain Comment #1316964208
Date: Wednesday, June 19, 2013 8:17:15 AM
Attachments: image001.png

From Envoy:

6/18/2013 5:45:25 PM
I STRONGLY disagree with the alignment of this freeway. I cannot see the citizens of the Ahwatukee Foothills benefiting in any way. I can only envision the negative impact of increased noise and air pollution. This is only being used as a way to enhance the CANAMEX Corridor while reducing drive-thru tourism for the city of Phoenix. Working out an agreement with the Tribal community would be very beneficial to all parties involved. Get back to negotiations with the tribe to push it farther south. Save our homes! Save my Church! Save South Mountain!

1 2 3 4 5 6 7 8

Douglas Nelson
dj1nelson1@aol.com
480-704-6494

Thanks,

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Air Quality**	
4	**Purpose and Need**	
5	**Trucks**	
6	**Alternatives, Gila River Indian Community Alignment**	
7	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
8	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4190

would be fine, but it's not.

Thanks.

MR. NELSON: As a resident of the Gila Indian Community, I feel that the Loop 202 is needed. It would serve all the communities, not just the southern part, but the northern part.

As far as serving the state, I have to go back to the history of the loop of the I-10 when it was constructed in 1957 and the right-of-way was put through Gila River. In 1957 it was 11 miles. At that time there was promise of frontage roads, better interchanges. To this date there really hasn't been anything done as far as fulfilling any of those promises. So one thing that I would like to come out of the Loop 202, if it is to come into the community, is that those promises are fulfilled, not only for the Loop 202, but for the I-10 that goes through the community towards Casa Grande and into Tucson.

At this time, the landowners there are a small voice, but yet they are not as loud as the opposition in the community. One thing that the State and ADOT has to know on the federal highway is that those people that are against the Loop 202 don't speak for the whole community even though they speak loud.

One thing that's been done in the tribe is

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Code	Issue	Response
1	**Traffic**	The historical improvements along Interstate 10 are not within the scope of the Preferred Alternative. At this time, a Gila River Indian Community alignment is not being considered based on the vote that occurred in February 2012. The Arizona Department of Transportation, Federal Highway Administration, and Maricopa Association of Governments continue to coordinate with the Gila River Indian Community on a variety of project issues, including traffic interchange locations, drainage, and mitigation measures.

Code	Comment Document

that the tribe looks after tribal lands before allotted land and the landowner is kind of left on his own. So I feel that step one, as far as saving South Mountain from further destruction of bringing the loop into the community, would serve our community better.

As far as economic growth in the area, it is needed, an alignment in the community. It would also serve the Ahwatukee residents of displacing people, property, and especially with the environment as far as the animals and the drainage with the water.

Overall, I feel that ADOT still has -- ADOT and the federal highway still are the ones that are going to make the decision, but I believe that their party -- the parties that are involved need to all be heard. And I would just want them to hear, not only the loudest people in the community, but the overall people. And I think they would hear that if we were to bring it to another vote because the first vote was a yes, a no, and a I don't want a freeway at all.

When we voted -- when Gila River voted "I don't want a freeway at all," that just threw it back to a no, so it really took away the yes vote and the no vote. So I'm just hoping that our community will see that and allow a second vote.

Thank you.

2

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Code	Issue	Response
2	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4227

1 MS. NELSON: Good morning. My name's
2 Jennifer Nelson, and I am here to support the Loop
3 202. I'm a Laveen resident. We moved here to
4 Arizona seven years ago, and have lived in the South
5 Mountain/Laveen area for that entire time. From the
6 beginning of that time when we first relocated at the
7 peak of the market, it was a promise this was a
8 transitioning section of the city, this is where the
9 growth was going to be, there was going to be a
10 highway and infrastructure to support it.
11 We haven't seen that, and I've seen the
12 residents kind of go through an up and down of
13 hopefulness and hopelessness about this freeway.
14 It's been approved twice since 1984 and 2004. We
15 approved of the tax increase. We're paying for it.
16 We desperately need it. There's really isn't a more
17 important or relevant project that the Department of
18 Transportation of Arizona can do than the
19 continuation of the Loop 202 and completing this.
20 There's a lot of statistics, obviously,
21 that show the residents are in full support of this,
22 residents of both Laveen and Ahwatukee show 59
23 percent approval of this. We are in need of the
24 police increase that would also come with this.
25 We're almost at the 50,000 population max that was

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

required for the mall and the hospital, the things that we need to support us.

Currently, right now, there's just a bleeding river of revenue. All these residents are having to seek what they need elsewhere, so we're driving to Tolleson, we're driving to Avondale, and we're driving to other cities and not bringing that tax and revenue to the City of Phoenix and to our own community. And we have the population that's desirable to have it. We did some research, and according to 2010 census bureau, we have the median income, the postgraduate and high school graduate level of education to support this.

We match and exceed Paradise Valley and we almost match Ahwatukee with a variance of about 15,000 median income. So this is an area that is growing exponentially, and especially in the next couple of years. We can't afford to be any more congested than we already are. Ahwatukee is in a land-locked situation, and every time the 10 shuts down, we are their only outlet, and it causes accidents, it causes a tremendous amount of pollution, and it's just incredibly necessary.

And in addition to the economic growth and the quality of life, I'd also like to speak

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Code	Issue	Response

(Comment codes continue on next page)

Code	Comment Document

briefly about when the roadway is built, because I'm going to assume you're going to vote for yes, and you're going to make this happen for us, because we're in dire need of it, that we also have some sound barriers that are attractive built in along the highway, that we use the rubberized asphalt as part of the 2002 noise reduction program that ADOT has, and that we have bike and pathways, traveling pathways, other than cars along the pathway of the highway, similar to what has been done in Tucson and other cities around the country. Tucson, in fact, has won awards for the work that they've done there by ADOT.

In regards to the opposition from the tribal community, I would just like to speak as a very close neighbor of them who lives right next door to the sacred land; I see the misuse of it, I see the treatment of it, and how it is has caused a tremendous amount of crime to our community through the casinos.

THE FACILITATOR: Excuse me. You've exceeded your time. If you'd like to add additional comments, please see the court reporters in the room next door.

MS. NELSON: And let's all speak

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Code	Issue	Response
2	**Visual Resources**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation's standard applications. As an example, for State Route 101 Loop (Pima Freeway) in Scottsdale, the City of Scottsdale chose to add public art to the noise barriers. The City's intent went above and beyond the Arizona Department of Transportation's guidelines of reasonable aesthetic treatment and, therefore, the Arizona Department of Transportation did not fund the aesthetic portion of the project. The Arizona Department of Transportation and the City of Scottsdale entered into an intergovernmental agreement for the purposes of allowing Scottsdale rights to design and construct artistic embellishment on the Arizona Department of Transportation-supplied noise barrier. The Arizona Department of Transportation provided the funds for construction of the noise barriers themselves, but the City of Scottsdale provided the funds to cover the aesthetic portion of the walls. Final Environmental Impact Statement page 4-171 explains the process municipalities might take to achieve the desired aesthetic treatment for noise barriers or other structures.
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Design**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.

Code	Comment Document

respectfully to each other.

THE FACILITATOR: Thank you.

Joseph Perez. Joseph Perez.

MR. PEREZ: I'm Joseph Perez. Thank you for allowing me the opportunity to make a comment to you about your Draft Environmental Impact Statement. I am a Gila River Indian Community member. I'm also a partner with Pangia [phonetic] and I lead a little bit over 1,200 landowners who exist in the Pecos Road Land Area that have put forward the initiative with the Gila River Indian Community for a revote to try to bring the alignment down on the reservation, which hopefully will be resolved tomorrow in a special council meeting.

I'm here today to comment on the draft EIS in the sense that the work that has been done pertaining to the Gila River Indian Community, and the cultural aspects was done through the community's cultural department. And they've worked closely and for a long time, I believe over 12 years, doing that aspect of the EIS. Unfortunately, where it stands right now, there is no other alternative for the freeway, because the only other alternative would be on the Gila River Indian Community. I believe that will have to be resolved with the people of the

Code	Issue	Response

Code	Comment Document

PHOENIX, ARIZONA; TUESDAY, MAY 21, 2013
10:00 A.M.
* * *

CHRIS BROWN: I am totally for the project, the South Mountain Project, especially if it improves drive times.

I drive a lot for business from the south part of town, like Maricopa, the city of Maricopa, and have to get to like Buckeye and west valley cities and I think South Mountain would cut down on travel time quite a bit.

I am very much for it.

*****

JENNIFER NELSON: I am in support of the Loop 202 South Mountain Freeway, specifically the W59 Alternative. I am a resident for seven years of Laveen and South Mountain.

Previously I spoke before the panel of all of the statistics that will positively impact this community, including the quality of life, the infrastructure, and the feasibility of being able to connect the east and west valley.

I have requested the design and construction of community-value additions, such as a

Code	Issue	Response

(Comment codes continue on next page)

Code	Comment Document

1
2
3

sound barrier and a bike and a pedestrian path along the length of the freeway to be included in the design and construction of the freeway.

I requested the use of rubberized asphalt as per ADOT's pilot program which was initiated in 2002.

Regarding the opposition from the Gila River Tribe, I am living neighboring the tribal reservation and their arguments for the mistreatment of their sacred land is negated, to me, because of my observation of how they are currently mistreating their sacred land. It is completely unkept, there's nothing but trash, and right now a casino that has brought crime-related, armed robberies to our community.

At 51st Avenue and Baseline, we have experienced over six armed robberies within a three-month period at Chase Bank, Wells Fargo and Walgreens from casino gamblers coming down to hold up and rob in order to have money to go back to the casino.

We have drug and alcohol addiction problems that are brought to our community through the casino.

We have a tremendous amount of traffic

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Code	Issue	Response
1	**Visual Resources**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation's standard applications. As an example, for State Route 101 Loop (Pima Freeway) in Scottsdale, the City of Scottsdale chose to add public art to the noise barriers. The City's intent went above and beyond the Arizona Department of Transportation's guidelines of reasonable aesthetic treatment and, therefore, the Arizona Department of Transportation did not fund the aesthetic portion of the project. The Arizona Department of Transportation and the City of Scottsdale entered into an intergovernmental agreement for the purposes of allowing Scottsdale rights to design and construct artistic embellishment on the Arizona Department of Transportation-supplied noise barrier. The Arizona Department of Transportation provided the funds for construction of the noise barriers themselves, but the City of Scottsdale provided the funds to cover the aesthetic portion of the walls. Final Environmental Impact Statement page 4-171 explains the process municipalities might take to achieve the desired aesthetic treatment for noise barriers or other structures.
2	**Design**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

up Baseline and the 51st Avenue corridor that is only going to increase when the casino opens its new hotel and restaurants.

There isn't, right now, any way to support the kind of traffic that the Gila River Tribe is putting on their sacred land without the highway.

The alternative, the W59 Alternative, is not going to cause any damage to their sacred land or to South Mountain.

Currently I am thinking that we have to continue with the program of the Loop 202 Freeway because it's the best alternative. It meets the needs of everyone in the community and it's critical for the development of Laveen and to be really a turning point for Laveen right at a place where this community can either move forward and excel and succeed, or you can put us in a holding place and we are going to have nothing but problems when it comes to traffic and the expediential growth we are going to experience in the next ten years.

***

MICHAEL ROBINSON: I oppose the Loop 202 through South Mountain Park near South Mountain

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 11:38 AM
CALLER: PATRICIA NELSON	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I would like you to go ahead and build that South Mountain freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Tuesday, July 16, 2013 10:08:01 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Doug Nering [mailto:doug@gloaming.com]
Sent: Monday, July 15, 2013 7:47 PM
To: Projects
Cc: council.district.6@phoenix.gov
Subject: Loop 202 South Mountain Freeway

Comment on the Draft EIS and Preferred Alternative selection.

1 2

The EIS findings are fundamentally flawed with respect to South Mountain Preserve impacts. Any alternative that crosses the Preserve and alters this landscape is unnecessary and unacceptable to the regional communities, principally Ahwatukee Foothills and the Gila River Indian Community, both in closest proximity to the impacted areas. Additionally, the importance of the preserved areas to these and the surrounding communities are undervalued in the EIS with respect to the significance of these resources to the vitality and appeal of this area for optimal residential and commercial values. The EIS expresses transport through this area as the primary value and objective, but undervalues the loss-impact on the landscape and community which is critical to the appeal and attraction of the landscape, viewscape, and recreation, and which brings the highest quality of residential and business interests to the areas surrounding the South Mountain Preserve. It is completely unacceptable to sacrifice the unique value of this landscape to build a freeway here simply because better alternatives, which do in fact exist, are not feasible at this time. The optimal solution is to postpone the construction of the freeway on the selected preferred alignment until one of the better options can be achieved.

3

4

The Gila River Indian Community especially does not want he freeway to be built through the ridgelines of the mountains. The subject of freeway construction remains controversial in the GRI Community due to a history of poor performance on past agreements, but these difficulties can be overcome and can result in the best outcome for both the Phoenix area and Native American groups. There is every reason to believe the GRI Community will support freeway construction at some point when the right alternative is presented. The right alternative is not found in this EIS. The correct decision is not to initiate construction at this time.

Doug Nering
3425 E Verbena Dr
Phoenix AZ 85044

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Alternatives**	Although the E1 Alternative (which would replace Pecos Road with the proposed freeway) is the only action alternative developed for the Eastern Section, the Arizona Department of Transportation and Federal Highway Administration sought permission to study alternatives in detail on Gila River Indian Community land, but the Gila River Indian Community decided such alternatives would not be in its best interest (see Draft Environmental Impact Statement page 3-25). Any alternative on Gila River Indian Community land must consider tribal sovereignty. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process. Therefore, the Arizona Department of Transportation, with concurrence from the Federal Highway Administration, identified the E1 Alternative as its Preferred Alternative in the Eastern Section. In reaching its determination, the Arizona Department of Transportation sought to balance its responsibilities to address regional mobility needs while being fiscally responsible and sensitive to local communities.
4	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: CYNDI NEWBURN
To: Projects
Subject: Loop 202 South Mountain Freeway Comments
Date: Tuesday, July 23, 2013 6:12:31 PM

Dear ADOT,

My husband and I have lived in Ahwatukee for four years; prior we lived in Tempe for over 40 years. We saw the noise and traffic take over Tempe, but it was a vital, active community that took an active part in transportation for the East Valley. When we moved, we made sure we lived on the North side of Chandler in Club West to be away from the traffic, if the freeway was ever built.

1 2 3

We became very concerned when we became of aware of hazmat traffic and the "freeway" being a truck route. If there was an accident, the only way out is Chandler Blvd and we would be in serious trouble: I am 68 and my husband is a 69 year old stroke survivor. We live in a little dell that would hold noxious fumes and gases against the mountain. This is more than a traffic reliever for East-West traffic.

4 5

At first I thought they should build the highway off of Riggs Rd; that is the route I take when I want to go to Glendale--easy drive and little traffic, as well as a time saver. But as I learned more about the mountains, the plans, the GRIC, we have come to believe the Indians are right and this should be a NO BUILD. Save money, keep the route to US8 and work with a committed, thriving, sharing, and problem-solving community. Arizona is indeed richer having a community like Ahwatukee.

My husband and I have been Arizona registered voters since 1965 and have seen a lot of changes but sometimes when a decision was made over 20 years ago because it made sense, doesn't mean it makes sense today--I am sure there have been times when you said the same.

We support the groups opposing the South Mountain Freeway, including PARC, GRIC, Leveen.
Please register our opposition.

Mike and Cyndi Newburn
318 E South Fork Dr
Phoenix, AZ 85048

Sent from Windows Mail

Code	Issue	Response
1	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SM Fwy Comment
Date: Tuesday, April 30, 2013 8:50:57 AM

From: Andre R. Newcomb [mailto:ceciliasfriendsarasvati@hotmail.com]
Sent: Monday, April 29, 2013 1:05 PM
To: Projects
Subject:

South Moutain Freeway . . . attn: EIS report. The Freeway is necessary. That is a given. People concerned about spirits ought to concern themselves also with worrying about spirits of those killed on future congested freeways. Another "given" is the Gila River Adjudication" that is giving large water allocations to Indians. The Indians have also stated that they would like to enhance eco-systems of the Gila River with their water and I would imagine that we can expect that agricultural infiltrations from farming will ALSO assist in elevating water tables of the Gila River communities (eco-systems). That means that there is going to be a restoration of other communities (species) to the Gila River. But where are they going to live, forage and sleep? Because we might assume that lands south of the Gila River will be under plow. So it's very likely that their safe habitats are going to be in the Phoenix Mountain Preserve. But there are going to be 10 lanes of traffic at 65 mph. Could it be possible to elevate the freeway wherever possible (like the Skyway in Chicago); to depress the freeway below land conditions wherever possible (with flying washes/arroyos over the freeway like what is being done with the CAP Canal); to tunnel through ridges leaving wildlife corridors over the freeway; and to build land bridges over the freeway as wildlife corridors (like what is being done over Oracle Road) . . . so that future communities of bio-diversity can commute TO THE WATER & to SAFE HAVENS IN THE MOUNTAINS? It would be nice if Maricopa County would outlaw any and all hunting in the Preserve (if they haven't done so already). This ought to satisfy the concerns of many and myself even though I'm only a single person expressing an opinion. Two givens: the river & the freeway.

1

Sincerely,

Andre R. Newcomb
homeless
Sierra Vista, Arizona 85635

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Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

regards to our limited resources, is complete insanity, and we will pay the cost of all these terrible public transportation policies. Thank you.

THE FACILITATOR: Thank you.

Anyone else in the auditorium wishing to speak, please make sure you register at the front desk.

Janeen Newhouse. Janeen Newhouse.

Ms. Newhouse, you have three minutes.

MS. NEWHOUSE: Okay. Thank you.

THE FACILITATOR: The monitor is right here; please begin.

MS. NEWHOUSE: Good afternoon. My name is Janeen Newhouse. I'm from zip code 85339 in Laveen, and I'm interested in definitely having the 202 go through. It's been a long time coming. We've had -- the voters have voted it in, two times, I believe, and just to alleviate congestion around the Broadway curve, as you guys know, Phoenix is going to be growing more and more. I don't think that we're going to be stagnant. And that's just going to create a lot more traffic, as you gentlemen know.

I'm a huge proponent of it. I do wish that ADOT would definitely make sure that the wildlife and animals and, you know, birds are definitely taken

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

care of. And so I know that that's in your plans. Sorry, I'm a bit nervous, but definitely we are huge proponents of the 202 going through for economic development of Laveen, as well, and to alleviate the traffic.

So thank you very much. I appreciate your time.

THE FACILITATOR: Thank you.

Chris Newhouse.

Mr. Newhouse, you also have three minutes; please begin.

MR. NEWHOUSE: My name is Chris Newhouse, and I live in Laveen as well, 85339. You know, I drive both Baseline and the 10. I work on all sides of the city, and I experience the congestion that I see both on Baseline, just from folks trying to get from one side of town to the other, as well as traveling on the 10 during the rush-hour traffic times, where you see a lot of your heavy traffic of truckers and folks that are actually heading down south and going on to Tucson.

Obviously, the 202 Loop extension could alleviate a lot of that traffic that goes on through the city trying to get down -- down towards the Tucson area. I think that this would obviously

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Pecos Road HWY project...
Date: Tuesday, April 30, 2013 8:51:27 AM

From: Mark Nichols [mailto:mark.nichols@russlyon.com]
Sent: Monday, April 29, 2013 11:05 AM
To: Projects
Subject: Pecos Road HWY project...

ADOT,

1 2

How do we find out which homes will be lost in this development?

Thank you.

Mark Nichols
C. 310.745.8300
F. 480.624.3492
www.Marknicholsrealtor.com

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Code	Issue	Response
1	**Acquisitions and Relocations**	Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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4413

THE FACILITATOR: Would you try this one. Sorry. Thank you.

Anybody out here who would like to speak, please go out and register at the front desk here, then come on back in.

Your attention, please. This is the first of three announcements. The last shuttle will be leaving at 7:30 for all routes; that's the orange, green, and blue routes or one, two, and three. Again, the last shuttle will leave at 7:30. Thank you.

If anybody out there would like to speak, please go out and register at the front desk and then come back in.

Stephanie Nichols-Young.

You have three minutes, the timer's right here.

MS. NICHOLS-YOUNG: Okay. I want to start by just for the record, my name is spelled without the A, so it's Nichols, not Nicholas.

Thank you for the opportunity to speak. I'm sorry you don't have more members of the public out, but I sure appreciate the opportunity to speak with you.

I've lived in Phoenix since about 1985. My husband's a native. We are avid hikers and are so grateful for the mountain preserve system. I think it's one of the things in our Valley that create a quality of

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

life that is so important. It's not just important for the people in the community, but it's important for wildlife. We don't have very many roadless areas that have productivity for wildlife and as you might guess where I'm going, as a result, I support the no-build alternative. I think it's incredibly important that we keep South Mountain Park intact and I think based on what I've seen of the EIS, the justifications just don't wash.

In addition to having concern about wildlife and the impact, I happen to be asthmatic and I saw in the EIS the comments about keeping the road -- or building the new road is going to improve the quality of air, but looking at it, I don't feel that alternate was really fully explored. And the roadway is going to become congested, just based on the way it's constructed. The article in the paper this morning noted that the curve is going to be congested and the traffic is going to be backed up. So for clean air, for protecting wildlife, I think it's incredibly important to support the no-build alternative, and I thank you for the opportunity to speak.

THE FACILITATOR: Thank you.

Before we call the next person up, the last shuttle will be leaving for all destinations at 7:30; that's orange, green, and blue or one, two, and three.

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Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Air Quality**	
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

Code	Comment Document

Stephanie Nichols-young Document Created: 7/24/2013 7:37:19 PM by Web Comment Form

1 2 We support the No Build alternative. The Mountain Preserve parks are a crown jewel of our community, and should not be disturbed. In addition to providing open space for recreation and wildlife habitat, their are many cultural sites in South Mountain Park and adjacent mountains. This area is also considered to be sacred by several of the Indian tribes and communities in our state. It would be disrespectful to put a freeway through a scared site.

3

My husband is a native of the Valley of the Sun. His Dad shared stories about going on boy scout outings in South Mountain Park. We relocated back to the Valley in 1985. Since that time, we have hiked virtual every trail in the Park. We've taken dogs, kids, neighbors, visiting friends and relatives with us on adventures in the Park. We've enjoyed many hikes for the natural beauty and cultural sites- including the many wonderful petroglyphs.

4 What a bad idea to put a freeway through South Mountain. We strongly support the No Build alternative.

Thank you for considering these comments.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants, and Wildlife**	
3	**Cultural Resources**	
4	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

From: Sierra Club on behalf of Mary Nickerson
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, May 29, 2013 5:18:57 PM

May 29, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 3 4 I believe the South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

5 6 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

7 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

4 8 In summary, I believe the proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mary Nickerson
3481 E Finger Rock Rd
Tucson, AZ 85718-1368

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Health Effects**	
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Biology, Plants, and Wildlife**	
7	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

Code	Comment Document

Michael Nicolai Document Created: 7/24/2013 11:01:09 PM by Web Comment Form

1 If the "recommended" alignments come to fruition for this project, it will be a monument to how 20+ years of planning can still manage to identify the worst possible solution.

2 We live close to Pecos Road. If the freeway IS built there, we won't stay long and will probably retire outside of AZ (after 25 years in Ahwatukee). This area will eventually become blighted as a result of being squeezed between a truck bypass and South Mountain only a short distance away. It's a shame.

3 The residents near Pima Road in Scottsdale nearly met the same fate with the Loop-101, but at least there was a better solution achieved in that case.

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: ADOT extended freeway
Date: Thursday, May 16, 2013 1:40:51 PM

From: Sandi Nielson [mailto:nielsonaz@cox.net]
Sent: Thursday, May 16, 2013 12:48 PM
To: Projects
Subject: ADOT extended freeway

To Whom it May Concern,

I live in Avondale, AZ. I have felt for the past decade the need for the freeway extension from Loop 202 along Pecos to ANYWHERE OUT WEST! The traffic through the center of Phoenix is a nightmare, always congested. I would like to see the extension come up 71st area because it is closer to the west valley without taking the road too far west. The 71st area actually hit midway. The 59th area is almost as bad as down town Phoenix and does nothing to give a cutoff from the west.

1

My address is 11574 W. Cocopah Street, Avondale AZ 85323
623-266-9789

Sandi Nielson
nielsonaz@cox.net

If you want to Save Money on your Utility Bills - click this link. We are saving thousands on our electric bill and locking our utility rate in for the next few decades. Check out this link:
http://www.solarcity.com/partners/network-application.aspx

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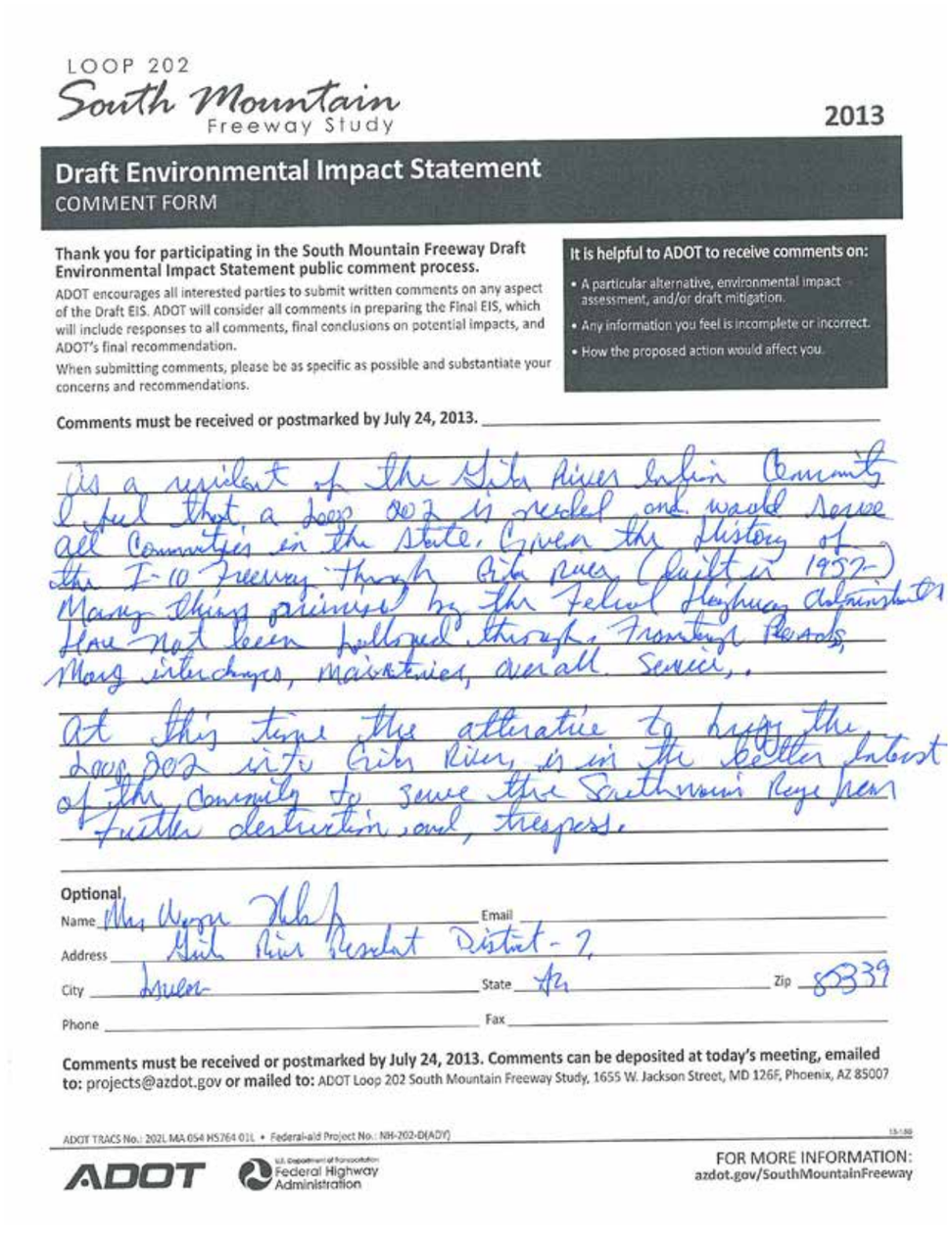
Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

As a resident of the Gila River Indian Community I feel that a loop 202 is needed and would serve all Communities in the state. Given the history of the I-10 Freeway through Gila River (built in 1957-) Many things promised by the Federal Highway Administration have not been followed through. Frontage Roads, Many interchanges, maintenance, overall Services.

At this time the alternative to bring the Loop 202 into Gila River, is in the better interest of the community to serve the Southwest Regional Further destruction, and, trespass.

Optional

Name Mrs Wayne Hale Email

Address Gila River Resident District - 7

City Laveen State AZ Zip 85339

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT · U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Christina Noble

Document Created: 7/24/2013 7:23:35 AM by Web Comment Form

South Mountain is a unique community treasures that must be maintained and protected. I am opposed to any alignment that cuts into (and in my mind) destroys our beautiful natural amenity. If funding sources cannot afford options that preserve South Mountain - such as a bridge or a tunnel - then we should delay the project until such funding becomes available.

I understand that development pressures place increased demand on our street systems, however it is also true that building more freeways invites increased development and traffic. The notion of induced demand has been studied and known for decades. Induced demand needs to be incorporated and accounted for in the transportation study. Additionally, as presented, alternative modes of transportation appear to have been quickly cast aside as seriously considered options due to a pre-existing bias towards a freeway. I would like to see alternative options such as rail reconsidered in greater depth and incorporated into plans for the future.

The study group needs to go back to the drawing board. We must consider a more forward thinking approach that acknowledges that cities are not developed solely on freeways. Residents no longer want to live a fully auto-dependent lifestyle and demand transportation options. For Phoenix to compete into the future and draw young, smart employees we must offer increased options that include various modes of transportation.

We must work harder and invest more wisely in transportation options that preserve rather than destroy the natural assets that make our city unique. The landscape and the mountains - including South Mountain - cannot be replaced. We must preserve and protect South Mountain. We would be irresponsible stewards of our City if we destroy South Mountain by cutting a freeway through.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The Final Environmental Impact Statement provides a thorough summary of the project team's analysis of the Bridge Alternatives. Please see pages 3-13 and 5-20. Options to build a bridge over the South Mountains were eliminated from further study not just because of high costs. They would not protect the South Mountains. Bridge Alternatives would have incident management and homeland security concerns, constructibility and maintenance issues, future expansion limitations, and undesirable intrusion-related impacts. Bridge Alternatives would not achieve avoidance of the South Mountains or meaningfully reduce use-related impacts under Section 4(f). Bridge Alternatives would increase visual impacts.
3	**Alternatives**	The Final Environmental Impact Statement provides a thorough summary of the project team's analysis of the Tunnel Alternatives. Please see pages 3-14, 3-16 and 3-17, and 5-18 through 5-20. Options to build a tunnel under the South Mountains were eliminated from further study not just because of high costs. They would not protect the South Mountains. Tunnel Alternatives would create safety and constructibility concerns, undesirable intrusion-related impacts, and maintenance issues. Tunnel Alternatives would not achieve avoidance of the South Mountains or meaningfully reduce use-related impacts under Section 4(f). Tunnel Alternatives would have less visual, noise level, and habitat acreage impacts than would the open-cut design of the proposed action.
4	**Alternatives**	The project team's analyses demonstrate that the proposed project is needed today. Details of this need are presented in the Final Environmental Impact Statement, beginning on page 1-13. While new projections based on the 2010 Census may show a lower anticipated population in 2035 than the previous projections showed, the need for the freeway has not changed. Waiting for available funds—that would likely never become available because tunnel or bridge alternative have accompanying environmental and other limitations that would not warrant their exceedingly high construction and maintenance costs—would not be prudent given the current and projected demand for the proposed action to relieve congestion and support regional travel mobility. The proposed action is currently funded as well as needed.
5	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
6	**Secondary and Cumulative**	The proposed freeway is a response to existing and anticipated travel demand in the metropolitan Phoenix area. It is not meant to increase travel beyond that expected to be generated from existing and anticipated population and employment growth and related land development. It is important to consider that improvements proposed for any type of transportation system (e.g., a new bus route, rail transit line, commuter rail service) would likely lead to changes in travel behavior, which, in turn, would lead to increased use of the particular system. Improvements made to a given transportation system are meant to attract new users (see Final Environmental Impact Statement pages 4-170 through 4-174). If this were not a primary goal, the improvements would be neither effective nor warranted. For the proposed action, a goal is to attract users of other segments of the Regional Freeway and Highway System and the local arterial street network, now and in the future, to the proposed action to optimize, in part, the entire regional transportation system (as outlined in the proposed action's purpose and need in Chapter 1).
7	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
8	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Purpose and Need, Lack of Support**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 highway
Date: Tuesday, June 25, 2013 8:50:53 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Tom Nofel [mailto:tomsbox75@msn.com]
Sent: Monday, June 24, 2013 8:03 PM
To: Projects
Subject: 202 highway

1

We need this highway badly. Please get this thing built already!!!!

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: extension of Loop 202/South Mountain Freeway
Date: Tuesday, April 30, 2013 8:52:48 AM

From: Sandy Nordstrom [mailto:sandynordstrom@gmail.com]
Sent: Sunday, April 28, 2013 10:40 AM
To: Projects
Subject: extension of Loop 202/South Mountain Freeway

1

My husband and I have been looking at the information and maps of this extension. Living in the West Valley, we are very much in favor of this extension. Of course we would be most in favor of the W101 alternatives which bring the road further west, but the recommended W59 alternative is better than not extending at all. The amount of traffic that could be deterred from the downtown area of Phoenix and the time saved from traveling from west to east across the Valley would be tremendous.

With the 10-year population and growth expectations, to not go forward with this much needed roadway would cause exceptional gridlock in the future.

Sandy and Kim Nordstrom

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 10:09 AM
CALLER: LORETTA NORMAN	CALLER ADDRESS: 5618 S. 26TH PLACE, PHOENIX, AZ 85040
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I am for the Freeway, South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1996, and the need is very prevalent. Especially when I-10 happens to be closed, it's a zoo getting out of Ahwatukee into the Phoenix area. Other times, even going to the west side takes forever. This freeway really would help out the whole situation.

I've lived near a freeway in Tempe as I was growing up, I didn't grow an extra arm or anything like that, so freeways are okay. I don't believe that putting it on the Gila River Indian Reservation should be explored any further. The routes have been there for years; people who bought houses in the path should have done their homework. And it's a need -- it's a necessity. It's not even a need; it's a necessity in that area, and it needs to be built today. That's all I've got.

* * *

MR. NORRIS: I'm in favor of building. I've worked for the City of Phoenix for almost 20 years, retired. But I watched this project and I hope that it still will be -- should have been constructed 20 years ago. Congestion around the Broadway Curve is a major problem getting back and forth from the East Valley. This would take off major trucks and people that don't need to go through Central Phoenix. They would have an alternative to go around, get off on Pecos, and then get

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 back on the I-10 and 51st Avenue, and that would relieve
2 a lot of the truck traffic and accidents and other
3 things.
4 The other thing would be just -- that would
5 also help pollution and air quality and cars idling and
6 trucks idling. And so all of those benefits, I think,
7 would be beneficial to building the freeway on that. And
8 also HOV lanes and stuff would be included on the South
9 Mountain Loop, so that's probably the main reasons why I
10 support it.
11 * * *
12 MS. HERRING: Patrice Herring. And I
13 definitely want a yes vote on the 202 for the W-59 link
14 because I am a Laveen resident. I bought a house in
15 Laveen because I was promised that this freeway was
16 coming through. We have horrible traffic in our area.
17 We have problems with the river -- when it gets flooded,
18 getting over the river. Sometimes we're stuck where we
19 can't even cross over to the other side of the city.
20 This will reduce pollution, as well, and bring much
21 needed businesses to the Laveen area, and link us to
22 other areas of the city. We definitely need the Loop 202
23 freeway and we need the W-59 route. Thank you.
24 * * *
25 UNIDENTIFIED SPEAKER: I really want you to

1

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4284

Ahwatukee -- southeastern portion of Ahwatukee.
That's all I have to say.

* * *

MR. ELTERS: My name is Bassam Elters, B-a-s-s-a-m E-l-t-e-r-s.
My comments are that I support the Loop 202. I've lived in Arizona for 30 years and in the Valley for nearly 10 years. The traffic congestion in the area needs a practical solution. This corridor has been a part of the regional plan for years. The voters approved it twice, and it's time to build it.
That's it.

* * *

MR. NOVAK: My name is Will Novak, N-o-v-a-k.
I just wanted to put in a comment that I hope they don't build anything and save the billion-and-a-half dollars and do something else with it, like build some light rail trains or plant 15 million trees or build a commuter rail, any of the number of things we need in Phoenix.
This is a city that is really -- we've got our

1
2

Page 5

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www.drivernix.com

Code	Issue	Response
1	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
2	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Comment codes continue on next page)

Code	Comment Document

priorities all backwards. And we used to be against building freeways in Phoenix. Back in the 1970s, people used to protest against the I-10. The Arizona Republic came out against building more and more freeways here and said we don't want to be like another Los Angeles. And that's what we ended up building, a hellish automotive nightmare where everybody has to drive everywhere.

And I'm sure for most people here, you know, if they just want to go to the grocery store, they have to drive there. If they want to get anything, you know, want to go to dinner, they have to drive there.

I'm lucky to live in Central Phoenix. I walk pretty much everywhere and ride my bicycle. I ride my bicycle to work. That's the sort of city we need to be building, a 21st Century city where we have multimodal options.

3

It's really depressing that all these middle-aged white guys at ADOT are going to be shoving this down our throats and that by the time it's built and developed, they'll all be dead so it doesn't really matter. But I've got to live here until I'm 90, because I love Phoenix and want to see it thrive. So me and my kids, we'll have to worry about choking to death on all the pollutants in the air, but, you know, eff it, the ADOT guys will be dead. Luckily, I'll be mayor by then, so I'll make sure they

4

Page 6

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

don't get their jobs back. We'll give them to people with sense in their heads.

Anyhow, thanks for listening. ADOT, you're depressing as always.

* * *

UNIDENTIFIED SPEAKER: The biggest thing right now, I think, is why is it that it's only one day and during the workday, like, this particular public hearing and the forum and everything like that? Because normal people work Monday through Friday, 8:00 to 5:00, so it seems like it would be better, like, on a weekend, all day Saturday and all day Sunday.

Because there's a lot of information for people to kind of comprehend, especially for the people who may be newer to the community and not familiar with the NEPA process, not familiar with the technical process, I think a bigger span of time would have been better.

* * *

MR. CASTLE: Patrick, C-a-s-t-l-e.

I just spoke in the other room, but I think that the key thing that we saw in years in living in an area

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Question
Date: Thursday, June 27, 2013 11:03:00 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Matt Novak [mailto:mnovak4@cox.net]
Sent: Wednesday, June 26, 2013 1:03 PM
To: Projects
Subject: Question

Hello,

1 I'm a realtor and have a question about the new South Mountain Freeway. Can you give me the
2 build radius from Pecos? Meaning I have a couple clients in a community at the end of Pecos road and we are wondering if there house would be in the build area of the freeway? Do you have the specifics of location for the freeway? I know it is along Pecos, but how close? Please let me know, I can find more info on this! Thanks.

Matt Novak
Real Estate Agent
American Allstar Realty
6642 E Baseline Rd., #101
Mesa, AZ 85206
480-239-6360 (Cell)
480-223-6383 (Fax)
mnovak4@cox.net
mattnovak@findazhomes.net
Search the MLS HERE!!

P.S. If you enjoy working with me and know of anyone needing a Realtor® they can trust, there is no greater compliment then having an introduction from you.

This email, its contents and attachments contain information from American Allstars, inc. D.B.A.

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Acquisitions and Relocations**	Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.

Code	Comment Document

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Code	Issue	Response

Code	Comment Document
1	Carolyn Nutter Document Created: 5/21/2013 8:52:45 PM by Web Comment Form Please, lets get this project underway. This highway is much needed. Baseline Rd., a road that I travel to the East Valley, gets very crowded. It is approximately 12 miles of traveling on Baseline Rd, stop and go traffic, just to get to highway 10 or 60. Also, the only way to get across the Salt River and travel north is limited. If 91st Ave and 67th Ave are flooded, 51st Ave is the closest option. This increases the time it takes to get somewhere and also increases cost as it takes more fuel. Please, please, lets get this project underway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Bob Obijiski
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, June 03, 2013 7:12:40 PM

Jun 3, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases. (5)

(6) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area. (7)

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(9) IT IS EXACTLY THESE DECISIONS THAT HAVE LED TO THE 100 DEGREE MARK AT MIDNIGHT. THERE IS TOO MUCH PAVEMENT AND TOO LITTLE OPEN SPACE. THIS HAS TO STOP SOMEWHERE! THE MORE YOU DEVELOP, THE MORE DEVELOPMENT YOU ENCOURAGE. SINCE THIS IS AMERICA AND MORE SO, ARIZONA, WE WANT TO DO WHAT WE WANT WITHOUT REGARD FOR THE CONSEQUENCES WE CREATE. STOP HIGHWAY EXPANSION AND TAKE CARE OF WHAT YOU HAVE.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	Sincerely, Mr. Bob Obijiski 4920 E Nihigan Pass Sedona, AZ 86336-9143

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.
9	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:04 PM
CALLER: MICHAEL O'BRIEN	ADDRESS: 7937 W. WINDROSE DRIVE, PEORIA, AZ 85381
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Kelly O'Connell Document Created: 5/21/2013 11:29:21 AM by Web Comment Form 1) It is time to build the 202 South Mountain Freeway. Our citizens have waited long enough to reap the benefits that come with this project. 2)The Freeway will cut commute time, thereby saving natural resources and time for each commuter. 3)Voters approved the Loop 202 South Mountain Freeway build twice. 4)The project will create much needed construction jobs during construction. 5) The project will create substainable jobs all along the freeway path. 6) The 202 South Mountain Freeway will bring positive results to real estate all along is path.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/7/13	INCOMING CALL TIME: 9:25 AM
CALLER: MARILYN O'CONNELL	CALLER ADDRESS:
PHONE: 480-496-5639	EMAIL:

CALLER REMARKS/QUESTIONS:

Hello, this is….Miss Senior Arizona 2008. I moved here over 30 years ago. My husband and I retired in Ahwatukee in the retirement community and um we knew about South Mountain freeway the proposed, pretty much right away. And we thought, well the traffic is pretty bad now they were working on I-10 at that time right near us and the freeway was getting to be a problem. But as the years went on as the problem with the traffic grew and grew, we still thought Oh good it's going to be relieved one of these days with the South Mountain freeway bypass. So, you know, we just settled in and waited our retirement years. Our lungs are very important to us, and here it is 30 years later the freeway still has not been built. And they went ahead and built houses and a church right in the pathway and it's ridiculous, all the studies, all the studies, all more studies and it's still isn't built. The Broadway curve, all this traffic has to go right by our retirement community with all the foul air coming in. I certainly knew about the I-10 but with the proposed bypass that would mean trucks through traffic would be going around this retirement community. So I'm furious. I think it's time that we build this freeway and relieve the retirement community, all these old people that need to help in breathing. I'm 85 and I'm hoping to live another 10 or 15 years, but I kind of doubt it if I'm still breathing this air from all this traffic. I mean I've heard there were 10,000, 12,000, cars that pass our retirement community, maybe more everyday. So do something, for God sakes, get this freeway built and relieve our little retirement community of this foul air. It can be reduced a lot and the noise, everything can be reduced. Give us a break, these are our golden years. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:58 PM
CALLER: PHYLLIS O'DELL	CALLER ADDRESS: 1961 E. STEVENS, TEMPE, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I do support the South Mountain Freeway. I hope that you would just take it into consideration that we have voted for this twice and we have a huge need for this. So, please consider this and I am a long time voter and there are three of us in this family and we would all vote for this. Thank you very much

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway: Access to APN: 300-05-003E
Date: Monday, July 22, 2013 8:42:43 AM

FYI

-----Original Message-----
From: Kent Oertle [mailto:mandkhome@aol.com]
Sent: Sunday, July 21, 2013 11:10 AM
To: Projects
Cc: realtyarizona@aol.com; Jr. John Oertle
Subject: South Mountain Freeway: Access to APN: 300-05-003E

1 2 We own a property, Maricopa Assessor number 300-05-003E Which is in the vicinity of the proposed South Mountain freeway. The proposed freeway is removing all access to our parcel and all the property owners in the area. From review of the proposal, there is no provision for access to our parcel. Currently, Pecos road provided access, however with the freeway displacing Pecos Road, there is now no access.
We need a frontage road provided to allow access to our parcel and all parcels in the area.
Regards.
Kent Oertle

_____

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.

Code	Issue	Response
1	**Traffic**	The proposed freeway does not currently include frontage roads or an interchange in this location. The access locations are primarily at connections to existing roads within the region's arterial street system. During the right-of-way acquisition process, the Arizona Department of Transportation would evaluate the need to provide access to given properties on a case-by-case basis. Examples of how the Arizona Department of Transportation would adjust local streets to retain circulation are presented on pages 3-56 and 3-57 of the Final Environmental Impact Statement.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Additional information about the property acquisition process is available on the Arizona Department of Transportation's Web site, in the Right-of-Way Group Acquisition, at <azdot.gov>.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/12/13	INCOMING CALL TIME: 5:00 PM
CALLER: JOHN OERTLE	CALLER ADDRESS:
PHONE: 480-953-3888	EMAIL:

CALLER REMARKS/QUESTIONS:

1 2

I have property close to the South Mountain corridor where ADOT is planning the 202 extension around the South Mountain. My comment would be that we would like to be able to get freeway access to our property which we have 60 acres there and it's kind of in the 'saddle' there between two mountains around near 51st Avenue. Actually it would be 35th Avenue just north of Pecos and Chandler Boulevard. Chandler Boulevard. Anyway, we would like either a frontage road or an exit/entrance to the freeway in that area. There is probably about, I would guess 1,000 acres in there that will be landlocked if we don't get that kind of solution. Anyway if you could include that comment in the remarks that you are forwarding on your environmental study I would appreciate it. Thank you.

RESPONSE:

I tried calling this number on Friday, July 19 at 11:37 a.m. and it says it is not in service.

Jessica Amend
HDR/InfraConsult

RESPONSE DATE:	RESPONSE TIME:	HDR STAFF INITIAL:

Code	Issue	Response
1	**Design**	The proposed freeway does not currently include frontage roads or an interchange in this location. The access locations are primarily at connections to existing roads within the region's arterial street system. During the right-of-way acquisition process, the Arizona Department of Transportation would evaluate the need to provide access to given properties on a case-by-case basis. Examples of how the Arizona Department of Transportation would adjust local streets to retain circulation are presented on pages 3-56 and 3-57 of the Final Environmental Impact Statement.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Additional information about the property acquisition process is available on the Arizona Department of Transportation's Web site, in the Right-of-Way Group Acquisition, at <azdot.gov>.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, July 15, 2013 11:21:18 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Brian Oesterreicher (Phx) [mailto:Brian.O@rimex.com]
Sent: Monday, July 15, 2013 11:16 AM
To: Projects
Subject: South Mountain Freeway

1

59th Ave. makes no sense. Why would it not use the 99th Ave. corridor?

freeway would run from I-10 in the West Valley along 59th Avenue, cut across the southwest corner of South

Brian Oesterreicher
Rimex Inc.
U.S. General Manager
5801 West VanBuren St.
Phoenix, Az. 85043
P.(602)272-9393
C.(602)616-1771
F.(602)272-9388

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Wednesday, May 15, 2013 11:55:02 AM

From: Voltaire L. Ojastro [mailto:findvoltaire@yahoo.com]
Sent: Wednesday, May 15, 2013 11:23 AM
To: Projects
Subject: 202

1

Please build the 202 South Mountain freeway.

Please and Thank you.

Kind regards,

Voltaire

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:
- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. I fully support the concept of the Loop 202 South Mountain Freeway. After reviewing the exhibits I was surprised to see no improvements to I-10 between the Loop 101 and the alternatives W71 ad W59. Would not costs to upgrade I-10 to handle the increased traffic flows from the L101 to L 202 on I-10 be a logical expense in order to compare with W101? Operationally W101 would be superior to W71 ad W59. I am not convinced at this point that W59 is the logical alternative. I will go online to review the documents more fully. Overall, the presentation video was excellent and displays were good Study team member present handled my questions well.

Optional

Name Brad Olbert Email

Address 273 S. Gibson Street

City Gilbert State Az Zip 85296

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

1 2 3 4 5

Kerilei Oldoerp Document Created: 5/18/2013 11:35:10 PM by Web Comment Form

The original proposed location of the 202 loop continuing down Pecos is now obsolete. It no longer effectively by-passes the city. A new more southernly route needs to be established. The Pecos portion of the loop should no longer be developed. Additionally it is an intrusion into the existing developments of the Ahwatukee area.

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community Alignment**	
3	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
4	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document
1	Kerilei Oldoerp Document Created: 5/18/2013 11:39:50 PM by Web Comment Form In these difficult economic times additional expenditures on unnecessary freeway development is unwarranted.

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Estudio de la Autopista
South Mountain
LOOP 202

2013

Reporte Del Impacto Ambiental
FORMULARIO DE COMENTARIOS

Gracias por participar en el proceso de recopilación de comentarios sobre el Reporte del Impacto Ambiental del proyecto de la autopista South Mountain.

ADOT alienta a todos los interesados, a presentar sus comentarios por escrito sobre cualquier aspecto del Reporte del Impacto Ambiental. ADOT considerará todos los comentarios en la preparación final de este reporte e incluirá las respuestas a todos los comentarios, conclusiones finales sobre impactos potenciales, y la recomendación final de ADOT.

Para ADOT es muy útil recibir comentarios sobre:

- Alguna alternativa en particular, cúal sería su impacto ambiental y las medidas propuestas para reducir dicho impacto.
- Cualquier información que usted sienta que está incompleta o incorrecta.
- Cómo le afectará a usted la acción propuesta.

Los comentarios deben ser recibidos o tener el sello postal con fecha límite del 24 de julio de 2013.

1 Congestion on I-10 between I-17 & 101 is avid locked during rush hour, so it would be better if the connection is made at the 101 T.I.

Opcional

Nombre David Alvarez Correo Electrónico _____

Dirección _____

Ciudad _____ Estado _____ Código Postal _____

Teléfono _____ Fax _____

Los comentarios deben ser recibidos o tener el sello postal con fecha límite de Julio 24,2013. Los comentarios pueden ser depositados en la reunión de hoy, enviados por correo electrónico a projects@azdot.gov **o por correo regular a :**
ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-550

ADOT U.S. Department of Transportation Federal Highway Administration

PARA MÁS INFORMACÓN:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

say.

THE FACILITATOR: Thank you.

MR. NEELY: Thank you.

THE FACILITATOR: Vicky Oliver.

MS. OLIVER: Hi, my name is Vicky Oliver and I'm for the 202 project because I think it will bring employment opportunities to our area, which we definitely need, and also will help the commute for a lot of people coming in the area. And also, it's been proven that freeways cut down pollution and also traffic accidents, and it'll keep some of the traffic off of our city streets.

1

THE FACILITATOR: Thank you.

Jake Speck.

MR. SPECK: Good afternoon. My name is Jake Speck, I'm here in support of the 202. I think this project is a great benefit to the community for a lot of different reasons: Reducing traffic, revitalizing economy, bringing over 30,000 jobs to the community, as well as a significant investment. I think it will attract potential employers as well, which would be great for growing the economy going forward.

After looking at the EIS, I think the potential impacts are vastly outweighed by the benefits this project brings, and I believe that now is the time to go

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Christo Olivier Document Created: 5/12/2013 7:59:47 PM by Web Comment Form W101 Alternate Central Option preferred option.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain EIS Comment
Date: Wednesday, May 22, 2013 10:49:37 AM

From: kolsonus@gmail.com [mailto:kolsonus@gmail.com] **On Behalf Of** Kevin Olson
Sent: Tuesday, May 21, 2013 5:37 PM
To: Projects
Subject: South Mountain EIS Comment

1

I am writing to comment on the South Mountain Freeway EIS and in support of building the proposed freeway as soon as budget allows. I live in Tempe and am a regular user of the I-10, the 202, the 101 and the 60. I can remember, many years ago, when the full opening of the 101 in N. Scottsdale had a noticeable impact in reduced congestion on I-10.

It is clear to me that the building the South Mountain represents a key opportunity to divert traffic that now uses the I-10 to an alternate route and delay the complete spiral of the I-10 into gridlock. The benefits for mobility throughout the Valley are significant.

Thank you

Kevin Olson
Tempe, Arizona

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Stewart Ongchin
To: Projects
Subject: Comments on the proposed loop
Date: Wednesday, July 24, 2013 7:17:24 PM

1 2 3 4 5

My fear with the proposed loop is that it'll be used as a truck bypass instead of going thru downtown. Not to mention the disruption it'll have to south mountain and the increased pollution to the surrounding areas. I've heard of other issues of water reserves and other things being impacted. Overall I'm not in favor of the proposed loop and fear that the loop will be detrimental to the environment and quality of life for the immediate habitants.

Thanks,
Stew....

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Air Quality**	
4	**Groundwater**	The Study Area is located within two Active Management Areas that are regulated by the State of Arizona. The Arizona Department of Water Resources administers groundwater use. Water level decline in one subbasin can be offset by recharging water in another subbasin of the Active Management Area. The Arizona Department of Water Resources regulates drilling, installation, and abandonment of groundwater wells. (See Final Environmental Impact Statement page 4-104.) If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See the text box on Final Environmental Impact Statement page 4-108.)
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Thursday, May 16, 2013 8:13:54 AM

From: C O [mailto:swbrotha100@yahoo.com]
Sent: Thursday, May 16, 2013 5:21 AM
To: Projects
Subject: Loop 202 South Mountain Freeway

1 2

Hello there. I'm writing to give my opinion on the proposed South Mountain Freeway. I believe this project should have been built a long time ago. I still believe it should be built now. I hope you guys will reconsider a connection to Loop 101 and I-10, but I can live with the 59th Ave connection to I-10. I also hope you can work out a deal with the Gila River Indian Community, if it can help them and spare the residents along the current Pecos Rd corridor. I believe the Pecos section would have been better if it was similar to the stretch of the Santan Freeway in Chandler between I-10 and Loop 101/Price Rd. If you have to start the eastern and western segments separately, or build a temporary road like Loop 303 was before its current construction, so be it. Thank you for your time.

Chuck Onwubu
Phoenix AZ

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 3:14 PM
CALLER: HERMAN ORCHID	CALLER ADDRESS: 512 W. EL CAMINITO DRIVE, PHOENIX, ARIZONA 85021
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 And I am in support of the South Mountain Freeway, I think it should be built. Thank you. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
7/23/13	2:36 PM
CALLER:	CALLER ADDRESS:
ORLANDO ORLEANES	85007
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Hello there, I would like to propose that nobody build the 202 freeway. I feel it would lead to a destructive freeway affecting indigenous communities. So I ask that you vote no in building the proposed 202 freeway extension. That's a no build – no.

1

2

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Public Comment
Date: Monday, July 22, 2013 8:35:45 AM

F Y I

From: C & D Orr [mailto:cdorrfamily@cox.net]
Sent: Friday, July 19, 2013 6:00 PM
To: Projects
Cc: C & D Orr
Subject: South Mountain Freeway Public Comment

Greetings.

As a resident of Ahwatukee I am opposed to the South Mountain Freeway Alignment along Pecos in general.

(1) However, even if its inevitable, the current design is flawed. The most glaring issue is elimination of the 32nd St. access to 'Pecos'. So all DVHighSchool traffic will funnel to 24th and 40th St. All traffic out of DVHS will have to left turn onto 32nd St or drive through neighborhoods. Its bad enough as it is and especially during events. The traffic jams are terrible. We have enough stressors in life without creating unnecessary events. Even though

(2) our kids are almost done with DVHS, I believe this is plan is unacceptable to the community quality of life.

Curtis Orr
Ahwatukee resident of 16 years.

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Code	Issue	Response
1	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: south mountain loop 202
Date: Wednesday, July 17, 2013 4:02:28 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Antonio Ortiz [mailto:ortizantonio22@yahoo.com]
Sent: Wednesday, July 17, 2013 3:09 PM
To: Projects
Subject: south mountain loop 202

1

Hello! I am a tribal member of the Gila River Indian Community, my comment is, I believe the freeway is your problem. Bulldoze the mountain down, let us conquered people left alone. How much more can you take from us ? Your attempt to murder us all, was almost successful. Now, you want what little land and pride(south mountain) what we have left, is very shameful. Your people(white) have no soul's I pray for you and your kind. Have your goon's flash money to our people but we will know that all of this construction for " prosperity" and "to lessen traffic" is absurd. Go arrest or shoot some more mexicans or black's maybe that will curb your quest for expansion.

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Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 DON'T RUIN PECOS ROAD- I RIDE my Bicycle
There + you don't need to use that area- find
2 another parcel of land. GRIC needs to be asked
again if they would let you build there — DON'T
BUILD ON PECOS!

3 You Are destroying so many peoples houses +
4 ruining our lives By sending all this traffic
into my Back yard.

I OPPOSE THIS ROAD BUILD
ELSEWHERE!

Optional

Name CARL OSBORNE Email

Address 2817 W. ASHURST

City PHX State AZ Zip 85045

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-190

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community Alignment**	
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

(Comment codes continue on next page)

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

Don't Build it
Do Pleeee

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

(1) (2) (3) I understand the need for future growth to connect the East and the west valley. I get it. I don't get why we would destroy the Ahwatukee community and churches ad homes to build the highway on Pecos.

It is a quiet ad peaceful ad pristine mountain preserve.

(1) Why can't we buld the highway where there are no homes ad no ones community will be destroyed.

(4) Tak to the Gila River Indian community — PTO

Optional

Name Tania Osborne Email tstreungotwalt@gmail.com

Address 2917 W Ashwst Dr

City Phoenix State AZ Zip 85048

Phone 602-363-9449 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 1265, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

LOOP 202
South Mountain
Freeway Study
2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

5 Make it worth their while to build the road off of Maricopa instead of Pecos.

6 7 What about losing the cycling on Pecos & the quiet hiking and mountain biking through the preserve between Chandler & 27th Avenue.

2 1 Please don't throw all those folks from their homes and make Ahwatukee a throughfare!

5 3 Build the loop 202 South, just don't build it on Pecos! Go further South please. Preserve Ahwatukee!

4 Talk to Gila Indian Community. Figure it out. They have the land. Make it lygrative enough for them to consider an alternative

3 charge us more to pay them to put the highway miles south of Pecos.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-159

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
5	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
6	**Traffic**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

5039

1 CARL OSBORN: I'm opposed to it where it's
2 in the current location where they are showing the
3 current location because it impacts too many things in my
4 opinion. We're going to lose Pecos Road which I ride my
5 bicycle on all the time. There are so many houses and
6 things that are being destroyed to make it. People put
7 their -- I'm not one of them, but I live close enough to
8 it that I don't want the noise. I know the people that
9 are losing their houses, I can't even imagine.
10 I know I read and heard about that they
11 tried to propose doing it to the Gila River Community and
12 they opposed it. They need to find another way then.
13 I think putting it where it's at is
14 ridiculous. You're impacting so many people in the east
15 Valley.
16 Looking at the video, the west Valley
17 doesn't look like too many houses in the place where it's
18 going through right now. I don't think there are too
19 many people there that will try and oppose it.
20 But in the east Valley, it's impacting so
21 many people down here. It seems to me so much impact to
22 people's lives that live down here. I moved here and I
23 understand it was always proposed since 1985, but they
24 let people build houses down here without --
25 I mean, it's taken how long? 20 plus

Page 23

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

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8

(Comment codes continue on next page)

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Traffic**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives, Gila River Indian Community Alignment**	
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land despite the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.

Code	Comment Document

6

years; right?

And you built so many things down here. And now people have their house and their life down here. And I don't want that thing in my backyard. It just seems to me so much impact to people's lives that live down here.

Don't build it.

Code	Issue	Response

Code	Comment Document

5040

1 TANIA OSBORN: It sucks. Build it. Just
2 don't build it where you're looking to build it.
3 It's hard not to see Maricopa Road a mile
4 south and not think that is, like, the perfect way to go.
5 Why kill a community to go through there?
6 It just -- It doesn't make sense.
7 And, yes, let's talk to the Gila Indian
8 Community because the money that we're going to spend
9 destroying people's homes could be used to compensate
10 them to try to build more where there is nothing
11 established right now.
12 (The public comments conclude at this point.)
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Page 25

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:29 PM
CALLER: HENRY OSOINACH	CALLER ADDRESS: 9818 E. WATFORD WAY, SUN LAKES, AZ 85248
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I highly support this. It has been on the books for many years and there are no residents that have a legitimate claim that they didn't know about it and really think it is way over due. I do have property in Ahwatukee and think it should happen. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Please say NO to loop 202 freeway extension
Date: Friday, July 12, 2013 8:59:38 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Jessica Outlaw [mailto:outlaw4vida@gmail.com]
Sent: Friday, July 12, 2013 3:08 AM
To: Projects
Subject: Please say NO to loop 202 freeway extension

1

Please leave this biodiverse area alone. It gives us Phoenicians a great natural place to go (South mnt) within the city, where we can get a taste of nature, hike, bike, ride horses, etc. Please do the right thing and stop this!!! THANK YOU

--

Jessica Outlaw
722-214-929

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO BUILD - Loop-202 freeway extension
Date: Monday, July 22, 2013 8:49:49 AM

From: Alyssa [mailto:tetramorium@gmail.com]
Sent: Sunday, July 21, 2013 4:01 PM
To: Projects
Subject: NO BUILD - Loop-202 freeway extension

The proposed 202-west extension is NOT needed or even good for us!

1 2 3

South Mountain is a beautiful place and must be preserved. The freeway extension is NOT necessary and will cause desctruction to the landscape. I watched the desert behind my home torn apart by the 202 Santan freeway in Chandler and I DO NOT want it to happen again. The desert that was destroyed used to be home to coyotes, jackrabbits, and countless other Arizona animals. When the freeway was made those coyote packs were forced out, killed, crushed by cars, and became roadkill. I never heard the howls of coyotes after that...and driving down the 202 made me horribly depressed when I saw crushed animals on the side.

The 202 has already destroyed so much land.
Don't continue to destroy SOUTH MOUNTAIN. There are plenty of other roads already.

4

NO BUILD ON THE 202 FREEWAY EXTENSION.

-Alyssa Overson

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Biology, Plants, and Wildlife**	
4	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

From: MICHAEL D OWEN
To: Projects
Subject: South Mtn Freeway
Date: Friday, June 21, 2013 12:52:42 PM

1

Just build the dang freeway already. The tribe has had their say, and didn't care about the economic advantages to their community. Too bad for them. I am tired of Phoenix traffic getting worse by the year. How much gasoline is wasted with cars sitting in gridlock day after day? How much time is wasted?

Michael Owen

Phoenix resident for over 30 years.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway comments on Draft EIS
Date: Tuesday, May 14, 2013 9:37:32 AM

From: Hal Owens [mailto:hal@pcireload.com]
Sent: Sunday, May 12, 2013 4:18 PM
To: Projects
Subject: South Mountain Freeway comments on Draft EIS

1

To whom it may concern,
I have reviewed the Draft EIS on the proposed South Mountain Freeway.
It sounds like completion of this freeway is a good thing for the environment and I support its completion as soon as possible.
Thanks,
Hal Owens
Phoenix, AZ

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, May 20, 2013 8:23:02 AM

From: Inphx2@aol.com [mailto:Inphx2@aol.com]
Sent: Sunday, May 19, 2013 4:24 PM
To: Projects
Subject: South Mountain Freeway

1

Let's move forward and build the South Mountain Freeway. We voted for it long ago and in the long run, it is best for Phoenix and for the environment.

J Owens
Gilbert

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 11:57 AM
CALLER: LINDA PACE	CALLER ADDRESS: 2039 WEST WINDSOR AVENUE, PHOENIX, ARIZONA 85009
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
Hello, I support the South Mountain freeway construction. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2 3 4	Alicia Pacheco Document Created: 5/21/2013 11:02:11 PM by Web Comment Form I oppose AND DO NOT want the W 101 alternative central option as a possible location to connect the 202. This freeway would be in my back yard and over my roof, literally. This community is still underdeveloped with houses still being bought and built. We are in need of more grocery stores and schools not a freeway. There are 3 schools that would be in its path and/or under it. This connection WILL bring our neighborhoods down in value, that of which are still trying to recover from this economy, but even more so create problems with re-sale. It would also create more unwanted traffic and noise. I will continue to fight and oppose this option to protect my home and its value.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Raymond Pacheco Document Created: 5/21/2013 11:09:24 PM by Web Comment Form

1 2

The freeway option alternative is a bad option for a struggling housing market in the city of Tolleson. The freeway route would create more noise and traffic to the area. The neighborhoods are finding it difficult to recover their original home values. The area is one of Phoenix's lowest ranking cities when it comes to home values. Again this would be a serious blow and set back to regaining what was lost with the housing collapse six years ago.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	

Code	Comment Document

5020

1 MS. PACKER: First of all, let's see. I am
2 resentful that they're insisting that this is not a truck
3 route. I feel that there is no way trucks are going to go
4 through downtown Phoenix when they can take this route to get
5 to the other side of town.
6 I think it's a shame that they're blasting through
7 South Mountain. That's such an important asset that we have
8 here. I feel that there is so much still left up in the air
9 about the design process and so forth.
10 And I'm fearful how far this will go before they
11 say to the Indians, "Never mind, we don't want to negotiate
12 with you anymore," or, "We're not taking anything from you.
13 We're doing it our way."
14 I think it's an inexpensive freeway, in that it's
15 not going to be below grade.
16 And I am afraid of them destroying the water
17 sources for Lakewood Lake -- Lakes and the Foothills Golf
18 Course. And they don't really have a plan for replacing that
19 water.
20 So I think this whole thing is a very bad idea
21 that's been hoisted on us after too many years. I realize this
22 has been planned for 20 more -- more than 20 years, but I still
23 think that it went too far before they really started making
24 their real plans. And too much happened, in the meantime, for
25 them to come now and say, "Okay, this is where the road is

Page 6

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Alternatives, Gila River Indian Community Alignment**	
4	**Groundwater**	The Study Area is located within two Active Management Areas that are regulated by the State of Arizona. The Arizona Department of Water Resources administers groundwater use. Water level decline in one subbasin can be offset by recharging water in another subbasin of the Active Management Area. The Arizona Department of Water Resources regulates drilling, installation, and abandonment of groundwater wells. (See Final Environmental Impact Statement page 4-104) If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See the text box on Final Environmental Impact Statement page 4-108.)
5	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

going."

And I think that's probably all I can say except, "Boo."

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:39 PM
CALLER: CHRISTOPHER J. PADDOCK	CALLER ADDRESS: 9739 S. GRANDVIEW DRIVE, TEMPE, AZ 85284
PHONE: 480-961-9153	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I totally support the building of the South Mountain Freeway. I lived in south Tempe since 1984 and I think it's ridiculous that is hasn't been built and I would suggest that anyone that opposes it either from a financial interest or the to the contrary should be committed to the Arizona State Hospital. The freeway needs to be built. While I recognize that it won't be built until after I'm retired, but it's best for the economic growth of the valley for reasons of pollution, farm out concerns and traffic congestion. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 1:00 PM
CALLER: DAL PAGET	CALLER ADDRESS: 5756 W. MARCONI AVE., GLENDALE, ARIZONA 85306
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I'm calling to let you know I support the building of the South Mountain freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

the freeway -- the city or whatever. But anyway, thank you.

* * *

MR. PALERMO: My name is Joe Palermo. I'm in favor of the Loop 202 South Mountain Freeway. I commute daily for work on the I-10 through downtown, and I believe that the Loop 202 will significantly help the flow of traffic through downtown.

Additionally, I believe that the traffic that is stuck in idling in downtown contributes significantly to the poor air quality of our metropolitan area. And I believe that traffic will inevitably increase over the coming years. And while we have this opportunity to build the 202 freeway, we should proceed forward, rather than be behind the curve and potentially find ourselves in a gridlock situation.

Additionally, I am an environmental consultant as my career. And I believe that this will help me and my family with opportunity to potentially be part of this important infrastructure project. And so additionally I'm in favor of it, not only for reasons for the city, but also for myself personally. Thank you.

* * *

MR. MARINO: Christopher Marino, and I'm for the freeway. I have lived in Ahwatukee for since

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4391

Bay State Milling Company, 421 South 99the Avenue. I want to go on record fully supporting the South Mountain corridor freeway with the alignment, recommended alignment going down 59th Avenue. Thank you.

THE FACILITATOR: Thank you.

Reyes Medrano.

MR. MEDRANO: Good afternoon. Reyes Medrano, I'm the City manager of the City of Tolleson at 9555 West Van Buren. Mr. Burdick, good to see you, sir, it's been too long.

We're here to accompany Mr. Frank, who is one of our primary business partners and employers in Tolleson, and also to issue our support for the 59th Avenue alignment to intersect with the South Mountain freeway. Thank you.

THE FACILITATOR: Thank you.

If you'd like to speak, please go to the registration desk out front.

Joe Palermo.

MR. PALERMO: Good afternoon, gentlemen. My name is Joe Palermo, I want to speak on behalf of support for the Loop 202 freeway project. In my opinion, I travel the I-10 corridor daily to work and it's often very much a burden to me to see traffic at a complete standstill and gridlock in downtown. And in my opinion,

1

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www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

the traffic in this regional area is going to increase over the coming decades and I feel like we have an opportunity at this moment to mitigate what may be a terrible transportation nightmare in a few short decades if we don't act at this point. When I see semi-trucks standing at idle at a dead stop on the freeway and I look out and I see the haze and the air pollution in downtown, I really don't believe that this is a sensible solution to route a lot of that major transportation of goods through the region, through the area around the downtown area and out of that way where there's a lot of local traffic that needs to get to and from work.

And additionally, I just see this, again, as an inevitable, the traffic issues we're facing are going to inevitably become worse over the coming decades. At this point I really feel that ADOT has done an excellent job. I've lived here in Phoenix for 15 years and I enjoy being able to travel on the loop freeways, it's the I-10 that I struggle with. And I really think we have an excellent transportation system and we need to stay ahead of that curve, so in that way I do support it.

Last point I'd like to make, I'm an environmental consultant, I do work for metropolitan areas as well as some work for ADOT, and this potential freeway project is a great opportunity for me as a

Code	Issue	Response

Code	Comment Document

businessman to be able to help assist for my company, for us to personally be involved in this important work, to support me and my family and support our region and our city with the positive outcome of this project, so thank you.

THE FACILITATOR: Thank you.

Jeff Krobot.

MR. KROBOT: Afternoon, thanks for giving me a chance to talk. Quickly, I wanted to just voice my support for building the 202. I've been in the Valley for about 20 years now and I'd agree with the last gentleman that ADOT has done a very good job with the network of freeways. In that 20 years, I spent two years not in the Valley and lived in some cities that ignored the future transportation needs of their residents, and then they were trying to build things later rather than sooner. I'd like to avoid that and just support the 202 construction now. Thanks.

THE FACILITATOR: Thank you.

Please feel free to use either microphone when you come up.

Mike Radack.

MR. RADACK: Hello. I'd like to voice my approval of the building of the highway. I moved here about nine years ago and actually moved from Denver,

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Wednesday, May 22, 2013 10:54:00 AM

From: David Palladini [mailto:dpalladini418@yahoo.com]
Sent: Tuesday, May 21, 2013 10:19 AM
To: Projects
Subject: South Mountain Freeway

Dear ADOT officials
Interestingly enough I keep getting e-mails from We Build Arizona, an origination made up of investors and developers who support the building of the South Mountain Freeway. I have shared my opinion with them and received no reply from them, yet they continue to ask for my support. In their latest e-mail they provided this (your) e-mail and asked that I e-mail you in support of the project, I however will share with you the statement I sent to them.

This is the statement I sent them O 5/11/ 2013, originally there was an attached copy of the e-mail they had sent me asking for support.

I found this this in my in-box this morning, I went on to their web-sight and poked around. I was a little annoyed that they are portraying themselves as some sort of non profit taking donations to fund their cause under the guise of doing a greater good. When visiting the site their is a spot for contacting your elected officials, oddly enough it does not work, I was actually hoping to find out who is connected to this group. I did however find a contact us link, at,

http://www.webuildaz.org/contact-us/

This is the statement I sent them, wonder if I will get a response...

"As a concerned citizen, and a one who is native born, and was raised right here in Phoenix Arizona, I share many of the same concerns that you mentioned in the spam e-mail that your origination sent out. I grew up here in the valley of the sun and have watched it go through it's growing pains, both good and bad. Phoenix it's self has had a history of bulldozing it's own heritage and history in the name of progress. Some of this destruction was unavoidable, but most was just greed driven by developers. I also have some Native American heritage in me, and I am aware of the ongoing plight the

(Comment codes begin on next page)

Code	Issue	Response

Code	Comment Document

native people. So I am very alarmed that your spam mail makes no mention of the freeways plan to move through native lands. This is the biggest hold up for this project, yet you do not mention it, why? Until the concerns of the native people have been addressed I support them in delaying this project."

1 2

This is how I feel about the SM project and I should hope that whatever action ADOT chooses that it will be done with respect in accordance with wishes of the native peoples and all of the responsibility expected of our appointed and elected officials.

David Palladini

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Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I support building the 202
Date: Monday, May 20, 2013 8:35:57 AM

From: Tyler Palmer [mailto:palmer.tyler@gmail.com]
Sent: Friday, May 17, 2013 9:24 PM
To: Projects; info@buildthe202.com
Subject: I support building the 202

1

I live in Laveen at 64th Ave and Baseline. I have been waiting for this freeway to be built since moving to Laveen 6 years ago. I believe this project will bring greater convenience and increased commercial development. I look forward to this project's speedy completion.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 3:27 PM
CALLER: MARYANNE PALMER	CALLER ADDRESS: 7753 N. 17TH PLACE, PHOENIX, AZ 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Yes I do agree on this freeway. Hello.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Patrick Panetta Document Created: 7/9/2013 1:45:21 PM by Web Comment Form

As a previous member of the Ahwatukee Village Planning Committee, and alternate member of the South Mountain Citizen's Advisory Team, I know that these comments will be read but will in all likelyhood be disregarded. Nonetheless, I would like to get a couple of things on record regarding the Draft EIS.

1 First, per the MAG 2001 modeling (Figure 22, Page 39 of the 10/31/2002 draft report) the Trip Distribution projected for the facility indicates that just 7% of the traffic will enter/leave on I-10 to the west, and just 12% will do so to the south. The major justification for a full-fledged, 8-lane freeway is to relieve the congestion caused by the traffic moving through the city from one end of the urban area to the other. But these MAG numbers indicate that less than 20% of the vehicles on the SMF will be doing so. Another number in this projection is that 19% of the usage (or the same percentage as that of the anticipated through traffic), will be from Ahwatukee, the bulk of which will continue to utilize the stretch from 27th Avenue east to I-10 for the commute to downtown. That volume is already being easily accommodated by the existing four-lane Pecos Road "parkway" facility. (I would attach the graphic but no option was given to do so on this comment form).

2 Second, at the public meeting in May, a sign was displayed titled "Design Adjustments, Arizona Parkway Concept". The information on this sign is at best misleading, and at worse, patently false. The statement says that the parkway concept was "considered but eliminated from further consideration because it:
- would not help improve congestion;
- would not remove a sufficient amount of traffic from the arterial network;
- would not meet the proposed project's purpose and need."

Right next to these statements is a graphic showing that a parkway could accommodate 105,000 vehicles, while the corridor need was listed at 150,000 vehicles. So moving 105,000 vehicles along a parkway concept (70% of the projected need) would not help improve congestion, remove a significant amount of traffic from the arterial network, nor meet the proposed project's purpose of connecting the two sides of the valley and providing a downtown bypass option? Really? I think this would have been a perfectly acceptable compromise between ADOT and the local community but was summarily dismissed because it wasn't part of the original 1985 Transportation Plan.

3 I understand and support the need for an east-west connection south of town, but still believe a parkway concept, or even a hybrid solution of a parkway along the Pecos alignment to 51st Avenue, with a full freeway facility from there north to I-10 is still a viable, and preferable alternative that ADOT seriously needs to consider. It would be much cheaper for ADOT, less impactful to the Ahwatukee community, and would like eliminate the need to blast through South Mountain, as a smaller facility needs less room, and could potentially be palatable

4 enough the Gila River Indian Community to allow a small portion of it to reside on their land from 43d to 51st Avenue. And it would still be moving a significant amount of traffic around

Code	Issue	Response
1	**Traffic**	Information related to origins and destinations of motorists that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Final Environmental Impact Statement. The definition of freeway users considers only those motorists who travel through the South Mountains; so, motorists who begin their trips in Ahwatukee Foothills Village and travel east to Interstate 10 (Maricopa Freeway) or motorists who begin in Laveen Village and travel north to Interstate 10 (Papago Freeway) are not counted in the analysis. The analysis of origins and destinations shows that 73 percent of travelers would be involved in trips beginning or ending in the Study Area or areas immediately surrounding it. Seven percent of the trips would begin, end, or begin and end outside of the Maricopa Association of Governments region; ten percent would either begin or end in Pinal County.
2	**Alternatives**	In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.
3	**Alternatives**	The Gila River Indian Community has not allowed the project team to consider alignments on its land, so extending Pecos Road to 51st Avenue is not feasible. A hybrid facility is not desirable because the transition points typically result in substantial bottlenecks to the system (an example on a smaller scale is State Route 143 transitioning into 48th Street). The comparison of travel demand served by the parkway and freeway considers eight-lane facilities for both. The parkway would include four lanes in each direction while the freeway would include three general purpose lanes and one high-occupancy vehicle lane in each direction. Therefore, the general width of the facilities would be relatively the same as they pass through the South Mountains, resulting in similar impacts. The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Final Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The determination of purpose and need for the proposed project includes an assumption that substantial improvements would be made to the Interstate 10 corridor between State Route 51 and U.S. Route 60 (see Draft Environmental Impact Statement page 1-13) and other facilities and programs in the *Regional Transportation Plan*. Even with these planned improvements, the proposed project remains a vital component of the Regional Freeway and Highway System.
4	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
	the valley. Couple this with the Broadway Curve widening local/express project, and the expanding Intelligent Transportation Systems infrastructure, and the targeted Levels of Service for the Regional Freeway system could be easily met. The SMF is the easy, yet most costly, disruptive, and uncreative solution to the projected transportation challenges.

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 22, 2013 10:54:24 AM

-----Original Message-----
From: PARKER, BRAD [mailto:BPARKER@mesamaterials.com]
Sent: Monday, May 20, 2013 7:53 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

As a commuter from the East Valley to the West Valley each day I understand the importance of this project. This has been approved by the voters twice before and needs to be completed. The impact to our economy and quality of life will have a great benefit.

sent from my ipad

Brad J. Parker, P.E.
General Manager
Mesa Materials

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 - Comments
Date: Tuesday, July 23, 2013 8:13:47 AM

F.Y.I.

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT
Communications

From: Dani Parker [mailto:parker_dj@msn.com]
Sent: Monday, July 22, 2013 3:45 PM
To: Projects
Subject: Loop 202 - Comments

Thank you for the opportunity to comment on the DEIS for the extension of Loop 202 along the Pecos Road alignment.

As a resident of Ahwatukee for 10 years, **I oppose** the construction of the freeway for the following reasons:

(1) (2) (3) (4) (5) (6) (7) (8) (9) (10) (11)

1. **Too expensive**. Twenty plus miles of light rail were constructed for $ 1.4 Billion. Less expensive mass transit options are available. $ 2.6 Billion plus is excessive.
2. **Destruction** of private property, existing homes, aquifers, water storage facilities and churches along Pecos road.
3. **Desecration** of South Mountain, an area culturally sensitive to the Gila River Indian Community.
4. **Loss of open space** in the public South Mountain Park area and impact to the ecosystems and wildlife habitats of the area.
5. Increased truck traffic and the accompanying **decrease in air quality** when the freeway is used as a Phoenix by-pass by long-haul truckers.
6. **Increased noise and pollution levels** when an additional 137,000 vehicles per day pass adjacent to Ahwatukee.
7. **Increased traffic** within Ahwatukee via Chandler Blvd. when now major access roads (such as 32nd St.) are eliminated.

Code	Issue	Response
1	**Design**	The cost estimates for the proposed freeway, as described on page 3-59 of the Final Environmental Impact Statement, were developed in accordance with accepted engineering practices by professional engineers. The project has been subject to multiple peer reviews of both the quantities and unit costs used in the estimate by the Arizona Department of Transportation, Federal Highway Administration, Maricopa Association of Governments, and their consultants. In each case, the estimate was found to be reasonable and accurate. The proposed project is part of the *Regional Transportation Plan* for the Maricopa County region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. The well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Water Resources to effectively mitigate well impacts associated with its projects throughout the region. The lakes in the Foothills area are supplied by two water sources: groundwater from wells and potable water supplied by the City of Phoenix. The lakes were designed with excess capacity that allows runoff to be stored. After a storm, water can be released at overflow points or be used to irrigate the golf course. (See text box on Final Environmental Impact Statement page 4-108.)
5	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	
8	**Purpose and Need, Truck Bypass**	
9	**Noise**	
10	**Air Quality**	

(Responses continue on next page)

Code	Comment Document
12 13	8. **Loss of tax revenues** for the city of Phoenix resulting from conversion of currently assessed land to non-revenue generating parcels. Many of the negative issues identified in the DEIS are impossible to mitigate. The peace and tranquility of our Ahwatukee neighborhood is at stake if this extension is built. Dani J. Parker 1322 E. Wildwood Dr. Phoenix, AZ 85048 Sent from Windows Mail Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
11	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
12	**Economics, Socioeconomics**	Table 4-16 on page 4-56 in the Final Environmental Impact Statement displays anticipated reductions, by land use and by action alternative, for current land uses in Phoenix, Tolleson, and Avondale. Under future (at build-out—roughly 2035) land use conditions and with the proposed action implemented, no substantial changes in the taxable land base (Final Environmental Impact Statement Tables 4-21 and 4-22 on pages 4-61 and 4-62, respectively) are anticipated. Low-intensity land uses like agricultural will transition to commercial, industrial, and residential uses. The freeway and continuing growth would likely create greater tax revenue impacts because of the higher anticipated intensity of land use.
13	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document
1	Wesley Parks Document Created: 5/21/2013 2:04:20 PM by Web Comment Form I am for the construction of the Loop 202. The Loop 202 South Mountain Freeway will improve traffic flow, reduce emmission from congested freeways, and bring much needed work to the Valley.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Thursday, June 27, 2013 1:20:03 PM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Lisa Parks [mailto:parks.lisamarie@gmail.com]
Sent: Wednesday, June 26, 2013 2:55 PM
To: Projects
Subject: Loop 202 South Mountain Freeway

Dear Arizona Department of Transportation:

1 The extension of the South Mountain Freeway would negatively impact our city and I'm absolutely opposed to it. 2 Building more roads only leads to more congestion, which is known as induced demand. We need to find a way to reduce the dependency on cars, lessen sprawl and reduce pollution, instead of increasing all of these needless things. 3 Public transportation options and bicycle lanes can do so much more than a freeway without the heartbreaking need to sever South Mountain.

"If you plan cities for cars and traffic, you get cars and traffic. If you plan cities for people and places, you get people and places." - Fred Kent, Founder of Project for Public Spaces

Thank you for your consideration.

Sincerely,

Lisa Parks

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Code	Issue	Response
1	**Secondary and Cumulative**	The proposed freeway is a response to existing and anticipated travel demand in the metropolitan Phoenix area. It is not meant to increase travel beyond that expected to be generated from existing and anticipated population and employment growth and related land development. It is important to consider that improvements proposed for any type of transportation system (e.g., a new bus route, rail transit line, commuter rail service) would likely lead to changes in travel behavior, which, in turn, would lead to increased use of the particular system. Improvements made to a given transportation system are meant to attract new users (see Final Environmental Impact Statement pages 4-170 through 4-174). If this were not a primary goal, the improvements would be neither effective nor warranted. For the proposed action, a goal is to attract users of other segments of the Regional Freeway and Highway System and the local arterial street network, now and in the future, to the proposed action to optimize, in part, the entire regional transportation system (as outlined in the proposed action's purpose and need in Chapter 1).
2	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 Western Expansion
Date: Thursday, July 11, 2013 8:28:31 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

From: Katherine Parks [mailto:katparks@gmail.com]
Sent: Wednesday, July 10, 2013 9:52 PM
To: Projects
Subject: Loop 202 Western Expansion

Dear Ladies and Gentlemen,

While I wholeheartedly agree that the final stage of the Loop 202 is completed, I am very concerned by the proposals that would come right up against (Or directly over) 63rd Ave.

1 Having spent time as a dispatcher, and having a brother who was a truck driver, the best routes would be one of the three W101 routes, even though they would cost more. I would certainly be willing to pay a bit higher State Taxes to help accomplish this goal. This would enable a high number of semi tractor/trailers coming from CA to bypass the downtown areas, as they head to Ahwatukee, Chandler, and beyond.

3 My main concern is along 63rd Ave, which may be affected by both the 59th Ave and 71st Ave routes. There is a very high achieving Charter School at 63rd Ave and Southern, and their entire existence is in jeopardy with either of those projected routes. Not to mention the Principal and a couple of the teachers also live very close to the school, as do a high percentage of their students. Speaking of their students, these kids continuously rank high in their AIMS scores every year. I have met many of their students who accompany their Life Sciences teacher to meetings with the Arizona Herpetological Association, where I was a board member and their teacher is a current board member. These kids are amazingly knowledgeable regarding their native wildlife, and it is because of their teacher. Mr. Burge is the kind of teacher that I wish every student could have for their STEM-based classes, not just science, but technology, engineering and mathematics. Mr. Burge is not the only "infectious" teacher creating voracious learners at Country Gardens Charter School, there are several others that are just as creative and imaginative, keeping their students actively engaged in learning every step of the way. They also have a high number of their graduates going on to college. The routes that come the closest to this school would endanger the best chance at a complete education that these students have.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Design**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.

Code	Comment Document

Sincerely,

Katherine Parks
1649 S 80th St
Mesa, AZ 85209
480-703-8907

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Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Let"s build 202
Date: Monday, May 20, 2013 1:08:01 PM

From: Parsa, Ferial [mailto:Ferial.Parsa@CenturyLink.com]
Sent: Monday, May 20, 2013 11:15 AM
To: Projects
Subject: Let's build 202

1

I am in favor of building 202.

Please cupport it.

Ferial Parsa

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 15, 2013 4:40:26 PM

From: John Parsons [mailto:Jdparsons@sundt.com]
Sent: Wednesday, May 15, 2013 4:36 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Please Build the South Mountain Freeway

John D. Parsons, CPA, CTP
Employee Owner
Assistant Treasurer
The Sundt Companies, Inc.
2015 W. River Road, Suite 101
Tucson, AZ 85704
Phone (520) 750-4631
Fax (520) 750-4520
jdparsons@sundt.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:18 PM
CALLER: PAULY PARSONS	CALLER ADDRESS: 10445 W. FLOWER STREET, AVONDALE, AZ 85392
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I want to leave a message in support of the South Mountain Freeway. I have voted for it and think it would of benefit to the community and traffic time-savings, and congestion. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2	Rakesh Patel Document Created: 5/21/2013 2:42:11 PM by Web Comment Form ABSOLUTLEY NOT. I have lived in the Foothills for over 18 years and have seen growth (some good/ some bad) but never have i seen so much of tax payer money being spent towards a project which does need to happen. I think ADOT can find other needy projects to focus their attention on.

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

Jay Patel — Document Created: 7/21/2013 3:34:42 PM by Web Comment Form

(1) (2) The South Mountain Freeway proposal is out dated. It was put together in the mid eighties and the greater Phoenix area has changed significantly since that time. The proposed W59 does not make sense for today. For example, the proposal recommends the 59th avenue alignment which dumps traffic right in the middle of the city, instead of the outskirts. The W71 is a better alternative since it would tie in with Loop 101. However, to meet the growth of the Phoenix area, and address air quality issues, the EIS needs to study the I8 / SR 85 corridor as an alternative. Therefore, the EIS is incomplete since it does not consider building out the I8 / SR 85 route as a viable alternative. A freeway is needed, however, it is being proposed in the wrong place.

(3) The current W59 proposal has considerable issues which much be addressed. For example:

(4) (5) 1) The current alignment calls for the destruction of ridges within South Mountain. South Mountain is a sacred site for the Gila River community. There are archeological sites which would be affected by the proposal. Destroying the site is culturally insensitive. Moreover, the current recommendation would fragment habitats for potentially endangered species like the Tortoise.

(6) (7) 2) The proposed route has safety and security issues. For example, there will exist a tank farm close to the freeway. Also, trucks using the freeway would be carrying hazardous materials which would put the community at risk. To address this, the community would need shelters, sirens, emergency plans, evacuation training in the nearby schools, gas masks, etc. which the EIS has not studied in detail. There is also the potential of fire in South Mountain due to an increase of traffic in the area.

(8) 3) The current W59 proposal will interact with the greatest number of hazardous materials sites which must be cleaned up. This is a very risky and expensive endeavor.

(9) (3) 4) The proposed W59 alignment will not do anything to address air quality, it will just redistribute pollutants. Therefore, the I8/ SR 85 route makes better sense and needs to be part of the EIS study.

(10) (11) (12) 5) The proposed alignment has significant engineering challenges. For example, massive ridges will need to be cut in South Mountain, there is a water well in the middle of Pecos which serves the golf courses, and there are electric transmission lines which need to be addressed. All this will add significant costs to the tax payers.

(13) (14) (15) 6) For the existing residences near the proposed freeway, noise will be an issue. It is predicted that noise levels will be between 59 and 70 DBs, Mitigation needs to be provided at 64 DBs. The 20 ft sound walls will not be able to abate the noise, especially when you consider that trucks will rev their engines to climb grades and use “jake brakes” to slow down.

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	
3	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
4	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Biology, Plants, and Wildlife**	
6	**Alternatives**	The alignment of the W55 Alternative was shifted west onto 59th Avenue in 2009 to take advantage of the existing right-of-way that the Arizona Department of Transportation already owned and to reduce cost and business displacements. This shifted alignment (called the W59 Alternative) would connect to Interstate 10 at an existing service traffic interchange. Among the advantages (listed on page 3-68 of the Draft Environmental Impact Statement) of this alignment shift is its preferability “from a security perspective because it would be farther from the petroleum storage facilities at 51st Avenue and Van Buren Street.”
7	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Hazardous Materials**	The corridor analysis revealed sites that would need further assessment during the property acquisition phase of the project, if an action alternative were to become the Selected Alternative. The Arizona Department of Transportation employs a phased approach to site assessment that allows time for cleanup of any sites found to have hazardous waste issues. The project team concluded from the level of analysis conducted during the environmental impact statement process that the types of sites likely to be acquired contain common hazardous waste issues like underground storage tanks, asbestos and lead paint in buildings, and other commonly found issues (see Draft Environmental Impact Statement page 4-153). The Arizona Department of Transportation maintains a process for addressing these issues in accordance with all applicable environmental laws and regulations.

(Responses continue on next page)

Code	Comment Document
16	7) The visual aspect of the study does not consider billboards. Illuminated billboards will affect visual quality both during the day and night. There is a great potential for billboards since they already exist on the Gila River community near the current Loop 202; therefore, one can expect that there will be billboards next to the W59 alignment.
17	8) The W59 proposal will destroy homes and a Church. This will affect the fabric of the community and there are no good alternatives to move the growing Church. Moving a growing Church's congregation is not a trivial task and the replacement costs must be considered.
3	In summary, the EIS has a significant deficiently in that it does not study the I8/ SR 85 as an alternative which would alleviate many of the social, cultural, economic and environmental issues posed by the proposed W59 alignment.

Code	Issue	Response
9	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Construction**	The Arizona Department of Transportation is experienced in successfully designing, engineering, and constructing steep road cuts. The road cuts would be similar—but deeper—than the deepest ones along State Route 51, north of Phoenix. Similarly deep and steep ones are near Hoover Dam on U.S. Route 93 (see Figure 5-10 on Draft Environmental Impact Statement page 5-17 for details regarding the dimensions of the proposed road cuts to the ridges of the South Mountains).
11	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. The well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Water Resources to effectively mitigate well impacts associated with its projects throughout the region. The lakes in the Foothills area are supplied by two water sources: groundwater from wells and potable water supplied by the City of Phoenix. The lakes were designed with excess capacity that allows runoff to be stored. After a storm, water can be released at overflow points or be used to irrigate the golf course. (See text box on Final Environmental Impact Statement page 4-108.)
12	**Utilities**	Utilities are discussed beginning on page 4-174 of the Final Environmental Impact Statement, and a summary of major impacts is provided in Table 4-52 on page 4-175. The high-voltage power lines located just south of Pecos Road that run east–west would not be adversely affected by the proposed freeway. They would remain as-is.
13	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
14	**Noise**	Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered "acceptable" by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.
15	**Noise**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Air quality and noise modeling for the Draft and Final Environmental Impact Statements used this forecast truck traffic (see Final Environmental Impact Statement pages 4-68 and 4-100, respectively). Noise mitigation is designed for this predicted noise level, including the noise from trucks.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
16	**Visual Resources**	The State of Arizona (through the Arizona Department of Transportation) administers an Outdoor Advertising Program as mandated by the Federal Highway Beautification Act. Arizona's program provides regulations for the permitting, placement, and maintenance of outdoor advertising signs along Interstate highways as well as State highways within Arizona. The State statutes (Arizona Revised Statutes §§ 28-7901 through 28-7915) and the State rules (R17-3-701 and R17-3-701.01) provide that the Arizona Department of Transportation must regulate any sign that is within view of, directed at, and intended to be read from the main traveled way of a controlled highway. (A controlled highway is any highway that is part of the National Highway System along with specific State routes. The South Mountain Freeway would be both a State route and part of the National Highway System.) While the Arizona Court of Appeals did decide in November 2011 that electronic billboards violate the 1970 Arizona Highway Beautification Act, a new law was passed by the State Legislature that banned such billboards in much of the state but allowed them in most of Maricopa County and parts of Pinal, Yuma, and La Paz counties. Weeks later, the Phoenix City Council created a zoning ordinance to regulate such billboards on city streets and highways. Chapter 7, Section 705, of the Zoning Ordinance of the City of Phoenix does not permit billboards to occupy public property or to extend across a property line where such property line borders a public highway. Electronic messages are permitted only on land zoned as commercial or industrial or zoned as a nonresidential use in Residential Districts. Under current zoning, this eliminates most, if not all, of the land along the E1 Alternative. Such signs might be permissible along portions of the W59 Alternative. Such signs may not be illuminated between 11 p.m. and sunrise "when (1) located within one hundred fifty (150) feet of Single Family Residential zoned property and (2) visible from such development or property." Erection and operation of any billboards on Gila River Indian Community land would be subject to regulation by the Gila River Indian Community.
17	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway EIS Comments
Date: Monday, July 22, 2013 8:47:32 AM

FYI

From: Jay Patel [mailto:iamsejal@msn.com]
Sent: Sunday, July 21, 2013 1:39 PM
To: Projects
Cc: jayzx6@hotmail.com
Subject: South Mountain Freeway EIS Comments

Comments were also sent via the ADOT Site.

(1) The South Mountain Freeway proposal is out dated. It was put together in the mid eighties and the greater Phoenix area has changed significantly since that time. The proposed W59 does not make sense for today. For example, the proposal recommends the 59th avenue alignment which dumps traffic right in the middle of the city, instead of the outskirts. The W71 is a better alternative since it would tie in with Loop 101. However, to meet the growth of the Phoenix area, and address air quality issues, the EIS needs to study the I8 / SR 85 corridor as an alternative. Therefore, the EIS is incomplete since it does not consider building out the I8 / SR 85 route as a viable alternative. A freeway is needed, however, it is being proposed in the wrong place.

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(9) 4) The proposed W59 alignment will not do anything to address air quality, it will just redistribute pollutants. Therefore, the I8/ SR 85 route makes better sense and needs

(3)

Code	Issue	Response
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(Responses continue on next page)

Code	Comment Document

to be part of the EIS study.

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Jay Patel

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(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
16	**Visual Resources**	The State of Arizona (through the Arizona Department of Transportation) administers an Outdoor Advertising Program as mandated by the Federal Highway Beautification Act. Arizona's program provides regulations for the permitting, placement, and maintenance of outdoor advertising signs along Interstate highways as well as State highways within Arizona. The State statutes (Arizona Revised Statutes §§ 28-7901 through 28-7915) and the State rules (R17-3-701 and R17-3-701.01) provide that the Arizona Department of Transportation must regulate any sign that is within view of, directed at, and intended to be read from the main traveled way of a controlled highway. (A controlled highway is any highway that is part of the National Highway System along with specific State routes. The South Mountain Freeway would be both a State route and part of the National Highway System.) While the Arizona Court of Appeals did decide in November 2011 that electronic billboards violate the 1970 Arizona Highway Beautification Act, a new law was passed by the State Legislature that banned such billboards in much of the state but allowed them in most of Maricopa County and parts of Pinal, Yuma, and La Paz counties. Weeks later, the Phoenix City Council created a zoning ordinance to regulate such billboards on city streets and highways. Chapter 7, Section 705, of the Zoning Ordinance of the City of Phoenix does not permit billboards to occupy public property or to extend across a property line where such property line borders a public highway. Electronic messages are permitted only on land zoned as commercial or industrial or zoned as a nonresidential use in Residential Districts. Under current zoning, this eliminates most, if not all, of the land along the E1 Alternative. Such signs might be permissible along portions of the W59 Alternative. Such signs may not be illuminated between 11 p.m. and sunrise "when (1) located within one hundred fifty (150) feet of Single Family Residential zoned property and (2) visible from such development or property." Erection and operation of any billboards on Gila River Indian Community land would be subject to regulation by the Gila River Indian Community.
17	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

Rakesh & Raju Patel
19 year residents of Ahwatukee Foothills
PARC Member

Summerhill sub-division
14630 South 1st Street
Phoenix
AZ. 85048

June 11, 2013

ADOT Loop 202 South
Mountain Freeway Study
1655 W. Jackson Street
MD 126F
Phoenix, AZ 85007

ref: Indignation at the proposed Loop 202 South extension

To whom it may concern,

(1) With reference to the above mentioned project I would like to voice my objections and utter disgust to the proposed TRUCK BYPASS through the community we have been a part of for the last nineteen years.

(2) (3) (4) (5) (6) (7) Outside of wasting valuable tax payer dollars, the total disregard of native American heritage, tearing down houses of worship, displacing homeowners and creating nuisance in the form of noise and air pollution, ADOT has completely failed to realize that its strategic plans laid out well over two decades ago may have been relevant then but have now become an ill-conceived disaster.

(8) I was unfortunate enough to have attended the recent presentation/ public meeting ADOT held in the Phoenix Convention Center where the 'gangs' of green 'T' shirt members (pro Loopers) walked around intimidating anyone with an opinion differing from that of ADOT. I saw a lot of information on the 'proposed benefits' of this Loop extension including videos of how tranquil an 8 lane highway will be having an almost zero impact on the adjacent communities but nowhere did I see any upfront assessment of the disadvantages this will bring:

(5) (9) (3) (10) (11) (12) (13)

1. Noise pollution
2. Impact of air quality on the schools which are within 500 feet of the highway
3. Destruction of sacred Native American lands
4. Overpasses blocking open views for adjacent residents
5. Increase in crime
6. Valuation decreases in home prices
7. Loss of public space/ usage - Pecos Road is always being used by cyclists and the adjacent lands are used by the local high school for their cross country training
8. Inevitable introduction of everything we abhor (bill boards/ trash etc.)

(14) I hope ADOT has the willingness and fortitude to stop the Loop 202 expansion and realize that the impact on the community is a price not worth paying.

Rakesh & Raju Patel
(Jay Patel - son aged 12)
(Nina Patel – daughter aged 14)

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Cultural Resources**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	
7	**Purpose and Need, Old Plan or Use of Old Data**	
8	**Alternatives**	The information presented at the public hearing was a summary of the content of the Draft Environmental Impact Statement. Information related to impacts or disadvantages of building the proposed freeway is presented throughout the Draft Environmental Impact Statement.
9	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Visual Resources**	For most of the alignments of each of the action alternatives, the proposed freeway would be elevated above the natural grade of the surrounding land. This elevated profile would allow noise to carry farther, creating noise impacts at greater distances from the freeway. Depressing the profile of the freeway below grade might reduce traffic noise levels adjacent to depressed sections. However, it would be necessary to also construct at-grade noise barriers to achieve noise reduction goals at receiver locations adjacent to depressed freeway sections (see page 4-99 in the Final Environmental Impact Statement). This strategy would reduce visual impacts associated with high noise barriers on elevated freeways, but would entail ground-level noise barriers and their associated interference with views. Thus, with either approach to noise reduction, views of nearby mountains could be disrupted. The specific impacts would depend on the geometrics of the height of any noise barriers constructed, the intervening topography, and the distance of the barriers from the residences in question.
11	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
12	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
13	**Traffic**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
14	**Visual Resources**	The State of Arizona (through the Arizona Department of Transportation) administers an Outdoor Advertising Program as mandated by the Federal Highway Beautification Act. Arizona's program provides regulations for the permitting, placement, and maintenance of outdoor advertising signs along Interstate highways as well as State highways within Arizona. The State statutes (Arizona Revised Statutes §§ 28-7901 through 28-7915) and the State rules (R17-3-701 and R17-3-701.01) provide that the Arizona Department of Transportation must regulate any sign that is within view of, directed at, and intended to be read from the main traveled way of a controlled highway. (A controlled highway is any highway that is part of the National Highway System along with specific State routes. The South Mountain Freeway would be both a State route and part of the National Highway System.) While the Arizona Court of Appeals did decide in November 2011 that electronic billboards violate the 1970 Arizona Highway Beautification Act, a new law was passed by the State Legislature that banned such billboards in much of the state but allowed them in most of Maricopa County and parts of Pinal, Yuma, and La Paz counties. Weeks later, the Phoenix City Council created a zoning ordinance to regulate such billboards on city streets and highways. Chapter 7, Section 705, of the Zoning Ordinance of the City of Phoenix does not permit billboards to occupy public property or to extend across a property line where such property line borders a public highway. Electronic messages are permitted only on land zoned as commercial or industrial or zoned as a nonresidential use in Residential Districts. Under current zoning, this eliminates most, if not all, of the land along the E1 Alternative. Such signs might be permissible along portions of the W59 Alternative. Such signs may not be illuminated between 11 p.m. and sunrise "when (1) located within one hundred fifty (150) feet of Single Family Residential zoned property and (2) visible from such development or property." Erection and operation of any billboards on Gila River Indian Community land would be subject to regulation by the Gila River Indian Community.

Code	Comment Document

From: Thomas Patno
To: Projects
Subject: Impact of Loop 202 Freeway on The Foothills--questions
Date: Monday, June 03, 2013 8:03:56 AM

Hello:

(1) Will Pecos road still exist? Will the freeway exist where Pecos road currently exists? Will there be a frontage road?

(2) How far north will the road and any associated features (embankments, noise barriers, foliage, frontage road, etc.) extend?

(3) Where will the freeway exits along what is currently Pecos Road be (Desert Foothills Parkway, 24th St, 32nd St, etc.)? How far apart will the exits be?

(4) I am having difficulty determining how the air quality in my neighborhood will be changing due to this project. I live just north of Frye Road and west of Desert Foothills Parkway. Please tell me how the air quality will be affected by this freeway.

(5) Has anybody proposed taking on the cost of removing the trash from the Gila River Community (paid for by the State of Arizona or Maricopa County or City of Phoenix or a combination of all 3) in exchange for their promise not to burn on their property? Would this perhaps be considered as an "equivalent" exchange for the air pollution that will be occurring due to the freeway?

(6) (7) Also, how will noise impact my home (see my address below)? I understand there can be constructive and destructive acoustic patterns, how will you ensure I don't get a "bad bounce" (constructive acoustics) from the freeway noise pollution?

Regards,
Thomas Patno

16029 S 10th Place
Phoenix, AZ 85048

---------- Forwarded message ----------
From: <mrenfro@rossmar.com>
Date: Sun, Jun 2, 2013 at 9:43 AM
Subject: Impact of Loop 202 Freeway on The Foothills
To: thomaspatno@gmail.com

June 2, 2013

Attention Foothills Community Association Residents,

ADOT (Arizona Department of Transportation) will be holding a series of 6 community forums on the

Code	Issue	Response
1	**Design**	Pecos Road would not exist after construction of the South Mountain Freeway were completed, if an action alternative were the Selected Alternative. The alignment of the proposed freeway is just north of the existing Pecos Road alignment. There is no frontage road currently proposed in the E1 Alternative. A minimum of 10 feet is provided between the Arizona Department of Transportation right-of-way and the proposed roadway embankments and/or associated features.
2	**Design**	The traffic interchange locations for the proposed freeway along the Pecos Road section are 40th Street, 24th Street, Desert Foothills Parkway, and 17th Avenue (see Figure 3-28 on Final Environmental Impact Statement page 3-51). They are spaced between 1.5 and 2 miles apart.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	The proposal in the comment is outside the scope of this project.
5	**Design**	Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.
6	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Noise**	Acoustic principles of constructive and destructive interference refer to sounds of pure tone, with a single frequency and phase. Traffic noise, however, is not a pure tone and is a compilation of many frequencies and phases, so the concepts of constructive and destructive interference do not apply to traffic noise.

Code	Comment Document

proposed 202 freeway that will effect The Foothills communitybeginning June 4th . These forums will provide additional opportunities for members of the public to comment on the Draft Environmental Impact Statement for the proposed South Mountain Freeway. While these forums are not formal public hearings and will not include presentations, they will allow members of the public to view the study video, talk with technical experts about the draft environmental impact statement and provide comments to a court reporter.

These forums may be your final opportunity to see the data that is being used to justify this freeway. Regardless of how you feel about this freeway, it is in your best interest to be totally informed about the pros and cons of this project and how it will affect life in The Foothills.

For more information on the draft environmental impact statement or the community forums for the South Mountain Freeway, please visitazdot.gov/SouthMountainFreeway

Please see the below information from ADOT with the dates and times of the upcoming forums.

South Mountain upcoming community forums

Six community forums provide opportunity to comment on proposed freeway

PHOENIX — A series of six community forums will be conducted by the Arizona Department of Transportation beginning June 4 to provide additional opportunities for members of the public to comment on the Draft Environmental Impact Statement for the proposed South Mountain Freeway. While these forums are not formal public hearings and will not include presentations, they will allow members of the public to view the study video, talk with technical experts about the draft environmental impact statement and provide comments to a court reporter.

Forums will be held:
-June 4, 4 p.m. to 7 p.m. at Sunridge Elementary School – Cafetorium, 6244 W. Roosevelt St. in Phoenix.
-June 18, 4 p.m. to 7 p.m. at The Foothills Golf Club – Saguaro Room, 2201 E. Clubhouse Drive in Phoenix.
-June 22, 9 a.m. to noon at the Komatke Boys and Girls Club, 5047 W. Pecos Road on the Gila River Indian Community.
-June 25, 11 a.m. to 2 p.m. at the Windmill Suites – Arizona Ballroom, 3535 W. Chandler Blvd. in Chandler.
-July 9, 4 p.m. to 7 p.m. at the Laveen Education Center – Boardroom, 5001 W. Dobbins Road in Laveen.
-July 11, 11 a.m. to 2 p.m. at the Hilton Garden Inn Phoenix/Avondale – Ballroom, 11460 W. Hilton Way in Avondale.

The project's study team will incorporate input gained from comments to produce the final environmental impact statement, which will have a 60-day public review period. A record of decision is expected in 2014.

Code	Issue	Response

Code	Comment Document

Those with comments about the proposed South Mountain Freeway don't need to wait until a community forum – comments are currently being accepted through July 24, via these channels:

-Providing input by email at projects@azdot.gov
-Submitting online comments at azdot.gov/SouthMountainFreeway
-Calling 602.712.7006
-By mail to the South Mountain Study Team, 1655 W. Jackson St. MD 126F, Phoenix, AZ 85007

For more information on the draft environmental impact statement or the community forums for the South Mountain Freeway, please visitazdot.gov/SouthMountainFreeway.

mc: 16383

Code	Issue	Response

Code	Comment Document

ahead and proceed with this project. This project has been approved several times and has the overwhelming support, based on recent polls, and I think it'll be a great benefit to our community. Thank you.

THE FACILITATOR: Thank you.

Ana Morago?

Tiffany Reddy.

MS. REDDY: Good afternoon. My name is Tiffany Reddy and I just wanted to come and show my support for South Mountain freeway. The congestion for the commuters in Phoenix has long been a problem for our community and I think it would greatly help our residents in Phoenix. Also, I love the idea of bringing 30,000 jobs to our community and to our people here in Phoenix, so we're in big support. Thank you.

THE FACILITATOR: Thank you.

If you'd like to speak and have not yet registered, please go out to the front registration table.

Chris Pattock. Could I ask you to use this microphone, please.

MR. PATTOCK: Sure. Thank you. My name is Chris Pattock, I'm a Tempe resident, I work downtown, I'm a lawyer. I'm not prepared to do this, I just got a phone call last night, apparently someone knew that I was

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

in favor of the freeway, and I just want to put in my two cents.

I've lived in either West Chandler or South Tempe since December of 1984, and lack of a freeway has encouraged me to ride a bicycle two days a week. But I know that's probably not the best means of transportation for most people and I would -- I strongly support the freeway for all the normal reasons and I'm appalled that it hasn't been built. It wasn't built many years ago, obviously, has many environmental benefits. Congestion is appalling. As a large metropolis, I'm appalled that we haven't built this long ago. Obviously, it has great economical value and it's clear to me, I think it's clear to everybody that the people that are opposed to this are basically NIMBYs, not in my backyard. I strongly support this building, although it'll probably never benefit me, by the time it's built I'll be retired or at least close to it. I strongly encourage -- by the way, I formerly used to represent ADOT as a client when I worked for the Attorney General's Office -- to move ahead with the freeway with all deliberate speed and do whatever it takes to build it. Thank you very much.

THE FACILITATOR: Thank you.

Allen Mills.

If your name is on the list and you're going to

1

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Paris Pavlidis Document Created: 7/10/2013 4:24:27 PM by Web Comment Form It will help us get to Laveen from Mesa airport much easier if there was such a free way Thank you

Code	Issue	Response
1		Comment noted.

Code	Comment Document

David Pawlowski

Document Created: 5/21/2013 5:05:02 PM by Web Comment Form

The Loop 202 is an integral part of the future to grow and build Maricopa County. In turn with future population growth (of out of state baby boomers) we will benefit by the Loop 202 Freeway. I recommend the 59th Ave location along with the Pecos Rd location. The freeway will cut traffic congestion across the metro area, reduce air pollution and save drivers time and money. Majority of the population recommend the future freeway.
The Loop 202 with enhance sustainability for the entire Maricopa County Community. The 202 freeway will create 30,000 jobes durning the 5 to 6 year construction period. The is no more important project to the areas commuters and workers than the South Mountain Project. We need to build the freeway now!

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

My house is very close to the proposed Fwy interchange at Pecos & Desert Foothills pkwy. I have owned it for 17 years & bought because of rural environment.

1 I believe my family's quality of life will
2 be severely effected by the proposed freeway
3 in terms of increased health risks due to emissions caused by trucks & 3x traffic going past my house. Air pollution in my area will greatly increase beyond current levels.

4 I am also concerned with noise levels. I love the quiet neighborhood.

5 Pecos road is completely unsuitable as a freeway. Please don't build it!!! ⇒

Optional

Name Valerie Paxton Email valeriepaxton@gmail.com

Address 1243 E Glenhaven Dr.

City Phoenix State AZ Zip 85048

Phone 602 999-4339 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Noise**	
5	**Alternatives, E1 Alternative**	

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: I will have to sell my house because of noise + pollution. I just completed a renovation! A very expensive renovation.

6
7

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
6	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
7	**Acquisitions and Relocations**	By law, the State must pay market value for real property acquired. Market value is determined by an independent appraiser. Additional information about the property acquisition process is available on the Arizona Department of Transportation's Web site, in the Right-of-Way Group Acquisition, at <azdot.gov>.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 3:48 PM
CALLER RON PAYNE	CALLER ADDRESS: 10829 HUTTON DRIVE, SUN CITY, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1

I think the freeway would be quite a benefit. It would take a lot of traffic, and I mean big traffic like trucks and travelers going east of Phoenix toward Tucson and on beyond that. I think it would alter the truck routes to the point where it would help traffic in downtown Phoenix and the overall traffic I think would be better. I hope it does get passed, but I don't want to disrupt the Indian reservations. I think it could be worked out but the thing of it is, I think some people will have to do a little bit more adjusting. But anyway, I think it's a great plan and should be in effect. Thank you very much.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 12:03 PM
CALLER: JOHN PAYNE	CALLER ADDRESS: 1434 EAST FAIRVIEW STREET, GILBERT, ARIZONA 85295
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, I support the South Mountain freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Wednesday, May 15, 2013 11:12:07 AM

-----Original Message-----
From: Ryan Pearson [mailto:ryanpearson32@yahoo.com]
Sent: Wednesday, May 15, 2013 11:01 AM
To: Projects
Subject: 202

1

Let's build it.

Sent from my iPhone

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Kim Pearson
To: Projects
Subject: Comment on the DEIS
Date: Tuesday, July 23, 2013 9:08:21 PM

To whom it may concern,

I was born and raised in Phoenix. As a kid, my mom would drive us to South Mountain to go hiking and look out over the city. Recently, I have been hiking there and have marveled at the beauty it adds to our city. I am not surprised that this place is sacred to native groups in the area. I have also worked in community relations in that area, and enjoy the peacefulness of the fields and towns. I didn't know much about the proposed Loop 202 extension until now and I am writing to register my opposition against this project for several reasons. To begin with, I believe the very idea of building another freeway out west is antithetical to the goals of providing a good future for the generations to come. Just as importantly, this project demeans the Gila River Indian Community (GRIC) by desecrating a place that is sacred to them and bringing environmental destruction. Throughout I give suggestions as to what ADOT should do so that the public can make an informed decision.

1

2

Assumption that major population growth is Maricopa County's only means of survival, vs. improving quality of life in older, already developed areas, many of which are rapidly deteriorating (in part because freeways are so heavily relied-on for supporting growth that added congestion worsens air quality, noise, creates physical barriers between communities that limit access to services/amenities). This is especially problematic, because there is no sense that "maturation" of MAG transportation infrastructure is on the horizon. Freeways are built to relieve congestion from growth that previous freeways created. This predates freeways; expansion of Phoenix's arterial street network with rapid annexation had the same effect (and spurred notions that freeway growth would solve this). The issue throughout Phoenix's history, which spread to most other MAG members, is that city/regional administration fails to seriously consider the existing built environment and its need for continual renewal as it ages. ADOT needs to justify why we shouldn't instead be spending the money set aside for this project on urban transportation renewal. Having lived in Phoenix for a long time, I know there is a further need for public transit and road improvement. Why exactly do we plan on seeing such a huge population growth outside of the urban core? What alternative growth patterns could we develop? All in all, building up vs. out is cheaper and can result in a higher quality of life for people of Phoenix.

3 4 5

6

This project gives freeways precedence as a way to create urban sprawl vs. mitigating travel time within neighborhoods by building density. The same year MAG regional transportation plan was approved, 1985, Phoenix's "Urban Village" planning system was adopted. The former thrived, while the latter today is something of a joke. The Urban Villages model's implementation of compact "village cores" that support a localized jobs-housing balance is so underutilized in some parts of Phoenix that freeways remain the only viable means of travel to employment/amenities. Further, development of Phoenix's newer "villages" is so heavily reliant on freeways that the designated "cores" of the Laveen and Estrella villages within the case study area--zoned for development since early last decade--will not exist until the Loop 202 is completed. Consistent with Phoenix's growth since the postwar era, most MAG cities blithely build out into areas that are barely accessible by automobile, aware

7

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Noise**	
6	**Alternatives, Nonfreeway Alternatives**	
7	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

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9

that a new freeway link will eventually save them. This is not sustainable. Taxpayers should not be funding projects based on development models that are outdated, not aligned with current needs to conserve natural and financial resources across the board. Why should people have to drive more to go to work, to get home, to go to the grocery store? This project will bring negative quality of life to people who will live in these houses that the Loop 202 will give access to. Please have the report explicitly describe the reason this extension is proposed to be built. Who is deciding on building these new population centers? Which municipalities have given permission? Do the developers receive tax breaks?

Relatedly, we the public need to know more, explicitly about how the project will socially and environmentally impact the GRIC and other groups. The Loop 202 extension is situated in an area that is effectively "landlocked" (no added growth beyond GRIC boundary->somewhat more resistant to increased congestion over time than I-10, etc), but it brings environmental harm and symbolic violence to the GRIC, who never asked for it. This is arguably a minor link of the regional transportation system, but it is as much a symbol of environmental racism as the region's older freeways, which literally cut communities in half. It unjustly values one set of landholders over another. It dismisses the GRIC's concerns as petty. I am concerned that the report does not address the displacement of GRIC homes and does not identify an evacuation route in the event of a biohazardous incident. Meanwhile, the report does not visually depict the loss of agricultural land in the Laveen and Gila areas. Culturally, ADOT needs to visually represent the prehistoric sites visually disrupted by proposed construction. After this research and visual development is undertaken, the information needs to be distributed in the community.

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Loop 202 (along with 303) also threatens the region's resilience to climate change and worsens the urban heat island effect. It encourages the development (propagation of impervious surfaces) of much of the remaining agricultural land which, had it been introduced in the region's past, would have remained an environmental amenity for MAG cities. "Urban Villages" like Estrella and Laveen have been planned to grow around freeways, rather than coexist with agriculture. This project weakens incentivization of public transit/transit-oriented development by municipal governments because the nature of growth in the areas affected is one reliant on single-passenger auto ownership (SFR land-use). The DEIS needs to investigate the urban heat island effect in relation to this project. It also needs to model what impact this project would have on climate change, with the increase number of automobiles that would be on the road. Again, this project isn't mitigating crowding, it's simply adding a new freeway so that more people can drive to developments built far from the urban core.

16 17

1

All in all, I reject the proposed need for this type of project and also am pointing out the detrimental impacts it will have on the environment, the GRIC, and other communities.

Sincerely,
Kim Pearson

Code	Issue	Response
8	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the Responses to Frequently Submitted Public Comments beginning on page B733 of this appendix.
9	**Purpose and Need**	Data, inputs, and model results were appropriately used throughout the environmental impact statement process. The Final Environmental Impact Statement—particularly in Chapter 1, *Purpose and Need*, and Chapter 3, *Alternatives*—thoroughly explains how the process of establishing a purpose and need for the proposed action followed nationally accepted guidance and policy. Examples of how the purpose and need analyses were appropriately applied include the: · the section, *Context of the Purpose and Need in the EIS Process*, beginning on page 1-1 · the sidebar, *"A proposed action's purpose and need documentation should:"*, on page 1-1 · the sidebar, *"How are MAG data used in the DEIS?"*, on page 1-4 · the sidebar, *"What is the MAG regional demand model?"*, on page 1-5 · the sidebar, *"How will the economic downturn affect growth rates?"*, on page 1-11 · the section, *Need Based on Regional Transportation Demand and Existing and Projected Transportation System Capacity Deficiencies*, beginning on page 1-13 · the section, *Conclusions*, beginning on page 1-21 · the section, *Reconfirm the Purpose and Need for the Proposed Action*, beginning on page 3-1 · the section, *Responsiveness of the Proposed Freeway to Purpose and Need Criteria*, beginning on page 3-27 The models, methods, and assumptions used throughout the Draft Environmental Impact Statement account for reasonably foreseeable future conditions and rightfully dismiss speculative considerations.
10	**Environmental Justice/Lifestyle**	The Arizona Department of Transportation and Federal Highway Administration have engaged all population segments to ensure access to the environmental impact statement process. Assisted by this involvement, analytical results indicate the proposed action would provide net benefits to all populations in the Study Area in general by reducing traffic congestion, enhancing accessibility, and supporting local economic development plans.
11	**Alternatives**	There would be no displacement of Gila River Indian homes because the proposed action would not be built on Gila River Indian Community land.
12	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
13	**Hazardous Materials**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
14	**Agriculture**	Existing agriculture is depicted in Figure 4-3, on page 4-6, of the Final Environmental Impact Statement. While not an aerial photograph, it outlines the parcels that are currently under agricultural production. Table 4-4, on page 4-7, summarizes existing zoning by land use for the entire Study Area. In addition, Figure 4-4, on page 4-8, reveals how much of the existing agricultural land along the W59 Alternative is already slated for commercial and residential development. Implementation of the E1 Alternative would cause no conversion of agricultural uses on Gila River Indian Community land. Urbanization will continue with or without implementation of the proposed freeway (see Final Environmental Impact Statement pages 4-161 and 4-162).
15	**Cultural Resources**	Visual representations of prehistoric sites, such as showing their locations on maps, are not made public to protect the sites.
16	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
17	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].

Code	Comment Document

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for the future in 10, 15, 20 years for the people that live out there? Thank you.

THE FACILITATOR: Thank you very much.

Andrew Pedro.

MR. PEDRO: Hello, I'm from the Gila River Indian Community and I'm one of our community managers, our community manager, David White for Gila River, he stated that transportation officials were to be taking cultural awareness training, and has that ever happened for people part of the 202? Anyone? And if it were, who would be taking those cultural awareness training classes; would it be construction? Would it be ADOT officials themselves? And in the DEIS it does say that if any uncovered cultural items, that construction would stop immediately. How are they supposed to know if training never happened?

And like Danelle said, it is a sacred place to us and we have been here thousands of years, you people have been here 200 years. And that thing in the EIS, except for saying that it could cause loss of cultural property and that is like -- that's a violation of our religious rights, that is a sacred place. How is ADOT able to go through there with being that it's a public park and it's a public preserve, so it's owned by the public; how are you supposed to get those right-of-ways

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Code	Issue	Response
1	**Cultural Resources**	The cultural awareness training has been attended by project team members including the Arizona Department of Transportation, Federal Highway Administration, Maricopa Association of Governments, and consultant staff. Were the project to move forward to construction, additional training would be provided for construction personnel.
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

in a public park?

So yeah, we are against this freeway and there is nothing in the EIS that says that they stopped working with the community to look into the effects of the community when it's right on our border. And obviously, it's going to affect us. And yeah, like people in Laveen, they're on the other side of the mountain, they're not going to feel it as much as we do.

And especially to our culture, how we live. We're almost gone, most of our community lives in poverty and most of the people there can't even speak our native language. And it's not our fault, it's colonization's fault for pushing us out of our own land. And right here, right where you stand and where you're sitting is traditional Akimel O'odham territory, and I hope that you realize that and wonder about how it really affects us and not just the financials of it, how it affects us internally and spiritually. If we were to build through one of your churches, I'm sure you would be standing here where I am telling you that this is a bad idea, because it affects your religious rights. Well, this affects our religious rights.

If there's one corridor that separates us from the mountain itself, that's a violation of our religious rights and that -- yeah, there's supposed to be one

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Code	Issue	Response
5	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

2 6 7 8 9 10 2

tunnel going under the freeway, that's unsafe and it would affect our medicinal plants that we use culturally that are going extinct and cultural animals that we use in our culture: The owl, tortoise, Sonoran Desert tortoise, Mexican spotted owl, those are all endangered species that you're willing to sacrifice other species just for progress.

Is that really how you want your kids to view the world; do you want your kids growing up in pollution, growing up with cancer, asthma, bronchitis, birth defects? We don't want that for our community. Look how bad it is already. We don't want none of that, so I just hope that you look back into that.

And with the shuttles, I mean, nobody actually got the shuttles, there wasn't that much effort put into it from ADOT themselves, the community had to invite ADOT to come to the community to give out information. They weren't giving out any information before until the community told them to. That itself is just disgusting, how she said before, and how disgusting it is to see people pushing this freeway, which they don't acknowledge us as a people, being that we've been here before anybody has been here and our ancestors go back. And what if there was other people who came into this? This doesn't affect just the Gila River Indian tribe, this affects all

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Code	Issue	Response
6	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Air Quality**	
8	**Health Effects**	
9	**Public Involvement**	Leading up to the release of the Draft Environmental Impact Statement, the project team communicated regularly with the Gila River Indian Community's Communications and Public Affairs Office and the Community Manager's Office regarding the availability of project-related informational materials and the public outreach plan for the Draft Environmental Impact Statement. Consistent with the protocol for other project-related coordination with the Gila River Indian Community, the communication related to the Draft Environmental Impact Statement was conducted at a "government-to-government" level. The Communications and Public Affairs Office informed the Arizona Department of Transportation that all communication and distribution of informational materials on Gila River Indian Community land would be handled by the Communications and Public Affairs Office (see Chapter 6 of the Final Environmental Impact Statement and Appendix 6-5 for more information related to communications between the Arizona Department of Transportation and the Communications and Public Affairs Office regarding outreach to Gila River Indian Community members).
10	**Cultural Resources**	The Arizona Department of Transportation and the Federal Highway Administration have attended meetings as requested by Gila River Indian Community groups, including the Gila Borderlands Advisory Committee and the Elderly Concerns Group. To keep Gila River Indian Community members engaged in the process and to ensure adequate access to project activities, three newsletters have been provided to the Gila River Indian Community for distribution and articles have been provided to the *Gila River Indian News* for inclusion in the weekly tribal newspaper. The Arizona Department of Transportation has participated in the Gila River Indian Community's annual fair to answer questions regarding the proposed action. Times and locations of all public meetings (see Chapter 6, *Comments and Coordination*) relating to the project have been advertised to the Gila River Indian Community, inviting members to attend.

Code	Comment Document

11

tribes in Southern Arizona, being Tohono O'odham, Ak Chin, Salt River Indian Community, culturally it affects them and is disgusting to see how this is still being pushed forward.

THE FACILITATOR: Thank you.

If anybody else who has not registered would like to speak at the hearing, please make sure that you register at the registration desk and then come before us.

If you need additional time, please, if you would like to make additional comments, please give your comments to the court reporter. Thank you.

Harlan Barehand.

MR. BAREHAND: Good morning, sirs. Thank you for the opportunity to come and speak with you this morning. I am Harlan Barehand, I'm registered with the Gila River Indian Community. Thank you very much for not putting it on our reservation, we appreciate that very much. I hope that it will stay off our borders and into the Ahwatukee and the Laveen area. And I think that we can benefit financially through them, but our reservation as it is is very small and we cannot afford to lose any more land as it is. And history tells us that the original Gila River boundaries is Van Buren on this side, so you're asking for Gila River land, but that's history.

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Code	Issue	Response
11	**Cultural Resources**	Native American tribes consulted for this project include the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribes, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community, the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe. (See Final Environmental Impact Statement pages 2-4 through 2-7, 4-145 through 4-157, 4-159, and 5-29 through 5-30.)

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 Sounds Good

Optional

Name Simon Pena Email SIMONDOESIT@gmail.com

Address 101 N. 91st Ave #1034

City Tolleson State AZ Zip 85353

Phone 480-427-8026 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Richard Pena Document Created: 7/12/2013 12:43:16 PM by Web Comment Form Stop taking AZ's natural beauty. Its not yours to control.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 3:33 PM
CALLER JOHN PENNELL	CALLER ADDRESS: 9012 W. SANDRA TERRACE, PEORIA, ARIZONA 85382
PHONE: 623-933-0228	EMAIL:

CALLER REMARKS/QUESTIONS:

Hello, I support the freeway in South Mountain. We need more freeways to get the congestion off the highways. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Wednesday, May 29, 2013 8:26:49 AM

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Susan Penner
Sent: Tuesday, May 28, 2013 4:58 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) (4) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Ms. Susan Penner
13018 W Meeker Blvd
Sun City West, AZ 85375-3803

_____

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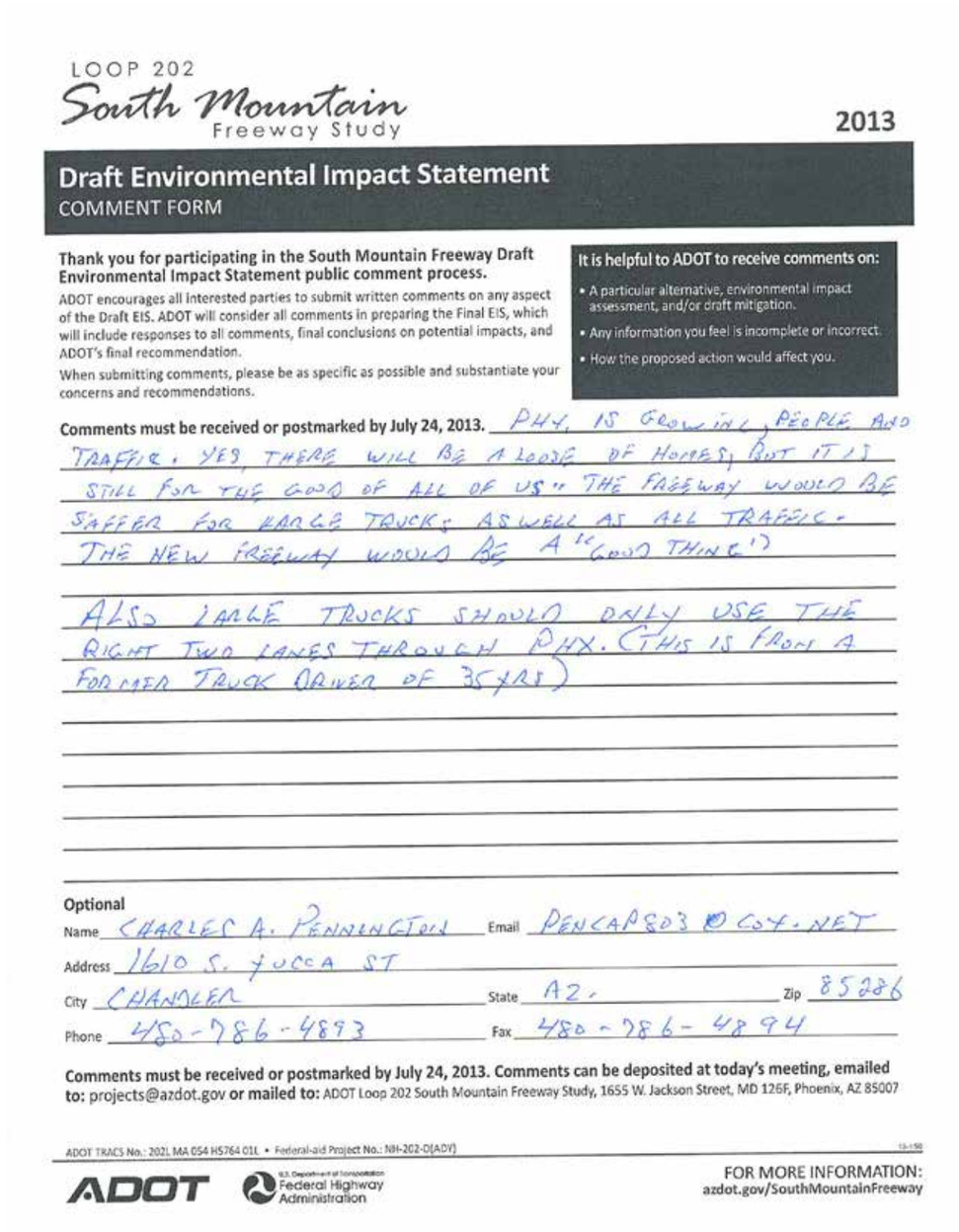
Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Section 4(f) and Section 6(f)**	
4	**Biology, Plants, and Wildlife**	

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. PHX IS GROWING, PEOPLE AND TRAFFIC. YES, THERE WILL BE A LOSS OF HOMES, BUT IT IS STILL FOR THE GOOD OF ALL OF US. THE FREEWAY WOULD BE SAFER FOR LARGE TRUCKS AS WELL AS ALL TRAFFIC. THE NEW FREEWAY WOULD BE A "GOOD THING"

ALSO LARGE TRUCKS SHOULD ONLY USE THE RIGHT TWO LANES THROUGH PHX. (THIS IS FROM A FORMER TRUCK DRIVER OF 35 YRS)

Optional

Name CHARLES A. PENNINGTON Email PENCAP803@COX.NET

Address 1610 S. YUCCA ST

City CHANDLER State AZ. Zip 85286

Phone 480-786-4893 Fax 480-786-4894

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 It would be a great asset to the community. Easy for me to get to downtown and my children and Asotin. Better access to 10 and other parts of phoenix.

Optional

Name Carol A. Pennington Email Pencap8030@cox.net

Address 1610 S. Yucca St

City Chandler, State AZ Zip 85286

Phone 480-786-4893 Fax 480-786-4894

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 10:15 AM
CALLER: DEBBIE PENNY	CALLER ADDRESS: GILBERT, AZ
PHONE: 480-857-8511	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, I am just voicing my opinion that I support building the South Mountain Freeway in the Phoenix area, if you have any questions my name is Debbie Penny, Gilbert, AZ.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

From: Rusty Crerand
To: ADOT
Subject: S. Mt. Opinion
Date: Thursday, July 11, 2013 11:44:47 AM
Attachments: image001.png

From Envoy:

7/11/2013 11:06:40 AM
As public comment on is coming to an end on the freeway extension that will cut through South Mountain Park and Preserve, I find it necessary to voice my opinion. I would like to express my concerns about the conservation and protection of South Mountain. Spectacular views can be seen of the entire valley, and I have been fortunate enough to be able to grow up hiking and biking along these beautiful trails of the Southwest.
I feel the impact study is not sufficient and doesn't take into account social implications of degrading a special place that has been protected for so long. I know the growth of the city in the next decades will require an increase of roads, but the construction of a freeway through South Mountain will send the message to our citizens that we do not care about our special desert environment.
Please, please see that a 22 year old college student that has had a strong connection with South Mountain Park and Preserve her whole life, really cares about this beautiful area. I hope it can be protected and remain for others to enjoy as much as I have.

Olivia Peralta
op22@nau.edu

Thanks,

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Document Created: 7/23/2013 8:53:23 PM by Web Comment Form

1 2 3 4 5

I am writing to state my opposition for the proposed expansion of Loop 202/ South Mountain Freeway . Ahwatukee residents would ultimately be affected by air & noise pollution, as well as devastation of local business, homes & church in the line of proposed route. The 40 years old project could be & should be adjusted due to new develops & changes , happened since 1983.

Sincerely,

Igor & Larisa Peremislov

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Economics, Socioeconomics**	Businesses that would be directly and adversely affected by the Preferred Alternative, if it were the Selected Alternative, would be mitigated through relocation or site purchase at fair market value. Construction of the proposed facility would likely generate additional business and jobs in the corridor upon implementation because of the improved access it would provide.
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Document Created: 7/23/2013 9:04:35 PM by Web Comment Form

1 2 3

I am writing to state my opposition for the proposed expansion of Loop 202/ South Mountain Freeway. I want to advocate " no built" as only the option that preserves the environment, health of Laveen & Ahwatukee resident & respects O'dham traditions.
Sencerely,
Eli Peremislov

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	
3	**Cultural Resources**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 1:33 PM
CALLER: JOSE PEREZ	CALLER ADDRESS: 730 WEST ROVO AVENUE, APT. #162 PHOENIX, ARIZONA 85021
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain freeway. Thank you very much and God Bless. Bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

5054

1 ***
2 THE REPORTER: Please state your name.
3 MS. PEREZ: Rolinda Perez.
4 I think the comment I have is that it's
5 stating that the air quality is going to be perfect,
6 I mean, a lot better with the freeway. I mean, I
7 really don't think that way, because my family -- all
8 my family, they're asthmatic. And the reason why we
9 live here in this community is because there is not
10 pollution ever. The only way we ever see pollution,
11 if you see it in the -- if you're sitting down in the
12 daytime, you can actually see by South Mountain the
13 pollution that's coming from Phoenix, you know, the
14 smog, or the non-clarity on that side.
15 And then with the fire that just came,
16 like two weeks, three weeks ago we had a fire from a
17 hay fire, that smoke alone had a lot of our allergies
18 inside the clinic. So that smoke alone, my daughter,
19 it triggered her more. We had to have more
20 medication for that. And when I spoke to that lady
21 about it, she said with the freeway and more vehicles
22 coming onto the freeway, the air quality is going to
23 be even better, because it's pushing all that air
24 away. And I don't get that. I don't get that.
25 And then I told her, that's -- you're

1

2

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	

Code	Comment Document

going to have three to four lanes, or whatever it is. It's going to -- and more vehicles with diesel on there, and everything else. I see a lot of vehicles still have -- they're not up to date on their emissions tests, so they're not fixing those vehicles. And you can see that smoke coming out of their mufflers. And she said, "Well, you guys have a road down 51st in this area anyways," but there's not a lot of vehicles. It's mainly just for the community members or you see -- it would be ten times more now if we get it. And that is just my concern is that -- it's -- you know, I have asthma, and then my daughter, who is six years old, has asthma.

By the time it comes -- I mean, it's more our children. And I'm just concerned about that. Is that I don't understand how they say the air quality is going to be good. I really don't think so, because I've lived in Phoenix for a while now, and coming here to this community, it's so much better. It's so much better. My asthma, I don't take medication for it anymore. I have an emergency inhaler, but I hardly ever get it. And I'm under control here.

And I'm just concerned about that, so I just wanted to speak my mind on that.

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 4:16 PM
CALLER: PAT PESSTLE	CALLER ADDRESS: 4718 E. CAMPBELL AVENUE, PHOENIX, ARIZONA 85018
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Hi I'm calling to say I support the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the 202
Date: Wednesday, May 15, 2013 2:39:37 PM

-----Original Message-----
From: Peter [mailto:peterbhc@yahoo.com]
Sent: Wednesday, May 15, 2013 2:30 PM
To: Projects
Subject: Build the 202

1 Build the 202 from pecos to 51st
Sent from my iPad

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/14/13	INCOMING CALL TIME: 1:20 PM
CALLER: IRENE PETERSEN	CALLER ADDRESS: 13840 NO. DESERT HARBOR DRIVE APT. #369, PEORIA, ARIZONA 85381
PHONE: 623-243-5325	EMAIL:
CALLER REMARKS/QUESTIONS: Yes, I'm calling in support of the South Mountain freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the 202!!
Date: Monday, May 20, 2013 8:42:38 AM

From: mindset839@aol.com [mailto:mindset839@aol.com]
Sent: Friday, May 17, 2013 6:43 PM
To: Projects
Subject: Build the 202!!

1

It is extremely important to the future quality of life in the valley that the 202 through South Mountain be completed. It is imperative that we stay ahead of the traffic curve as the population in the valley continues to increase. The 202 will act as a "reliever" and divert traffic that would otherwise be forced to go through the heart of Phoenix, clogging our roadways.

This is the single most important roadway project in the valley in the last 20 years and we must do everything in our power to complete is with the utmost urgency.

I urge you to do anything you can to see this project through.

Respectfully,

Fredrick Peterson
Glendale, AZ
(623)337-7236

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: freeway thru South Mountain
Date: Monday, May 20, 2013 1:07:46 PM

From: Blake Peterson [mailto:blakepeterson@cox.net]
Sent: Monday, May 20, 2013 12:01 PM
To: Projects
Subject: freeway thru South Mountain

1

I want to voice my opposition ADOT's plan to carve more than 30 acres from South Mountain Park Preserve and align the freeway through three ridges at the southwest end of South Mountain?

Blake Peterson

Blake Peterson, CPA
2120 S. Rural #1
Tempe, Arizona 85282
480-829-0509
Fax: 480-829-0055
blakepeterson@cox.net
blakepetersoncpa.com

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:33 PM
CALLER: STORM PETERSON	CALLER ADDRESS: 6490 S. INDIAN WELLS COURT, CHANDLER, AZ 85249
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I would like to offer my support for the bypass around South Mountain pending funding that would be available.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

July 5, 2013

ADOT Loop 202 South Mountain Freeway Study
1655 W Jackson Street, MD 126F
Phoenix, AZ 85007

1 2 3 4 5 6

I want to register my opposition to the proposed 8-lane freeway on the Pecos Road alignment. Tearing down houses and Mountain Park Community Church doesn't make much sense. This route was proposed in 1988 that's over 25 years ago. I hate to imagine what Ahwatukee is going to become with the increase in noise and poor air quality caused by all the trucks using the road as a Phoenix bypass. There has to be an alternative route such as Riggs Road. I would hope ADOT would stop their plan to destroy our neighborhood.

Adrienne Petraitis

Adrienne Petraitis, Homeowner
16655 S 14th Street
Phoenix, AZ 85048

CC: Protecting Arizona's Resources and Children (PARC)

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Purpose and Need, Truck Bypass**	
6	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 6:13 PM
CALLER: DAVE PETTIPLACE	CALLER ADDRESS: 3839 EAST GLENHAVEN DRIVE, PHOENIX, AZ 85048
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I have been a Phoenix resident since 1991 and I can't wait to build the stupid freeway. Go ahead and build it. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/19/13	INCOMING CALL TIME: 5:21 PM
CALLER: JIM AND TANYA PHAL	CALLER ADDRESS: PHOENIX, ARIZONA
PHONE: 602-997-4828	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Ok, I don't know if you're still there – long message. I'm fully in support of the South Mountain freeway and so is my wife.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:06 PM
CALLER: PATRICIA PINAL	CALLER ADDRESS: AVONDALE, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
We support the South Mountain Freeway. Thank you very much.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Corrine Pinks Document Created: 5/21/2013 2:32:10 PM by Web Comment Form I feel the completion of the the 202 Freeway would be beneficial to the growing Phoenix Metro area. This would improve traffic flow from the East Valley to the West Valley.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Bruce Piper
To: Projects
Subject: 202 loop through Ahwatukee
Date: Tuesday, June 04, 2013 5:40:56 PM

1
2 3
4 5 6

Hello,
I would like to voice my strong opposition to this project. Ahwatukee residents live here because of the quiet, crime free environment. Adding this freeway would ruin our area. There is no businesses out here and therefore no reason to build the freeway. If connecting the freeways is the main objective then run the freeway parallel to 51st ave down and away from Ahwatukee. According to the national association of Realtors, living within 1 mile of a freeway off ramp increases your chances of being the victim of a crime by 50%! This means the state is increasing the risk of many of us that own half million dollar homes. Home values will plummet and that will decrease property tax revenues dramatically. If approved, I personally know many people that will sell their homes.

Thank you for reading.

Bruce Piper
HomeSmart Real Estate
480 201 3011

Code	Issue	Response
1	**Purpose and Need**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
4	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
6	**Economics, Socioeconomics**	Table 4-23 on Final Environmental Impact Statement page 4-63 displays projected property tax impacts on the various affected jurisdictions from right-of-way acquisition and future land uses related to each of the action alternatives. Property tax impacts from implementing the W59 Alternative would be about twice those resulting from the E1 Alternative. The loss in annual City of Phoenix tax revenues from implementation of the E1 Alternative are discussed on page 4-64 and would, given all tax revenues for the City of Phoenix, "be nearly inconsequential."

Code	Comment Document
1	Carl Piper I support the 202. Document Created: 7/24/2013 10:23:41 PM by Web Comment Form

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 11:03 AM
CALLER: [UNCLEAR] PLAY	CALLER ADDRESS: 1755 SOUTH [UNCLEAR] STREET, GILBERT, ARIZONA 85295
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I'm supporting for the Loop 202 South Mountain freeway because of the traffic jam and we are getting new road and [unclear] and supporting this project. Thank you, have a nice day. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:39:49 AM

-----Original Message-----
From: Joel Plote [mailto:joelplote@gmail.com]
Sent: Friday, May 10, 2013 9:25 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Sent from my iPhone

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 1:00 PM
CALLER: VINCENT PLUMBER	CALLER ADDRESS: 11457 EAST COVINA STREET, MESA, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hello, I'm not for the freeway. I think at that part of the valley it would be an environmental impact. If you are going to put any money anywhere you should hire more policemen and that's my opinion.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Comments on the Proposed South Mountain Freeway

1 2

I am opposed to the proposed South Mountain Freeway for many reasons but primarily because it is not needed and will not solve the traffic problems described in the draft Environmental Impact Statement and there are better and far less expensive alternatives.

First, it is irrelevant this freeway has been proposed since 1985. It should be evaluated based on today. The proposed Paradise Parkway was also proposed in 1985 and has been eliminated for many of the same reasons the South Mountain Freeway should be eliminated.

3 4

There is no question as to the excessive traffic now and the likely traffic increases at the Broadway Curve on I-10. However, if one is to conclude the South Mountain Freeway is going to help this situation one would have to believe the Broadway Curve traffic is caused by vehicles transiting Phoenix and leaving on I-10 westbound towards Los Angeles. This is categorically false. As anyone who drives I-10 into Phoenix (or out) during rush hour knows, as soon as traffic passes SR-143 just past the Broadway Curve it thins out appreciably and is no longer heavy into downtown Phoenix.

3

The study concludes that over 50% of projected growth will be in areas "immediately served" by the proposed freeway. One of the communities cited in the study and projected for significant growth is Chandler/Gilbert. It is a monumental stretch to conclude these people will be served by the new freeway. The only time this would be the case would be if they need to go to the west valley or towards California. It is simply not true they will be significant beneficiaries of the project.

3 1

Ahwautukee, easily the most impacted of the communities "immediately served" by the freeway is projected to have only 8.5% population growth between now and 2035 or just .38 of 1% per year. Again, no one in Ahwautukee will use this freeway except to go to the west valley or California. The study provides no data on projections for either Ahwautukee or Gilbert/Chandler residents to actually use this freeway probably because the numbers would be so low.

I do believe the growth numbers for the southwest valley but that's a very small stretch of freeway miles. If ADOT honestly believes west valley residents will use the freeway to drive to work at the technology companies in Chandler they would be pursuing a strategy of encouraging extreme commutes to work which is certainly not a mainstream strategy. Southwest valley leaders have suggested the freeway will lead to a regional mall as the 82,000 residents of Ahwautukee are added to the Laveen "area." If anyone seriously thinks Ahwautukee residents are going to drive to Laveen to shop they have totally lost their minds. If it's important for Laveen residents to be able to have a freeway access to I-1- then build one that's about 5 miles long.

5

6

I am shocked the I-8/SR 85 alternative required upgrades are misstated and this alternative "does not meet the proposed access purpose." If support for this last statement is in the study I missed it but

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
3	**Traffic**	Information related to origins and destinations of motorists that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Final Environmental Impact Statement. The definition of freeway users considers only those motorists who travel through the South Mountains; so, motorists who begin their trips in Ahwatukee Foothills Village and travel east to Interstate 10 (Maricopa Freeway) or motorists who begin in Laveen Village and travel north to Interstate 10 (Papago Freeway) are not counted in the analysis. The analysis of origins and destinations shows that 73 percent of travelers would be involved in trips beginning or ending in the Study Area or areas immediately surrounding it. Seven percent of the trips would begin, end, or begin and end outside of the Maricopa Association of Governments region; ten percent would either begin or end in Pinal County.
4	**Traffic**	In 2035, the average daily traffic on the proposed freeway is projected to range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-62). The estimated volume depends on location. The purpose and need for the South Mountain Freeway are not solely to relieve congestion on Interstate 10 (Maricopa Freeway). Facilitating mobility in the Maricopa Association of Governments region does not mean just relieving congestion on the Broadway Curve (see Draft Environmental Impact Statement page 1-21). Among other criteria, the proposed freeway is to permit the entire Regional Freeway and Highway System to function as designed. Optimal function of that design includes completing all the segments of the Loop 202 system (see Draft Environmental Impact Statement pages 3-35 and 3-37). With implementation of the South Mountain Freeway, many motorists would be able to get from Point A to Point B, a route that never included needing to use Interstate 10.

(Responses continue on next page)

Code	Comment Document
6	cannot understand why this alternative is not seriously considered. I-8 requires no upgrades including adding lanes. It is a poorly utilized stretch of interstate highway now. An interchange will be required between I-8 and SR 85 and between SR 85 and I-10 but little additional work on SR 85 will be required until it nears I-10 west of Phoenix. This alternative will cost a fraction of the South Mountain Freeway cost. A bigger question is why isn't this alternate route being used already? ADOT appears to be secretly promoting the South Mountain Freeway as a Phoenix bypass but fails to provide data supporting this need and, in any case, cannot explain why the existing and quite useable bypass – even without upgrades – is rarely used.
7	Many pages are devoted to working with the Gila River Indian Community but it does appear to be just words. Everyone knows ADOT has not seriously pursued putting the freeway on the reservation and doesn't appear to seriously consider GRIC objections to the project on multiple environmental grounds.
8 9	ADOT makes a poor presentation as to the need for this enormous expenditure but even this inflated price is only obtained by building a cheap project at grade obviously without considering the quality of life issues for both Ahwautukee and the GRIC.
10	Finally, I doubt this project will ever be built. There will be legal challenge after legal challenge that at a minimum will delay the project for years and add millions of dollars of cost. At the end of the day there are going to be hard questions as to why ADOT/MAG have blindly pursued such an unpopular and semi-useless project when there are many better ways to invest in our transportation infrastructure.
	Paul E. Poer 480-759-8796

Code	Issue	Response
5	**Alternatives**	According to 23 Code of Federal Regulations §771.111(f)," the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope...". The proposed action should satisfy the project need and should be considered in the context of the local area socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need.
6	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
7	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Design**	The cost estimates for the proposed freeway, as described beginning on page 3-59 of the Final Environmental Impact Statement, were developed in accordance with accepted engineering practices by professional engineers. The project has been subject to multiple peer reviews of both the quantities and unit costs used in the estimate by the Arizona Department of Transportation, Federal Highway Administration, Maricopa Association of Governments, and their consultants. In each case, the estimate was found to be reasonable and accurate. The proposed project is part of the *Regional Transportation Plan* for the Maricopa County region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
9	**Design**	Depressing the proposed Pecos Road sections would entail installation of pump stations to drain the main line freeway. A depressed freeway would also need a drainage channel to capture the off-site flows to prevent their entering the freeway. Pump stations were not used because of the high cost of construction and maintenance needed for their operation. The preferred freeway configuration would have the E1 Alternative aboveground and the existing culverts extending to pass the drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Depressing the freeway in this area would eliminate the existing culvert crossings and potentially have adverse flooding impacts on adjacent properties. Extending the existing culverts or upsizing the culverts would maintain or improve drainage flows. This would ensure that there would be no adverse flooding impacts on adjacent properties. (See Final Environmental Impact Statement pages 3-15 and 3-18.) To reduce impacts by depressing the proposed freeway in the Eastern Section, the Arizona Department of Transportation would: - need to spend an additional $400 million for right-of-way acquisition and construction - displace an additional 300 residences - maintain additional pump stations and detention basins for the life of the freeway - observe noise-related impacts requiring mitigation (i.e., noise barriers and their associated costs and visual impacts) Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study.
10	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:46:04 AM

-----Original Message-----
From: John Poirier [mailto:johnnyp44@yahoo.com]
Sent: Friday, May 10, 2013 5:21 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Please start this project.

John Poirier

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

SOUTH MOUNTAIN FREEWAY NEEDS TO BE BUILT TO RELIEVE TRAFFIC CONGESTION THROUGH THE CITY OF PHOENIX AREA AND ALONG I-10. THIS PROJECT HAS BEEN STUDIED FOR DECADES AND IT IS TIME TO ACT.

Optional

Name STAN POLASIK Email ACIVILDAD@COX.NET

Address 845 N. GAYLORD

City MESA State AZ Zip 85213

Phone 480-644-8927 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. While everyone is within their rights to speak to this project failure to complete this needed and valuable freeway harms not only the current generations but those who will depend on this freeway in the future and at this time have no say due to their age or having not been born yet.

This freeway is well planed and has in my opinion less negative impacts than the many positive impacts.

In todays political area government gets too much of a negitive reception due in large part to negativity being more promenent

Optional

Name Peter Polcon Email petep@dolphincasting.com

Address 11209 W Citrus Grove

City Avondale State AZ Zip 85392

Phone 602 725 1626 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 10-13B

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

(Comment codes begin on next page)

Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study
2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: IN OUR FAST PACED NEWS INVIROMENT.
ADOT ~~Dot~~ did a FANTASTIC JOB on this project AND deserves ~~the~~ Recognition NO MATTER what public opinion is AS A Result of Public Hearings. The ADOT Team HIT A Home Run WITH This project
Build the freeway because IT is the Right thing to do TODAY 1 year from NOW 10 years from NOW OR 100 years FROM NOW IT is the Right thing to do. JUST DO IT NOW

1

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-180

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Homes to be acquired
Date: Friday, July 19, 2013 8:56:38 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: JEFF POLLETT [mailto:jpollett6@msn.com]
Sent: Thursday, July 18, 2013 9:12 PM
To: Projects
Subject: Homes to be acquired

1
2

Hi,
I am a concerned resident in Ahwatukee and would like to know if the project does go forward, what houses in what areas would need to be acquired ? Thanks in advance for your help.

Jeff Pollett

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Code	Issue	Response
1	**Acquisitions and Relocations**	Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 8:01 PM
CALLER: PETE POLLION	CALLER ADDRESS: 11209 W. CITRUS GROVE, AVONDALE, AZ 85392
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I fully support the South Mountain Freeway as it will definitely reduce traffic through the Broadway curve and through downtown Phoenix and it will also make it more convenient for trucks traveling east-west on I-10 to bypass a lot of Phoenix and it will reduce traffic, reduce pollution, and I am in favor of it. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Loop 202
Date: Tuesday, July 16, 2013 10:08:50 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Lisa P. [mailto:azlisap@cox.net]
Sent: Monday, July 15, 2013 4:13 PM
To: Projects
Subject: South Mountain Loop 202

1 2 3 4 5

We would like to voice our opposition to the proposed South Mountain Loop 202 Freeway. The demolition of many homes, a church, and beautiful park land would have an adverse effect on our wonderful community, particularly through Ahwatukee.

Please consider the 'no build' option, and put the funds toward other much-needed improvements instead.

Respectfully,

Steve and Lisa Pomraning
1580 W. Saltsage Drive
Phoenix, AZ 85045

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Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build 202
Date: Monday, May 20, 2013 8:36:33 AM

-----Original Message-----
From: Lucas Pool [mailto:tkn602@yahoo.com]
Sent: Friday, May 17, 2013 8:45 PM
To: Projects
Subject: Build 202

1

Build the South Mountain 202 please.

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 1:41 PM
CALLER: ANGELA POPPY	CALLER ADDRESS: 7644 N. 20TH STREET, PHOENIX, AZ
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I'm very much in favor of the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:21 PM
CALLER: ELIZABETH PORTER	CALLER ADDRESS: CHANDLER, AZ
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:

I am a registered voter in Chandler, Arizona and I just wanted to let you know that I am in support of this South 202 Freeway south of South Mountain. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, April 30, 2013 2:55:56 PM

F.Y.I.

From: Dan Pratt [mailto:mrdanpratt@gmail.com]
Sent: Tuesday, April 30, 2013 1:51 PM
To: Projects
Subject: South Mountain Freeway

To Whom It May Concern:

1

I support the construction of the South Mountain Freeway. The freeway is sorely needed in order to alleviate traffic throughout the valley. I applaud the efforts of the team who did the environmental impact study. Their findings show that construction of the freeway is simply the best option. Also, I favor their recommended routes. I hope that the South Mountain Freeway can be built with all possible speed. Thank you.

Sincerely,

Dan Pratt

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Grady Preston Document Created: 7/22/2013 3:48:34 PM by Web Comment Form

1 2

I feel if is very important that we move away from making more freeways and pay for more buses and extending the light rail. It will be much better for the environment and increase tourism to our great state. I can tell you it is always much nicer when I travel to cities with good public transportation. The light rail is a great start but it really needs to be extended into Scottsdale and north Phx / Glendale. We also need better bus routes that arrive more frequently. I'm very against this plan.

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Stop the 202!
Date: Monday, May 20, 2013 8:42:06 AM

From: Ron933a [mailto:ron933a@aol.com]
Sent: Friday, May 17, 2013 7:03 PM
To: Projects
Subject: Stop the 202!

1
2

Please stop any plans to continue to build the 202. I think it's can be agreed that the last extension of the 202 has done nothing to relieve traffic on the 10, 17 or 60 and other parts of the 202. There is no need to waste money on a big freeway, you just need to extend pecos road. No need for the 202.

Thanks,

Ron Price
Phoenix, AZ/

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Code	Issue	Response
1	**Alternatives**	The Gila River Indian Community has not allowed the project team to consider alignments on its land, so extending Pecos Road to 51st Avenue is not feasible.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Briana Price Document Created: 5/21/2013 1:12:23 PM by Web Comment Form South Phoenix/Laveen NEEDS the Loop 202 W59 freeway!!!! As a resident of this area we have to travel east to Tempe, Ahwatukee or west to Avondale, Tolleson for shopping and movie theaters and kids programs. We deserve to have all the amenities as other communities and the proposed W59 will do that for us. It will bring in anchor retailers and a movie theater and a hospital, etc. Other routes will not do that. So Yes we need the freeway and yes we need the W59 route!!! Also, for those communting around the South Mountain having closer freeway access will shorten those commutes and make travelling around the vally easier and quicker for all of us. It will also cut down on congestion along Baseline Rd and surrounding areas as we can stay in our local community and/or get on the new freeway. Our surface streets and packed and we've had so many accidents here lately I feel partly due to the congesting and fact that people are so busy and having to travel great distances to get where they're going. Just as the west Loop 101 has done for the NW valley, the South Mountain Freeway Loop 202 W59 will do for the SW valley...it just has to be done! We need the infrastructure!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

My home is located very near to all of the freeway options. I'm located at 78th Lane just north of Broadway Road in Phoenix.

1 After reviewing the video it appears that the preferred choice is the W59 Alternative. I am in agreement with this option.

Submitted@public hearing on 5/21/13 @ 11:15 am.

Optional

Name Heather Price Email hprice225@gmail.com

Address 4220 S 78th Lane

City Phoenix State AZ Zip 85043

Cell Phone 623-203-4091 Fax

best time to contact is weekdays @ 11:15 or 11:30 am

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Mark and Lisa Prieto
To: Projects
Subject: re: South Mountain Freeway
Date: Wednesday, July 24, 2013 2:19:38 PM

Hello. This email is a response to the request for public comment in regards to the South Mountain Freeway Project.

1 2 As a 13 year resident of the Ahwatukee Foothills, the details of this project make me incredibly sad that those who are in a position of leadership in our state government are so willing to destroy such a lovely community in the interest of a project that should have been trashed decades ago. Having been here as long as I have, I also have a perspective of the information provided to this community that is different than the one that ADOT pushes in the press.

While it is true that the freeway has been 'on the books' for decades, the amount of information was nothing like what is portrayed in the press. I purchased my first home in Ahwatukee in 2000. At that time the builder was obligated to disclose the planned freeway. The public information available at the time consisted of a red line on a map that appeared to be South of Pecos Rd. There was no funding, no comprehensive plan, no info on how many lanes or where on/off ramps would be etc. When I purchased my second home, where I live now, it was previously owned. There was no disclosure of the freeway by the previous owner, so had I not already been aware of it, it would have been a big surprise to me! Which I believe is probably the case for a lot of the residents that currently reside in the area. So to those who insist on pointing out that the project 'was on the books.' I say, that doesn't mean it was common knowledge. I purchased my current home in September of the year after the Prop passed. The first comprehensive information was made available to public that following November, thanks to the Proposition that passed granting funding. A proposition that I believe only passed because the freeway was wrapped up with the funding for the light rail! That is the other misconception that ADOT insists on pushing in the press. I keep reading that the public voted for it, so it must be done. In truth, the public voted for the light rail. Every single person I know that voted for that proposition did so because they were in favor of the light rail. Most were not even aware of the inclusion of funding for the South Mountain Freeway. Which goes to show that what people really want is a functional mass transit system. Something we still don't have.

3 4 5

My husband and I both work within 15 minutes of our home. We have always worked within reasonable commuting distance from where we live. That is a responsible choice. Another excuse I keep hearing for why this freeway is a must, is that it will help people commute from the far out areas to the East Valley and back for work commute. WHY would we want to encourage that. Why live in Laveen if you want to work in Chandler. There are plenty of nice communities in the Chandler area, live there. Or work in Laveen, or South

6

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Neighborhoods/ Communities**	Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.
4	**Public Involvement**	Information related to freeway awareness is presented in the Final Environmental Impact Statement on page 4-13.
5	**Acquisitions and Relocations**	The text box "Freeway Awareness," on Final Environmental Impact Statement page 4-13, provides a thorough history of the public disclosure of the proposed South Mountain Freeway, beginning with a map made public in 1980 and one in 1984 showing more or less the current alignment. This text box also explains the legal requirements for developers and other home sellers to "inform potential buyers of conflicts with planned transportation projects like the proposed action." The Southwest Loop Highway—the South Mountain Freeway predecessor—was integral to the Regional Freeway and Highway System approved by Maricopa County voters in 1985. Although other facilities were considered a higher priority early in development of the Regional Freeway and Highway System, the South Mountain Freeway has been included in every subsequent update. The same route was approved by the State Transportation Board in 1988. In 2004, Maricopa County voters approved Proposition 400, which was designed to fund completion of the remaining segments of the Regional Freeway and Highway System, including the proposed South Mountain Freeway (Final Environmental Impact Statement page 1-21).
6	**Traffic**	Information related to origins and destinations of motorists that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Final Environmental Impact Statement. The definition of freeway users considers only those motorists who travel through the South Mountains; so, motorists who begin their trips in Ahwatukee Foothills Village and travel east to Interstate 10 (Maricopa Freeway) or motorists who begin in Laveen Village and travel north to Interstate 10 (Papago Freeway) are not counted in the analysis. The analysis of origins and destinations shows that 73 percent of travelers would be involved in trips beginning or ending in the Study Area or areas immediately surrounding it. Seven percent of the trips would begin, end, or begin and end outside of the Maricopa Association of Governments region; ten percent would either begin or end in Pinal County.

Code	Comment Document

Phoenix.

In short I believe this freeway is a mistake. I reviewed the information from the recently released impact study. While it does a very good job of trying to put a positive spin on things, using all the benefits for Laveen, it completely ignores the negative impact to the residents of Ahwatukee. Crime rates will go up, traffic will increase on our community streets, the quality of the air in Ahwatukee will be negatively impacted, the health of the residents, especially the children will be negatively impacted. I don't think the positives listed in the study come anywhere near balancing the scales with negative impact on the people in this community.

7 8 9 10

I have tried to keep my comments on the negative effect I think it causes my community as whole. But I also want to take a quick moment to focus on my own family. I live less than a mile from Pecos Road. I have 5 children, including one with a severe heart defect for which he has undergone 3 open heart surgeries. The negative health impact this freeway could have on my family is enormous. Although the perception is that everyone in this community is rich, that is incorrect. Some of us just made necessary sacrifices in order to provide our children with a home in a good community, with good schools. We can't just move. And ADOT has not given us any definitive indication whether our home is in the destruct zone, nor have I seen any mention of compensation for those within a mile of its construction.

11 12

I voted no on the proposition that provides funding for this freeway. I am against its construction 100%. I think it is a mistake of epic proportions being made to line the pockets of a few. I think that if ADOT really wanted to, they could find a better alternative. I think that 1.9 billion would be better spent on a functional mass transit system.

13 14

Lisa Prieto
16802 S 8th St
Phoenix AZ 85048

Code	Issue	Response
7	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
8	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
9	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Health Effects**	
11	**Acquisitions and Relocations**	
12	**Acquisitions and Relocations**	Agencies may acquire only those properties located entirely or partly within the project right-of-way limits (see Final Environmental Impact Statement page 4-45).
13	**Alternatives, Nonfreeway Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
14	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:22 PM
CALLER: STEVE PROWLIN	CALLER ADDRESS: 2026 E. BUENA VISTA DRIVE, CHANDLER, AZ 85249
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I just wanted to voice my support for the extension of the loop 202 around South Mountain. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

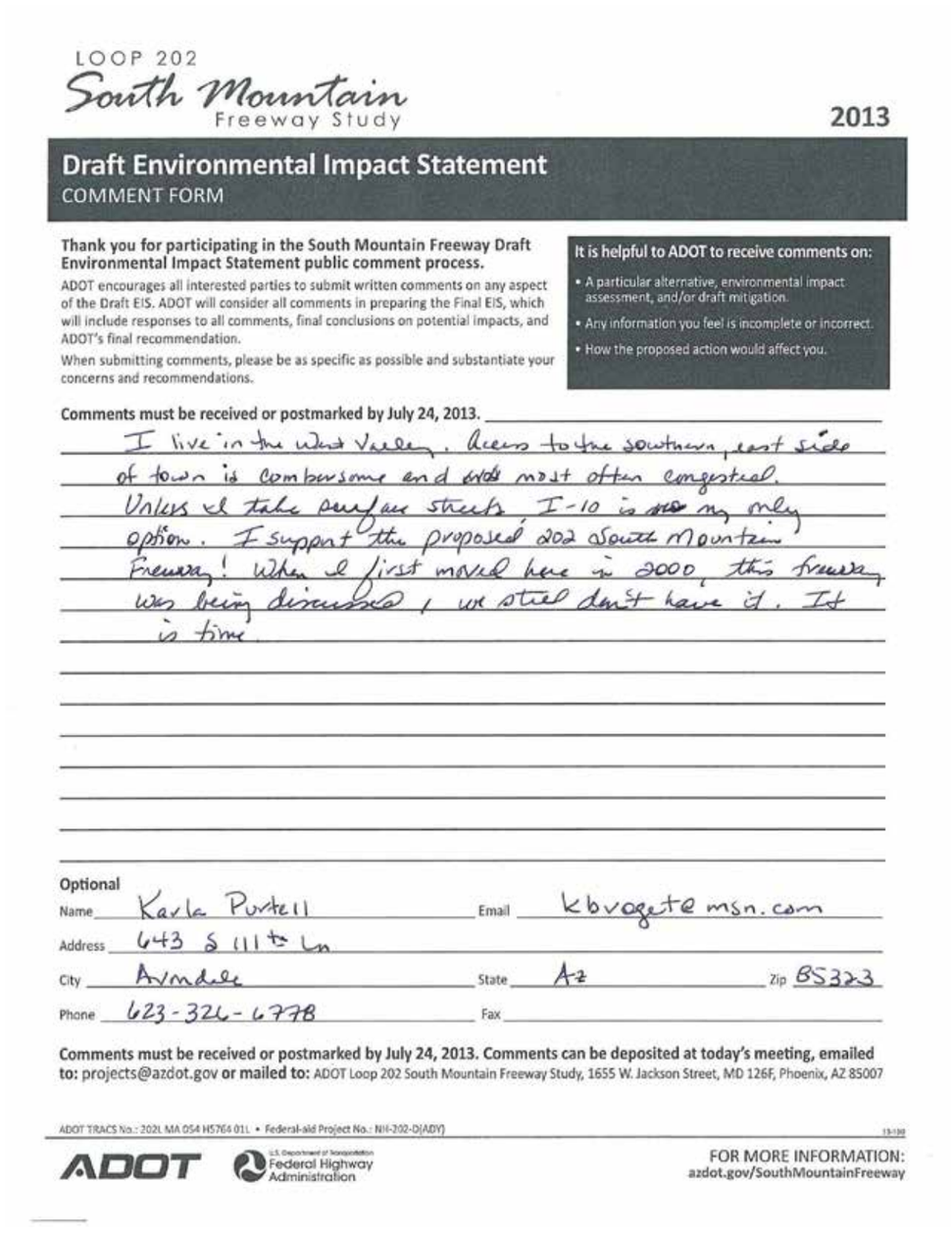
TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:02 PM
CALLER: PULLMAN	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I live in the West Valley. Access to the southern, east side of town is cumbersome and most often congested. Unless I take surface streets, I-10 is my only option. I support the proposed 202 South Mountain Freeway! When I first moved here in 2000, this freeway was being discussed, we still don't have it. It is time.

Optional

Name Karla Purtell Email kbvogete msn.com

Address 643 S 111th Ln

City Avondale State AZ Zip 85323

Phone 623-326-6778 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-100

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Brian Paul
To: Projects
Subject: Re: Proposed South Mountain Eastern section (Ahwatukee).
Date: Sunday, June 16, 2013 8:25:55 PM

Re: Proposed South Mountain Eastern section (Ahwatukee)

1 Why not consider a parkway with no truck traffic? They have these in the North East . They allow relief of traffic congestion with out the impact of heavy truck traffic (Environmental,Safety and increased congestion) and are aesthetically appealing. Why are 2 the needs of the Gila Indian Reservation paramount to all other parties involved. As a group they stand to gain the most from the freeway expansion; increased traffic to their Casinos, Resorts, Outlets (thus increasing overall income to the community) and access to a new freeway for their whole community. All these benefits with absolutely no compromise on their part. The Gila Indian Reservation needs the revenue to help their citizens. I attended a corporate luncheon in the past. We were asked to bring can goods to donate to the community. I find it hard to understand why a community that has citizens that are economically disadvantaged would not be more open to other alternatives. If the Freeway must be built why not have it aligned 1 mile south of Pecos road on the Gila Indian Reservation (connecting at the I-10 ,Pecos 202 interchange then south for 1 mile ,then running east to west around Ahwatukee). This would accomplish two things and be a reasonable compromise for the citizens of Ahwatukee and the Gila Indian Reservation. First it would allow the sovereign citizens of Ahwatukee to remain an intact community and avoid increased crime, drop houses, environmental impact (potential chemical spills, accidents, pollution etc.), displacing (homeowners, businesses and churches), noise pollution and a lower overall quality of life for the Residents and Families of Ahwatukee. The Gila Indian Reservation could benefit from monthly lease payments from the AZ DOT or out right purchase of the land. They would have all the previous benefits mentioned and the additional benefit of extremely valuable commercial and potential residential land to sell, lease or rent to businesses and developers for light industrial commercial development and residential etc. They would also have the opportunity to increase their own communities commercial ventures allowing the Gila Indian Reservation viable economic opportunities for all of its citizens to prosper in the future. If the freeway is to be built a parkway south of Pecos is the best alternative.
Thank you for your consideration,

3 4 5 6 7 8

Ahwatukee Resident 10 Years

Brian, Monica and Luke Putnicki

Code	Issue	Response
1	**Alternatives**	In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.
2	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
4	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	
6	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
7	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: freeway
Date: Monday, July 15, 2013 12:19:44 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Wayne Pyle [mailto:waynepyle93@yahoo.com]
Sent: Monday, July 15, 2013 12:03 PM
To: Projects
Subject: freeway

1 2 3 4 5 6 7 8 9 10

I am writing to oppose the South Mountain Loop 202 Freeway. I have lived in Ahwatukee for 23 years. My favorite activity is hiking at South Mountain Park. This freeway will bring crime, pollution. nosie, and the danger of a toxic waste spill from the many poorly regulated Mexican trucks that will passing nearby. It will also damage South Mountain Park with its wildlife and hikers. For what purpose ? Only to shorten trips for a few trucks. Very few people commute between the Ahwatukee area and the far west side. I work in downtown Phoenix and will never use the new freeway because of time and distance. The money could better be used for light rail or other less polluting forms of transportation. I urge you not to sacrifice beautiful Ahwatukee for the sake of convenience for a few trucks.

Wayne Pyle, a 37 year resident of the Phoenix area

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Code	Issue	Response
1	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	
4	**Hazardous Materials**	
5	**Trucks**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	
8	**Purpose and Need, Lack of Support**	
9	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
10	**Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Katharine Lee Quarrie Document Created: 7/12/2013 2:03:42 AM by Web Comment Form sop this mad rush to destroy our land.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain (SM) 202
Date: Tuesday, May 14, 2013 9:37:06 AM

From: sam chin [mailto:samfchin2000@yahoo.com]
Sent: Sunday, May 12, 2013 11:07 PM
To: Projects
Subject: South Mountain (SM) 202

To whom it may concern

1 It is my believe the SM 202 will improve Phoenix's image, reduce every day traffic congestion, and related air pollution, time and money wasting. It would help the economic development in Laveen and Southwest Phoenix as well, which we could all benefit from.
I support the plan strongly.

Sam Quinn

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Jessica Quinter Document Created: 5/21/2013 8:41:30 PM by Web Comment Form I commute to tempe monday thru friday from laveen and am excited about the idea of the freeway addition. Traffic is awful in the morning. having to drive baseline or southern to mill ave is the only option because taking the 10 fwy has proven to be more time consuming in rush hour traffic. I live on 35th ave and dobbins to be exact. I am sure many ppl would be happy with the 59th ave alternative. It would reduce congestion and make it easier to travel to the east side of the valley.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Jessica Quinter Document Created: 5/21/2013 8:41:56 PM by Web Comment Form I commute to tempe monday thru friday from laveen and am excited about the idea of the freeway addition. Traffic is awful in the morning. having to drive baseline or southern to mill ave is the only option because taking the 10 fwy has proven to be more time consuming in rush hour traffic. I live on 35th ave and dobbins to be exact. I am sure many ppl would be happy with the 59th ave alternative. It would reduce congestion and make it easier to travel to the east side of the valley.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4082

SOUTH MOUNTAIN PUBLIC HEARING
Public comments to reporter)
May 21, 2013
10:00 a.m.
REPORTED BY:
Bonnie Ponce, RPR
AZ Certified Reporter No. 50669

1

8 MS. QUINTERO: Jessica Quintero.
9 I like the proposal for the 59th Avenue. I
10 think it would be a lot more convenient and beneficial
11 for everybody in the area to travel that route.
12 That's it.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

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When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

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- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

EXCELLENT VIDEO & GRAPHICS!

WILL NEED TO REVIEW DOCUMENT FOR THE ELIMINATION OF W101 ALTERNATIVE.

IT SEEMS THAT CONNECTING TO THE 101 LOOP WILL BE THE BEST GEOMETRY, THERE IS HEAVY TRAFFIC FROM THE 101 LOOP TO DOWNTOWN, ENDING THE FUTURE 202L @ 59TH AVE (OR 55TH AVENUE) SEEM TO CREATE OTHER ISSUES IN THE REGION.

Optional

Name VANESSA QUINTO Email vanessa.quinto@jacobs.com

Address

City State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 12-190

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Document Created: 6/8/2013 1:57:01 PM by Web Comment Form

1 2 3 4 5 6 7

Hello. I am writing in opposition to the building of the South Mountain Freeway. I find the proposed construction of this highway deeply troubling due to a) its intrusion into sacred and historic sites of the native community of the area, b) its impact on natural areas, and c) the fact that it further commits our community to a car culture that will exacerbate sprawl, noise and air pollution, and climate change.

8 9

As a relatively new resident in the Phoenix area, I have been quite dismayed by the lack of widespread mass transit options. This would seem to be a wonderful opportunity to redirect the billions to be spent on yet another highway toward innovative and wide-reaching transit options that encourage residents to move away from car travel and toward more sustainable transit options. This is particular urgent as we see our area experiencing the impacts of climate change, especially in regard to rising temperatures and stress on our water supply. Continuing to promote car travel can only make these problems worse.

Fyi, I have given up my car for a bicycle, and thus am trying to do my part for a more sustainable future for our area.

David Radcliff
Director
New Community Project
Peoria

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Biology, Plants, and Wildlife**	
4	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.
5	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].
8	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for transit projects nor would not constructing this facility make available additional funds for other transit projects.

Code	Comment Document

Joe Ray Document Created: 5/2/2013 10:46:27 AM by Web Comment Form

We have relocated to the beautiful, peaceful, village of Ahwatukee recently, and are very saddened that a highway would be considered to skirt our schools and houses. The traffic noise is already bad coming from Pecos, so cannot imagine living there when 150,000 vehicles travel this proposed route. This not only presents a noise problem, but a crime problem as well. Ahwatukee has been somewhat protected/isolated from the surrounding areas, and we want it to stay that way. Pollution is another obvious concern that politicians will continue to deny, and lie about. If this is approved, our property values will plummet. Will you compensate us? Our house will go up for sale same day, if this disaster is approved. If it doesn't sell? It will go abandoned, like so many others. We cannot and will not live on a corridor.

1
2
3
4 5
6

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
5	**Acquisitions and Relocations**	Agencies may acquire only those properties located entirely or partly within the project right-of-way limits (see Final Environmental Impact Statement page 4-45).
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
05/1/13	6:56 PM
CALLER: JOE RAE	CALLER ADDRESS: 16816 S. 33RD WAY, PHOENIX, AZ 85048
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I live a block from the proposed freeway. This project should be a no build. I have a daughter and a son that both attend school nearby and they would be affected if this freeway is built. This freeway is a travesty; I will leave my house behind should it be constructed.

2 I will be attending the Public Hearing

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Wednesday, May 15, 2013 8:38:15 AM

From: Anthony Ramirez [mailto:ajramirez1969@gmail.com]
Sent: Tuesday, May 14, 2013 4:02 PM
To: Projects
Subject: South Mountain Freeway

I saw the article about the PARC meeting held in relation to the release of the DEIS. The freeway is good for the community and needs to constructed sooner rather than later. The PARC only had 50 people show up to their meeting so I think that is indicative of their lack of support.

1

Keep up the good work and break ground asap.

--
Anthony Ramirez

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. This is a great idea, very well designed and what looks to be very helpful I am looking forward to this and hope it will help everyone.

1

Optional

Name Noah Ramirez Email noahramirez172@gmail.com

Address 1956 E Brantrup Dr.

City Tempe State Arizona Zip 85283

Phone 480-659-7424 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Questions regarding the DEIS for South Mountain Loop 202
Date: Tuesday, July 23, 2013 8:17:06 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

-----Original Message-----
From: wdramsay@cox.net [mailto:wdramsay@cox.net]
Sent: Monday, July 22, 2013 10:57 PM
To: Projects
Subject: Questions regarding the DEIS for South Mountain Loop 202

1

In regards to the proposed South Mountain Loop 202, please identify the specific air quality study or studies that personnel at the Maricopa Association of Governments (MAG) supervised, reviewed, or had any input with. Please identify the names(s) of MAG personnel involved with testing or reviewing testing.

William D. Ramsay

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.

Code	Issue	Response
1	**Air Quality**	As members of the project team, Maricopa Association of Governments staff reviewed the entire Draft Environmental Impact Statement, including the air quality section. Maricopa Association of Governments personnel are identified at <azmag.gov>.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Questions regarding the DEIS for South Mountain Loop 202
Date: Tuesday, July 23, 2013 8:17:39 AM

F.Y.I.

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

-----Original Message-----
From: wdramsay@cox.net [mailto:wdramsay@cox.net]
Sent: Monday, July 22, 2013 11:15 PM
To: Projects
Subject: Questions regarding the DEIS for South Mountain Loop 202

1

In regards to the proposed South Mountain Loop 202, please identify the specific circumstances under which FHWA would issue a "No Build" or "No Decision."

William D. Ramsay

_____

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.

Code	Issue	Response
1	**Purpose and Need**	There are numerous reasons why a federal lead agency may select a no-build alternative. Changes in funding, agency policy redirection, agency restructuring of priorities, changes in human and/or natural environmental conditions, and public sentiment are just a few examples. As related to the proposed action, the lead agency has identified an action alternative as its preference. No factors, such as those cited above, would currently alter that preference. Certain members of the public would argue that, given some public sentiment against the project, there is sufficient reason to pursue a no-build alternative. However, as documented in the Final Environmental Impact Statement and in this appendix, substantial support from members of the public has been expressed for the Preferred Alternative.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Questions regarding the DEIS for South Mountain Loop 202
Date: Tuesday, July 23, 2013 8:17:50 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

-----Original Message-----
From: wdramsay@cox.net [mailto:wdramsay@cox.net]
Sent: Monday, July 22, 2013 11:03 PM
To: Projects
Subject: Questions regarding the DEIS for South Mountain Loop 202

1

In regards to the proposed South Mountain Loop 202, please identify the following concerning air quality testing associated with the project:
Name of firm(s) conducting testing;
Dates that tests were conducted on;
Specific locations tests were conducted at; Devices used to conduct tests; Dates devices were calibrated on, and names of personnel conducting the calibration; Names of personnel who actually performed tests; Credentials of individuals conducting testing.

William D. Ramsay

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.

Code	Issue	Response
1	**Air Quality**	For the purposes of the Draft Environmental Impact Statement, only limited meteorological monitoring occurred. At the request of (then) Arizona State Senator John Huppenthal, short-term monitoring of meteorological conditions at Pecos Road and 24th and 40th streets was conducted during 2006 and 2007. Results of this sampling were included in the air quality technical report for informational purposes only. All other air quality monitoring and reporting discussed in the Draft Environmental Impact Statement (see the discussion beginning on page 4-58) was completed by the Maricopa County Air Quality Department and the Arizona Department of Environmental Quality.

Code	Comment Document

From: wdramsay@cox.net
To: Projects
Subject: Questions regarding the DEIS for South Mountain Loop 202
Date: Tuesday, July 23, 2013 6:26:26 PM

1

In regards to the proposed South Mountain Loop 202, ADOT exhorts motorists via overhead signs on freeways to Carpool, Vanpool, or telecommute during high pollution advisory days in Maricopa County, AZ. This is so because motor vehicles cause particulate matter - "dust" - to be propelled into the air. Please explain how adding the South Mountain Loop 202 freeway will not exacerbate particulate matter pollution in Maricopa County, AZ caused by motor vehicles.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Emissions from road dust and additional sources were considered in the quantitative project-level particulate matter (PM_{10}) hot-spot analysis prepared for the proposed project. The results of the analysis are summarized in the prologue to the Final Environmental Impact Statement (page xiii) and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

Code	Comment Document

From: wdramsay@cox.net
To: Projects
Subject: Questions regarding the DEIS for the South Mountain Loop 202
Date: Tuesday, July 23, 2013 6:35:09 PM

1

In regards to the proposed South Mountain Loop 202 freeway study, did any Maricopa Association of Governments personnel:
Directly hire or influence the hiring of any contractor(s) used in the air quality studies for the DEIS:
Direct or supervise any work performed by air quality study contractors;
Review any work performed by said air quality study contractors prior to its release into the DEIS.

.

Code	Issue	Response
1	**Air Quality**	Maricopa Association of Government personnel did not directly hire or influence the hiring of any contractor(s) used in the air quality studies for the Draft Environmental Impact Statement or direct or supervise any work performed by air quality study contractors. As members of the project team, Maricopa Association of Governments staff reviewed the entire Draft Environmental Impact Statement, including the air quality section.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway (Loop 202)
Date: Monday, May 20, 2013 8:29:28 AM

From: Ashek Rana [mailto:ashek_rana@yahoo.com]
Sent: Saturday, May 18, 2013 11:59 AM
To: Projects
Subject: South Mountain Freeway (Loop 202)

1

I support the construction of Loop 202 South Mountain Freeway

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Larry Randall Document Created: 5/20/2013 8:10:45 PM by Web Comment Form I support the proposed 59th alignment.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:07 PM
CALLER: SUE RANKIN	ADDRESS: 11414 W. COTTONWOOD LANE, AVONDALE, AZ 85392
PHONE: 623-877-8352	EMAIL:

CALLER REMARKS/QUESTIONS:

I am for doing the construction and building the connection from I-10 connecting to Pecos. If you have any questions please call me back. Thank you and have a good day.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202
Date: Thursday, July 11, 2013 8:28:48 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Rae Ray [mailto:azartpro@yahoo.com]
Sent: Wednesday, July 10, 2013 7:24 PM
To: Projects; Rae
Subject: Loop 202

1 2 3 4 5 6 7 8 9

I moved to the Ahwatukee area 19 years ago to get out of central Phoenix. I wanted to be next to the mountains, cleaner air and the beauty of the desert. I was born in Arizona and have only seen major distruction of neighborhoods, families and businesses all for the sake of development and growth. I was never told about this freeway or I never would have settled here, but I did and now I can not afford to move. This is the only area in most the world where you will find flora and fauna vendictive to this small area which will be destroyed by this freeway. I see no reason to build this freeway at the location chosen. There is Hwy 8 and interstate 85 further west. I have not seen any other plans only the one to destroy South Mountian Perserve. Ahwatukee is a cultisac and with the largest city park in the world! It needs to remain that way for the health and safety of its residents.

I hired a private compnay to take air pollution measures at the entry way of my home, being I have asthma I was concerned. Those measurements came out to be at industrial park levels! I installed an industrail type air cleaner on the intake system of my home. A freeway anywhere close to the Warner /Elliot Loop or Ray /Chandler loop will only make the air even more polluted, unhealthy and unsafe.
When do we as humans say enough is enough with growth and development!?
I support a "no" build on this freeway.

Rene

_____

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.

Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives, E1 Alternative**	
4	**Purpose and Need, Lack of Support**	
5	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
6	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Air Quality**	
8	**Health Effects**	
9	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:20 PM
CALLER: DEBORAH REDDING	CALLER ADDRESS: 1443 W. KESSLER LANE, CHANDLER, AZ 85224
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I just wanted to leave a message stating that I am in favor of the freeway system. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Tiffany Reddy Document Created: 5/21/2013 1:57:22 PM by Web Comment Form I support the South Mountain Freeway build. Phoenicians continiuously struggle with commuting times around the valley and this Freeway would greatly help relieve that congestion. This project would also be thousands of jobs created for the people that live in our community.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Aaron Reddy Document Created: 5/21/2013 1:59:24 PM by Web Comment Form I strongly support the construction of the South Mountain Freeway. Not only will this project help to alleviate traffic congestion in the Phoenix area it will also be a huge boom for the local economy.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Construction
Date: Wednesday, May 22, 2013 10:54:19 AM

From: tiffany jo chamanzad [mailto:tchamanzad@hotmail.com]
Sent: Tuesday, May 21, 2013 7:52 AM
To: Projects
Subject: South Mountain Freeway Construction

To whom it may concern,

1

I am in complete support of building the South Mountain Freeway in Phoenix. Traffic Jams continue to be an issue in our city and this freeway will help cut out some of the congested areas in Phoenix, which will save Phoenician's money and time. After reading about a study from ADOT the traffic in this area is only expected to get much worse in the coming years.

I only see positives coming from this project - saves Phoenician's time and money, improves air quality, and creates job for thousands of poeple.

Thanks so much for your consideration, I do hope that ADOT decides to move forward with building this worthwhile project.

Tiffany Reddy

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

4379

ahead and proceed with this project. This project has been approved several times and has the overwhelming support, based on recent polls, and I think it'll be a great benefit to our community. Thank you.

THE FACILITATOR: Thank you.

Ana Morago?

Tiffany Reddy.

MS. REDDY: Good afternoon. My name is Tiffany Reddy and I just wanted to come and show my support for South Mountain freeway. The congestion for the commuters in Phoenix has long been a problem for our community and I think it would greatly help our residents in Phoenix. Also, I love the idea of bringing 30,000 jobs to our community and to our people here in Phoenix, so we're in big support. Thank you.

THE FACILITATOR: Thank you.

If you'd like to speak and have not yet registered, please go out to the front registration table.

Chris Pattock. Could I ask you to use this microphone, please.

MR. PATTOCK: Sure. Thank you. My name is Chris Pattock, I'm a Tempe resident, I work downtown, I'm a lawyer. I'm not prepared to do this, I just got a phone call last night, apparently someone knew that I was

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Thursday, May 23, 2013 9:08:04 AM

From: Reed, Shelli - MGMC [mailto:Shelli.Reed@DignityHealth.org]
Sent: Thursday, May 23, 2013 9:00 AM
To: Projects
Subject: Loop 202 South Mountain Freeway

1

I have been waiting years for this Freeway to come about. Obviously if the voters keep voting it in they want it built. I live in the west valley and have to travel to the east valley to work every day. I have been watching this project fail in every which way and just wish a decision would be made to proceed and build it. The congestion on I-10 is ridiculous not to mention the traffic accidents that happen on that freeway every day. I would think this Freeway would have been top priority for the state of AZ for that reason alone, to stop unnecessary traffic from traveling through downtown to get to Tucson. Please hurry and proceed with the 202 S Mtn Freeway.....

Shelli J Reed

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 6:46 PM
CALLER DONNA REESE	CALLER ADDRESS: 21663 N. 57TH AVENUE, GLENDALE, ARIZONA 85308
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1

I am very much in support of the 202 freeway South Mountain extension. I lease shopping centers in Phoenix, Arizona and I deal with the congestion everyday of my shopping centers basically encompass the west valley from 7th Street to Goodyear/Avondale area. The 10 freeway is always congested and always a nightmare and it's so difficult to take the 10 into Ahwatukee from the west side. This will make an immense difference in the congestion on the 10 and the travel time between the west valley and the Ahwatukee/Chandler area. Thank you very much.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, May 20, 2013 8:49:52 AM

From: Alan Regier [mailto:bbscout@aol.com]
Sent: Monday, May 20, 2013 8:28 AM
To: Projects
Subject: South Mountain Freeway

1

I hope to see this project begin, finally.

Alan Regier
bbscout@aol.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Claudine Community
To: Projects
Subject: 202 South Mountain FREEWAY
Date: Wednesday, July 24, 2013 8:37:36 AM

1

As a member of the Laveen Village Planning Committee, I would like to submit my POSITIVE statement FOR the 202 South Mountain Freeway. The residents that have moved here since 1993 have all been aware that this freeway was going to happen and was voted in by the taxpayers in 1985. We understood the impact this Freeway would have on our lives and we committed to move here with that knowledge. I have watched the videos provided, looked at all the material on the site and in person, and agree that this is a project that not only the local area needs but, will help to connect the commuters from around the valley and give much needed relief from our existing freeway system.

As far as the EIS goes, I would hope that this freeway is built with the same attention to detail, wildlife, and preservation as the rest of the valley. Enhancements like rubberized asphalt, sound barriers, and esthetically pleasing on and off ramps. Keeping true to the rural and farming traditions that have always been in the Southwest Valley.

Claudine Reifschneider
Laveen Community Council
Officer/Past President
Laveen Village PlanningCommittee
Commissioner
602-758-1902

"Start where you are, use what you have and do what you can." - Arthur Ashe

Code	Issue	Response
1	**Public Involvement**	Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Proposed South Mountain Freeway
Date: Monday, July 15, 2013 11:21:17 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Mary Ann Reith [mailto:mareith@cox.net]
Sent: Monday, July 15, 2013 11:19 AM
To: Projects
Subject: Proposed South Mountain Freeway

1 Build it!

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 1:49 PM
CALLER: GERALD RENDY	CALLER ADDRESS: 6508 N. VILLA MANANA DRIVE, PHOENIX, AZ 85014
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the building of the 202 Extension	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Reva Lusion
To: Projects
Subject: No to South Mountain Freeway Expansion
Date: Monday, May 27, 2013 8:56:23 PM

Hello,
I'm a resident of Arizona. I am emailing to state my opposition and demand that South Mountain Freeway planning be brought to an end, once and for all. While Scenario A is the closest to a desirable plan, extreme shifts in the state's focus on public transit and bike lanes must be stepped up beyond this proposal's current state. 1

ADOT's development of the Tentative Five-Year Transportation Plan due to budget restraints makes it apparent that not only is South Mountain Freeway an economic detriment, but a cultural and environmental disaster waiting to happen. 2

The participation of (insert office name) in the destruction of South Mountain is a clear indication that it does not uphold the best interests of the O'odham tribes and local communities of Awhatukee and Laveen. 3
• This mountain is held sacred by all O'odham tribes. This type of damage is irreversible and no amount of monetary compensation would ever replace this sacred natural treasure. 4
• After 30 years of this freeway's planning, an Environmental Impact Statement (EIS) has still not been presented. 3
• The freeway would impose on a critical wildlife corridor for various threatened desert animals and fragile ecosystems unique to both the Estrella and South Mountain ranges. 5
• It is well-known that Phoenix city's and surrounding areas' air quality is becoming increasingly harmful to residents. Building this freeway would further spread poor air quality in part of the Phoenix valley. 6
• Allocating funds to forms of transportation that lead to further environmental degradation will only take Arizona residents down a road to increased health risks that will eventually drive more individuals to leave the state. 7
Statewide communities oppose your further involvement in the environmental, cultural, and sacred destruction of South Mountain. 8

Thank you,
Reva

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Design**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
3	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Section 4(f) and Section 6(f)**	
5	**Draft Environmental Impact Statement**	The Draft Environmental Impact Statement for the South Mountain Freeway was released to the public on April 26, 2013.
6	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Air Quality**	
8	**Health Effects**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, July 08, 2013 8:49:02 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Ey5147@aol.com [mailto:Ey5147@aol.com]
Sent: Saturday, July 06, 2013 6:08 PM
To: Projects
Subject: South Mountain Freeway

1

YES.....this freeway should be built....plain and simple....the reason: it will send part of the 1-10 traffic away from the Phx area, creating a lesser traffic buildup, especially around the Broadway Curve. There is plenty of land to consume. I hear that some of the land is on Indian property and considered sacred....well, build the freeway, and give them back some of the cost. Building the freeway will also create a lot of job, for an extended period of time! Plus, build a QuikTrip along the freeway, and I guarantee people will go there for gas or other items.

It's time to break ground, and get the construction people building the new South Mountain Freeway!

Brad Rex
Phoenix

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Trent Rhodes Document Created: 5/24/2013 1:10:44 PM by Web Comment Form As a resident of Laveen, I am very much in favor of building this freeway. We need it in order to bring more businesses to this area like a hospital, restaurants, and retail shops. It will also help to reduce traffic going through downtown Phoenix on I-10. As Laveen continues to expand, Baseline and the other major streets in the area will keep getting increased traffic until the highway is built.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202
Date: Tuesday, July 16, 2013 10:09:01 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Trent Rhodes [mailto:trentr9@cox.net]
Sent: Monday, July 15, 2013 4:01 PM
To: Projects
Subject: Loop 202

1

I support the construction of the South Mountain Freeway. As a resident of Laveen, I believe that it will bring businesses and jobs to the community. It will also decrease the amount of traffic going through downtown Phoenix on I-10, and will provide Laveen residences with much shorter commute times to the east and west valleys.

Sincerely,

Trent Rhodes
8209 S 45th Lane
Laveen, AZ 85339

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 2:20 PM
CALLER: TOM RICE	CALLER ADDRESS: 2934 NO. 47TH STREET, PHOENIX, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, I want to voice my support of the South Mountain Loop. I think it would help with freeway congestion during both rush hours. Thanks for hearing me.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Monday, July 15, 2013 3:12:02 PM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Minnie (Mini) Richards
Sent: Monday, July 15, 2013 3:11 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

Jul 15, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.
(3) ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Alternative. Thank you.WE MUST BE PROTECTIVE OR OUR AREA WILL DECLINE ENVIRONMENTALLY AND AS A DESIRABLE AREA!

Sincerely,

Mrs. Minnie (Mini) Richards
!882 W. Lantana Dr.
Chandler, AZ 85248-2170
(480) 812-0172

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Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Sierra Club on behalf of Jacki Richards
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 3:06:22 PM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) (4) (5) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief while at the same time permanently damaging our beautiful park and the wildlife that inhabits it. We are so blessed here in the Valley of the Sun to have this wondrous park right in the middle of our city and it would be a disgrace to ruin that for the benefit of some that need to get to where they are going a little sooner. This will not reduce traffic -- the only way to do that is get cars off the road. The negative permanent effects of this freeway plan are permanent to our park, our wildlife, our air, our community.

(3) (4) (6) Please do not damage South Mountain with this disastrous build plan

(3) (4) It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(2) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Ms. Jacki Richards
2083 E Laguna Dr
Tempe, AZ 85282-5965

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Biology, Plants, and Wildlife**	
5	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 3:24 PM
CALLER: ROBERT RICHARDS	CALLER ADDRESS: 13038 NORTH 13TH LANE, PHOENIX, ARIZONA 85029
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I thought for years they ought to get that freeway in process down there. It would really impact the other freeways. Take some of the heat off from them especially in Ahwatukee. I would be a faster way to get around and I'm fully in support of that. So, thanks, bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Aimee Richardson

Document Created: 5/22/2013 1:53:01 PM by Web Comment Form

Wy we need to build the 202 –

It's voter approved, better for the environment (less exhaust than cars at a standstill due to congestion), little impact to displacement of families (City/State owns 90% of the land), no impact to Gila River Indian Reservation, and minimal impact to South Mountain Park. No current access to healthcare, more taxes in mean more revenue for schools (which are already strapped for resources), 4.5MM dollars is lost tax revenue (based on BLS data) to other cities because we shop in Glendale Avondale Chandler. Current road infrastructure is not made to support the traffic as it stands (Laveen doubled in size and will continue as forecasted to double again) BASELINE AND DOBBINS ARE ALREADY CLOGGED WITH TRAFFIC. THE PAVEMENT IS ALREADY COLLAPSING DUE TO OVERUSED DUE TO TRUCKING TRAFFIC. We need this freeway!

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: WHY WE NEED THE 202
Date: Wednesday, May 22, 2013 1:11:58 PM

From: surfnvolley63@yahoo.com [mailto:surfnvolley63@yahoo.com]
Sent: Wednesday, May 22, 2013 11:56 AM
To: Projects
Subject: WHY WE NEED THE 202

Wy we need to build the 202 –
It's voter approved, better for the environment (less exhaust than cars at a standstill due to congestion), little impact to displacement of families (City/State owns 90% of the land), no impact to Gila River Indian Reservation, and minimal impact to South Mountain Park. No current access to healthcare, more taxes in mean more revenue for schools (which are already strapped for resources), 4.5MM dollars is lost tax revenue (based on BLS data) to other cities because we shop in Glendale Avondale Chandler. Current road infrastructure is not made to support the traffic as it stands (Laveen doubled in size and will continue as forecasted to double again) BASELINE AND DOBBINS ARE ALREADY CLOGGED WITH TRAFFIC. THE PAVEMENT IS ALREADY COLLAPSING DUE TO OVERUSE OF TRUCKING TRAFFIC.
PLEASE BUILD THIS FREEWAY TO HELP LAVEEN.
Aimee Richardson
2770 W. Cheyenne Drive
Laveen AZ 85339

1

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Terry Richardson
5218 W. Gwen
Laveen, Arizona 85339

I would like see the L202 built on the preferred route for the following reasons:

1) The Avenues between 43rd and 67th avenues and the Salt River and I-10 have a very high concentration of businesses, including major trucking companies, a tank farm, and large warehouses. These businesses have heavy truck traffic day and night. To locate the new L202 away from these businesses would only add to the present gridlock.
2) I live south of the Salt River in Laveen. The 59th Avenue preferred route would add an additional bridged river crossing for the folks living west of 59th Avenue, south of the river. This would give some relief to Baseline Rd. and 51st Avenue in the morning rush hours.
3) I am not for putting the L202 on the Gila River Indian Community (GRIC). They have not approved it and it is not necessary. The Tribe would have to take another vote, which may not pass. The delay will cost us dearly. Just by waiting two years, the cost can increase 10 percent simply due to inflation, along with stunting the grown of the southwest Valley. I don't think there should be any exit or on-ramp to the L202 south of Baseline because this may encourage truckers to use 51st Avenue to get to the freeway.
4) The Laveen and GRIC residents would like to get rid of the big truck traffic using 51st Avenue. If another route is chosen it would be too far away from the truckers, forcing them to continue using 51st Avenue, which I don't want to see. If another route is chosen it would not be reasonable for local traffic to go to west in the morning to cross the River on the new L202 to catch I-10.
5) I hope that ADOT and FHWA would realize that the L202 is more than just a bypass; it is a key part of our community's infrastructure and needed to grow the southwest Valley. If done right it can quiet the neighborhoods, provide easy access for local businesses, and stimulate new and targeted growth. It should be built as soon as possible, with the idea of efficiency and getting the most for our hard-earned buck.

Terry Richardson

1

Code	Issue	Response
1	**Design**	As part of the proposed freeway, there are interchanges planned at Dobbins Road, Elliot Road, and 51st Avenue (see page 3-51 of the Final Environmental Impact Statement). As noted in other areas of the comment and in the Final Environmental Impact Statement on page 3-29, the proposed freeway would reduce traffic on 51st Avenue in 2035 in comparison to the No-Action Alternative.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/19/13	INCOMING CALL TIME: 5:54 PM
CALLER: MARGIE A. RICO	CALLER ADDRESS: 8434 N. CENTRAL PHOENIX, ARIZONA 85020
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Document Created: 5/22/2013 6:40:17 PM by Web Comment Form

To whom it may concern:

1 2 3 3 2 2

I oppose building the South Mountain Freeway. Such a freeway will increase urban sprawl, destroy natural habitats, and eradicate open space that enhances the quality of life for those in the Phoenix metropolitan area. South Mountain Park is one of the few natural wonders in this area. It is one reason why many people enjoy visiting this area and why some people choose to move here. It adds a great deal to the quality of life in this region. To bisect South Mountain Park would be a terrible mistake that would negatively affect the quality of life and natural beauty of this area. It would also destroy natural habitats and dissect wildlife corridors. Finally, the destruction of South Mountain Park would have a negative economic impact. It is one of the few jewels of this area, it is the largest urban park in America, and it helps to give Phoenix a unique image and reputation as an outdoor mecca. South Mountain Park is too valuable to sacrifice.

Sincerely,

Dr. Karyn Riedell

Code	Issue	Response
1	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Section 4(f) and Section 6(f)**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO on South Mountain Freeway
Date: Wednesday, May 22, 2013 10:50:00 AM

From: Karyn Riedell [mailto:karyriedell@yahoo.com]
Sent: Tuesday, May 21, 2013 3:32 PM
To: Projects
Subject: NO on South Mountain Freeway

To whom it may concern:

1
2 3
3 2
2

I oppose building the South Mountain Freeway. Such a freeway will increase urban sprawl, destroy natural habitats, and eradicate open space that enhances the quality of life for those in the Phoenix metropolitan area. South Mountain Park is one of the few natural wonders in this area. It is one reason why many people enjoy visiting this area and why some people choose to move here. It adds a great deal to the quality of life in this region. To bisect South Mountain Park would be a terrible mistake that would negatively affect the quality of life and natural beauty of this area. It would also destroy natural habitats and dissect wildlife corridors. Finally, the destruction of South Mountain Park would have a negative economic impact. It is one of the few jewels of this area, it is the largest urban park in America, and it helps to give Phoenix a unique image and reputation as an outdoor mecca. South Mountain Park is too valuable to sacrifice.

Sincerely,

Dr. Karyn Riedell

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Code	Issue	Response
1	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
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3	**Section 4(f) and Section 6(f)**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:03 PM
CALLER: JULIE RILEY	CALLER ADDRESS: 11837 S. KI ROAD, PHOENIX, AZ 85044
PHONE: 480-496-4585	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 7:00 PM
CALLER KEVIN RINGGER	CALLER ADDRESS: 17903 W. BANFLAME, SURPRISE, ARIZONA 85388
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I'm calling in support of the South Mountain freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Robert Ringwald Document Created: 5/7/2013 12:03:00 PM by Web Comment Form This is a much needed project which will greatly improve freeway congestion by allowing traffic including trucks bypass downtown Phoenix.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Wyatt Ringwald Document Created: 5/21/2013 5:33:05 PM by Web Comment Form I am for the new freeway. It will help reduce traffic congestion.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Wyatt Ringwald Document Created: 5/21/2013 5:34:34 PM by Web Comment Form I am for the south mountain freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Shelley Ringwald Document Created: 5/21/2013 5:36:13 PM by Web Comment Form I support the new freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 south mtn.
Date: Monday, May 20, 2013 8:42:07 AM

-----Original Message-----
From: r3308@netzero.com [mailto:r3308@netzero.com]
Sent: Friday, May 17, 2013 6:54 PM
To: Projects
Subject: 202 south mtn.

1

I approve it...

Jerry ritter

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

create is pollution, contamination, poor air quality, and it doesn't make sense in this year of 2013.

So please take those opinions and make sure that you know that I represent Arizona and many people that can't be here today, and certainly in my community. Thank you.

THE FACILITATOR: Thank you. Haley Ritter.

MS. RITTER: Good morning, panel members. Thank you for letting us speak here today. My name is Haley Ritter. And I live off of 23rd Avenue and Camelback. There's a lot of horrible uranium mining going on up north, which is poisoning communities, leaving children waiting for kidneys and things like that. That type of waste is going to be transported on a type of freeway like this, which is also going to contaminate when those types of hazardous chemicals pass through. And we need to, like other folks have been saying, we need to look to alternatives means of sustaining our community.

This national park and this sacred mountain are very, very important to Arizona, and the livelihood of the species, the remainder of endangered species that live there, for example. The native community would be, and the folks that live in

Code	Issue	Response
1	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Cultural Resources**	
4	**Biology, Plants, and Wildlife**	

Code	Comment Document

4

5

6

7

the scheduled pathway to build this freeway are going to be horribly displaced, and there's way too many things that we need to be doing instead.

Like other people have been saying, we need to focus on the streets, the Complete Streets Program, my understanding, is a wonderful proposal. Take all those billions of dollars, put them back into the streets, enhance the city itself rather than building another freeway. We don't need more freeways, we've got plenty. We don't want this to look like L.A. It -- these are outdated ideas; they really need to be put aside for now and thrown out.

So please move forward with sustainable means, you know. We need to get bike lanes on all the streets. I've lived in Phoenix for 20 years and I've ridden a bicycle everywhere. I take the public transportation, and it's very challenging to ride a bicycle legally on the streets with cars, you know, swiping by me going 50 miles an hour.

You know, there's streets that have nine lanes of traffic, vehicle traffic, and no bike lanes without any buffers between the pedestrians and the streets. And there's a lot more people riding bicycles today to stay in shape, and to get around the city, because it's really not that difficult,

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www.drivernix.com

Code	Issue	Response
5	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
7	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

7

even with the heat. I've done it for 20 years.
So please, please don't approve this idea for the 202 Freeway. It's very unnecessary. Supply and demand are not high enough for this type of project. Thank you.
THE FACILITATOR: Thank you. Has Prem Goyal returned? Did I pronounce your name correctly?
MR. GOYAL: Yes, thanks. I won't take three minutes. A good question is I was looking at the curves, which are growth curves, they are based on 2005 data; they should be based on 2013 data. And I have the newspaper cuttings every day that you did at least expect lower demand. That directive curve leads to the expansion of the future demand of the transportation. Only way they can project the future demands is from the utility demands. It looks like we should verify those curves, as the [unintelligible] president said, trust but verify. All those curves have been verified, or they're just ten years old, which don't mean very much in today's environment.
Thanks very much. Have a good day.
THE FACILITATOR: Thank you very much.
Greta Rogers. Greta Rogers.
MS. ROGERS: Good morning. Let's turn

Code	Issue	Response

Code	Comment Document

4419

going to revolt or do something like that. But I don't think that's fair, you know. And I would just like to, you know, kind of let the people know, you know, what's going on, because they won't let news medias or reporters go to their meetings or anything, and nobody knows, you know, what's going on out there.

So I just thought maybe I could make a little comment that -- you know, let them know how I feel about it. So that's it. That's it. Thank you.

MS. RITTER: My name is Haley Ritter, H-a-l-e-y, Ritter, R-i-t-t-e-r, and I live in Phoenix, 85015 area, district 4.

I'm excited about the upcoming city council elections, because I think a lot of the younger people coming into leadership in this city will realize that we can't keep building freeways.

I'm against the 202 because there's a lot of pollution going through the city already. The uranium mines up north in Flagstaff and surrounding communities are very, very harmful for that community up there. And then the toxic chemicals that are being hauled through Phoenix and then through the South -- South Mountain Gila River Community if the 202 is built are going to be horrible to the environment.

There have been plenty of environmental

1

Page 4

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www.drivernix.com

Code	Issue	Response
1	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

impact studies done already that show that it's not a good idea. It's going to cause a lot of destruction for the city.

And there's a lot of people around the world that come to Phoenix for South Mountain because it's a beautiful natural park -- national park. And it's a sacred mountain for the surrounding Native American community.

And I've -- I've ridden a bicycle around the city for 20 years now. And it's not that difficult. We don't need more vehicles, more traffic, more freeways. We need less vehicles, less freeways, less traffic.

All that money being hoarded for such a project needs to be deterred into the streets that exist already as they are. In Phoenix they're crumbling beneath us. There are no bike lanes on most of them. And the pedestrian walkways are so hot and unbearable that people can't travel that way. So we need to -- I'm in support of Mayor Stanton's proposal to put 1.5 million of that money in -- back into the streets, into the Complete Streets program suggested by the federal government for major cities like Phoenix to -- to invest all that money in local community and local businesses and people that need it rather than more freeways for huge industries that are destroying the planet.

Page 5

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www.drivernix.com

Code	Issue	Response
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Cultural Resources**	
4	**Purpose and Need, Old Plan or Use of Old Data**	
5	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

So in conclusion, I guess, I just want to make sure that -- that all these comments against the freeway are realized and heard, and I want to make sure that this project does not go through to the highest bidder or whoever. It's become a private project anyway. It's all about money at this point. And I want to see the streets improved. I want to see more bike lanes. I want to see Complete Streets passed and moved forward with. And I support Mayor Stanton, in that I do not support the 202 Freeway.

Thank you very much. I appreciate your willingness to hear my comments.

If you could add something to that, one of the pro-202 speakers mentioned that we need a freeway in order to build a hospital in Laveen. And I believe the complete opposite is true. We need a hospital in Laveen before we build a freeway. We don't need a freeway to get to a hospital.

That's all.

MS. GARZA: Well, my name is Anna Garza, A-n-n-a, G-a-r-z-a. I am a living resident in ZIP Code 85239. And I'm here to share my comments.

I feel it is time to build the South Mountain Freeway. Our Valley commuters have waited long enough. In the meantime, we are -- we have traffic jams,

Code	Issue	Response

Code	Comment Document

From: GcrBusinesses
To: Projects
Subject: Loop 202 Extension Feedback
Date: Sunday, May 26, 2013 9:56:17 PM

Hello,

1 Since this project has been conceptualized for about 30 years, please give the Gila River Indian Community another year or two to get their act together and "see the light". Don't all of a sudden be rushed into a bad decision. If we have waited 30 years, we can wait two more!

If they (GRIC) accept a path at least one half mile south of Pecos Road (on vacant, unused land), everyone will benefit.

2 It is simply logical to put the highway on worthless, vacant land instead of tearing up developed Ahwatukee. Does logic and common sense matter anymore?

No matter how many facts you shove at environmental wackos, they live in their own little bubble world and simply say "no" to anything involving development. That is how brainwashed they can be. Ignore them.

Thank You,

George C. Ritz
(Concerned Ahwatukee resident)

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

5050

MR. RIVERS: So the first thing I want to do is talk about where I'm from. And I'm from a village called Vahki, V-a-h-k-i. And that translates into "medicine house" or "a sacred house." And my family has been there for a long time. I don't know how long, but we know that it's several, probably, millennia as far as we understand.

I am a member of the Gila River Indian Community. But, more importantly, I am an O'oodham, which is the people that live on this land. The O'oodham have a history that dates back several thousand years. Archeologists talk about the Huhugam, or Hohokam, who we are descendants of.

And we were given this specific responsibilities, to take care of this land, and, if we were to take care of this land, this land would take care of us.

So I just wanted to mention that much about the culture.

But I want to go into today and some of the issues that we're looking at and why it's important for us to address this issue about a 202 Freeway, specifically a freeway that will impact some of our most sacred cultural areas and sites.

The United States in 2008, along with other member States of the United Nations, supported the UN Declaration on the Rights of Indigenous Peoples. And in 2010 President Obama supported, moved even further and said that he would do anything to support the rights of indigenous peoples; and that

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Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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being specifically that the first people, the original people of these territories, human rights have been violated, so much so that we have been placed on reservations and quarantined, to some degree.

The other -- The concern about that is, though I -- Though I understand that the United States is supporting the Declaration on the Rights of Indigenous Peoples, we still struggle to have our basic human rights needs when it comes to our culture and our tradition and our spirituality.

And those are all English terms that are not -- that are difficult to translate as Native people. But what we recognized is that all of us, even our white brothers, our non-Native people, have some sort of awareness of the spiritual connectedness to their God.

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We, as O'oodham, believe that this area, this South Mountain area, is one of the most sacred connections to our himduc, our way of life. And, if we lose -- continue to lose that way of life, we will cease to exist.

And by that I mean that we can adapt and adopt and even go so for as to assimilate into another culture. But that's all we're doing; we're assimilating.

If we are a distinct people, a distinct people from all other people, who have a different idea of religion and cultural ties to a sacred place or a sacred land, then what is the -- an agency like the Arizona Department of Transportation,

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(Comment codes begin on next page)

Code	Issue	Response
2	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
3	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.

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or the other agencies that are Federal agencies and under the umbrella of the United States Government, doing to protect those sacred sites or those very basic needs, the human rights of indigenous peoples, especially the O'oodham people, the Gila River Indian Community.

So there are a lot of -- a lot of things that we need to address here. And, specifically, I want to talk about the environmental impact. What will the environmental impact look like?

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We know that Phoenix is one of the largest urban islands anywhere, urban heat islands. We know that there's -- this urban sprawl has an impact on our territory. And our territorial boundaries are being impacted by the encroachment of large development and population growth.

So we are forced to -- to live under this pollution, under this -- this environment that's taking place. And that environment is that it's not -- We are concerned about the health and the future of our children. We've seen a 60 percent increase in the asthmatic-related problems here.

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We have always seen South Mountain as a buffer to the city. But now we see the encroachment, and we see the expansion of it. It's now impacting. So it, environmentally, is impacting us. Physically, it's impacting us. It's creating many more lung problems for our people.

As a population that already suffers from certain

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Code	Issue	Response
4	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	
7	**Cultural Resources**	Indirect impacts such as damage to archaeological sites as a result of increased access as a result of the freeway are being considered in the environmental impact statement process (see proposed mitigation beginning on page 4-146 of the Draft Environmental Impact Statement).

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medical illnesses, diabetes being one of them, how do we, then, as a society, as an indigenous -- as distinct people, protect our people for -- from the future of all these other impacts, specifically the environment?

We are here to protect this environment. We are here to live distinctly in this environment, but we can't if we're being forced -- if we're being forced to adopt or to live next to another freeway. So that was the issue on the air quality.

The second is -- and for specific reasons, I can't go into the cultural sites and what they specifically mean to our people because that is our cultural protection. So the concern that I have is the access to these sites by non-Native people. For decades and millennia, we have visited these sites and prayed at these sites. We don't disrupt these sites. But we know that, with the increased population and increased visibility and awareness from non-Native communities, they will come and in and destroy and take some of these petroglyphs and these -- maybe some of these things that are there that are sacred to our community.

Lastly, I want to say that, because these Federal agencies are involved, the issue of free prior and informed consent, with indigenous peoples and populations, has not been taking its proper course by these Government agencies under the United States Federal Government. And that is a priority to

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Code	Issue	Response
8	**Public Involvement**	Arizona Department of Transportation and Federal Highway Administration solicited input from the Gila River Indian Community and other Native American tribes and tribal members and considered fully the substantive input and comments that were received. Consultation related to cultural resources strictly followed the requirements of Section 106 of the National Historic Preservation Act. Project communication with Gila River Indian Community officials followed a protocol established for this study, from years of previous coordination recognizing the sovereign nation status of the Gila River Indian Community and with respect for the Gila River Indian Community's cultural norms. Coordination occurred one-on-one with the appropriate Gila River Indian Community officials. Representatives from the Gila River Indian Community participated for years in the South Mountain Citizens Advisory Committee. During the public comment period, Gila River Indian Community members were provided the same opportunities to attend the public hearing and participate in a public forum as all other populations.
9	**Cultural Resources**	The communication protocol established for this study, from years of previous coordination and with respect for the Gila River Indian Community's cultural norms, was conducted in a "government-to-government" nature (i.e., the Arizona Department of Transportation Project Manager would speak directly to the Gila River Indian Community Manager; the Arizona Department of Transportation Communications Director would speak directly to the Gila River Indian Community Public Involvement Officer). Coordination occurred one-on-one with the appropriate Gila River Indian Community officials.

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Native people, that they have to have community comments, not just government-to-government relationship comments, but people that will be directly impacted by a freeway that goes through our territory.

So, as a member of the Gila River Indian Community, I oppose this freeway because of the -- the things that I mentioned: the air quality, the environmental impact, the cultural significant sites to our people. And, lastly, our way of life will cease to exist if we continue to allow people and governments and corporations to develop and destroy our territory.

That's it.

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LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. I AM AGAINST THE CURRENT PLAN AND ALIGNMENT AS IT STANDS TODAY. THE DELAYS HAVE RESULTED IN UNPLANNED ADDITIONAL COSTS AND ACQUISITIONS WHICH WERE NOT DETAILED AT THE TIME PROP 400 WAS APPROVED. THE DELAYS HAVE ALSO RESULTED IN DECISIONS TO NOT BUILD BELOW GRADE IN AREAS CLOSE TO RESIDENCES, AND INCLUDE OVERPASSES AND NOISE ABATEMENT WALLS. ONE OTHER MAJOR SORE SPOT IS THE DAMAGE THAT WILL OCCUR TO THE MOUNTAIN PARK AND HIKING TRAILS THAT I'VE USED EXTENSIVELY FOR THE PAST 20 YEARS. I AM ALSO ~~CEI~~ NOT CONVINCED THAT THE IMPACT STUDY HAS ACCURATELY DEPICTED THE AMOUNT OF

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Optional

Name ROBERT ROACH Email jaschiva@cox.net

Address 637 W. MUIRWOOD DR

City PHOENIX State AZ Zip 85045

Phone 480 460 3078 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Construction**	The cost estimates for the proposed freeway, as described beginning on page 3-59 of the Final Environmental Impact Statement, were developed in accordance with accepted engineering practices by professional engineers. The project has been subject to multiple peer reviews of both the quantities and unit costs used in the estimate by the Arizona Department of Transportation, Federal Highway Administration, Maricopa Association of Governments, and their consultants. In each case, the estimate was found to be reasonable and accurate. The proposed project is part of the *Regional Transportation Plan* for the Maricopa County region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources.
2	**Acquisitions and Relocations**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
3	**Design**	Depressing the proposed Pecos Road sections would entail installation of pump stations to drain the main line freeway. A depressed freeway would also need a drainage channel to capture the off-site flows to prevent their entering the freeway. Pump stations were not used because of the high cost of construction and maintenance needed for their operation. The preferred freeway configuration would have the E1 Alternative aboveground and the existing culverts extending to pass the drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Depressing the freeway in this area would eliminate the existing culvert crossings and potentially have adverse flooding impacts on adjacent properties. Extending the existing culverts or upsizing the culverts would maintain or improve drainage flows. This would ensure that there would be no adverse flooding impacts on adjacent properties. (See Final Environmental Impact Statement pages 3-15 and 3-18.) To reduce impacts by depressing the proposed freeway in the Eastern Section, the Arizona Department of Transportation would: · need to spend an additional $400 million for right-of-way acquisition and construction · displace an additional 300 residences · maintain additional pump stations and detention basins for the life of the freeway · observe noise-related impacts requiring mitigation (i.e., noise barriers and their associated costs and visual impacts) Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study.

(Responses continue on next page)

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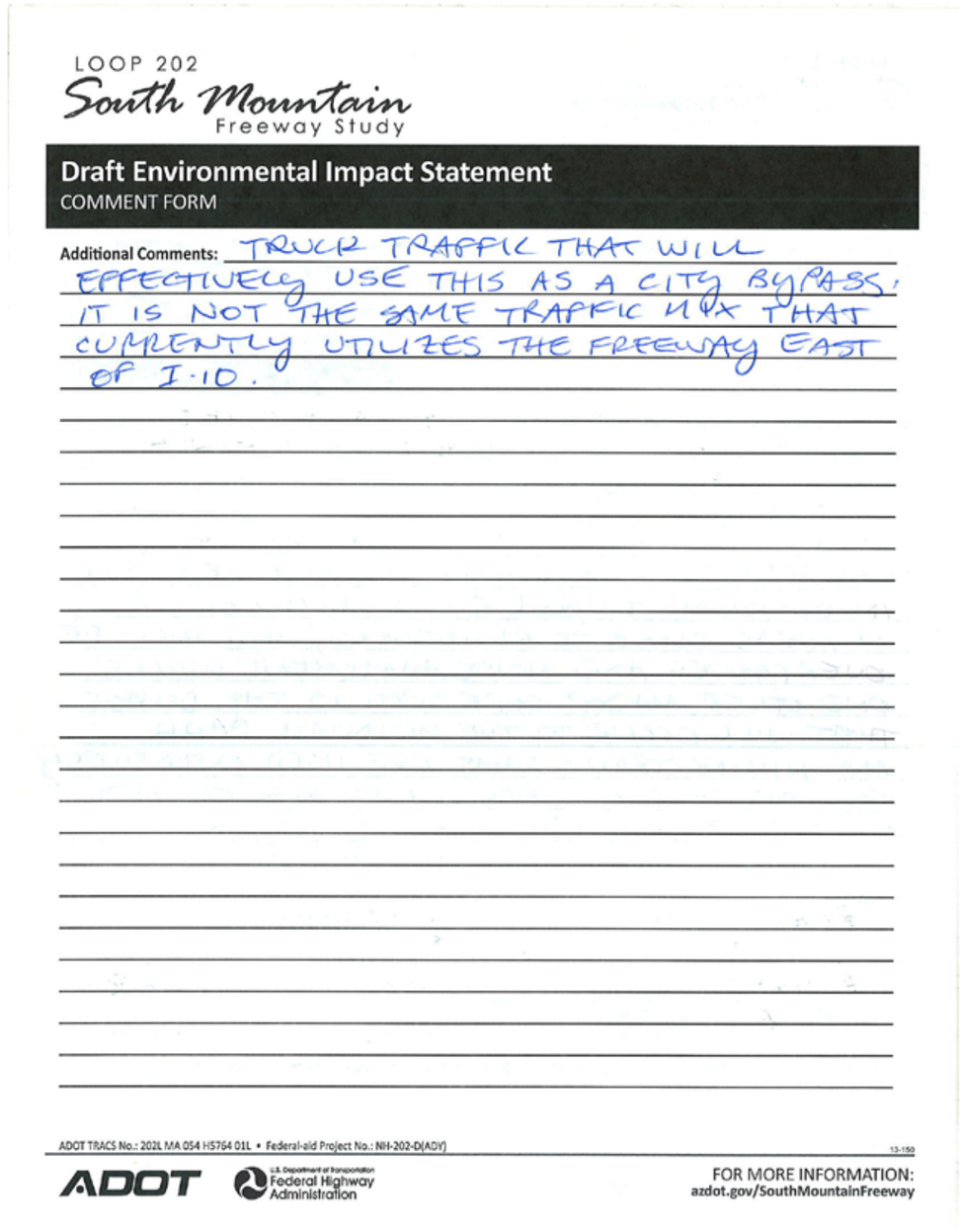
7	

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: TRUCK TRAFFIC THAT WILL EFFECTIVELY USE THIS AS A CITY BYPASS. IT IS NOT THE SAME TRAFFIC MIX THAT CURRENTLY UTILIZES THE FREEWAY EAST OF I-10.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
4	**Design**	For most of the alignments of each of the action alternatives, the proposed freeway would be elevated above the natural grade of the surrounding land. This elevated profile would allow noise to carry farther, creating noise impacts at greater distances from the freeway. Depressing the profile of the freeway below grade might reduce traffic noise levels adjacent to depressed sections. However, it would be necessary to also construct at-grade noise barriers to achieve noise reduction goals at receiver locations adjacent to depressed freeway sections (see page 4-99 in the Final Environmental Impact Statement). This strategy would reduce visual impacts associated with high noise barriers on elevated freeways, but would entail ground-level noise barriers and their associated interference with views. Thus, with either approach to noise reduction, views of nearby mountains could be disrupted. The specific impacts would depend on the geometrics of the height of any noise barriers constructed, the intervening topography, and the distance of the barriers from the residences in question. A depressed freeway option was evaluated in the Final Environmental Impact Statement and is described on pages 3-15 and 4-99. Although depressing the freeway would reduce noise levels, noise walls would still be needed to further reduce noise to meet the Arizona Department of Transportation noise policy. Whether the freeway is built aboveground with tall walls or belowground with shorter walls, the final mitigated noise levels would be nearly the same at nearby residences.
5	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Section 4(f) and Section 6(f)**	Impacts on Phoenix South Mountain Park/Preserve have been important considerations since the freeway was first proposed in the mid-1980s. The Draft Environmental Impact Statement discusses how the proposed freeway would affect the park, beginning on page 5-14. None of the existing trails would be directly affected by the proposed freeway. The proposed freeway would introduce noise impacts to those areas of the park close to the freeway, but noise levels would rapidly diminish with increasing distance from the freeway. The trail segments near the proposed freeway are used for active recreation such as running, hiking, and biking, the noise sensitivities of which would depend on the specific activity, user, and time of day.
7	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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5035

1 ROBERT ROACH: We were just out talking
2 about the fact that I haven't seen any evidence that they
3 have taken into account the amount of truck traffic as
4 it's going to be used as a bypass unlike any other loop
5 in the Valley. I haven't seen any evidence that they
6 have taken that additional truck traffic into account
7 when they were assessing whether to build it below grade,
8 above grade, the sound barriers, and things like that.
9 That's really the concern that I had.
10 And I guess I can -- I could see a need to
11 have some sort of a transportation outlet on that side of
12 the Valley. Just the way that they've revised the plan
13 since it was originally incepted till now, it's just very
14 different than when I moved to the Valley back in '93.
15 That's basically -- That's my concern.
16 I knew it was going to be there when I
17 moved in. You know, it was no secret.
18 The fact that it's changed so drastically
19 and the additional cost between the original inception
20 and as we have it now -- the proposition that we voted
21 for, I can't remember exactly what year, that proposition
22 didn't provide enough details about the additional costs
23 that were to be incurred because of the delay and then
24 the decisions made by the City to allow people to build
25 and then acquire and the additional costs seem to be

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Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the proposed freeway in 2035 (see Final Environmental impact Statement pages 3-64 and 4-72). The forecast truck traffic is based on existing traffic studies and projected socioeconomic data. This percentage is similar to current traffic conditions on Interstate 10 between State Route 101L and Interstate 17 and on US 60. Commercial trucks would use the proposed freeway. As with all other freeways in the region, trucks would use it for the through transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary users of the proposed freeway would be automobiles. Vehicle classification counts (2007) from the Arizona Department of Transportation for Maricopa County show passenger vehicles and other nontruck vehicles make up over 90 percent of all traffic on the regional freeway system, and it is expected these percentages would not vary with the proposed freeway. Further, it is not expected that the entire 21 percent of through truck traffic (by tonnage) using Interstate 10 would divert from Interstate 10 to use the proposed freeway (see Final Environmental Impact Statement page 3-64). Trucking destinations in the Phoenix metropolitan area would still prompt trucks to enter congested areas. Choosing to travel on the proposed freeway versus Interstate 10 would not produce substantial travel time benefits. Therefore, it is expected that "true" through truck traffic (not having to stop in the metropolitan area) would continue to use the faster, designated, and posted bypass system of Interstate 8 and State Route 85.
3	**Design**	Depressing the proposed Pecos Road sections would entail installation of pump stations to drain the main line freeway. A depressed freeway would also need a drainage channel to capture the off-site flows to prevent their entering the freeway. Pump stations were not used because of the high cost of construction and maintenance needed for their operation. The preferred freeway configuration would have the E1 Alternative aboveground and the existing culverts extending to pass the drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Depressing the freeway in this area would eliminate the existing culvert crossings and potentially have adverse flooding impacts on adjacent properties. Extending the existing culverts or upsizing the culverts would maintain or improve drainage flows. This would ensure that there would be no adverse flooding impacts on adjacent properties. (See Final Environmental Impact Statement pages 3-15 and 3-18.) To reduce impacts by depressing the proposed freeway in the Eastern Section, the Arizona Department of Transportation would: · need to spend an additional $400 million for right-of-way acquisition and construction · displace an additional 300 residences · maintain additional pump stations and detention basins for the life of the freeway · observe noise-related impacts requiring mitigation (i.e., noise barriers and their associated costs and visual impacts) Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study.

(Responses continue on next page)

Code	Comment Document

hidden to me.

I think that's about it.

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Code	Issue	Response
4	**Design**	For most of the alignments of each of the action alternatives, the proposed freeway would be elevated above the natural grade of the surrounding land. This elevated profile would allow noise to carry farther, creating noise impacts at greater distances from the freeway. Depressing the profile of the freeway below grade might reduce traffic noise levels adjacent to depressed sections. However, it would be necessary to also construct at-grade noise barriers to achieve noise reduction goals at receiver locations adjacent to depressed freeway sections (see page 4-99 in the Final Environmental Impact Statement). This strategy would reduce visual impacts associated with high noise barriers on elevated freeways, but would entail ground-level noise barriers and their associated interference with views. Thus, with either approach to noise reduction, views of nearby mountains could be disrupted. The specific impacts would depend on the geometrics of the height of any noise barriers constructed, the intervening topography, and the distance of the barriers from the residences in question. A depressed freeway option was evaluated in the Final Environmental Impact Statement and is described on pages 3-15 and 4-99. Although depressing the freeway would reduce noise levels, noise walls would still be needed to further reduce noise to meet the Arizona Department of Transportation noise policy. Whether the freeway is built aboveground with tall walls or belowground with shorter walls, the final mitigated noise levels would be nearly the same at nearby residences.
5	**Purpose and Need**	Information related to origins and destinations of motorists that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Final Environmental Impact Statement. The definition of freeway users considers only those motorists who travel through the South Mountains; so, motorists who begin their trips in Ahwatukee Foothills Village and travel east to Interstate 10 (Maricopa Freeway) or motorists who begin in Laveen Village and travel north to Interstate 10 (Papago Freeway) are not counted in the analysis. The analysis of origins and destinations shows that 73 percent of travelers would be involved in trips beginning or ending in the Study Area or areas immediately surrounding it. Seven percent of the trips would begin, end, or begin and end outside of the Maricopa Association of Governments region; ten percent would either begin or end in Pinal County.
6	**Economics, Socioeconomics**	The proposed South Mountain Freeway would be funded by State, federal and local dollars. The total budget for constructing the proposed freeway is $1.9 billion, approved by the Maricopa Association of Governments Regional Council in May 2012. The approved program includes design, right-of-way, and construction of the proposed action. Funding for project-related activities is included in the current 5-year program identified in the regional Transportation Improvement Program as well as in the State Transportation Improvement Program.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Acquisitions and Relocations**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.

Code	Comment Document

5010

MS. ROBB: My name is Mary Robb. In the map there because you don't have a little map that I could show you, okay, I live down in the Foothills reserve up in the mountain, you know, which is fine. I'm a little distance from the freeway where it's going to be, but there's no -- there's going to be no entry for me to go to the freeway. I have to go up -- now they're going to make me go -- take Chandler, which isn't even there now, and go up. You know, I don't know how many miles it would be. It would be a few miles and then come down 17 for me to enter the freeway.

Whereas now, I go to the end of that Chandler, just south, you know, and I just enter Pecos Road. So every time I want to go to the freeway, I've got another six miles to go for no reason. And I figured they were going to put a frontage road that would make like a -- like a straight line to our home to 17th Avenue. So, you know, we'd just bypass -- so a frontage road just bypassing the whole freeway. But, no, they're putting that Chandler thing in up higher and around and it's just crazy.

And then so that's going to make a lot more traffic on 17 too, and there's a lot of homes

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Code	Issue	Response
1	**Design**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange was evaluated but ultimately eliminated because of increased residential displacements and cost. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). There are no provisions for frontage roads connecting 17th Avenue to the residential area to the west. Reasonable access is provided from 17th Avenue and the extension of Chandler Boulevard. Traffic volume on 17th Street in 2011 was approximately 4,500 vehicles per day just north of Pecos Road (see <phoenix.gov/streets/traffic/volumemap>). With the proposed freeway in place, an additional 4,000 vehicles day would use 17th Avenue to gain access to residences west of 17th Avenue. The total daily traffic would be well below the capacity of a two-lane road (approximately 15,000 vehicles per day).
2	**Acquisitions and Relocations**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

over there and they're not going to like that. But if there was a frontage road down towards like running right along the freeway, at least they're saying that it would have to be an entrance and an exit, but why? Why can't it just be an entry for all the -- all those homes that are down there, and eventually they have a thing in front of that where Chandler is going to be put through over to 17. They have a big piece of land. Now, they can put those homes there now.

I mean, it's going to be all new homes there eventually. And if they don't put a frontal road there now, it's going to be even -- you know, they'll do the same darn thing. They're going to knock down a bunch of houses to put a frontage road in, and they aren't planning at all. I just don't see it.

They're going to make -- all our homes are going to be lowered in value. It's totally -- they're going to do -- what they did years ago is they let someone buy that property and they go, well, it wasn't the state's -- you know, it wasn't this, it wasn't that. Well, somebody had to okay it knowing that freeway was there. And it's going to cost $2.1 million to even get so they can even start the darn

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Code	Issue	Response
3	**Acquisitions and Relocations**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.

Code	Comment Document

road.

So I just don't understand why they just can't make us all happy and, you know, they could do a frontal road and do the one -- put Chandler through, but there's just no reason not to. So they're going to wait until -- I think what they're trying to do is they aren't putting a frontal road up there because whoever buys that land and develops it is going to be responsible for that road. So what, 10 years, 15 years. In the meantime, we have to do this big long route just to go to the freeway. It's just -- it's just nonsense.

Code	Issue	Response

Code	Comment Document

From: Mary Robb
To: Projects
Subject: Loop 202 South Mountain Freeway Draft Environmental Impact Statement -COMMENT-
Date: Wednesday, July 24, 2013 8:27:03 PM

July 24, 2013

To: ADOT

(1) My husband and I live in Foothills Reserve in the Sunrise gated community. I am requesting that Liberty Lane be continued west to Chandler as a frontage road. The only way to our community will be Chandler when it is built. The extended Chandler Boulevard going west will be bumper to bumper without the Liberty Lane extended. Also, The only other way we can access our community will be the 17th Avenue exit which also will be bumper to bumper at the exit. Have you ever driven out here during the after work/dinner hour? We could exit 17th Avenue and get the Liberty Lane extension much easier and it will alleviate all the traffic traveling home on Chandler only. If Liberty Lane is not extended 17th Avenue will be blocked to the point people won't even be able to take the exit and also cause difficulty turning onto Chandler to be able to get to our home(s). Also, The 17th Avenue exit/road will be extremely busy and loud going up the hill causing very high level noise (2) and pollution for all the homes backing up to 17th Avenue. This area too is an upscale neighborhood and it is possible that they will decrease in value because of the reasons I indicated. Will ADOT be building higher sound wall(s)on 17th Avenue heading north to Chandler Blvd? (3) (4) I don't believe the existing walls are adequate to handle the forthcoming noise.

(5) (6) If we had a choice we would rather you work with the GRIC Community or just NOT BUILD!

(7) (8) It is hard for us to believe you want to displace so many families and cause so much hardship for so many. Think about it...what if were your community?
I believe all of us in The Foothills Reserve use Pecos Road in and out of our community. Once you take our Pecos Road you are creating a true *One Way In and One Way Out* for all of us living here.

Please extend Liberty Lane as our frontage road.

Thank you!

Arnold Robb
Mary Robb
480-283-8851 (Home)
480-236-2080 (mobile)

Code	Issue	Response
1	**Traffic**	The extension of the Liberty Lane to the west is not part of the proposed project. This road would likely be built in the future along with the development of the State Land Department property. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The daily traffic volume on 17th Street in 2011 was approximately 4,500 vehicles per day just north of Pecos Road (see phoenix.gov/streets/traffic/volumemap). With the proposed freeway in place, an additional 4,000 vehicles day would use 17th Avenue to access residences west of 17th Avenue. The total daily traffic would be well below the capacity of a two-lane road (approximately 15,000 vehicles per day). The residents in the Foothills Reserve currently only have one way in and out of their community, Pecos Road. If the freeway is constructed, there would continue to be one way out of the community, Chandler Boulevard.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
4	**Noise**	As mentioned in the sidebar on page 4-91, the Final Environmental Impact Statement is based on preliminary design and traffic information. As the design progresses to the final design phase, noise barrier locations and heights will be refined and finalized. During final design, more detailed information on the location, actual height, and distance from the property line of each noise barrier will become available. Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered "acceptable" by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.
5	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
6	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
8	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91). The proposed freeway would not adversely affect north–south access because the land immediately south of Pecos Road is Gila River Indian Community land, with no existing north–south access. (See the E1 portion of Table 4-9 on Final Environmental Impact Statement page 4-27.)

Code	Comment Document

From: Lynn Robbins
To: Projects
Subject: Oppose proposed SMF
Date: Wednesday, July 24, 2013 5:19:58 PM

To whom it may concern:

1 2 3 4 5 6 7 8

After living in this beautiful community of Ahwatukee for almost 20 years, I am compelled to write in stark opposition to this proposed UNNECESSARY freeway. We will be about 1/4 mile from the Desert Foothills Pkwy exchange and the attached 8 lane 22 miles of solid concrete. We will be subjected to air and noise pollution as well as crime with the new access in and out of the Foothills. This destruction of natural mountains and desert (not to mention our quality of life) serves no purpose for any of the families that reside in what the Indians call " The place of our dreams. " Those of us who have chosen to buy our homes and decided to spend the rest of our lives here WOULD NOT depend on this proposed freeway. The only people licking their chops would be the truckers and contractors who are looking for a more expedient way around Phoenix.

9 10 11 4 7

We have experienced the wrath of freeways in our backyard in Los Angeles - - and will never go through that again!! There are numerous detrimental effects, not to mention ones health and the impact it will have on the young children as they are trying to develop. Contrary to the hype of rising home prices, in actuality the value decreases as most people want to be able to enjoy the peace and quiet of their backyards, especially those that have a mountain preserve lot with magnificent sunsets. Who wants to sit outside amid the constant 24/7 roar of truck and automobile tires. Currently when I'm outside I hear the gentle hum of AC units and an occasional dog.

We could have lived anywhere in the valley, but chose this little community of Ahwatukee (Our Paradise) because of the tranquility and the beauty of the desert and it sickens me to think that we might be uprooted - to benefit the truckers and contractors who DO NOT live here.

A proud resident of Ahwatukee

Code	Issue	Response
1	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Noise**	
5	**Section 4(f) and Section 6(f)**	
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
7	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
8	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Purpose and Need, Truck Bypass**	
10	**Health Effects**	
11	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:43:56 AM

-----Original Message-----
From: Robert [mailto:worshiphimforever@yahoo.com]
Sent: Friday, May 17, 2013 5:59 PM
To: Projects
Subject: 202

1

Keep building the 202

Sent from my iPhone 5

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:42 PM
CALLER: CONNIE ROBERTS	CALLER ADDRESS: 4632 W. BEVERLY ROAD, LAVEEN, AZ 85339
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support South Mountain Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Kyle Robinson
To: Projects
Cc: Kyle Robinson
Subject: SouthMountainFreeway Input
Date: Sunday, June 02, 2013 6:34:25 PM

I'm a member of the Queen Creek Planning and Zoning commission as well as the Maricopa County's Citizens' Transportation Oversight Committee.
I fully support the South Mountain Freeway.
The Gila River Indian Community chose to not have alternative routs considered on their land. This is unfortunate, as they would have had more authority to dictate requirements and conditions. I feel the loop 101 portion of freeway on Native American land was beneficial to that community as well as their neighbors.

1

Recommended route: Any one of the three 101 routes would be acceptable. The Central or Easter routes would be preferred as being the more efficient. This route would preserve commercial/industrial properties, which to me are critical to a community's overall health and land use balance.

Reasons for support of this freeway:
Estimated increase in area population necessitates additional freeway resources, as well as expansion of public transportation.
Reduced congestion and pollution from stationary or slow moving vehicles would be significantly reduced.
Any loss to communities due to displaced tax revenue, I feel will be more than made up for with future business opportunities.
Reduced regional CO and particulate emissions. Reduced energy consumption.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

up Baseline and the 51st Avenue corridor that is only going to increase when the casino opens its new hotel and restaurants.

There isn't, right now, any way to support the kind of traffic that the Gila River Tribe is putting on their sacred land without the highway.

The alternative, the W59 Alternative, is not going to cause any damage to their sacred land or to South Mountain.

Currently I am thinking that we have to continue with the program of the Loop 202 Freeway because it's the best alternative. It meets the needs of everyone in the community and it's critical for the development of Laveen and to be really a turning point for Laveen right at a place where this community can either move forward and excel and succeed, or you can put us in a holding place and we are going to have nothing but problems when it comes to traffic and the expediential growth we are going to experience in the next ten years.

***

MICHAEL ROBINSON: I oppose the Loop 202 through South Mountain Park near South Mountain

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1
2
3
4
5
1

Park, because I feel it's an idea that has passed its usefulness.

I don't believe that building this freeway would reduce the congestion.

I do think it would encourage sprawl and encourage the waste of the natural resources that we have remaining.

I think the massive amount of money projected to be spent on this freeway could be better spent elsewhere repairing our aging infrastructure throughout the region, promoting public transit, bikes, other alternatives.

I believe it would be a waste of money.

That's all I need.

***

ADAM JOHNSON: I like the 59 Alternative. I feel that brings the community closer to downtown Phoenix.

I think bringing the community together involves bringing the economy up. You connect the cities together, to me it helps the people grow, helps the city connect.

I guess what I am trying to say is putting the 59 in, economically it will help the city

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
4	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
5	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:35 PM
CALLER: ROBINSON	ADDRESS: 55 S. 64TH AVENUE, PHOENIX, AZ 85043
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
We are the Robinson's and support the South Mountain Freeway Loop. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Jesse Robinson
To: Projects
Subject: AZ LOOP 202: opposed!
Date: Wednesday, July 24, 2013 5:58:50 AM

Just emailing to express my opposition to the loop 202 extension.

It is a bandaid solution to a symptom of a larger problem that we've created.

1

There are other ways to relieve congestion on the roads. Put these funds toward expanding the light rail. Or make it easier and safer to ride bikes.

Many Phoenix residents drive because it feels like that's the only option.

What if we became known as one of the most forward thinking cities by becoming champions of new better ways to get around beyond the archaic freeway?

Thanks for reading.

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: robotafamily@gmail.com
To: Projects
Subject: South mountain freeway
Date: Saturday, June 08, 2013 2:45:03 PM

1
2 3
4 5
6 7 2

We wish to voice our strong opposition to the South Mountain Freeway being built on Pecos Road.
The DEIS report mentions the improvement in emissions on cars as a reason why air quality should not be an issue. This will be a diesel TRUCK route. All of the major LTL trucking companies and warehouse are on the west side and will use this route. It will be a truck bypass creating bad air and hazmat issues for Ahwatukee.
The cost of the project is prohibitive and crime in Ahwatukee will increase.
We are affiliated with PARC and hope our financial support to them will help in their litigation of building any such highway.
It's too late to consider this project. Move it elsewhere. This community is already established and you will destroy our way of life.
Respectfully submitted,
Susan and Edward Robota
Sent from my iPad

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Hazardous Materials**	
4	**Purpose and Need**	The project is completely funded through federal sources and a local ½-cent sales tax, as programmed in the Arizona Department of Transportation 5-year Transportation Facilities Construction Program and the Maricopa Association of Governments *Regional Transportation Plan*.
5	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
6	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 7:10 PM
CALLER MONTE RODMAN	CALLER ADDRESS: 18200 W. PARADISE LANE, SURPRISE, ARIZONA 85388
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in support of building that South Mountain freeway and I would really like to see it get going. It sure would ease up on traffic conditions. Thank you. Hurry up build that thing, save me a lot of miles when I go to Tucson. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the 202
Date: Monday, May 20, 2013 8:42:17 AM

-----Original Message-----
From: Shawn Rodrigues [mailto:aporia34@aol.com]
Sent: Friday, May 17, 2013 6:51 PM
To: Projects
Subject: Build the 202

1

Please consider the positive impact building the 202 could have on overall air quality.

Sent from my iPhone

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Wednesday, May 22, 2013 10:51:04 AM

From: Rodriguez, Alfredo UTAS [mailto:Alfredo.Rodriguez@utas.utc.com]
Sent: Tuesday, May 21, 2013 12:36 PM
To: Projects
Subject: Loop 202 South Mountain Freeway

As a resident of Laveen for over 10 years I support the completion of the Loop 202 South Mountain Freeway.

1

I agree with the Environmental Impact Study and the effects it will have on reducing commuting times and reducing the amount of pollution emitted by vehicles in stop and go traffic. In the years I have lived in Laveen I have seen the congestion grow, particularly north along 51st Avenue and east along Baseline Rd. Prior to the widening of 51st Ave and Baseline Rd, traffic would come to a complete stand still near my community, making it nearly impossible to go anywhere during rush hour. Not only that, in the past few years, I have seen the number of car accidents along Baseline increase significantly, as more and more traffic attempts to move toward the East Valley through the busy South Central intersections.

I work in the Downtown area and am also a strong supporter of all of the recent Downtown growth. But I am also conscious of the issues faced along the I-10/US60 commutes to and from the East Valley. If we don't build the South Mountain Freeway, traffic in that region will get much worse. According to ADOT's own study, over the next two decades, traffic on I-10 through Central Phoenix will grow by 28%, another 103,000 cars will use the Broadway Curve each day and another 38,000 cars will jam the Tunnel every day. Morning and evening commute times will increase by up to 82% and traffic congestion on city streets will go up by 46%.

I understand the environmental concerns by some of the opposing parties, but it seems clear that unless the number of residents and the number of vehicles in the Valley decreases, not acting on this project results in even greater detrimental impact. I also agree that it's important to ensure the construction is as unobtrusive and environmentally-friendly as possible. In fact, most residents of Laveen that support the project also request that freeway construction must include means for pedestrian and bike traffic, including but not limited to sidewalks, bike paths and trails.

Finally, the money to build the freeway has been approved by voters twice, first in 1985 and again in 2004. The project will also create 30,000 jobs during the five to six year construction period and result in a $2 billion investment in the Phoenix-area economy. Residents of Laveen have waited long enough for this. Those of us that support our community and have stuck it out through the economic downturn and related housing crisis, are counting on the long term economic growth we believe this freeway will help bring to the area. Laveen was built with this freeway in mind. Without it, the future prosperity of Laveen and the surrounding area is in jeopardy.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Thank you for your time and consideration,

Alfredo Rodriguez

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Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Wednesday, May 22, 2013 10:49:36 AM

From: Ana Karina Camacho Barraza [mailto:karinacamacho9@hotmail.com]
Sent: Tuesday, May 21, 2013 5:11 PM
To: Projects
Subject: Loop 202 South Mountain Freeway

1

I support the completion of the Loop 202 South Mountain Freeway. I live in Laveen and it has been frustrating not to have an alternative and fast way to get to other places. It takes about 15-25 minutes to get to the nearest freeway, sometimes even more depending on the traffic. Traffic has increase in the area. There is a lot of semi trucks through 51st Ave and there have been more car accidents along Baseline Ave. Also, I think this freeway can help bring economy growth to our area. This comunity has increase significantly and we need this freeway.

I agree with other residents of Laveen that it's important to ensure the construction is as unobtrusive and environmentally-friendly as possible and that freeway construction must include means for pedestrian and bike traffic, including but not limited to sidewalks, bike paths and trails.

Thank you for your time and consideration,

Ana Karina Rodriguez

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Code	Issue	Response
1	**Neighborhoods/ Communities**	Measures to mitigate adverse effects of the proposed freeway are presented on beginning on page S-18 of the Final Environmental Impact Statement). There are no plans for bicycle lanes or trails along the proposed freeway alignment. However, the freeway bridge structures will be designed to allow existing and future trails and paths to pass under the freeway. Also, crossroads that connect to the freeway at traffic interchanges would be constructed with provisions for bicycle lanes and sidewalks (see design features beginning on page 3-54 of the Final Environmental Impact Statement)

Code	Comment Document

4304

lucrative for them, now there's not such an uproar about it. So I do believe that we are respecting their values and giving them a voice. But I also believe that there's a louder voice, including that with my community and residents in Laveen and everything, that absolutely this is the right choice and the right direction for growth.

1 MR. RODRIGUEZ: Yeah. Basically, I just want to state my absolute support for the 59th Avenue alternate. That's the priority one right now. I think it's probably -- Well, I know it's the best option based on the city planners of the City of Phoenix. They've expected this for a long time. It's a great benefit to Maricopa County. It's a great benefit to the Valley. And, quite honestly, a lot of people coming from the West Valley, all the way out to Buckeye, eventually, you have to cross 59th.

If it were to go any further west, then people that live on, for example, 51st, 59th, 67th, 75th, 83rd, they're not going to go back to try to catch it at the 101 if they're heading out to the East Valley. It's counterintuitive to what human nature would tell you. So they would just jump on the I-10, currently, and continue to take the regular flow, causing the same problems that we're experiencing downtown, when it comes to major traffic. So I would say 59th Avenue is, without a doubt, the best alternative.

The worst alternative is the one going through

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1		Comment noted.

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Tolleson. Tolleson has been here since 1929. They have given to our state. That city was actually split when the I-10 came in. So, much like Margaret T. Hance and the Deck Park Tunnel, that kind of divided up the -- that broke up the downtown community, the same thing happened in Tolleson. Part of the property is on the northern side of the I-10 and part of it is on the -- on the southern side of I-10. And so it took many years, many decades, for that city to be able to grow back together; and, successfully, it has.

Unfortunately, the north part of it hasn't developed. A lot of it has to do with the disconnection between the government and property owners north of the I-10 corridor or the I-10 freeway.

So, to ask a city of that size -- that's already given so much to the greater part of the state transportation system -- to now divide itself again, with the 101 dividing it right down to 99th Avenue, would be a travesty. So not only for the reasons of Tolleson, but also for the practical reasons of why 59th Avenue would be the top-notch selection.

So, finally, I would say, going back to 59th Avenue, the economic impact of sales-tax revenue to the City of Phoenix, just the developmental impacts to the City of Phoenix; property taxes that we would pay to the local school districts, including Maricopa County Community College districts, would be top-notch. Every single exit off of the 101 on the 59th

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lineup -- 59th connection would be an economic engine. And so it's designed that way. The setbacks are already set up that way. And it would be a -- It would just be a win/win for everybody at the end of the day.

And you're taking that from a person who lives in Tolleson but is employed by the City of Phoenix. So it's a win/win for me because that's how -- that's how I feed my family, with the City of Phoenix.

And the sales-tax revenue coming back to the City would be huge, especially during these -- especially during these difficult economic times. And who knows -- who knows how long it's going to last? But also because, as a long-term, long-time -- actually, life-long resident of the City of Tolleson, I would hate to see what happened to our city many, many moons ago happen again.

And so that, my friend, is what I have to say.

MR. BRENNAN: Another point that I would like to bring up regarding, sort of, a land-use concern of the Loop 202 is, in light of the recent Brookings Institution report that has been publicized in the last week regarding the shift in poverty from more urban to suburban areas around the country, while not being a total shift in the share of impoverished populations, it does illustrate the challenges that more suburban areas are -- are experiencing in trying to address those social problems.

Code	Issue	Response

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From: Sierra Club on behalf of Sue Rodriguez
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 9:06:22 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 3 4 5 Enough roads. Enough encroachment on wildlife. Enough air pollution, noise pollution, people pollution. Enough already!

6 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

2

4 7 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

8 3 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

9 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mrs. Sue Rodriguez
7835 E Cactus Rd

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
3	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Noise**	
6	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
7	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Section 4(f) and Section 6(f)**	

(Responses continue on next page)

Code	Comment Document
	Scottsdale, AZ 85260-5514

Code	Issue	Response
9	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

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even with the heat. I've done it for 20 years.
So please, please don't approve this idea for the 202 Freeway. It's very unnecessary. Supply and demand are not high enough for this type of project. Thank you.
THE FACILITATOR: Thank you. Has Prem Goyal returned? Did I pronounce your name correctly?
MR. GOYAL: Yes, thanks. I won't take three minutes. A good question is I was looking at the curves, which are growth curves, they are based on 2005 data; they should be based on 2013 data. And I have the newspaper cuttings every day that you did at least expect lower demand. That directive curve leads to the expansion of the future demand of the transportation. Only way they can project the future demands is from the utility demands. It looks like we should verify those curves, as the [unintelligible] president said, trust but verify. All those curves have been verified, or they're just ten years old, which don't mean very much in today's environment.
Thanks very much. Have a good day.
THE FACILITATOR: Thank you very much.
Greta Rogers. Greta Rogers.
MS. ROGERS: Good morning. Let's turn

Code	Issue	Response

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this around.

Good morning. I'm Greta Rogers. I live in Ahwatukee, near 48th Street and Elliott, just five miles north of the proposed route. ADOT has been mucking around on this for 30 years. And they're 30 years too late to come on the 202 west of I-10 to blow up the mountain and then go north. We don't need to blow up the mountain, and it isn't because it's a sacred site to me; personally, it is not. But it is a natural benefit to all of us. And part of the South Mountain Park Preserve.

We don't need to do this to facilitate the trucking industry. And I'm talking about those that carry ICC license plates and are hauling freight and 18-wheelers. One of the things that the -- the IES [sic] report that was delivered recently within the past 30 days, the first of any that has ever been delivered. The third allegedly, that ADOT filed with the -- with NQA, and allegedly the first two were returned to them with a big red X on it. Go back to the beginning, follow instructions. They still have not done that.

There is absolutely no indication in this at all for the danger to the communities that will be affected, both on the north and the south sides of

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Purpose and Need, Truck Bypass**	

Code	Comment Document

4

the mountain with the hauling of hazardous materials. Nitrates, fuel, and chlorine. And the existence for clear and present endangerment, i.e., death, if you live within the wind distance of these things being carried by the winds in the event of a crash and an imminent subsequent explosion. And all are.

Nothing -- this is criminal negligence by ADOT to the citizens of this city and by HDR, their $21 million consultant whom they depend upon like they were biblical. They are all guilty of criminal negligence to the citizens directly affected and to the citizens of Phoenix, and I unalterably oppose this. Thank you.

THE FACILITATOR: Please refrain from applause or boos. Be respectful of both build and no-build discussions today. This is a hearing and we appreciate your patience.

Michelle Stewart. Michelle Stewart. Those of you whose names have been registered now to speak, you should make your way to the front of the room; that will help speed this up a little bit.

MS. STEWART: Good morning. Speak this way? Hi, everyone, thanks for -- my name is Michelle Stewart. Thank you for listening to our comments today, and I'm addressing you. And you. I'm an

Code	Issue	Response
4	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 7:27 PM
CALLER JANET WHEELHOWER ROGERSON	CALLER ADDRESS: 17635 W. IRONWOOD ST., SURPRISE, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the Loop 202 expansion plan. Good luck with your project.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Gary Rohr
To: Projects
Subject: South Mountain Study Team - Comment
Date: Tuesday, June 04, 2013 11:25:51 AM

I moved into the Lakewood Community of Ahwatukee in 1988. Back then there was talk of building this loop. I believe Pecos dead-ended at 32nd ST back then and Chandler Blvd looped into Ray Road but didn't go any further. Back then it wouldn't have cost much and it could have made sense to do this project. Back then the land should have been zoned, purchased or whatever to keep it from being developed. Of course it was not. Now it does not make any sense to continue with this project - the cost and disruptions far outweigh any possible benefit. (1) (2) (3) (4)

We now live in the Foothills Reserve community at the end of Pecos - the area you wish to destroy. The quiet secluded area where crime is fairly low due to how hard it is to leave the area. Building the Loop 202 around South Mountain now would open us to all sort of crime. (5) (6) (7)

Will building this Loop easy the congestion on I-10? I seriously doubt it - it's not like the Phoenix metropolitan area is some little hick place that people want to avoid - trucks coming down I-10 need to drop things off in the Phoenix area and pick things up.

Our vote is to not build the South Mountain 202 Loop - save the money and use it for something that will provide more benefit - like either an upper or lower level to I-10 with limited entry and exit points (3)

Gary & Leslie Rohr
3036 W Cottonwood LN
Phoenix, AZ 85045

Code	Issue	Response
1	**Acquisitions and Relocations**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
2	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
5	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Purpose and Need**	In 2035, the average daily traffic on the proposed freeway is projected to range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-62). The estimated volume depends on location. The purpose and need for the South Mountain Freeway are not solely to relieve congestion on Interstate 10 (Maricopa Freeway). Facilitating mobility in the Maricopa Association of Governments region does not mean just relieving congestion on the Broadway Curve (see Final Environmental Impact Statement page 1-21). Among other criteria, the proposed freeway is to permit the entire Regional Freeway and Highway System to function as designed. Optimal function of that design includes completing all the segments of the State Route 202L system (see Final Environmental Impact Statement pages 3-35 and 3-37). With implementation of the South Mountain Freeway, many motorists would be able to get from Point A to Point B, a route that never included needing to use Interstate 10.

Code	Comment Document
1	Scott Rolfe Document Created: 5/21/2013 2:43:58 PM by Web Comment Form Cannot wait till it is built, will detour a lot of traffic around Phoenix

Code	Issue	Response
1		Comment noted.

Code	Comment Document

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THE REPORTER: State your name, please.

MS. ROMERO: Tokcha, T-o-k-c-h-a, Romero, R-o-m-e-r-o.

I would prefer the no-build solution, but I think they're going to tear up a lot of neighborhoods no matter which way they go. I think the farthest -- farthest west they can go, in my opinion, would be better. Why? Because I've lived here for over 30 years. My husband and I built our house with one power tool, and that was our saw. The rest we did by hand for our five children. Our grandchildren call it "the fortress," when they have go to Nana and Poppa's. I can't imagine our -- we're not big numbers of population, because we're on acreage, but we're a very tight community. Taking that down 59th or 63rd will destroy our neighborhood. It will absolutely be in the backyard of the Country Gardens Charter School, which that school is -- high on their list is their natural habitat. Their Sonoran Desert Tortoises, their livestock, it's a way of life that doesn't really exist in the city anymore, and that our kids and grandkids attend and learn from. And excel, I might add.

Not only that, they go on these

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	
3	**Acquisitions and Relocations**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.

Code	Comment Document

marvelous trips to Washington and learn about the government. And this will destroy it. I just can't understand how a community in Ahwatukee, because they need another outlet that chose to be there a few years ago, chose to -- when I came out here, I chose to live in a place that had no stores. The closest one was eight miles away. I chose it for what it was.

4

And I can't understand how a community over there trumps our community. But I'm afraid that's what will happen. I have little faith that they will hear us and that they will do anything different. When you get to my age you're really too old to feel like starting over when you put roots in a place. And that's what this place is about, roots. Friends and neighbors and family that we cry with each other when someone dies and rejoice when someone is born, and really are a tight community. And I'm afraid that that 59 alignment -- I know that this 59 alignment will totally destroy this neighborhood.

5

THE REPORTER: Thank you, ma'am.

(Proceedings concluded at 7:00 p.m.)

Code	Issue	Response
4	**Neighborhoods/ Communities**	The Laveen Village area is anticipated to have a built-out population of over 105,000 (see Final Environmental Impact Statement page 4-5). This proposed level of development places increasing demand on the road network. The City of Phoenix's General Plan for Laveen Village has designated areas along the proposed freeway for commercial development that cannot support the projected densities without implementation of the proposed freeway. Without the proposed freeway, the conversion of land from undeveloped and agricultural uses to residential, commercial, and industrial land uses would likely continue, placing a greater demand on surface streets (see Final Environmental Impact Statement page 4-14).
5	**Environmental Justice/Lifestyle**	Low-income populations were evaluated to ensure there were not disproportionately high and adverse impacts. The Preferred Alternative would not adversely affect any census block groups with low-income populations south of the Salt River (e.g., South Mountain Village). The Arizona Department of Transportation and Federal Highway Administration have engaged all population segments to ensure access to the environmental impact statement process. Assisted by this involvement, analytical results indicate the proposed action would provide net benefits to all populations in the Study Area in general by reducing traffic congestion, enhancing accessibility, and supporting local economic development plans.

Code	Comment Document

5584

PROCEEDINGS

THE REPORTER: Can you state your name?

MASTER ROMERO: Benjamin Romero.

Dear ADOT, I oppose your idea of the South Mountain Freeway, it will take out my neighborhood and school, but it's not any other school. I've gone on -- it has these awesome trips and stuff. I just went on one recently, it was a three-week trip to Florida and Washington, D.C. Can you find another school that met our Senator Flake? They take care of us. They never give up on us, and I won't give up on them.

The school is important to me and my family. It has been here for 13 years and my house only has stood there for 30 years. We can't give up now. Sincerely, Benjamin Romero.

THE REPORTER: Thanks, Benjamin.

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Code	Issue	Response
1	**Acquisitions and Relocations**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.

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5586

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THE REPORTER: Can you state your name, please.

MR. ROMERO: Daniel Romero.

I oppose against it. I oppose it, you know. We've lived out there for 30 years, and there's never been, you know what I mean? We knew what we got into when we were there, and basically, it's going to affect wildlife and there's a proven fact on that, for one. My second issue is it's going to increase crime, number two.

There's already a path through there, I don't understand why, there's nothing in the river bottom, why they don't take the 99th Avenue route, the 91st Avenue route. You're going through two quarter million dollars homes or going right next to them.

My other fact is -- I'm just trying to put it together, you know -- you're putting ramps up right next to Country Gardens School. You're talking about a 3,000-foot bridge, which is over half a mile, you know, and you sit there and do construction on that, it's going to take a year, at least, and that's going to hurt the school. And I have a niece and nephew going to that school. And they exceed any

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Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
3	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Neighborhoods/ Communities**	Prospective home buyers after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Acquisitions and Relocations**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.

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other school around there. And they're going to put a freeway right next to it?

My other concern is industrial. They're going to put industrial next to it? That kills residences. I oppose it. I do not want it there. There's already alternatives on I-10 to get to the same location. So that's why I oppose against it.

THE REPORTER: That's it?

MR. ROMERO: Yes, that's it.

THE REPORTER: Thank you, sir.

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Code	Issue	Response
7	**Planning**	Cities' and towns' adopted land use plans were evaluated as part of the environmental impact statement process. The effect of a freeway corridor on these plans was considered (see Final Environmental Impact Statement pages 1-21, 4-18, and 4-19). The City of Phoenix's General Plan land use map shows the freeway alignment as "Future Transportation," generally matching the W59 (Preferred) Alternative alignment. The City of Phoenix's plans for both Laveen and Estrella Villages identify "cores" along the W59 Alternative, surrounded by commercial/ mixed-commercial uses for each planning area clearly intended to benefit from proximity to the proposed freeway.

Code	Comment Document

5589

MS. ROMERO: My name is Tokcha Romero. I've lived in Laveen for 30 years. My husband and I built our house there. Contractor didn't do it, we did. We raised our five children there. We have five grandchildren now that call that place their sanctuary, their home, their go to place and the happy place because they go there when they just need some extra care.

You can build a house anywhere. It takes a long time to build a home. I live on an acre and a quarter and I can walk out there in the dead of night in the dark and my feet know every inch of that property. They say that a place belongs forever to the person who loves it so much they wrench it from itself and remake it in their own image, and that's what my home is to me.

It's not a fancy house. It's a wood frame house, but it has memories that I can only begin to tell you. One of them is handprints on the south wall that my grandchildren thought would be nice to paint with mud handprints, and they faded over the years, but you can still see them. And rather than making me angry, they're now a cherished, cherished memory.

My neighborhood. We've seen each other

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 through everything. It's the only neighborhood that
2 many of us have lived in for longer than most people
3 are married, 30 years. We've watched births and
4 grandchildren be born and deaths and we're always
5 there for each other. I mean, literally, everybody
6 there. We're not in each other's business, but
7 everybody there. We know each other's names. Not
8 too many neighborhoods are that way anymore.
9 The school. The school will be impacted
10 if they take that 59, 62, 63, whatever it is they're
11 going to call it now. And pardon me if I don't have
12 a lot of faith that they won't keep moving it over,
13 but, you know, I'm a realist. I think they will.
14 Even if they take the 59 route, it's going to impact
15 us. I would prefer if they're going to do this,
16 follow Pecos all the way out and go up 99th. Why cut
17 up? There's already a freeway goes north. Take
18 that. But if you really have to get to the far
19 northwest valley, take it out to Pecos and all the
20 way up 99th. Then you're really over there as
21 opposed to cutting through homes.
22 The school. The impact it would have on
23 that is enormous. My granddaughter went to Laveen
24 Elementary for several years and as my kids had, but
25 it had changed over the years. A lot of newcomers

Page 3

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Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Acquisitions and Relocations**	The alignment of the W59 Alternative had not been changed in the area of the Country Garden Charter School. The freeway would not directly affect the school, but would run just east of the school. Design of each action alternative, while completed to an equivalent level, is still preliminary and subject to change because designs would be further refined. The Arizona Department of Transportation would work with businesses during the design phase to identify ways to minimize property impacts that allow the business to continue operations.
3	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

came in and things were different, and she got beat down not only mentally but physically and dropped out of in sixth grade and had to stay home for a half year.

She went to Country Gardens. They embraced her and brought out the best in her and she's now an honor student. She's in high school. She has huge plans and Country Gardens gave her what she needed. They gave her the discipline. I never have to speak to her about her homework, and she does huge amounts of homework.

Her writing. I worked at one of the public schools, and the amount of writing they do at Country Gardens is enormous. Other kids get out of high school and don't know how to write at all, but they make them write reports, history reports on all these trips they take to Washington, to St. Augustine, all these places. It's -- it is a unique school. And if they even put it at 59th, it is going to be so impacted that it will destroy what we've had. And I don't believe they'll keep it at 59th. I think it will keep its way over and eventually our neighborhood, our school will be gone.

I beg them, what looks good on paper isn't always good for people. Look at the other

Code	Issue	Response

Code	Comment Document

alternatives. Look at going all the way out to 99th where you already will hook up with the freeway. Why here? Why now? Why right there? I beg them to rethink this. I didn't build a house in Laveen. I built a home, and this will be so impacted that at the age of 63, I won't be able to find another place where my feet will know every inch of it when I walk down the street. I can walk down the street in the dark and my feet know, well, that's where the grass goes across it. You've got to lift your foot a little higher.

These people that are going to make this decision, come out and visit us in our neighborhood. Come out and talk to the neighbors in our neighborhood and see what you're going to do to us if you don't change this alignment, preferably as far west as you can take it because that would make sense. Follow Pecos all the way out and up 99th. Thank you.

Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:
- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. I AM TOTALLY AGAINST BUILDING THE 202 SOUTH MOUNTAIN FRWY.

1 2 1. ALONG THE PROJECT PECOS ALIGNMENT WILL SIGNIFICATLY INCREASE NOISE LEVELS. WHICH WILL IMPACT THE HEALTH OF RESIDENTS. ~~AS~~ WILD LIFE IS ALSO EFFECTED BY NOISE & EVEN WITH UNDER-
3 PASSES FOR ANIMALS TO CROSS THE FRWY IT WILL IMPACT THE WILD LIFE IN THE AREA.

4 2. AIR POLLUTION IN THE SOUTH MOUNTAIN AREA TODAY DOES NOT MEET FEDERAL STANDARDS ACCORDING TO THE AIR QUALITY STUDY IN 2005. ADDING 140,000 CARS & TRUCKS PER DAY THROUGH THIS AREA WILL ONLY MAKE AIR QUALITY EVEN WORSE.

5 NO BUILD!!!

Optional

Name WILLIAM R. ROOT Email BROOT11@COX.NET

Address 16407 S. 27TH AVE

City PHOENIX State AZ Zip 85045

Phone 480-307-8225 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Biology, Plants, and Wildlife**	
4	**Air Quality**	
5	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 12:28 PM
CALLER: ROSANNA	CALLER ADDRESS:
PHONE: 602-402-7063	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, we were calling to say that we are for the freeway. We are just off of 26th Street and Liberty Lane in the cul-de-sac. If anyone can call me back with any more info'. I am going to go on your website to look at the information. We have been at this location for about 14 to 15 years. O.k., thank you so much and have a great day. Bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support for building the 202
Date: Monday, May 20, 2013 3:11:23 PM

From: Megan Rose [mailto:mrose@gcjpr.com]
Sent: Monday, May 20, 2013 3:04 PM
To: Projects
Subject: Support for building the 202

1

Hello! I am a resident of Laveen, Arizona and an Arizona native. I am writing in support of building the 202 in the SW Valley. The Valley is growing and more and more affordable housing is found along the outskirts of metro phoenix. Traffic will only get worse and this freeway has been on the books for a long time. Also, I am hoping that a freeway will bring more commercial business to Laveen, which is not only good for our city but for residents like me that spend my money in other cities because there isn't a lot to do in Laveen.

Thank you for the opportunity to voice my support.

Megan Rose
602-690-0801

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

4331

I don't know how to put it. We were never notified that our house was no longer in the line of demolition. And so what's ADOT's recourse to those of us homeowners who all these years had thought that our I'm home was going to be purchased by ADOT because we couldn't sell them. And now all of the sudden, we're not in the alignment anymore, our house is not going to be bought by ADOT, and I'm faced with a house that's going to be worthless.

And if they had told us, given us a written statement, something that notified us, your home is not in the line of demolition anymore, you know, we would have taken action at that time. Either get out somehow, and now we've lost all of that in our home and we have to move. Now what do I do?

We've been in limbo for years, but we were reassured, just sit tight, the freeway goes through, it's no big deal because they're going to have to take our house. At least we'll be able to get out and be recouped. Now we lost everything, everything. I don't know what we're going to do. My name is Erica Slapke, 3119 East Redwood Court in Phoenix, 85048.

MR. ROSE: My name's Scott Rose, R-o-s-e,

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

a resident of Laveen. I'm very much in favor of the freeway. We moved out there nine years ago and waiting for the freeway to be built, and we moved out there hoping to raise our family out there with a lot of other amenities and the freeway has been holding this up. So we know that with the building of the freeway, there will be many amenities for us and the family and the whole community to use.

We live about a half mile from there, from the freeway, and it would be great access for us. And what else was I going to say? Oh, we're in favor of the 59 west alignment, but we also would be in favor of a -- potentially a parkway tying in the 101. What else? Anything else? I think that's it.

MR. HARDING: I'm Henry Harding and I live at 304 West Coolidge Street here in Phoenix, 85013. I'm not really in favor of this section of the 202. It's just -- if we promulgate more and more highways -- now, I talked to Ben over there. He said that we would save 40 million gallons or -- yeah, I think 40 million gallons of oil every year or gasoline every year.

What if we didn't do that and people start -- took the amount of money that would take to build this section of road and educated the people

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 7:30 PM
CALLER: JANET ROSEN	CALLER ADDRESS: 5371 W. LINDA LANE, CHANDER, AZ 85226
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Yes, I support the South Mountain Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4433

UNIDENTIFIED SPEAKER: I was resident of Laveen. I was there since 2007 to 2000 -- end of 2012. I work in Chandler, and my commute was only through Baseline Road, and it was like a nightmare every day, and I pretty much couldn't stay anymore because I had to have early morning meetings, so I had to move out to Chandler. But I still have my home back in Laveen. And I'm -- it's rented right now.

So I'm very interested to see this freeway getting built, because if you stay -- if you ever go to Laveen, you'll see that area has a lot of prospects, but it's just not developing or growing because of not having a proper freeway there yet. It's just like a cul-de-sac, with only one road, Baseline, going back and forth.

So -- so I really hope and thank the ADOT team for committing the years. I know it's a long process, and I hope this process moves faster and quickly so that the freeway gets built as soon as possible.

MR. ROSS: Richard Ross, R-i-c-h-a-r-d, R-o-s-s, as in Sam, -s, as in Sam.

So I am against the building of this road for a lot of reasons. One, I don't believe -- I don't believe we have the money. Or another way of saying it is I think the money could be spent in a better way. I don't believe we need more roads built. We have an incredible

1

Page 37

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Code	Issue	Response
1	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

problem with heat island effect, and building of more roads is going to exacerbate that problem.

Regarding traffic and air quality, I lived in Atlanta during the building of the downtown freeway and the freeway out to the northwest -- north, northwest suburbs. The original proposition there was that the building of that expressway would last 30 to 50 years. It would relieve traffic congestion on arterial roads.

That took 11 years to build, and that entire network of roads was completely filled up in one year. It did not alleviate anything. As the road got built, traffic moved to it. I see no reason why the same issue would not happen here. If you build it, they will come. It will cause more interstate traffic and more regional traffic to go on this route. It won't alleviate arterial traffic as well.

Regarding air quality, which is linked to that, if the thought was if we alleviate stop-and-go arterial traffic, that will help air quality, my guess is we will end up with stop-and-go traffic on the proposed expansion, and it wouldn't help with air quality. As a matter of fact, more traffic will come to the area, increasing air quality issues, along with heat island effect, which combines with a one-plus-one-equals-three issue to air quality.

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Code	Issue	Response
2	**Heat Island**	As buildings, parking lots, roads, and other infrastructure replace open land and vegetation, an urban heat island may result. The heat island effect is of a regional nature and, therefore, there is no requirement to analyze potential impacts and no possibility of determining the localized contribution at the project level to the regional heat island effect. It is likely, however, that a proposed project such as the South Mountain Freeway would be a minor contributor to the overall issue.
3	**Purpose and Need**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Final Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

There's -- a lot stated in the project is based on future car travel miles increasing dramatically. I don't believe that car travel miles will increase as the study shows. Car travel miles elsewhere are showing a decrease. We have the light rail, causing a decrease. We have bikers, causing a decrease. Car travel miles are not going to increase at the rate that is in the projections. I think it's a bogus projection, and I think we're building a road that is solving a symptom, not a problem. The problem is too many people. What we need to do is stop having people -- we -- we have to stop the growth of people entering the system, and there will not be a need for -- for the road.

But with all those issues, the biggest issue for me personally is the park. The park is -- South Mountain Park. The park is unique. It is our crown jewel. The proposal of this road is one that, once it is done, cannot be undone ever. We need to remember that we did not inherit the land from our ancestors; we borrowed it from our children and our children's children for the next seven generations and beyond. It is our job and our responsibility to protect that land.

That's it. Thank you.

(The proceedings concluded at 8:00 p.m.)

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www.drivernix.com

Code	Issue	Response
5	**Traffic**	In Maricopa County, daily vehicle miles traveled levels increased by almost 2 percent between 2011 and 2012 and the 2012 daily vehicle miles traveled is approaching the prerecession peak in 2007. (*Source:* Arizona Department of Transportation Multimodal Planning Division Highway Performance Monitoring System Data for the Calendar Year 2012 and 2011). Even if the trend of vehicle miles traveled "per capita" decreasing continues, the total vehicle miles traveled in the region would still increase along with increases in total population.
6	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Section 4(f) and Section 6(f)**	

Code	Comment Document

Document Created: 7/18/2013 12:07:53 PM by Web Comment Form

Sirs,

I have lived in Laveen for 25 years, and during that time have been to numerous meetings to discuss the expansion of this area. During those meetings, prior to the growth west of 67th Avenue between Baseline Road and Southern Avenue, we spoke and argued and met with many people to discuss our negativity to the dense growth proposed there.

As it turned out later, we had been speaking to deaf ears, since the property west of 67th Avenue had already been purchased and proceeded on prior to all the meetings we attended, and was going to move forward REGARDLESS of our speeches, and tears. It was a done deal before we got to express our opinions.

Therefore, it is with a heavy heart that I write to you now. I am sure that this is just procedure that you must follow; your decision has probably already been made regardless of what the public says it wants.

1 My opinion is that the proposed freeway connect via the W101 Western Alternative, which would connect to an already heavy-use freeway area, and exchanges are already in place on the north side of the I-10 interstate. By using the 101 connection, you can bypass the already-congested area of 59th Avenue and I-10, and not add to the congestion there with more vehicles and trucks. It wouldn't matter if you added 100 more lanes in any direction. The bottleneck at that area will ONLY become worse, not "better".

1 Areas closer to the metropolitan Phoenix area from 99th Avenue is already a disaster area in 2013, and whenever this new freeway will be added will only cause to increase the congestion with cars and pollution. Keeping the proposed Loop 202 SM Freeway at the 101 Interchange keeps that congestion further west, where motorists who only want to continue west will not have to deal with the inner-city congestion too.

2 3 4 Also, the Laveen area, which started out at 8,500 population in 1988 when I moved here, and has blossomed into the 120,000+ population it is today, despite our efforts to "keep Laveen small", will again be bombarded with change – destroying our remaining farm fields and open space, displacing families, adding pollution, removing our irrigation system, destroying our "quiet" living conditions and adding health risks to its population.

Sadly, as mentioned earlier, it will not matter what I want, what I think, or what I feel about this W59 Alternative freeway. You want us to write and express our feelings, but your proposals are probably already established.

I say an emphatic NONONONONONONONONONONONONONONONONONO to the W59 Alternative. My vote would be for the W101 Western Alternative to bypass the my Laveen community.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	The Laveen Village area is anticipated to have a built-out population of over 105,000 (see Final Environmental Impact Statement page 4-5). This proposed level of development places increasing demand on the road network. The City of Phoenix's General Plan for Laveen Village has designated areas along the proposed freeway for commercial development that cannot support the projected densities without implementation of the proposed freeway. Without the proposed freeway, the conversion of land from undeveloped and agricultural uses to residential, commercial, and industrial land uses would likely continue, placing a greater demand on surface streets (see Final Environmental Impact Statement page 4-14).
3	**Neighborhoods/ Communities**	In the Phoenix metropolitan area, vacant and agricultural land is already quickly being converted without the proposed freeway. Of three major land use types, residential land use was predominant in 2009 (see Table 4-2 and sidebar on Final Environmental Impact Statement page 4-3). In addition, the Study Area has over 140 developments encompassing some 11,000 acres (see Final Environmental Impact Statement page 4-7). None of the affected communities' long-range plans include agriculture as a future land use.
4	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

Sincerely,

Debra N Ross

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Laveen, AZ 85339
602-248-9255 PHONE
602-248-4990 FAX
dnross@phxinternet.com

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: DEIS Loop 202/South Mountain Freeway Study
Date: Thursday, July 18, 2013 10:15:45 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Debra Ross [mailto:dnross@phxinternet.com]
Sent: Thursday, July 18, 2013 10:12 AM
To: Projects
Subject: Re: DEIS Loop 202/South Mountain Freeway Study

Sirs,

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2 3 4

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Also, the Laveen area, which started out at 8,500 population in 1988 when I moved here, and has blossomed into the 120,000+ population it is today, despite our efforts to "keep Laveen small", will again be bombarded with change – destroying our remaining farm fields and open space, displacing families, adding pollution, removing our irrigation system, destroying our "quiet" living conditions and adding health risks to its population.

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Sincerely,

Debra N Ross

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Code	Issue	Response
2	**Neighborhoods/ Communities**	The Laveen Village area is anticipated to have a built-out population of over 105,000 (see Final Environmental Impact Statement page 4-5). This proposed level of development places increasing demand on the road network. The City of Phoenix's General Plan for Laveen Village has designated areas along the proposed freeway for commercial development that cannot support the projected densities without implementation of the proposed freeway. Without the proposed freeway, the conversion of land from undeveloped and agricultural uses to residential, commercial, and industrial land uses would likely continue, placing a greater demand on surface streets (see Final Environmental Impact Statement page 4-14).
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Code	Comment Document

June 6, 2013

South Mountain Study Team

1

2 3

All of the plans I seen or read about will only succeed in moving a traffic bottleneck from the Broadway Curve to 59th Avenue. Recent newspaper articles pointed out the growth in the west valley and in particular the town of Buckeye. Traffic on westbound I-10 can only be expected to increase and it won't be too many years before the bypass will have to be moved further west. Has any consideration been given building a highway from Gila Bend in a northwest direction and connecting with I-10 somewhere around Tonopah? By having such a highway travelers going west could take I-8 near Casa Grande to Gila Bend and reconnect with I-10 west of Buckeye, those traveling east would do the reverse. This could remove most of the truck and auto traffic traveling east and west on I-10 by allowing it to bypass Phoenix. The current connection between I-8 and I-10, SR85 requires drivers to back track in either direction and travelers are hesitant about taking it.

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5

Two other advantages are presented with the new highway. Current residential homes in the proposed route would not have to be removed, saving millions of dollars. And there is discussion regarding constructing a new Interstate (I-9) from Nogales to Canada. With I-19, I-10 and I-8 already in place a highway connecting I-8 and I-10 from Gila Bend to Tonopah would be a good start.

Thanks for listening.

Clayton Ross

Clayton Ross

PO Box 315

Arizona City, AZ 85123

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Alternatives**	The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Final Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The *Regional Transportation Plan* includes other freeway projects, such as State Route 30 and State Route 303L that provide additional connections to the southwestern areas of metropolitan Phoenix. All of these transportation facilities work as a system and rely on each other to provide optimum performance. Additionally, the Maricopa Association of Governments recently completed the Interstate 10/Hassayampa Valley Roadway Framework Study that evaluated transportation needs in western Maricopa County. This study proposed a system of parkways and freeways (including the Hassayampa Freeway, also designated as Interstate 11 through this area (see <bqaz.org/hasReports.asp> for more information). The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, it was eliminated from further consideration.

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help the commute to work. I know a lot of times the freeway, I-10 gets closed and then the surface streets are just blocked all the time and I just really hope that we can get there. We moved to Laveen counting on that freeway coming in, knowing that it was approved, so I just really hope that you guys take that into consideration and support the freeway.

That's all I have to say. Thanks.

THE FACILITATOR: Thank you.

For those of you who may not have heard, the last bus is leaving in about three minutes for all destinations out there.

Jennifer Rouse, take your time.

MS. ROUSE: Hi, thank you. I wanted to speak on the record in favor of the 202. I live in Laveen, and have lived there for seven years. When we first moved there I lived close to 35th and [unintelligble] Road, where traffic jams pretty much with the big trucks going down the road, and things have changed, and having moved closer to 51st Avenue and Baseline, we see the semis that come through that earlier we heard people talk about how this is going to bring all of these semis coming through the neighborhood. It's already there. It's already

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1		Comment noted.

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there, going well over 45 miles an hour. It's going to hit a child, I feel eventually, even though they've put in crosswalks. And whether that highway's built or not, the traffic is already there; it needs to be moved through faster.

I also, when I first moved to Laveen, we had just two children, and we were quite happy living kind of separated away from the rest of downtown Phoenix; however, things change, we had a third child. And he was born, he has special needs, and we had to have all sorts of therapists and stuff, and what we found is we need access or easier, quicker access to the East Valley. We love where we live; however, there just seems to be a really big disconnect from the rest of the Valley. We want to shop Phoenix; however, many of the stores that we want to go to, there's just one access, they're either way in the East Valley or so far west we have to drive out to Goodyear.

We feel that, especially now, a hospital, we hate to hear people say you need the highway before you get the hospital, before you get the malls; the hospital is the big thing. We have well over 40,000 people in Laveen now, and the nearest hospital is Maryvale. I had a friend that had to go

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there in an emergency situation, and it's not exactly the place you want to go. I guess we can't like -- we can't ask them to take us to Estrella, and I personally would love to see a hospital in our area.

Other than that. Thank you very much. Sorry.

THE FACILITATOR: Thank you. It is now 8:00 p.m. This concludes the Loop 202 South Mountain public hearing. Thanks to everyone here for participating, and your support throughout the day. Have a good evening.

(The proceedings concluded at 8:00 p.m.)

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THE FACILITATOR: Thank you.

MR. ROWLEY: Good afternoon, it's good to be here with you today. My name is Cade Rowley, I've been here in the Valley for almost 15 years, and I want to show my support for the 202 freeway. This things's been studied for almost 20 years, I think that I've reviewed the draft EIS, I think the team has done a very thorough job of looking at all the issues, weighing in on the environmental consideration as a need to be taken and, you know, the freeway here's going to provide a lot of great things for the community. It's going to reduce air pollution; as you probably heard today, congestion is at a premium in this part of the Valley, it's very difficult to get from the west side of the Valley to the east side where I live and, you know, it's going to make a big impact on that.

In addition to that, we really need the jobs here in Arizona, so it has the potential to create 30,000 jobs. Our economy is struggling, now is the time to build the 202, and I want to issue my support for the build option of the 202. Thank you.

THE FACILITATOR: Thank you.

Don Clark.

MR. CLARK: Thank you. I want to just voice my appreciation for the study that has been done and voice

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1		Comment noted.

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TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 6:10 PM
CALLER: SONYA ROYALS	CALLER ADDRESS: 10730 W. GARNETT DRIVE, SUN CITY, AZ
PHONE: 623-876-8644	EMAIL:
CALLER REMARKS/QUESTIONS: Hello, I support the South Mountain Freeway.	

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1		Comment noted.

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more highways you have, the less -- the more gas you're going to use. So it's taking a gas-tax fund and putting that money back into the same system. How can you not say that that's collusion? So there is a big problem with the Arizona Constitution, with this gas-tax law.

There is also a big problem with MAG and how they operate because they're the Association of Governments. Well, I think it's pretty clear that most people would agree that our government in this country has become extremely corrupt. I think people can, without a doubt, say that. I think special interests --

Am I speaking too loud?

UNIDENTIFIED SPEAKER: No, don't worry about it.

UNIDENTIFIED SPEAKER: A little bit.

UNIDENTIFIED SPEAKER: Good job, man.

MR. ROYER: So -- Sorry, I was speaking too loud. That was inconsiderate. No, I'm just kidding.

So most people, I think, would agree that the governments have become corrupt. So, again, the people that are dictating these decisions are the governments, the corrupted governments that don't represent the people, that represent special interests, in part because we let them; in part because there is a serious disparity in influence.

People that have the resources, the time, the money, the control, the power, are able to influence easier

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than people who are stuck in a system where they have to work 60 hours a week, where they have a family and they're far removed from these meetings and they have a hard time getting to these meetings, speaking of transportation.

I just don't know what this is about. I don't -- it's pretty -- it's -- Not that I don't know. I just -- I don't get why this is trying to happen. Because, to me, if this was really needed, there wouldn't be so many people opposed to it, and truly opposed to it with all your heart and their bodies, because there is too many red flags.

So, if this was truly a need, you would have to give proven evidence. And, through what I have seen, even though I'm sure a lot of people from ADOT worked hard, which apparently there is a lot of people who work at ADOT because I -- I don't want to bring up the word "bureaucracy," but ADOT is a job creator.

I really hope you all are doing good work. But I -- You know, I just don't -- I don't see it because, if you're a Department of Transportation, you should be finding a better way to help people transport. And I don't see it helping. I see people hurting. I see people hurting at the gas pump. Every time I pump gas, it hurts me. I go in debt. And so I see a lot of people struggling.

And so gas prices, being as they are, going higher, as they can and probably will, is hurting people.

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Code	Issue	Response
1	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
2	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.

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"So ADOT, what does ADOT really do?" is my question. I would love them to -- You know, because I've heard answers but I haven't heard a good answer, because trying to remain neutral is cowardice in times like these. You cannot remain neutral, and especially in a position of you're a Department of Transportation. Your department is transportation. Your whole purpose is to think about transportation. So why does Arizona have one of the -- one of the worst transportation systems? We are overreliant on cars.

And I'm sorry I'm talking your ear off. I'm really sorry. You are a saint.

We have -- We are overreliant on gasoline, which is just hurting a lot of people because it's not -- it's not sustainable for them.

Imagine if we had electric cars; we didn't have to pay 60, a hundred dollars a week, on gas, or whatever people are paying.

I mean, so we're talking about investments here. And so, if ADOT was talking about investments, then I want good investments. And this is not a good investment. I mean, now we're talking business. This is -- This is not a good social investment.

Sure, this is a good investment for a private corporation that is going to -- and contractors and construction companies or whatever, and developers, developers,

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developers, people that keep developing things. But this is not a good investment for the majority of the people. This is not going to help more people get around. This is only going to make it easier for cars to drive, to continue to drive. It's not going to reduce -- and, you know, I don't want to -- I don't want to, like, sound like a broken record.

I'll give you a minute if you want.

COURT REPORTER: No, that's fine.

MR. ROYER: If we really wanted to help people, we would help them get around easier, at an effective way. And I don't see how individualizing commuter systems, transportation systems, reliant on a fossil fuel, reliant on something that is costly, reliant on something that is dictated by markets and profiteers who have been proven, time and time again, to do shady dealings -- Wall Street is a corrupt institution, and yet they are in the oil-speculation business.

BP, Shell, Chevron, along with getting subsidies, along with diverting real accountability because no one gets held accountable, continue to pollute this earth and us. And the people that feel it are fed up with it.

And the sad thing is most people aren't going to do nothing unless it affects them directly. Are we going to wait until we have such a bad gas shortage here, or we have such a bad water shortage here or a food shortage here, to realize that urban sprawl is not a good thing, to realize that

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Code	Issue	Response
3	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

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sustainability starts with building strong communities and not divided communities and sprawled-out communities?

Literally, this -- this freeway divides a community from a mountain. It divides a mountain from people. It surrounds this mountain with freeways. It -- It severs the connection that nature has to itself. Animals come and go.

Now you've got a freeway to pass over, Animals. Good luck with that.

Where is the animals in here? They don't have nothing to say? We -- We almost laugh at that. And yet people call themselves animal -- They care about animals, right?

"Well, I have a dog; I care about animals."

Well, what about the natural animals that have been destroyed because of all this development?

Development? What's real development? What really matters to people?

I think, to some people, what really matters is this idea of becoming rich or something, of having more power than others so that they can exert their will. To me, it's all about bullying. It's a bully culture.

And I've seen this firsthand. Pangea, this corporation, is a bully. This kind of methodology, where we're going to build; there's no other option: That's bullying.

"There's no other option. I have to beat you up for your lunch money." That's a bully.

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Code	Issue	Response
4	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Comment codes continue on next page)

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So, to me, what it comes down to, people of ADOT, whoever is going to receive this message, is that: Do you want to stand with the bully or do you want to stand with the people who want to stand against bullying culture?

Not that we're going to go and bully the bully. But we need to stand against the bullying culture. We've got to change this culture.

So, anyways, the Sierra Club is against this. Many Gila River community members are against this. PARC -- I wish I could remember what "PARC" stands for.

Do you know what "PARC" stands for, by any chance?

Let me see. I need to get their name right because it's important.

Can I -- Can I take a moment, real quick?

COURT REPORTER: Yeah.

MR. ROYER: Okay. So here's PARC. So I stand in solidarity with PARC, which is Protecting Arizona's Resources and Children. This is this group, and they've been having meetings.

For instance, one of -- Something that I can see is six reasons why -- six, kind of, like, myths that they're -- or six problems that they have with the EIS.

5 6

One is truck traffic from Mexico and high-sulfur diesel. Truck bypass negated.

7

Another one is air -- Another one is air --

Code	Issue	Response
5	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Purpose and Need, Truck Bypass**	
7	**Air Quality**	

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I don't know how you do that, by the way. It's impressive.

Another one is air toxics are already a crisis but not mentioned.

Another -- another issue with the EIS is risk from hazardous material, materials transportation, incidents, due to the SMF.

Number 4, more air-quality issues, the straw that broke the camel's back.

Number 5, traffic-congestion issues at west I-10 junction.

And Number 7, blasting South Mountain, religious and racial discrimination and civil rights violation in SMFDEIS. And that's the South Mountain Freeway Draft Environmental Impact Statement.

I think all of those are valid points.

And I think the most important thing is, when I watched the simulation, I saw that it was cutting through South Mountain. It was cutting through South Mountain. And I'm getting tired of driving around and seeing humans cut through things because, again, it's that mentality that we can't just go around. We can't be courteous to what's there.

We have to just go through. We have to plough through. And it's that mentality that I think is very dangerous.

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Code	Issue	Response
8	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Alternatives, W59 Alternative Versus W101 Alternative**	
10	**Cultural Resources**	
11	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
12	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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And I don't think most people would be for this if they thought, not as a citizen of a state, but as a citizen to the earth. If we really cared about our environment, which we need, if we really cared about animals, which we need, then we wouldn't continue to destroy those things. It's really that simple.

It comes down to The Lorax story. It comes down to childhood stories. But this is old wisdom, Aesop's wisdom. It comes down to Shel Silverstein's, with The Giving Tree, wisdom. You cannot continue to take and take and expect to have anything left.

I think I'm good. I feel better now.

(The public hearing proceedings concluded at 8:00 p.m.)

Code	Issue	Response

Code	Comment Document
1	Phil Royer Document Created: 7/17/2013 11:07:49 PM by Web Comment Form Sierra Colina Block Watch Group supports this effort for improving our community and Our Valley Freeway System

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Monday, July 15, 2013 2:11:25 PM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Michael Royer
Sent: Monday, July 15, 2013 2:11 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

Jul 15, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) This freeway extension is not needed. The DEIS is incomplete. South Mountain is sacred and should be respected and left intact.

(3) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.
(4) ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(5) (6) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(7) (8) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(9) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	
7	**Section 4(f) and Section 6(f)**	
8	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
1	infrastructure so that others can live farther and farther from a city center. Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you. Sincerely, Mr. Michael Royer 5332 W Fairview St Chandler, AZ 85226-4557 _____ Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments. .

Code	Issue	Response
9	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Against Builing TheSouth Mountain Freeway
Date: Monday, May 20, 2013 8:31:21 AM

From: RRoyko1000@aol.com [mailto:RRoyko1000@aol.com]
Sent: Saturday, May 18, 2013 8:59 AM
To: Projects
Cc: mwroyko@gmail.com
Subject: Against Builing TheSouth Mountain Freeway

Gentlemen,

Contrary to the unsolicited e-mail I just received from a group calling themselves "We Build Arizona", urging me to support the building of the 202 through what is now Pecos Road, I urge you not to build it.

1

I live in Ahwatukee and my quality of life would be irreparably harmed by the proposed South Mountain Freeway. So much so that I am seriously considering selling my home and relocating.

Thank you for your consideration.

Raymond T. Royko, Esq.
16218 S. 14th Way
Phoenix AZ, 85048
(4480) 283-1369

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Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

Catherine Royse

Document Created: 5/18/2013 10:48:24 AM by Web Comment Form

I am an Arizona native and have lived in the South Mountain, Laveen Areas for 60 years. Laveen is one of the few areas left that is not overdeveloped. I have stayed in the area due to lack of noise, pollution, traffic and availability of horse property. However, the pollution, traffic and noise have increased in the last ten years due to growth. Many of the projects that were proposed such as an area being developed on Dobbins similar to the Prescott Courthouse area have not happened. Most of the original home owners in the area left in Laveen that is still County moved or stayed in the area because we wanted a rural feel to our community. I have seen many of the traditional small town activities change as Phoenix has expanded into Laveen. As well as an increase in crime. I am close to the proposed exchange and DO NOT want increased traffic, noise, pollution, or loss of land to take place. I have attended community meetings as well as filled out information at one of the barbeques. I feel that because Laveen residents are fewer than residents in some of the other communities polled our voices are not heard.

1 2 3 4 5

I attend a meeting where an Attorney spoke for one of the larger land owners in the area that supported the Route. His comments were very condescending to the residents in attendance and not appreciated.

I realize that growth is inevitable as I have already seen it occur in our community, but I would urge you to reconsider 59th Avenue as the preferred route just due to expense. If you truly respect community wellfare and opinion, I believe you need to choose another alternative.

6

Code	Issue	Response
1	**Neighborhoods/ Communities**	The Laveen Village area is anticipated to have a built-out population of over 105,000 (see Final Environmental Impact Statement page 4-5). This proposed level of development places increasing demand on the road network. The City of Phoenix's General Plan for Laveen Village has designated areas along the proposed freeway for commercial development that cannot support the projected densities without implementation of the proposed freeway. Without the proposed freeway, the conversion of land from undeveloped and agricultural uses to residential, commercial, and industrial land uses would likely continue, placing a greater demand on surface streets (see Final Environmental Impact Statement page 4-14).
2	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
3	**Traffic**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	
6	**Alternatives, W59 Alternative Versus W101 Alternative**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 2:58 PM
CALLER: JOHN RUFNECK	CALLER ADDRESS: 7211 N. 2ND STREET, PHOENIX, AZ 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I would like to announce my support for that and my reason for doing that is because it would alleviate traffic and it would extend the whole valley in a very positive manner. I hope that this will be acted upon. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

benefit Laveen by adding additional traffic flow to the community, which would then bring in some economic development as well.

So, you know, we in Laveen really support the 202, and would appreciate, you know, every eye and ear paying attention to its future development. So thank you.

THE FACILITATOR: Thank you.

Another reminder, if anyone wishes to speak, please make sure that you register at the front desk. Your name will appear on the screen, and we will call you in the order that you register.

Miguel Ruiz.

Good afternoon, you have three minutes. Here's the timer; please begin.

1

MR. RUIZ: Thank you, I'm a Laveen resident and just want to voice my support for the Loop 202 extension. I drive from Laveen to Ahwatukee, so 35th Avenue and Baseline down to 48th Street and Ray Road every day, and it is a test of my patience driving down Baseline Road.

Aside from my personal issues I run into every day, it will create jobs. It will lead to economic development, like what we've seen with the San Tan 202. It will help the Valley as a whole,

Code	Issue	Response
1		Comment noted.

Code	Comment Document

regional availability. I have friends who live on the east side of town who want to get to the West Valley or points west, and this will also help them by being able to bypass downtown Phoenix completely. That's it for me. Thanks for your time.

THE FACILITATOR: Thank you, sir.

Larry Landry. Mr. Landry, you have three minutes. Here's your timer; please begin.

MR. LANDRY: Thank you. Hey, Steve. My name is Larry Landry; I live at 2409 East Solano Drive. I'm officially retired now; however, for 28, almost 30 years, I've worked on freeway issues, including the 1985 vote where the South Mountain Freeway was voted in. Ironically, the 303 was an optional freeway at that time. Look at all the money that we spent on that. 55th Street alignment, the preferred alignment, avenue alignment, is the key one, and it's been 28 years.

I know you have difficult decisions to make on the route, but this was on the map well before any homes were built in Ahwatukee, and sometimes the greater good, our air pollution is getting worse every day in every way, and if you -- you know, better than I, I-10, I-17, the Broadway curve is a parking lot all too often. We need this reliever.

Code	Issue	Response

Code	Comment Document

1

* * *

MS. RUIZ: I'm Caroline Ruiz, R-u-i-z.

THE COURT REPORTER: Spell your first name for me, please.

MS. RUIZ: It's C-a-r-o-l-i-n-e. Do you need an address?

THE COURT REPORTER: No.

MS. RUIZ: I am just here to comment that I'm -- I'm making a prostatement for the freeway and 59th Avenue. We live half a mile from the intersection of 59th Avenue and Lower Buckeye, and I believe that's where the commercial core of Estrella Village is branched. And I think the freeway would really spur that economic development, which we've lived there 13 years and currently have no meaningful retail. I think it's waiting for the freeway to come in.

I also think that we're seeing a lot of large warehouses go up in the area, and we currently don't have the road capacity to handle them. We're already doing a lot of -- there's a lot of mixing of vehicles with large semis, and we've seen a lot of accidents in the area. It's a dangerous situation.

I think the freeway would be a good way to just channel the traffic around the area, around Downtown, and also help with some of the pollution in the area to get

Code	Issue	Response
1		Comment noted.

Code	Comment Document

the big trucks off the arterial roads.

That's pretty much it. Thank you.

THE COURT REPORTER: You're welcome.

(Proceedings concluded at 7:00 p.m.)

Code	Issue	Response

Code	Comment Document

From: Amy Rulli
To: Projects
Subject: Please Consider NOT Building a Freeway Through Our Beautiful Community!
Date: Wednesday, July 24, 2013 10:04:25 AM
Attachments: image001.png

Hello,

1 2 3 4

My family and I have resided in the natural desert area of the Ahwatukee Foothills since moving to Arizona over 15 years ago. The community is a lovely place to raise a family. It has a low crime rate, low pollution index and is peaceful and quiet. It is a healthy place to live and work. If you build this freeway it will change all those factors and no longer be the community we know, admire and love. The freeway was planned many years ago. Things have changed. I share the same sentiment as many of my neighbors. If this freeway is attempted we will have to leave the area and likely will leave the state. Please consider your alternatives. The beautiful and sacred South Mountain will also be destroyed. Why? We are not at all in favor of this reckless plan by your organization.

5 6 7

Best Regards,
Amy Rulli
Territory Account Manager

Mobile: 602.690.4718 | Fax: 203.460.3497
amy.rulli@pb.com
Every connection is a new opportunity™
PitneyBowes

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Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Section 4(f) and Section 6(f)**	
6	**Cultural Resources**	
7	**Purpose and Need, Lack of Support**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Draft Environmental Impact Study for the South Mountain Freeway
Date: Tuesday, July 23, 2013 3:42:20 PM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Barbara Russell [mailto:bsuerussell@cox.net]
Sent: Tuesday, July 23, 2013 3:30 PM
To: Projects
Cc: SMF@aol.com
Subject: Draft Environmental Impact Study for the South Mountain Freeway

To Whom It May Concern:

1

My husband and I have been residents for ten years in the Lakewood Community in Ahwatukee. As you are aware, the Lakewood Community was established in June 1985. The lakes are fed by a "well" or "spring". Our grave concern is the protection of these existing wells or springs to continue as the source for the two lakes in our community.

We respectfully request that ADOT protect these existing wells as they review the route for construction of South Mountain Loop 202 Freeway. We recognize the importance of the freeway to the city of Phoenix and State of Arizona. We also recognize the importance of our community lakes and their existing properties including the wells that feed and sustain the lakes in this vital Phoenix community. Any negative change to the lakes would have a devastating impact on our community, residents and their future children.

We are proud citizens of our community and will be long term residents well into our retirement in Lakewood Community.

Sincerely,
Zacc & Barbara Russell
3421 E Wildwood Dr
Phoenix, AZ 85048

_____

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Code	Issue	Response
1	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.) The well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Water Resources to effectively mitigate well impacts associated with its projects throughout the region.

Code	Comment Document

From: Sierra Club on behalf of Jim Rutherford
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 2:01:18 PM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) I have carefully read ADOT's proposal for the South Mountain Freeway. I do not support its implementation. South Mountain Park deserves better. It is a precious urban resource that should be sheltered and protected. As you know it is the largest city park in the USA. As a landmark, as an urban oasis, as an unmatched urban trail system, it is known across the land.
This is precious public space.

(3) Building a new, very busy and, inevitably, very congested major roadway on its very perimeter makes no sense to me at all.

(4) The proposed freeway would cause more problems than it would solve. It might possibly provide short-term congestion relief but for how long? Many major roadways have been built and widened in the last 20 years but our roadways remain clogged. Building yet another road is not the answer. Building this particular road on the edge of a wonderful urban treasure would be a travesty to any notion of Urban Planning for the better good of all citizens.

(1) Please select the No-Build Alternative

Thank you.

Sincerely,

Jim Rutherford
5901 W Park Ave
Chandler, AZ 85226-1246
(480) 705-5271

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Alternatives, Nonfreeway Alternatives**	
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: build more interstate! PLEASE
Date: Monday, May 20, 2013 8:22:47 AM

From: denise ryle [mailto:mdryle31@yahoo.com]
Sent: Sunday, May 19, 2013 7:54 PM
To: Projects
Subject: build more interstate! PLEASE

1

Please build the 202 free that will better link South Mountain with the other interstate highways. Metro-Phoenix needs more highways/interstates to accommodate the ever increasing traffic issues its citizens face daily.

D. Ryle

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 2:52 PM
CALLER: HENNA SADIKI	CALLER ADDRESS: 6301 W. POST ROAD, CHANDLER, AZ 85226
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am calling to support the South Mountain Freeway. I support the construction of South Mountain Freeway near the Pecos Street and joining at I-10 on the west side. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 12:04 PM
CALLER: CALEO SALADINE	CALLER ADDRESS: 28738 N. 67TH DRIVE, PEORIA, AZ 85383
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Hello, I support the South Mountain freeway construction.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Friday, May 17, 2013 1:05:56 PM

From: Jackie Salamo [mailto:salamoj@yahoo.com]
Sent: Friday, May 17, 2013 9:31 AM
To: Projects
Subject: South Mountain Freeway

1

I am retired. None of my friends who live in north Phoenix, Scottsdale, or the East Valley will come to my home. The drive time is long and the instructions are too complex because much of the drive is on thoroughfares. Please complete the freeway.

Thank you,

Jackie Salamo

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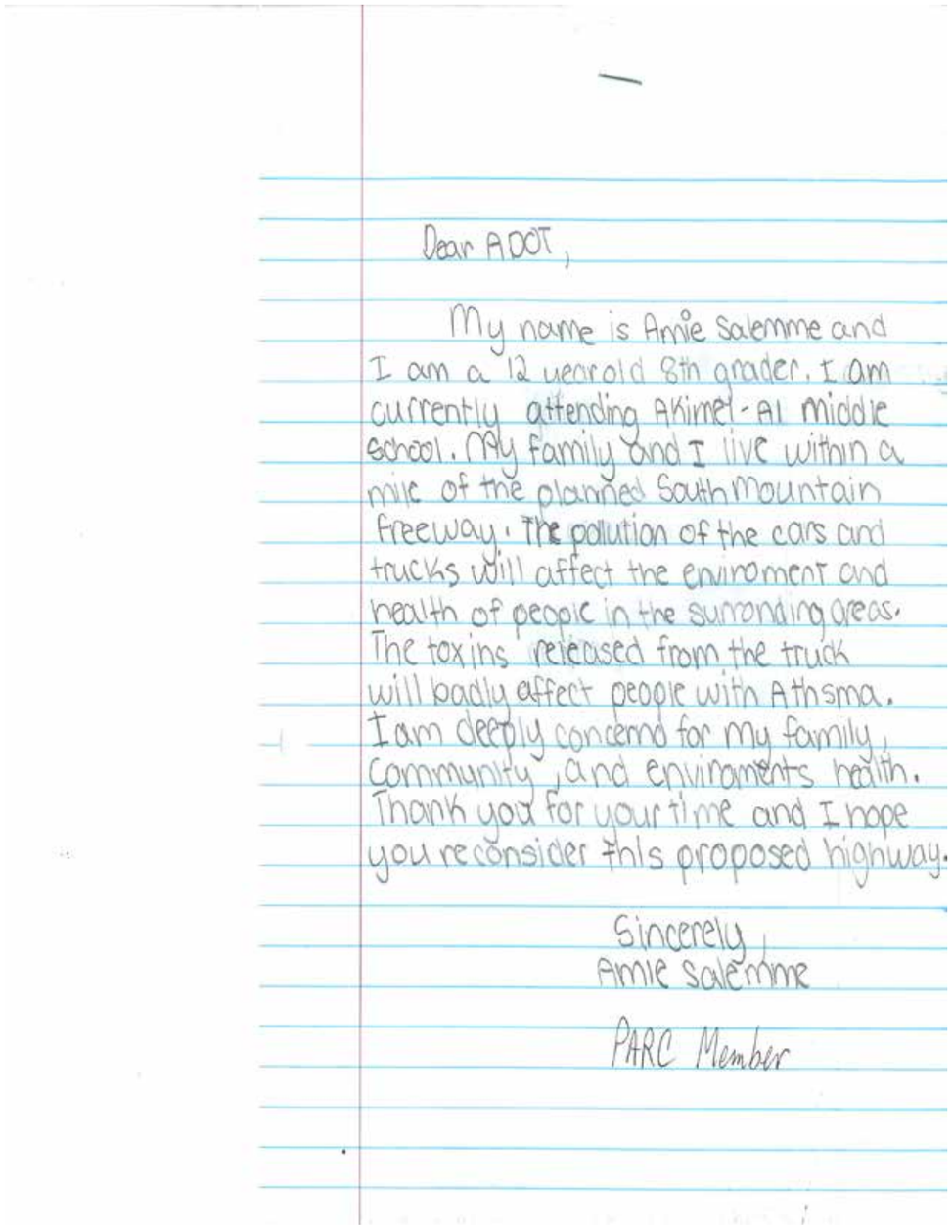
Code	Issue	Response
1		Comment noted.

Code	Comment Document



Dear ADOT,

My name is Amie Salemme and I am a 12 yearold 8th grader. I am currently attending Akimel-Al middle school. My family and I live within a mile of the planned South Mountain freeway. The pollution of the cars and trucks will affect the enviroment and health of people in the surrounding areas. The toxins released from the truck will badly effect people with Athsma. I am deeply concernd for my family, community, and enviraments health. Thank you for your time and I hope you reconsider this proposed highway.

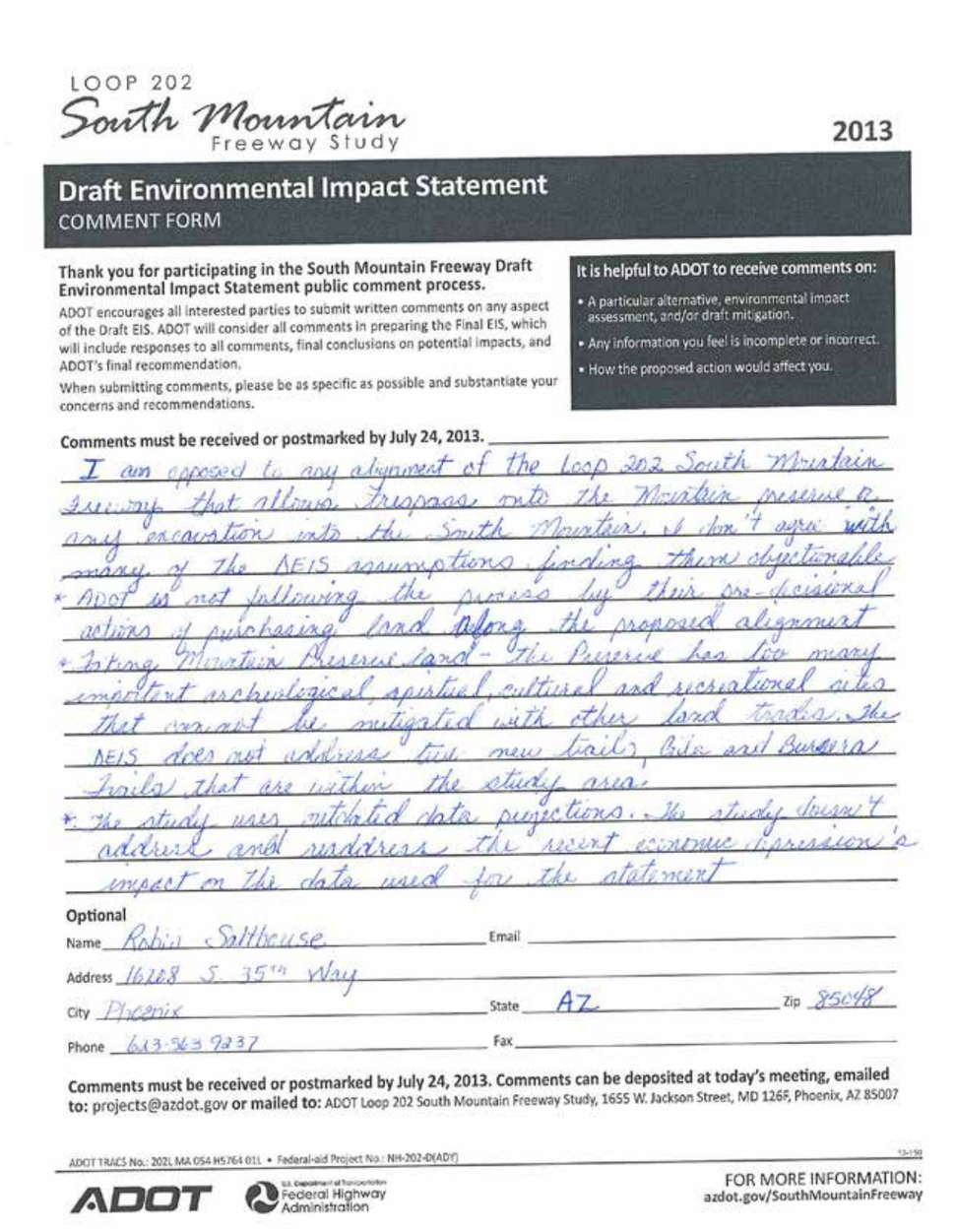
Sincerely,
Amie Salemme

PARC Member

1

2

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	

Code	Comment Document
1 2 1 3 4 5 6	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I am opposed to any alignment of the Loop 202 South Mountain freeway that allows trespass onto the Mountain preserve or any excavation into the South Mountain. I don't agree with many of the NEIS assumptions finding them objectionable.
* ADOT is not following the process by their pre-decisional actions of purchasing land along the proposed alignment
* Sttng Mountain Preserve land - The Preserve has too many important archeological, spiritual, cultural and recreational sites that cannot be mitigated with other land trades. The NEIS does not address the new trails, Gila and Bursera Trails that are within the study area.
* The study uses outdated data projections. The study doesn't address and readdress the recent economic depression's impact on the data used for the statement

Optional

Name Robin Salthouse Email

Address 16208 S. 35th Way

City Phoenix State AZ Zip 85048

Phone 623-363-9237 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-158

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	The Arizona Department of Transportation purchased some right-of-way along Pecos Road when it was adopted as the freeway alignment in 1988 (see Draft Environmental Impact Statement page 3-53). Should another alternative be adopted as a result of this study, the Arizona Department of Transportation would dispose of the land that has been acquired.
3	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Section 4(f) and Section 6(f)**	South Mountain's newest trails are the Bursera and Pyramid Trails (see Final Environmental Impact Statement page 5-8). The E1 Alternative is approximately 1 mile south of the Pyramid Trail and even farther from the Bursera Trail; thus, it would not affect either trail. The trails have walk-in access from Chandler Boulevard and 19th Avenue, with on-street parking. This walk-in access would be north of and adjacent to the planned extension of Chandler Boulevard and, thus, would not be directly affected. The walk-in access point and the part of the Pyramid Trial at the access point are located adjacent to a residential neighborhood and the City of Phoenix's planned Chandler Boulevard Extension. These trails are typically used for high-intensity recreational activities such as running, hiking, and biking, not noise- or viewshed-sensitive activities. All proposed action alternatives would span existing and proposed trails to avoid impacts. However, during construction (if an action alternative were selected), trails that would be spanned or would be near potential freeway construction would be closed for limited times for safety reasons. Closures would necessitate that trail users detour around construction sites to rejoin the trails farther along their length. According to Phoenix South Mountain Park/Preserve rangers, the Gila Trail—although well-defined—is not a designated trail within the park. That said, the Gila Trail would not be affected by the proposed freeway or by the Chandler Boulevard Extension. The Draft Environmental Impact Statement Appendix A394 contains information directly from the Phoenix General Plan and early coordination with the City of Phoenix Parks Department. The trails in the preserve are exceptions to this statement and were always meant as such. The trails within 1/4 mile of the proposed alternatives were treated separately, as in the case of the Maricopa County Regional Trails System. Should an alternative be selected, the Arizona Department of Transportation and Federal Highway Administration would work closely with the City of Phoenix during final design to ensure the connectivity of trails is maintained, whether they are eligible as Section 4(f) resources or not.
5	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

7
8
1

Additional Comments: * There is no place for hazardous waste incident. The loop 202 will eliminate the access/exit at 32nd Street and eliminate access as a surface street causing even less ability to move and exit the neighborhoods safely. Citizens have voted to financially support open space initiatives. South Mountain Preserve draws tourists who in turn support the local economy. The freeway alignment must not go through the preserve.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
6	**Purpose and Need**	The worldwide recession that began in late 2007 generated a substantial downturn in growth rates for new housing and employment across the United States. Arizona particularly suffered the effects of this recession because, beginning in the early 2000s, Arizona in general and Maricopa County specifically experienced some of the fastest population, housing, and employment growth rates in the country. Because the need for the proposed freeway is predicated in part on projected growth, one might conclude the recession reduced that need. An economic downturn associated with a given recession is, however, generally considered a short-term phenomenon with respect to the longer-term planning horizon established for the proposed freeway. Socioeconomic indicators have steadily and consistently increased in the region since the early 1900s. The critical factors underlying these indicators remain unchanged. (See the sidebar on Final Environmental Impact Statement page 1-11.)
7	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Alternatives**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

Code	Comment Document

1

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/1/13	INCOMING CALL TIME: 2:22 PM
CALLER: ROBIN	CALLER ADDRESS:
PHONE: 623-363-9237	EMAIL:

CALLER REMARKS/QUESTIONS:

Hi I actually need to talk to someone about adding additional comments now that there's been a chance to study the DEIS. If someone could please contact Robin and a message would be fine if you just tell me what impact submitting additional comments in an organization that previously submitted comments, i.e., at the May 21st public comment forum would have on the total of comments. Or you know would it impact our original comments. Or do you take all comments into consideration? Thank you. Goodbye.

RESPONSE:

A voice mail message was left for Robin stating that all comments submitted during the Draft Environmental Impact Statement public comment will be considered and addressed in the document. She was encouraged to submit her additional comments at www.southmountainfreeway.com or on the telephone hotline at 602-712-7006.

RESPONSE DATE: JULY 3, 2013	RESPONSE TIME: 10 A.M.	HDR STAFF INITIAL: MEB

Code	Issue	Response
1	**Public Involvement**	The 90-day public comment period was open from April 26, 2013 to July 24, 2013. Members of the public could submit as many comments as they wished during this time period by using e-mail, phone, mail, project Web site, or at the public hearing or community forum events.

Code	Comment Document

Document Created: 7/23/2013 6:07:12 PM by Web Comment Form

1 2 3 4 5 The DEIS provided for the Loop 202-South Mountain Freeway is a poor design based on outdated data. The current alignment will play havoc with the bordering Ahwatukee community's traffic with the removal of a major surface street and destroy a good portion of South Mountain with an expensive excavation of three mountain ridges. It is time to stop wasting money and not build the proposed alignment. ADOT has made some pre-decisional actions with the purchase of property before the Draft Environmental Impact Statement (DEIS) was released. I question the legality of this action and the entire DEIS when it appears ADOT has already made considerable financial investment to establish the alignment for the South Mountain Freeway rather than follow the prescribed process.

6 The elimination of Pecos Road in building the SMF would be disastrous for local arterial traffic in Ahwatukee Foothills. Not only would there be no interchange at 32nd Street, there would also be no frontage road along the freeway. So Chandler Boulevard would become inundated with traffic, much as it was before Pecos Road was connected to the I-10.

Also, the arterial streets north of Pecos, Liberty Lane and Lakewood Parkway, would become major East-West arterials in the area between Desert Foothills Parkway and 40th Street. Neither Liberty Lane nor Lakewood Parkway was designed for this. They provide access to 4 schools, including Desert Vista High School. Currently, the school bus traffic uses 32nd Street from Pecos Road to get to these schools. Without a SMF interchange at 32nd Street, this bus traffic would clog the already stressed arterials of Liberty Lane and Lakewood Parkway. High school traffic also includes a lot of student cars that would clog the arterials.

Furthermore, the elimination of the access to Pecos Road from near 27th Avenue (the road is currently called S. Chandler Boulevard) exacerbates an already difficult access problem for residents in that area. ADOT promised to pave W. Chandler Boulevard to provide residents' access to Ahwatukee Foothills further east, but this by no means provides these residents with an acceptable access to/from their homes. Pecos Road currently provides their only access out of their housing area, and it is a direct connection to I-10. With the SMF, Chandler Boulevard would provide their only access out of their housing area, and it would provide a convoluted access for resident to either the SMF or I-10. Egress in case of emergency would be extremely limited.

6 The DEIS lacks a traffic study of the effect the SMF would have on local arterial streets in Ahwatukee Foothills. A study should have been done both for traffic patterns during construction of the SMF as well as patterns that would develop after the SMF would be completed. Because the data is not current, ADOT and its consultants are missing a

7 continuing trend that young adult and teens are getting their driving licenses later and driving less. ADOT should be examining these trends when allocating funds for future projects to ensure our tax dollars are being used sensibly.

Young adults shift away from car ownership

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Alternatives**	The Arizona Department of Transportation purchased some right-of-way along Pecos Road when it was adopted as the freeway alignment in 1988 (see Draft Environmental Impact Statement page 3-53). Should another alternative be adopted as a result of this study, the Arizona Department of Transportation would dispose of the land that has been acquired.
5	**Alternatives**	The Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
6	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The extension of Chandler Boulevard west of 19th Avenue is included in this project because reasonable access must be maintained to the neighborhoods at the west end of Pecos Road (see Figure 3-33 on page 3-57 in the Draft Environmental Impact Statement). Early in the study process a traffic interchange at approximately 27th Avenue was evaluated but ultimately eliminated because of increased residential displacements and cost. The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Draft Environmental Impact Statement page 3-27.)

(Responses continue on next page)

Code	Comment Document
	http://search.ebscohost.com/login.aspx?direct=true&db=n5h&AN=2W63343749097&site=ehost-live Building Cities for Young People: Why We Should Design Cities with Preteens and Young Teens in Mind http://search.ebscohost.com/login.aspx?direct=true&db=a9h&AN=52038648&site=ehost-live For young Americans, driving is less enticing than it once was http://search.ebscohost.com/login.aspx?direct=true&db=n5h&AN=MYO328246030912&site=ehost-live
3	Over 3 million visitors come to South Mountain Park/Preserve annually, according to City of Phoenix statistics. Destroying any part of the mountain to align a high-capacity freeway will only have a negative impact on tourism and the many unique resources the park offers. The DEIS does not address the following issues:
8	• Further fragmentation of an endangered ecosystem – significant in that the Sonoran Desert was listed in 2011 as one of the 12 most threatened landscapes in the U.S. by the Cultural Landscape Foundation (Cultural Landscapes Foundation. 2011. http://travel.usatoday.com/destinations/dispatches/post/2011/09/cultural-landscapefoundation-most-threatened-landscapes/548464/1).
9	• Increase in types of invasive species and spread of existing invasive species, in that their distribution will be encouraged by the highway that will provide a corridor for their movement, further impacting individual native plant and animal species and habitat/ecosystem
8	• Loss of connectivity for plants and animals with Sierra Estrellas, Sonoran Desert National Monument
10	• Increase in heavy metals, particularly lead from vehicles, and cancer-causing pollutants emitted from asphalt
11	• Increase in elevated levels of particulates such as black carbon, nitrogen oxides and carbon monoxide downwind from freeway resulting in increased pulmonary and cardio health issues (Environ Health. 2007; 6: 23)
12	• With increase in pollutants, increased hazard to humans who hike and bike in South Mountain Park, particularly the west end – bicycling and walking increase exposure to air pollutants
10	• Air pollutants negatively affect many plants whether airborne or in the soil (most particles fall to ground) – loss of photosynthetic ability, reduced plant health and vigor; those plants that can exist near highways have increased susceptibility to environmental stresses when compared to plants further away from highway
9	• Construction kills plants including such iconic plants as ironwood, saguaro, Arizona Queen of the Night, elephant tree, ocotillo; those that are removed to be replanted, such as saguaro and littleleaf paloverde, historically experience a very high mortality rate
8	• Roads are highly correlated with changes in species composition and population sizes – populations of the more specialized species such as elephant tree, saguaro, Arizona escheveria, will respond negatively due to loss of habitat, including appropriate substrate and

Code	Issue	Response
7	**Traffic**	The references in the comment are primarily related to national trends for travel; however, the local conditions and setting of the Phoenix metropolitan area are not consistent with areas of high-density cities in other parts of the country. In Maricopa County, daily vehicle miles traveled levels increased by almost 2 percent between 2011 and 2012, and the 2012 daily vehicle miles traveled approached the 2007 prerecession peak in. (*Source:* the Arizona Department of Transportation's Multimodal Planning Division's Highway Performance Monitoring System Data for calendar years 2012 and 2011) Even if the recently observed national trend of per capita vehicle miles traveled decreasing continues, total vehicle miles traveled in the region would still increase along with increases in total population.
8	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Biology, Plants, and Wildlife**	Mitigation measures to prevent introduction of invasive species during construction are discussed on Draft Environmental Impact Statement pages 4-118 through 4-119 and 4-126 through 4-127. The disposition of protected native species would be determined by the Arizona Department of Transportation, in consultation with the Arizona Department of Agriculture, at least 60 calendar days prior to the start of construction. Please see Draft Environmental Impact Statement pages 4-118 and 4-126 through 4-127.
10	**Biology, Plants, and Wildlife**	Less than a mile of the proposed freeway would pass through the park. Issues such as heavy metals, pollutants from asphalt, and airborne emissions that would settle out would have inconsequential potential impacts on adjacent plant vitality and species composition.
11	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
12	**Health Effects**	

Code	Comment Document
13	associated species such as nurse plants • Increased, unmonitored use by humans in an area that had previously escaped heavy, often inappropriate use because of its greater isolation, resulting in a healthier ecosystem (especially compared to the eastern and central part of the Park) and sense of wilderness not experienced in any other City Preserve.
14	I urge ADOT to stop providing studies that do not accurately or thoroughly address the impact this freeway has on South Mountain. It's time to stop the $20 million and more in wasted taxpayer's money to study the environmental impact and design for an alignment that no longer makes sense. Respectfully, Robin Salthouse

Code	Issue	Response
13	**Section 4(f) and Section 6(f)**	The proposed freeway would be fenced off from the park, and no new access to trails or trailheads would be provided as part of the design. This area of the park would remain remote and little-used. The sense of wilderness—compromised as it currently is by the presence of the casino, of traffic on 51st Avenue, and of the currently four-lane Pecos road—would remain.
14	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

5066

1 MS. SALVO: Okay, my concern -- Well, my concern,
2 one of them, is noise readings. In Chapter 4 of the -- of the
3 DEIS, they're using data from September of '03 to July of '04.
4 So they're using very old data, okay, on the noise readings.
5 The fact that they are planning 30-foot sound walls
6 tells me that there's a noise issue. And who wants that sound
7 wall?
8 Another item, on groundwater. In Chapter 4, again,
9 the groundwater withdrawal figures are from 1995. And nothing
10 current.
11 Another item. On replacement water, in Chapter 4,
12 they're using a 1996 lake study, which is out of date and --
13 and incorrect for today's usage. And they have been made aware
14 of that and yet continue to use that study.
15 The next one, the -- They acknowledge, in
16 Chapter 4, that diesel particulate matter will increase with
17 the trucks. Also, Chapter 4, in hazardous materials, they're
18 using a 1986 study of what is being transported. There's no
19 plan to restrict hazardous materials; no plan to respond, on
20 202, to any hazardous-material accidents. And 202 and if they
21 run the South Mountain Freeway, there are no emergency services
22 or assistance for anybody planned along there. You know, if
23 you break down, you're out there.
24 Another item: If, when they -- When they go to cut
25 through South Mountain, they do not address what they may find

Page 2

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Code	Issue	Response
1	**Noise**	Extant noise measurements are used only as a rough check on modeled existing ambient noise levels. The noise model does rely, in part, on the difference between modeled existing ambient noise levels and modeled No-Action and with-project noise levels. The modeled existing ambient noise levels used in the latest noise modeling analyses were not those from 2004 or earlier, ambient or otherwise. The modeled noise levels in the most recent analyses (reported in this Final Environmental Impact Statement) were derived from traffic data generated in August 2013. These analyses updated for the Final Environmental Impact Statement used the most recent Federal Highway Administration and Arizona Department of Transportation policy and traffic projections provided by the Maricopa Association of Governments (August 2013). These updated analyses begin on page 4-88 of the Final Environmental Impact Statement. No substantial differences between the analyses presented in the Draft and the Final Environmental Impact Statements resulted.
2	**Noise**	Noise walls would range in height from 8 feet to 20 feet tall in the Ahwatukee Foothills area.
3	**Groundwater**	The 1995 data were used to provide historical context. Where relevant and available, the latest data available were used. For example, the groundwater data for dissolved solids (Draft Environmental Impact Statement page 4-97) are from 2009 U.S. Geological Survey reports. Often the latest U.S. Geological data are not what would appear to be current. What is important is what the Arizona Department of Transportation would do if its actions were to cause a groundwater impact. The operative language is on Draft Environmental Impact Statement page 4-98: "Affected wells that would need to be fully replaced ... would ... comply with Arizona Revised Statutes § 45-45(c)."
4	**Groundwater**	As with the other groundwater data (previous comment), again, the data were used to provide context. These data were the latest made available from the Foothills Community Association. The project team assumed that the productive capacity of the wells has not appreciably changed since publication of those data. As with the previous comment, the operative language is what is important (text box on Final Environmental Impact Statement page 4-108): "If the well were to be acquired, the water would be replaced ..."
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The Draft Environmental Impact Statement makes no mention in Chapter 4 (or elsewhere) of what hazardous materials might currently be being transported, let alone any 1986 study or data.

(Responses continue on next page)

Code	Comment Document

there: if there are any mines, any shafts, any sinkholes, anything that might have happened even a hundred years ago when this was a mining area. That's not addressed at all.

And another item is the study area is very narrow, like it was a foregone conclusion that this is where they were going to do it. They didn't go far enough south to hit Highway 85 and the route that way around, that would have eliminated the whole issue of these communities around South Mountain. So they kept the -- the study area specific to where they wanted it, which I believe is against the law. They have to broaden it, so that it's much more -- much wider. And then they could have found possibly another route that they didn't want to deal with because this was easier.

It also -- They also have not adequately addressed CANAMEX, C-A-N-A-M-E-X, which is the freeway that is supposed to take the Mexican trucks through to Canada. They're going to be using this as a bypass. These trucks are not up to our standards for pollution or for safety. And we don't know anything about how they operate. So they didn't even address that. They didn't address it in the video. That's just smoke and mirrors, as far as I'm concerned.

And let me see. Hold on a second. Let me check my notes here.

Most of the -- Most of this study is dealing with very old information, very old data, very old studies. There

Code	Issue	Response
7	**Safety and Health**	Emergency assistance and first responder responsibilities would be through the Arizona Department of Public Safety and its Highway Patrol Division and through the local jurisdictions along the route. State and local special training and staffing needs, if any, would not be addressed until closer to the time of freeway construction and operation, if an action alternative were to become the Selected Alternative. The Department's Freeway Service Patrol serves the Phoenix metropolitan area by locating and assisting stranded motorists and eliminating road hazards. The Freeway Service Patrol uses specially staffed and equipped vehicles to patrol the region's freeways seven days per week, 18 hours per day.
8	**Geology**	A search of the Arizona Mineral Industry Location System database, examination of aerial photographs and topographic maps, and field investigation were completed to identify mineral resources and mines in the Study Area. These efforts identified one gold mining claim, six unknown mining claims, and several mining features in the vicinity of the South Mountains. None of these mining claims or features are located within the proposed freeway alignment.
9	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
10	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Purpose and Need, Old Plan or Use of Old Data**	

Code	Comment Document

12 9

is nothing current.

So, basically, they're not being honest with the people and the impact this is going to have, because they don't have current information. And that really bothers me.

The money they spent, the time they spent doing this, the taxpayers deserve more.

I'm not against the freeway. I'm against the freeway on Pecos Road. There are other alternatives if they had just broadened their study area.

Thank you.

Code	Issue	Response
12	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Laveen 202 project
Date: Wednesday, May 22, 2013 10:46:29 AM

From: Sam and Debbie [mailto:sramsey21@cox.net]
Sent: Wednesday, May 22, 2013 10:32 AM
To: Projects
Subject: Laveen 202 project

1

I believe Route W59 is the best route for the 202 freeway.

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4399

three minutes are up. If you have more comments we encourage you to go next door and speak to a court reporter. Thank you.

MR. STONE: Thank you.

THE FACILITATOR: We would like to welcome our next speaker, Carol Sampson.

Welcome, Ms. Sampson. You have three minutes.

MS. SAMPSON: Thank you. Where's the time -- Oh, wait a minute, I have to get my glasses.

THE FACILITATOR: We'll restart the timer. Thank you.

MS. SAMPSON: Thank you. I received a postcard in the mail nearly two weeks ago announcing that a public hearing on May 21st was to provide an opportunity for the public to provide comments on the draft -- on the environmental impact statement on the proposed South Mountain freeway. None of my neighbors received the same postcard when I talked to them. Why were some of the public left out of the mailing? I don't know. They may not have been informed of this public hearing, but I have some comments to make.

I was one of the first home buyers 25 years ago in 1988 and moved into the Ahwatukee Foothills area. At that time I was informed from my builder that there could possibly be a future freeway put in within two years

1

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Code	Issue	Response
1	**Public Involvement**	A mailer providing notification of the Draft Environmental Impact Statement's publication and public hearing was distributed to approximately 87,000 residents and businesses within the Study Area as well as to individuals on the study stakeholder mailing list.

Code	Comment Document

before 1992. It would go around South Mountain, but they didn't know when in the future it would happen, where it would be constructed, how it would be laid out, or even who would pay for it. Since then multiple builders were allowed to build and build all during the 1990s without regard or restrictions to any future freeway plans.

(2)

The building department of Phoenix, the State of Arizona, and ADOT have never given guidelines to locate, designate, or place restricted land boundaries for a future freeway on any of these builders. Now the Ahwatukee Foothills has a population of around 70,000 people, including thousands of homes, numerous schools, parks, shopping, et cetera. The lowest average home value starts at about 250,000. The Arizona environmental impact study states that there are over 733 to 1,304 homes and 30 to 41 businesses along the proposed freeway route that has to be removed before construction even starts. These homes and businesses have to be paid for. These properties will probably be purchased at taxpayer expense, which is around 75 to $130 million.

(3)

(4)

One of the two things that has not ever been investigated and that is the possibility of mines in the South Mountain area. No environmental study has ever been done to prove or disprove or rule out the possibility of past mining in the South Mountain area

(5)

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Code	Issue	Response
2	**Acquisitions and Relocations**	It is not within a City's or State's right to deny building permits to developers who meet all requirements and want to develop their land. In 1996, the Maricopa Association of Governments Regional Council approved the Red Letter Process to provide early notification of potential development (including plans, zoning, and permits) in planned freeway alignments. In addition, the Arizona Department of Transportation works closely with Cities and Counties during the environmental impact statement process to encourage developers to reserve land for future transportation improvements. In some cases, when the developer is willing, the Arizona Department of Transportation has been able to purchase a portion of the land through advanced acquisition (see Final Environmental Impact Statement pages 3-53, 4-13, and 4-48).
3	**Acquisitions and Relocations**	The commenter's displacements are not correct. Table 4-12, on Draft Environmental Impact Statement page 4-39, shows that the Preferred Alternative (the W59 Alternative plus the E1 Alternative) would, potentially, displace 41 businesses, 165 single-family homes (53 along the W59 Alternative right-of-way and 112 along the E1 Alternative right-of-way), and 680 multifamily residences (all along the W59 Alternative right-of-way).
4	**Acquisitions and Relocation**	The commenter appears to suggest that estimated costs for acquisition of right-of-way would be $75 to $130 million. The project team's estimated right-of-way costs (2013 dollars) are $650 million ($425 million for the W59 Alternative and $225 million for the E1 Alternative). Please see Draft Environmental Impact Statement Figures 3-36 and 3-41 on pages 3-59 and 3-67, respectively.
5	**Geology**	A search of the Arizona Mineral Industry Location System database, examination of aerial photographs and topographic maps, and field investigation were completed to identify mineral resources and mines in the Study Area. These efforts identified one gold mining claim, six unknown mining claims, and several mining features in the vicinity of the South Mountains. None of these mining claims or features are located within the proposed freeway alignment.

Code	Comment Document

6

affecting this proposed freeway.

Also, the second issue is that this is a unique freeway in that it connects the north part of I-10 to the south, which is a bypass or a wraparound that makes all interstate traffic and truckers going through the Ahwatukee area and having congestion at the end of the road, where there is already major congestion from the 202 freeway, and there's miles and miles of stop-and-go traffic on the way to Maricopa, on the way to Sun City, and to the casino at that location.

I have a much longer statement that I would like to put into the information that's being collected today. I greatly oppose this freeway.

THE FACILITATOR: Thank you, Ms. Sampson.

MS. SAMPSON: Thank you.

THE FACILITATOR: Linda Abegg. Good afternoon. Did I pronounce your name right?

MS. ABEGG: Yes, you did.

THE FACILITATOR: Ms. Abegg, you have three minutes, there's a timer right down here. Begin, please.

MS. ABEGG: I just wanted to say that I'm in support of building the 202 freeway. I live in Laveen, I have been there for about six or seven years, I think that this would benefit our community in bringing more of the amenities and things that our community is lacking

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Code	Issue	Response
6	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Carol Sampson
Mountain Park Ranch
2441 E. Granite View Drive
Phoenix, Az. 85048

ADOT Loop 202 S
Mountain Freeway Study
1655 W. Jackson Street
MD 126F
Phoenix, Az. 85007

Date: June 7, 2013

Dear ADOT Planners,

(1) I received a postcard in the mail several weeks ago announcing a public hearing on May 21, 2013 to provide an opportunity for the public to provide comments on the Draft on the Environmental Impact Study on the proposed South Mountain Freeway. None of my neighbors received the same postcard when I talked to them. Why were some of the public left out of the mailing ?? They may not have been informed of this Public Hearing but I have comments to make.

I was one of the first home buyers, 25 years ago in 1988, who moved into the Ahwahtukee/Foothills area. At that time I was informed, from my builder, that there could possibly be a future freeway put in within two years before 1992. It would go around South Mountain but they didn't know when in the future it would happen, where it would be constructed, how it would be laid out or even who would pay for it.

(2) Since then, multiple builders were allowed to build and build all during the 1990's without regard or restrictions to any future freeway plans. The city building department of Phoenix, the state of Arizona and ADOT has never given guidelines to locate, designate or place restricted boundaries for a future freeway on any of these builders.

Now the Ahwatukee/Foothills has a population well over 87,000 people and includes thousands of homes, numerous schools, parks, shopping centers, recreation facilities, a Post Office and several churches all forming a prestigious cu-de-sac community. The lowest average home value starts at about $250,000.

(3) The Arizona ADOT/Governmental Draft of the Environmental Impact Study states that a total of between 733 to 1304 homes and 30 to 41 businesses along the proposed freeway route will have to be removed.

Code	Issue	Response
1	**Public Involvement**	A mailer providing notification of the release of the Draft Environmental Impact Statement and public hearing was distributed to approximately 87,000 residents and businesses as well as to individuals on the study stakeholder mailing list.
2	**Acquisitions and Relocation**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
3	**Acquisitions and Relocation**	The commenter's displacements are not correct. Table 4-12, on Draft Environmental Impact Statement page 4-39, shows that the Preferred Alternative (the W59 Alternative plus the E1 Alternative) would, potentially, displace 41 businesses, 165 single-family homes (53 along the W59 Alternative right-of-way and 112 along the E1 Alternative right-of-way), and 680 multifamily residences (all along the W59 Alternative right-of-way).

Code	Comment Document

Before construction even starts, the removal of these homes and businesses has to be paid for first. These properties will have to be purchased at tax payer expense which is much higher that land costs were 25 years ago. Purchases of these homes and businesses all along the proposed freeway route will balloon the tax payer costs to 2.6 hundred million dollars!! The costs to just purchase the land required is enormous and outrageous.

4

There are two serious undisclosed adverse effects and information lacking in the Draft of the Environmental Impact Study that has not been included or addressed at all. The agency is required to make clear that such incomplete and unavailable information is lacking in their report and it does not.

1. The first issue deals with the amount of mining activity that went on in the South Mountain area. As elsewhere, Arizona is a huge mining state and there are years of discussions and speculations as the amount of mining activity that went on in the South Mountain area. There has not been any research or investigation into the possible mining activity in and around South Mountain.

5

NO ENVIRONMENTAL STUDY HAS EVER BEEN DONE TO PROVE, OR DISPROVE, OR RULE OUT THE POSSIBLITY OF PAST MINING IN THE SOUTH MOUNTAIN AREA AFFECTING THIS PROPOSED FREEWAY.

Are there old mines and mine openings in this area dug by individuals and/or mining companies during the "Turn of the Century" rush to find gold and other minerals? Are there underground tunnels, mine shafts and openings in the pathway of this freeway? If so, where are these undisclosed mine shafts, where are the unknown underground tunnels and other openings effecting the building of this freeway?

Are we tax payers going to be responsible for millions of unknown costs to locate, fill and seal off these un-identified mines, tunnels and mine shafts? Could there be sink holes and other liabilities due to a possible unstable underground? Are these costs going to be another hidden expense to building this freeway? These questions were not even dealt with in the Draft of the Environmental Impact Study.

2. The second issue NOT addressed by the Draft of the Environmental Impact Study deals with the I-10 Interstate traffic.

6

The Draft of the Environmental Impact Study stated that, " the South Mountain 202 freeway would be similar or the same as the other freeways in the valley such as the 101, 143, 202, 303 and the 60 freeways. The other

Code	Issue	Response
4	**Acquisitions and Relocation**	The commenter appears to suggest that estimated costs for acquisition of right-of-way would be $260 million. The project team's estimated right-of-way costs (2013 dollars) are $650 million ($425 million for the W59 Alternative and $225 million for the E1 Alternative). Please see Draft Environmental Impact Statement Figures 3-36 and 3-41 on pages 3-59 and 3-67, respectively.
5	**Geology**	A search of the Arizona Mineral Industry Location System database, examination of aerial photographs and topographic maps, and field investigation were completed to identify mineral resources and mines in the Study Area. These efforts identified one gold mining claim, six unknown mining claims, and several mining features in the vicinity of the South Mountains. None of these mining claims or features are located within the proposed freeway alignment.
6	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

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freeways are helpful in moving traffic only for the population around the valley to and from work, shopping, etc. Benefits of these valley freeways include enhanced access to and from employment opportunities and enhanced movement of goods and services for improved access to such goods and services for all population segments." The Draft concludes: therefore, no secondary impacts would occur by building the South Mountain 202 Freeway.

That conclusion is grossly WRONG, because the proposed South Mountain 202 freeway is unique in one way that other valley freeways are not. This is not an extension of the 202 freeway serving only the Phoenix valley residences. It would connect the **Interstate I-10 freeway** in two locations: one on the west side of Phoenix and the other on the south side of Phoenix. This connection would give Interstate and International drivers the access and opportunity to avoid and go around the metropolitan Phoenix area. The proposed South Mountain 202 freeway would open up a huge short cut or by-pass for all kinds of **International and Interstate I-10** freeway traffic right thru Ahwatukee/Foothills and the Gila River Reservation.

6

General driver behavior, especially by Interstate truckers, would easily find the South Mountain 202 freeway a short cut or a by-pass, indeed, a great time saver shown on their GPS maps. All **International and Interstate I-10** drivers who are not stopping to enjoy Phoenix would find this alternative route an obvious time saver.

Therefore, the impact of the South Mountain 202 freeway for the Ahwatukee/Foothills would be disproportionately extreme.

The Ahwatukee/Foothills community is built on slopping foothill elevations. The air pollution and noise levels from the added **International and Interstate 1-10** traffic would increase all over the foothills area. Both noise and air pollution would be trapped up against the approximately 2,500 foot high South Mountain range and be confined directly to the Ahwatukee/Foothills below.

7
8

Instead of air pollution being dissipated, the typical southwest winds would push and hold pollutants against the foothills and the mountain would block them from being dispersed. The Ahwatukee/Foothills would become smog city making it a less desirable place to live. This proposed freeway will drop property values due to the traffic, smog, noise, and congestion.

9

The standard cure for noise pollution is the installation of freeway concrete noise abatement walls. These walls are somewhat successful on freeways with flat land behind them. They would do no good for the Ahwatukee/Foothills community which is built stair-stepped up the foothills.

7

3

Code	Issue	Response
7	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes, which may be elevated above the roadway, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Valley and across the country.
8	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
9	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138 -47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

Congestion today at the I-10 interstate and the 202 connection next to the Wild Horse Casino and new Outlet Discount stores is "stop and go" and gets worse for miles, in both directions and especially for those going to Chandler, Maricopa and Sun Lakes. Local traffic would be worse, especially during rush hours and holidays and could be the length or more of Pecos Road. Adding more **International and Interstate I-10** traffic using the proposed South Mountain 202 freeway short cut or by-pass would trap even higher amounts of traffic, fumes and noise in the surrounding communities.

10

In conclusion, as a member of PARC, I find this proposed South Mountain 202 freeway extremely costly for tax payers and environmentally unsafe, and it is environmentally unjust to one area of the population, the residences of the Ahwatukee /Foothills. The Draft of the Environmental Impact Study is lacking, not legally complete and has not done a through job of answering many major questions. The proposed South Mountain 202 freeway has not been properly planned for over the last 25 years and there may be a certain amount of negligence and liability on the part of the City of Phoenix, the State of Arizona and ADOT.

11

Sincerely,

Carol Sampson

Carol Sampson

Code	Issue	Response
10	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
11	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 9:50 AM
CALLER: MICHELLE SAMSON	CALLER ADDRESS: 8324 W. HAMMOND LANE, TOLLESON AZ 85353
PHONE: 623-478-8785	EMAIL:
CALLER REMARKS/QUESTIONS: I do support the proposed South Mountain Freeway thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/31/13	INCOMING CALL TIME: 12:22 AM
CALLER: JASMINE SANCHEZ	CALLER ADDRESS: 5914 W. ODEUM LANE, PHOENIX, AZ 85043
PHONE: 602-403-0533	EMAIL:

CALLER REMARKS/QUESTIONS:

1 2

I am leaving a message regarding the ADOT Loop 202 South. The reason I'm calling to give my input on the possible areas for the Loop 202. For the W-59 that would be very close to our home and that would create great hardship for us because both of our daughters go to the Riverside School District and it would be very difficult for us to then have to travel alternate routes to drop them off at school. Because according to this map it appears that the freeway would be going right by our home so we would not be able to take 59th Avenue north to drop them off at school, which is on 51st in between Buckeye and Lower Buckeye Road. So this will create great hardship for our family, as well as my husband works on 59th Avenue so he would have to go southbound rather than being able to take 59th straight northbound as he does every day. So it would be very difficult to take our children to school and it would cause us great hardship because of our work schedules and because the time it would take us to take alternate routes to drop them off because we would no longer be able to leave directly from our home, take 59th northbound to Lower Buckeye and drop the girls off at school. This would create great hardship. Please call me if you have any questions. Would you please consider another route for the Loop 202. Thanks very much for your time.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Design**	The proposed freeway would be located west of 59th Avenue and would not affect access to 59th Avenue south of Lower Buckeye Road (or to or from the commenter's neighborhood). Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.

Code	Comment Document

Document Created: 6/27/2013 1:22:27 PM by Web Comment Form

As a resident of Ahwatukee since 1979, a member of PARC, and as a parent and grandparent, I would like to go on record as being adamantly opposed to the Loop 202 extension.

1 2 3 4 5 6 7 8 9 10 11 12

The proposed extension along the Pecos alignment will not alleviate the congestion on the I-10 into the downtown area, and will only serve as a truck bypass as part of the CANMEX route. If that occurs additional pollution from unregulated trucks and vehicles will increase the risk to health of those living nearby. This includes students attending nearby schools, families in homes, and senior citizen communities. In addition, the South Mountain and Estrella mountain ranges form a natural barrier to the north and west of the proposed route which will keep the pollution from dissipating and further endangering residents living nearby.

Aside from damaging sensitive cultural and ecological areas of Phoenix's crowning jewel, South Mountain Park, the decision to move forward based on what appears to be an incomplete EIS is troubling. If traffic is such an issue why aren't planners looking to finding more sustainable mass transit solutions, or alternative routes for traffic? The I-8 to SR 85 route for this proposed bypass is a much more cost effective solution, less invasive solution.

13

I strongly urge you to remove the Pecos Road alignment from consideration.

Thank you,
Irma Sandercock

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	In 2035, the average daily traffic on the proposed freeway is projected to range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-62). The estimated volume depends on location. The purpose and need for the South Mountain Freeway are not solely to relieve congestion on Interstate 10 (Maricopa Freeway). Facilitating mobility in the Maricopa Association of Governments region does not mean just relieving congestion on the Broadway Curve (see Final Environmental Impact Statement page 1-21). Among other criteria, the proposed freeway is to permit the entire Regional Freeway and Highway System to function as designed. Optimal function of that design includes completing all the segments of the State Route 202L system (see Final Environmental Impact Statement pages 3-35 and 3-37). With implementation of the South Mountain Freeway, many motorists would be able to get from Point A to Point B, a route that never included needing to use Interstate 10. According to the project team's traffic analysis, without the proposed freeway, existing roads and planned road improvements would accommodate about 76 percent of the transportation demand projected for 2035, leaving 24 percent of the anticipated demand unmet. If one assumes better-than-expected performance of nonfreeway aspects of the transportation system, 13 additional percentage points of the 24 percent deficiency would be accommodated. This means that the transportation network would still have an 11 percent capacity deficiency. The same analysis with the proposed freeway in operation in 2035 concluded that the met demand would increase to 82 percent; better-than-planned scenarios noted above, if achieved, would reduce network deficiency to 5 percent. The proposed freeway would handle about half of the capacity deficiency not captured by other modes. (See Figure 3-14 on Final Environmental Impact Statement page 3-31).
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Trucks**	
5	**Air Quality**	
6	**Health Effects**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
8	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Section 4(f) and Section 6(f)**	
10	**Biology, Plants, and Wildlife**	
11	**Purpose and Need, Old Plan or Use of Old Data**	
12	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
13	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Sierra Club on behalf of John Sanders
To: Projects
Subject: Opposition to the South Mountain Freeway
Date: Thursday, June 06, 2013 3:48:27 PM

Jun 6, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

Hello,

(2) I'm writing to express my opposition to the proposed South Mountain Freeway. Building additional roads does not solve the obvious problem here - far too much reliance on automobiles. They needlessly burn fossil fuels, polluting the environment and increasing health hazards. (3) They also continue to foster the USA's reliance on fossil fuels, which is certainly not beneficial. Ozone levels would only increase in the long run, because additional freeways encourage urban sprawl, thereby (4) increasing reliance on the automobile. The only way to reduce the Valley's poor air quality is to have fewer automobiles and vehicles, not encouraging their proliferation. (5) With a fraction of the funding earmarked for the freeway, real mass transit options could be offered, thereby decreasing overall pollutants.

(6) Additionally, the freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation and a symbol of pride for Valley residents. (7) What message does it send to future generations that we were willing to devastate this Park for something as ridiculous as another freeway? We should listen carefully to our neighbors to the south, the Gila Indian reservations and respect the land, not demolish it. They view this land as holy and we should carefully consider why. After doing so, why should be more respectful of it and revere it, not look to ruin it.

(8) I understand this freeway was originally part of the Valley's transportation plan decades ago. In the meantime, we have progressed in many ways as a society. Let's keep that trend going by not just blindly following a poor plan that existed 25 plus years ago. Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. John Sanders
16602 S Magenta Rd
Phoenix, AZ 85048-2073
(602) 309-1512

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Health Effects**	
4	**Secondary and Cumulative**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
5	**Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Section 4(f) and Section 6(f)**	
7	**Cultural Resources**	
8	**Purpose and Need, Old Plan or Use of Old Data**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: No Build for South Mountain 202
Date: Tuesday, July 23, 2013 8:49:47 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT
Communications

From: Linda Sanders [mailto:sardermt@gmail.com]
Sent: Tuesday, July 23, 2013 6:26 AM
To: Projects
Subject: No Build for South Mountain 202

To Whom it May Concern:

I do not support the building of the South Mountain Portion of the 202.

1 2 3 -If it is built this segment will become a part of the Canada to Mexico trucking system. A more economical and efficient solution would be to convert Hwy 85 as a viable connection between I-8 to I-10.

4 -Building the segment will contribute to urban sprawl. With Phoenix being a relatively young city, it has the opportunity to look at previous cities and communities and the reality that building out freeways simply results in these systems being filled and more freeway building being required.

5 -Building this segment will decrease the air quality and

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
4	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
6 7	quality of life for the Ahwautukee neighborhoods and the visitors to the South Mountain Hiking system, a truly remarkable urban park. I encourage the Arizona Department of Transportation to think beyond the car/freeway option for a solutions to the transportation needs of the Phoenix metro area. I support a "no-build" decision for the South Mountain 202 segment. Sincerely, Linda Sanders 15405 S. 18th Ave. Phoenix, AZ 85045 sardermt@gmail.com Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
8 9	

Code	Issue	Response
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
9	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/10/13	INCOMING CALL TIME: 12:07 PM
CALLER: JACK SANDHAGEN	CALLER ADDRESS:
PHONE: 602-531-1335	EMAIL:
CALLER REMARKS/QUESTIONS: Yes, I support the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 4:41 PM
CALLER (UNCLEAR) SANTA MARIA	CALLER ADDRESS: 9047 W. BANFIELD, PEORIA 85381
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I approve the South Mountain freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: gary
To: Projects
Cc: parcthesmf@aol.com
Subject: South Mountain Freeway, Loop 202
Date: Wednesday, July 24, 2013 9:46:00 AM
Attachments: PARC Letter.doc

To whom it may concern:

Please see the attached Word document regarding my thoughts and opion regarding the South Mountain Freeway, Loop 202.

Sincerely,
Gary Sanuik
Ahwatukee/Phoenix resident

(Comment codes begin on next page)

Code	Issue	Response

Code	Comment Document

Gary Sanuik
15615 S. 16th Street
Phoenix, AZ 85048

July 24, 2013

PARC
P.O. Box 50455
Phoenix, AZ 85076-0455

Email: projects@azdot.gov

Subject: South Mountain Freeway, Loop 202

To Whom It May Concern:

1 2 3 4 5 I live near the intersection of 16th Street and Chandler Blvd. and I can hear the noise coming from Firebird Lake, soon to have a name change and expanded venues. I cannot imagine the noise that would come from a 10 lane freeway with big rig trucks running 24/7, all going 65-70 miles per hour. We in Ahwatukee sure don't want part of the CANAMEX highway running through our backyards

In my opinion, Pecos Road should be at most built out as a six (6) lane parkway, three (3) lanes each way running in each direction to the west side. There should be a provision that big rig semis cannot use this parkway, the big trucks need to stay on the interstate. 6

A parkway would be a better option as it opens up for cars and light trucks to travel from the East side of Phoenix to the West side using a shorter route saving time and mileage. This option would target the workforce that commutes from the East Valley to the West side. We don't want a shortcut for the long haul truckers to run through our backyards for the sake of saving a few miles. It's the same reason the Indians don't want those big rigs motoring across their land. Although they know in the long run they would benefit from the exposure to their casino and shopping mall. The Indians are greedy. They know the road is in their favor no matter where they put it. The Indians are dependent on the Federal Government for support and they know it is in their best interest. They also know that no matter what the outcome, they come out on top. Too bad, they are all part of the Governments free program's and they still won't cooperate for the good of all. 3 7

A parkway makes so much sense. It saves tons of money in construction costs and can be completed in a much shorter time frame. It would not impact normal traffic on Chandler Blvd. and/or Ray Road. It would also be much more environmentally friendly. Travel from West to East and East to West satisfies everyone who needs to get around South Mountain for work or shopping. Houses, churches, sacred land and other natural lands like South Mountain preserves would not be impacted. 8 9 10

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The proposed freeway would only have eight lanes (see page 3-58 of the Final Environmental Impact Statement).
2	**Noise**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Air quality and noise modeling for the Draft and Final Environmental Impact Statements used this forecast truck traffic (see Final Environmental Impact Statement pages 4-68 and 4-100, respectively). Noise mitigation is designed for this predicted noise level, including the noise from trucks.
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Trucks**	
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
6	**Alternatives**	In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.
7	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

(Responses continue on next page)

Code	Comment Document
11	The best option for big rig trucks is to make Route AZ 85 through Gila Bend to US Route 8 easier to use. That would divert hundreds of cars and trucks heading to or from Texas and California on Interstate 10 who only use our congested highways as a means to get from here to there. Everybody wins. Gila Bend wins. It would be a great place to live, similar to Casa Grande. Their economy would grow. They would be back on the map. They are close to Phoenix, San Diego, Mexico and all the other highways you would want to take to get places; Las Vegas, Nevada; Los Angeles, California and all up and down the West Coast. These are my thoughts and my opinion. Sincerely, Gary Sanuik Email: gsanuik@aol.com .

Code	Issue	Response
9	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
10	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document
1	Nandini Sarkar Document Created: 6/9/2013 12:48:15 PM by Web Comment Form Not a good idea. Tukee is a peaceful neighbourhood with great schools. People have worked hard to build this community. We do not a higway here.

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Sierra Club on behalf of Annmarie Sauer
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Tuesday, May 28, 2013 12:14:52 AM

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 3 Please do invest in good public transport and keep thus keep the air cleaner and prevent more deterioration of the landscape and the environment. The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 2 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

3 5 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

6 7 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

8 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

1 Sincerely,

Ms. Annmarie Sauer
Tennessee ave
Chloride, AZ 86431

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 3:42 PM
CALLER: LINDA SCHEPP	CALLER ADDRESS: 1049 E. MCLELLAN BOULEVARD, PHOENIX AZ 85014
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hello. I am in favor of the freeway and thank you for allowing me to add my name. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:19 PM
CALLER: LOIS SCHIER	CALLER ADDRESS: SUN LAKES, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the Red Mountain Freeway. Thank you. Bye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Need to build the 202
Date: Monday, May 20, 2013 1:57:19 PM

From: Byron Schlomach [mailto:bschlomach@goldwaterinstitute.org]
Sent: Monday, May 20, 2013 1:57 PM
To: Projects; info@buildthe202.com
Subject: Need to build the 202

I've lived in Arizona for almost 6 years now. The whole time, I've lived in the west of Phoenix and, of necessity, must use Interstate 10 to commute every day. I've tried other routes but traffic control lights, school zones, local traffic, and trains all get in the way to significantly delay the commute more than I-10 even when I-10 is heavily congested. I have been on the highways in other areas of town. It is difficult to find anything more congested than I-10 on the west side. However, traffic would move immensely better if there were an alternative route for trucks and other traffic only passing through.

The congestion increases emissions as vehicles idle, often at a full stop, on the interstate. Very often, top speed over a 12 mile stretch of I-10 is 40 miles per hour with numerous stops and starts. This increases wear and tear on vehicles and increases the heat bubble over I-10 (I know since I ride a motorcycle).

1

The 202 Loop was designed to pull traffic from downtown and the tunnel (a poor design choice, by the way). This relief is badly needed, especially in the area of the I-17 interchange. The one problem with Loop 202 is that it is designed to intersect I10 at 55th Avenue when it should have been routed to intersect with Loop 101 on the west side. This poor design choice will cause problems on I-10 until it is widened between 99th Avenue and 55th Avenue. Nevertheless, Loop 202 should be built to provide the same sort of qualitative transportation service to the west side of Phoenix as the east valley already enjoys.

Byron Schlomach, PhD | Economist | Center for Economic Prosperity at the Goldwater Institute
www.goldwaterinstitute.org | o: (602) 462-5000

"The Goldwater Institute is simply in the liberty business – and there's no institution in the country that performs that business better." – Columnist, journalist and author George Will

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

David Schneider Document Created: 5/21/2013 1:34:04 PM by Web Comment Form

1 2 3 4

I'm very dissapointed with the process where a road is approved than changed to a major freeway 8 lanes. This will become a truck bypass and the noise levels will be horific for the Ahwatukee Foothill residents,

Code	Issue	Response
1	**Design**	The general location and facility type for this project has remained unchanged since the mid-1980s. See Final Environmental Impact Statement page 1-5 for information on the history of this project.
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

Kelley Schneider

Document Created: 5/21/2013 2:20:52 PM by Web Comment Form

1 2 3 4

I feel the enviromental impact with air, noise and water issues would affect my quality of living. I live in Lakewood which is very close to Pecos Road and we would suffer large noise issues with a truck bypass for Phoenix. In addition I don't think water wells that feed our local lakes have even been looked into. We have a great ecosystem at these lakes and I don't want that to be affected by the build.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)
4	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

5068

1 MR. SCHODT: Just that I prefer the 101 West
2 Alignment, so that they don't put a kink in our loop. That's
3 what I feel that they're doing, you know, by bringing that I --
4 onto I-10. It's already a parking lot, in the evening. And
5 they're just putting more cars on top of that. It would just
6 make it worse.
7 So when we do travel to the west side, we're
8 generally going to a sporting event in Glendale, and the
9 202/101 alignment would be much easier to get to those events
10 to the north and would probably benefit Glendale a lot more by
11 bringing more business from Gilbert, Chandler, Ahwatukee, up
12 there.
13 So that's how I feel about it. Thank you.
14 (The public hearing proceedings concluded at 2:00 p.m.)
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22
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25

Page 7

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 12:57 PM
CALLER: HERMAN SCHREIBER	CALLER ADDRESS: 13825 N. SAHARA, SUN CITY, ARIZONA
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: In support of extending route 202 for economic development of Laveen
Date: Wednesday, May 22, 2013 10:51:39 AM

From: William Schrepple [mailto:william.schrepple@hotmail.com]
Sent: Tuesday, May 21, 2013 1:04 PM
To: Projects
Subject: In support of extending route 202 for economic development of Laveen

1

I would like to voice my support for the extension of the 202 for economic development to the Laveen area of Phoenix. It would help to create jobs, alleviate traffic on Baseline Rd and the 10, and make services more accessible to the people of Laveen. It would need to be built correctly with sound barriers, etc in respect of nearby neighborhood housing. I wouldn't mind if there was a toll on it to help support the costs of construction and to benefit local indian tribes.

-Bill Schrepple

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:45 PM
CALLER: SHIRLEY SCHUESTER	CALLER ADDRESS: SUN LAKES, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the extension of the 202 Freeway, south of South Mountain and Pecos Road. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: 202 S. Mt Opinion #1319541836
Date: Monday, July 15, 2013 7:43:06 AM
Attachments: image001.png

7/14/2013 11:32:48 AM
The South Mountain Freeway, Loop 202 Extension...
I am totally against the 202 Extension coming through Ahwatukee Foothills. I have seen the 215 Beltway go through Las Vegas and yes it does relieve traffic but it also grows and grows a desert with houses and stores and changes the face of the land forever. Ahwatukee Foothills has pollution as it is. But it also has beauty and a community feel. No no no on this extension.

1 2

Alice Schultze
roseypetunia@cox.net

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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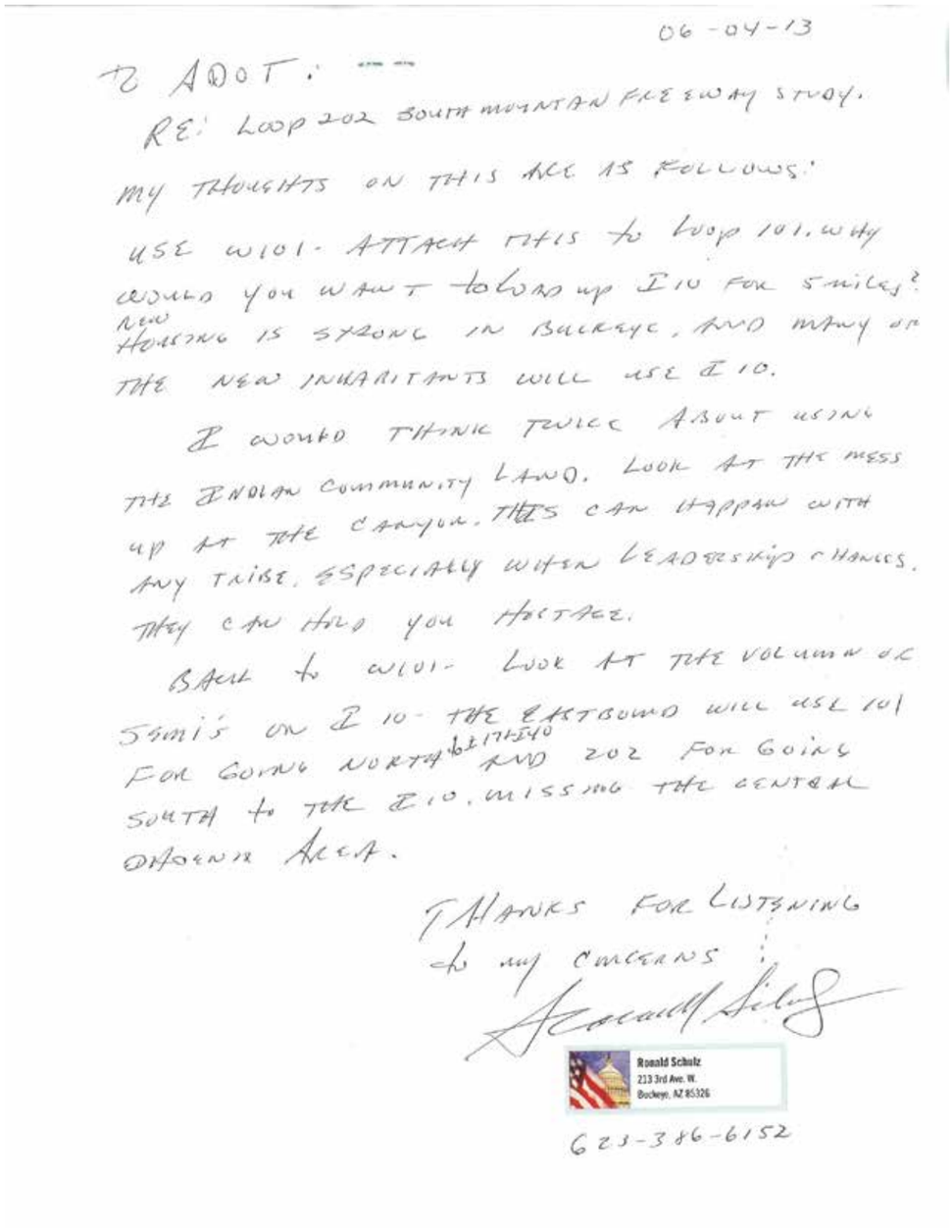
Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document
1 2	

06-04-13

TO ADOT:

RE: LOOP 202 SOUTH MOUNTAIN FREEWAY STUDY.

MY THOUGHTS ON THIS ARE AS FOLLOWS:

USE W101. ATTACH THIS TO LOOP 101. WHY WOULD YOU WANT TO LOAD UP I10 FOR 5 MILES? NEW HOUSING IS STRONG IN BUCKEYE, AND MANY OF THE NEW INHABITANTS WILL USE I 10.

I WOULD THINK TWICE ABOUT USING THE INDIAN COMMUNITY LAND. LOOK AT THE MESS UP AT THE CANYON. THIS CAN HAPPEN WITH ANY TRIBE, ESPECIALLY WITH LEADERSHIP CHANGES. THEY CAN HOLD YOU HOSTAGE.

BACK TO W101- LOOK AT THE VOLUMES OF 5 MILES ON I 10- THE EASTBOUND WILL USE 101 FOR GOING NORTH & EITHER AND 202 FOR GOING SOUTH TO THE I 10, MISSING THE CENTRAL PHOENIX AREA.

THANKS FOR LISTENING TO MY CONCERNS:

Ronald Schulz
213 3rd Ave. W.
Buckeye, AZ 85326

623-386-6152

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

better utilization of this portion of the freeway? Every afternoon I hear about how congested the San Tan portion is, so it seems like the South Mountain freeway will just increase congestion on this roadway, or is that what ADOT considers to be better utilization, more congestion and increased travel time.

Overall, this freeway is not worth the cost. It will destroy a portion of South Mountain Park, an area that was set aside to protect natural resources and to provide public benefit. It will destroy wildlife habitat and movement corridors. It will exacerbate air quality concerns and climate change. It will endanger public health, and it will do all of this without any real added benefit to our communities, so we should not build the South Mountain freeway. Thank you.

THE FACILITATOR: Thank you.

Ana Morago?

If you'd like to speak and are not yet registered, please go out to the front desk registration.

Steve Schwab. Please feel free to use either microphone.

MR. SCHWAB: Good afternoon. My name is Steve Schwab. I've been in the Valley for 31 years and I have witnessed a lot of freeway growth here and I strongly, strongly urge you to accept the action alternative here.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

I support the South Mountain freeway. I've seen a lot of economic development and an enhanced community as a result of the freeways that have been built here. I think they're beautiful the way ADOT does it and I strongly encourage acceptance of this. Thank you.

THE FACILITATOR: Thank you.

I'll try Ana Morago again.

MS. MORAGO: Hi, my name is Ana Morago, I am from Gila River Indian Community. Well, this is kind of -- I've been doing this for two years now, urging ADOT not to build the freeway at all, because we hold the South Mountain sacred to four tribes, actually: Akimel AuAuthm, Akimel O'odham, Tohono O'odham, and Ak Chin. These tribes all hold this ground sacred, and if you blast through this mountain you're going to be dealing with four tribes trying to save the mountain as well as the wildlife and the plant life that live on there.

I read the EIS last night talking -- or trying to get ideas for talking points, and one that we really need to look at is the water. Water is the source of all life. When I read it, there's hazardous materials are going to be going underground, water wells, lots of wells, surface water is going to be contaminated as well as polluted, as well as our Sonoran Desert tortoise as a newly endangered species list now, as well the Mexican

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Expressway L-202
Date: Monday, May 20, 2013 8:31:31 AM

From: raschwa@juno.com [mailto:raschwa@juno.com]
Sent: Saturday, May 18, 2013 8:30 AM
To: Projects
Subject: South Mountain Expressway L-202

1

Please build this freeway and soon [whichever alignment works best!]! It is long overdue!!

Thanks,

Ron Schwartz

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Joya Scott

Document Created: 7/9/2013 6:05:04 PM by Web Comment Form

(1) (2) I am writing to oppose the construction of the Loop 202 extension. I believe the increased traffic and pollution in the area will be destructive to my neighbors' way of life in Laveen, the Gila River Indian Community, and surrounding areas.

(3) (4) (5) (6) Specifically, I am very concerned that the DEIS is not accurate. It does not identify the displacement of Gila River homes, does not identify an evacuation route in the event of a biohazard accident, does not depict the loss of agriculturally zoned lands in the Laveen and Gila River areas, and does not visually display prehistoric and sacred sites potentially impacted from construction.

(7) I demand that ADOT thoroughly analyze these impacts and provide visuals such as aerial photography where needed.

(8) I also urge ADOT to release a revised Environmental Impact Statement that takes into account public health concerns and related issues.

Code	Issue	Response
1	**Neighborhoods/ Communities**	The Laveen Village area is anticipated to have a built-out population of over 105,000 (see Final Environmental Impact Statement page 4-5). This proposed level of development places increasing demand on the road network. The City of Phoenix's General Plan for Laveen Village has designated areas along the proposed freeway for commercial development that cannot support the projected densities without implementation of the proposed freeway. Without the proposed freeway, the conversion of land from undeveloped and agricultural uses to residential, commercial, and industrial land uses would likely continue, placing a greater demand on surface streets (see Final Environmental Impact Statement page 4-14).
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Design**	The proposed freeway would not use any Gila River Indian Community land therefore would not displace any Gila River Indian Community homes or convert any Gila River Indian Community farmlands to a freeway.
4	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Agriculture**	The current analysis of impacts on prime and unique farmland—the land most suitable for growing food—indicates that loss of this type of farmland would be negligible. Urbanization in the Study Area is steadily moving in a westward direction. If an action alternative were selected—and by the time it were to be constructed—it is likely that more land will have already been converted from agricultural use to residential, commercial, and/or industrial uses, and that the proposed South Mountain Freeway would have even less of an impact. Urbanization will continue with or without implementation of the proposed freeway (see Final Environmental Impact Statement pages 4-161 and 4-162).
6	**Cultural Resources**	The locations of prehistoric and sacred sites are not shown on maps to protect them from vandalism.
7	**Alternatives**	Aerial photographs are used throughout the Draft and Final Environmental Impact Statements. Long, detailed, roll plots of the alternatives were available to the public at the Public Meeting in May 2013 and were extensively used.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 2:50 PM
CALLER: JENNY SCRIBNER	CALLER ADDRESS: 3313 N. 60TH STREET, PHOENIX, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am calling in support of the South Mountain Freeway Extension. Thank you very much.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 10:57 AM
CALLER: THERESA SEELANDER	CALLER ADDRESS: 184 EAST LAGUNA ROYALE, LITCHFIELD PARK, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am in very much support of the South Mountain freeway and I'm just voicing my opinion and I think it would be a great advantage for our already busy, busy freeways and highways. And always in support for new jobs and helping out our economy. So I am definitely for it. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
04/25/13	2:29 PM
CALLER: SHANNON SELBY	CALLER ADDRESS: AHWATUKEE, AZ
PHONE: 602-908-3400	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I have a few questions about the proposed South Mountain Freeway. I am an Ahwatukee resident but work for the City of Tempe.

RESPONSE:

Message left on 4/25 at 2:50 p.m.
Message left on 4/26 at 9:30 a.m.
Message left on 4/29 at 9:30 a.m.

RESPONSE DATE:	RESPONSE TIME:	HDR STAFF INITIAL:
APRIL 12, 2013	1:45 PM	MEB

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
5/18/163	4:20 PM
CALLER: BEVERLY SEMPER	CALLER ADDRESS: 16415 NORTH 39TH PLACE PHOENIX AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Please, I do support the freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 5:16 PM
CALLER: KATHRYN SERANTE	CALLER ADDRESS: 2449 EAST LINCOLN CIRCLE, PHOENIX 85016
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I do support the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:37:43 AM

-----Original Message-----
From: Sharon A Service [mailto:sharonadsharon@yahoo.com]
Sent: Sunday, May 12, 2013 3:13 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I support building the 202 Freeway. I hope you will.

Sharon S.

Sent from my iPad

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:37:34 AM

-----Original Message-----
From: Sharon A Service [mailto:sharon14206@yahoo.com]
Sent: Sunday, May 12, 2013 3:15 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Please build the South Mountain Freeway. It's desperately needed.

Sharon S.

Sent from my iPad

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4193

1 MR. SHANKER: My name is Howard Shanker.
2 I live in Ahwatukee in Club West. I would like to
3 personally point out that I think the draft EIS is
4 inadequate in a number of reasons. I don't think it
5 addresses the air impacts adequately, especially with
6 schools and residences so close or the noise impacts.
7 What else?
8 I don't know that they've done an adequate
9 socioeconomic analysis, adequately interpreted the
10 impacts thereof. It seems to me that this was really a
11 foregone conclusion, that they made their mind up 20 or
12 30 years ago when the demographics were very different.
13 And to maintain this exact same location for the freeway
14 just doesn't make any sense anymore.
15 What else?
16 I think -- Did I talk about the 4F
17 analysis briefly already?
18 That's about all for now. This is all
19 sort of impromptu, but I'm glad to get this on the
20 record. I anticipate submitting a written response
21 hopefully.
22 MR. DAD: I'm in favor of the freeway
23 because of the traffic congestion that's coming into
24 Laveen. I've had this property since 1961, so it's come
25 a long ways. But the people bring traffic and we can't

Page 12

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www.drivernix.com

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	
3	**Noise**	
4	**Purpose and Need, Old Plan or Use of Old Data**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 1:18 PM
CALLER: SANDRA SHARBONAL	CALLER ADDRESS: 13401 W. RUMMOCK STREET, SURPRISE, ARIZONA 85374
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Alexis Sharif Document Created: 6/3/2013 12:15:29 PM by Web Comment Form

I am a resident of Ahwatukee and want the freeway built. It is difficult to leave or enter Ahwatukee on any weekday during "rush hour". But even not at the peak of "rush hour" traffic volume has increased. Weekend traffic has not diminished either. If there is an accident on the I-10 in either direction we are held hostage with no way to leave or get back to Ahwatukee, it is a total ROAD BLOCK NIGHTMARE. If there were an emergency that required an evacuation of this area this presents a potential tragedy just waiting to happen.

1

I respect and understand where the GRIC is coming from in their wish to preserve South Mountain and their land. However, they are major contributors and will continue to be major contributors to the increased traffic, pollution and gridlock on I-10. They now have major public attractions; Casino, Resort Hotel, Rawhide, and now the Outlet Mall. They don't have a problem building commercial entities on their land and reaping the benefits of such entities and I'm sure they have plans to continue to expand. Is the GRIC's progress for the "good of the community" and what community are we talking about. The freeway would be for the good of the community.....the GRIC AND the Phoenix/Ahwatukee community.

The GRIC can not be allowed to be a part of the problem (increased traffic to the area—I-10) to reap the benefits of their commercialization of the area and not be a part of the solution. They should either allow part of their land to be used for the freeway, as they have used for their commercial endeavors. This can/will offer more opportunities for them to further build income producing enterprises along the route and contribute to access to the area in and around Ahwatukee.

BUILD THE FREEWAY! People need to travel from the west side of town and will continue to do so on I-10 what a future gridlock nightmare if nothing is done.

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. _____

PLEASE Build Loop 202:

I live in Laveen near Baseline and 75th and our neighbors and I are tired of being isolated. This community is cut off from the rest of Phoenix because we have no dependable roads out. We must use one of three routes – Baseline to 91st, Baseline to 67th or Baseline to one of the more easterly avenues to get anywhere. Then, we often must backtrack to 75th Avenue to shop, see a doctor or go to a hospital. It's very scary when one has a medical emergency as we did a few years ago when a visiting relative experienced congestive heart failure. To make matters worse, whenever there are floods, 91st and 67th Avenues are flooded – often for extended periods of time - we must drive eastward down to 51st or 35th Avenue to get out of here even if we only want to go west on I-10.

I know there are people who believe that there will be more polluted air should South Mountain Freeway ever be built, but I can't begin to compute the extra miles that this family and hundreds like it have had to drive double the miles, zigzagging simply to get to I-10 and to access downtown Phoenix and other communities, to see the doctor, to go to the hospital, etc. I'm certain that our gas bills for our vehicles are twice as much than they would be for our vehicles than if there were reliable bridges at 59th, 67th and/or 75th Avenues out of here! I believe that the pollution will be less if we can lessen the number of miles we have to drive even when there is no flooding.

I also believe that there will be havoc on I-10 through central Phoenix if this 202 link isn't extended soon. There needs to be some relief to carry vehicles around Phoenix. The cars will come, but will Phoenix and Maricopa County be ready? This project should have been completed already, years ago! It won't help to stretch out this process longer. Please get the job done asap!

1

Address _____

City _____

K. Shariff

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

13-159

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Julie Sharpe

Document Created: 7/24/2013 1:46:40 PM by Web Comment Form

1 2 3 4 5

I am concerned that the DEIS does not identify the displacement of Gila River homes, does not identify an evacuation route in the event of a biohazardous accident, does not depict the loss of agriculturally zoned lands in the Laveen and Gila River areas, or visually display prehistoric sites potentially impacted from construction. ADOT needs to analyze these impacts and provide visuals such as aerial photography where needed.

Code	Issue	Response
1	**Alternatives**	The proposed freeway would not use any Gila River Indian Community land therefore would not displace any Gila River Indian Community homes or convert any Gila River Indian Community farmlands to a freeway.
2	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Agriculture**	Existing agriculture is depicted in Figure 4-3, on page 4-6, of the Draft Environmental Impact Statement. While not an aerial photograph, it outlines the parcels that are currently under agricultural production. Table 4-4, on page 4-7, summarizes existing zoning by land use for the entire Study Area. In addition, Figure 4-4, on page 4-8, reveals how much of the existing agricultural land along the W59 Alternative is already slated for commercial and residential development. Implementation of the E1 Alternative would cause no conversion of agricultural uses on Gila River Indian Community land. Urbanization will continue with or without implementation of the proposed freeway (see Final Environmental Impact Statement pages 4-161 and 4-162).
4	**Cultural Resources**	Maps showing locations of cultural sites are kept confidential to protect the sites.
5	**Alternatives**	Aerial photographs are used throughout the Draft and Final Environmental Impact Statements. Long, detailed, roll plots of the alternatives were available to the public at the Public Meeting in May 2013 and were extensively used.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

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When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 I AM 100% AGAINST THIS FREEWAY. SOUTH MOUNTAIN PARK IS SACRED TO ME AS WELL THE IDEA THAT THESE PARKS WOULD BE
2 DESTROYED FOR A FREEWAY IS HORRIFIC.
THIS IS THE 21ST CENTURY. IT IS TIME TO
3 CHANGE TO ALTERNATIVE TRANSPORTATION — EXTEND THE LIGHT RAIL, ADD MORE BUSES & BIKE LINES, ENCOURAGE PEOPLE TO MOVE CLOSER TO THEIR WORK.
THE PIESTEWA FREEWAY DESTROYED SQUAW PEAK, DON'T DO IT TO SOUTH MOUNTAIN!

Optional

Name PAULA SHAFFER Email paulas408@gmail.com
Address 12422 S. ONEIDA CT.
City PHOENIX State AZ. Zip
Phone 602-369-4431 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SOUTH MTN FREEWAY
Date: Wednesday, May 15, 2013 2:26:32 PM

From: ELVIN SHAW [mailto:elvinshaw@gmail.com]
Sent: Wednesday, May 15, 2013 1:56 PM
To: Projects
Subject: SOUTH MTN FREEWAY

I HOLE HEARTEDLY SUPPORT THE SOUTH MTN FREEWAY TO TAKE SOME LOAD OFF THE BROADWAY CURVE.

1

IS IT PRACTICAL TO CONSIDER A SECOND LEVEL FOR A STRETCH OF I-10 ???

ELVIN SHAW

480-380-7718

7910 E. NAVARRO AVE

MESA, AZ 85209

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.

Code	Issue	Response
1	**Design**	A double deck freeway would cost more to construct and maintain than a freeway alternative that would be at grade.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: No on Loop 202/South Mountain
Date: Wednesday, May 22, 2013 10:53:58 AM

From: DeAnne Shaw [mailto:shawsomes@gmail.com]
Sent: Tuesday, May 21, 2013 11:26 AM
To: Projects
Cc: DeAnne Shaw
Subject: No on Loop 202/South Mountain

Good morning,

I am writing today in hopes of ensuring that my voice is heard. I am unable to join the events in downtown Phoenix today to do this in person.

I am against the building of the South Mountain/Loop 202 along its current trajectory through Laveen at 59th Avenue. My husband and I made a choice eight years ago to build our home in Laveen after looking in different areas of the valley. We were drawn to Laveen's rural feel, the mountain vistas and the cultural opportunities for our children being so close to the Gila River Reservation. When many bailed out on their agreement to build their home in Laveen (our area of 67th Avenue/Baseline apparently had zoning issues that took many months to resolve) we waited almost 18 months to move from north Phoenix (16th Street/Loop 101) to Laveen.

1 Laveen is not and was not meant to be a metropolis. People who moved out here with limited transportation options and then demanded public transportation have turned a quiet little town in to a transient and not terribly rural community. People who moved out here and then complained that there are no sit down restaurants and not a wide variety of businesses do not seem to understand the concept that not all land must be developed. Yes, we took advantage of a beautiful area in which to build our home. However we did not expect infrastructure at the expense of the environment, native landscapes and small town feel.

I do agree that traffic congestion is an issue that needs to be addressed in the valley. It is not completely up to the state and federal government to solely address the issue. Citizens must do their part to reduce their trips in their cars that creates that congestion. Yes, it is very nice to live outside the city and have some space and be able to see the stars at night. Nevertheless the onus is also on every citizen to make sensible choices about where they live to ensure that all factors are considered. The introduction of a new high-speed roadway is not ever going to guarantee movie theaters, big box stores, and medical centers. Those things may very well come to the area if the roadway is indeed built although at what cost? Is there a guarantee that the businesses will be willing to pay what I am sure will be a premium space cost for proximity to the roadway? No. Is there a guarantee that Laveen will not become a roadway with two high schools and a grocery store? No. Is it an intelligent choice to destroy – no matter whether it's a *blast* or a small *cut* – mountains that have existed long before any of us and will be here long after? No. Do I take advantage of the I-17, knowing that blasts were done to get that roadway built? Yes, I do. However if I read the information correctly that roadway was built because there were no other roadways heading north and south. The current plan for Loop 202 does not fulfill a singular need where there are no other options.

2

Code	Issue	Response
1	**Neighborhoods/ Communities**	The Laveen Village area is anticipated to have a built-out population of over 105,000 (see Final Environmental Impact Statement page 4-5). This proposed level of development places increasing demand on the road network. The City of Phoenix's General Plan for Laveen Village has designated areas along the proposed freeway for commercial development that cannot support the projected densities without implementation of the proposed freeway. Without the proposed freeway, the conversion of land from undeveloped and agricultural uses to residential, commercial, and industrial land uses would likely continue, placing a greater demand on surface streets (see Final Environmental Impact Statement page 4-14).
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
3	I would indeed support a more logical trajectory of the 202 to connect at the 101/I-10 interchange. There is minimal commercial development on the southeast corner of 99th avenue/101 therefore with some mutually agreed upon concessions from both sides – public and private sector – I believe the necessary flyovers and other roadways could be developed. If the only option will remain the 59th Avenue trajectory then I cannot support continued development of this road way. Thank you for your time. Sincerely, DeAnne M. Shaw Laveen, AZ 480-201-2867 shawsomes@gmail.com Arizona Resident since 2002 Laveen Resident since 2005 Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
3	**Alternatives**	The Arizona Department of Transportation has designated the 59th Avenue connection (W59 Alternative) with Interstate 10 (Papago Freeway) as the Preferred Alternative for the proposed freeway in the Western Section of the Study Area. The W101 Alternative would connect with State Route 101L, but would also result in substantial impacts on the community of Tolleson. The South Mountain Citizen's Advisory Team recommended the W101 Alternative. The project team considered the input of all stakeholders—including regional leaders, municipalities, members of the public, and members of the South Mountain Citizen's Advisory Team—before identifying the W59 Alternative as the Preferred Alternative (see Final Environmental Impact Statement pages 3-65 and 3-68). The W59 Alternative was seen as the best option to balance fiscal responsibility, regional mobility needs, community sensitivity, and additional considerations such as consistency with long-range planning goals, economic and environmental impacts, and public and agency input.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 I OPPOSE The SMF entirely. It is in essence a "truck By-Pass" for Trucks going/coming from/to the West Valley distribution Warehouses. The trucking industry Surely lover the SMF.

2 I SMF would destroy the integrity of the S. Mtn. Park. This Park has been a Blessing To The Valley and now the SMF will destroy and disfigure (DISFIGURE) our great park.

3 This is a disaster TO Nature & our people.
What is the environmental Impact of leasing land by the Gila Community along the south of the SMF To Truck stops, Businesses etc.
Why did the Gila Community oppose the SMF? They know the horrible impact on their land and people.

Optional

Name Jim Shea Email —

Address 3020 N 14th St 222A

City PHX State AZ Zip

Phone 6072666038 Fax —

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Purpose and Need**	The direct impacts of adjacent development, whether in the City of Phoenix or on Gila River Indian Community land are not considered in the scope of this study.

Code	Comment Document

South mountain loop 202

After viewing the video on the south mountain freeway/ 202 loop. I feel it sadly depicts the highway as a moderately traveled high way without any large trucks. That in and of its self is an outright fraud and misrepresentation of what this Truck route will really be. This strip of road will be the preferred route of 18 wheelers coming and going to Mexico. Weather you identify it as the SMCAT route or not. Common sense tell you that truck drivers would rather take the route that allows them to avoid a metropolitan area. It will flood one of the better neighborhoods and communities in Phoenix with smog and diesel exhaust, increased noise from the large trucks, like Jake breaks noise and roar of the tires and large engines. It will expose our community to an increase in crime from transits to smugglers and more. Increased danger to our community from accidents with big rigs carrying hazardous materials. This route will endanger three schools and countless families with exhaust and an unsightly 16 foot so called noise reduction wall, that won't help the people that have bought houses higher in the foot hills than the wall. It is going to increase traffic through the surface roads and access roads to this high way. Which is something ADOT likes to say will be eased. It isn't even a short cut to the city. This highway is thirty years too late. It was voted in back when there was a fraction of people living here in Ahwahtukee. Now there are around 87 thousand folks living here that for the most part will be adversely affected by this waste of tax payer's money. Hundreds of homes and businesses have to be removed at the tax payers expense and this truck route will ultimately transform and dilute this wonderful community from a sought after place to live With good schools, nice environment, good property values, to a noisy, smog filled truck route. This Highway has to be stopped!!!!! No Action!

Rob Sheehan
2409 E Hiddenview Dr
Phx AZ 85048
lotsadoc@gmail.com
(480) 225-2768

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Air Quality**	
4	**Noise**	
5	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
6	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Health Effects**	
8	**Noise**	Noise walls would range in height from 8 feet to 20 feet tall in the Ahwatukee Foothills area. As mentioned in the sidebar on page 4-91, the Final Environmental Impact Statement is based on preliminary design and traffic information. As the design progresses to the Final Design phase, noise barrier locations and heights will be refined and finalized. During Final Design, more detailed information on the location, actual height, and distance from the property line of each noise barrier will become available.
9	**Noise**	As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes, which may be elevated above the roadway, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Valley and across the country.
10	**Traffic**	On arterial streets with traffic interchange connections with the proposed freeway, daily traffic volumes would increase near the freeway. This statement is supported by the traffic information presented in Figure 3-37 on page 3-61 of the Final Environmental Impact Statement; for example Van Buren Street between 59th and 51st Avenues). However, the freeway would provide wide-ranging reductions in overall travel on Study Area arterial streets. As shown in Figure 3-13 on page 3-30 of the Final Environmental Impact Statement, the total volume removed from the arterial street network with the proposed freeway in place in 2035 would be 277,000 vehicles per day.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
11	**Traffic**	The statement related to reductions on arterial streets considers those arterials streets in and around the entire Study Area, not just in Ahwatukee Foothills Village. The traffic projections for Chandler Boulevard (see Figure 3-12 on page 3-29 of the Final Environmental Impact Statement do show a reduction with the proposed freeway when compared with conditions without the proposed freeway. The travel time comparison shown in Figure 3-17 on page 3-34 of the Final Environmental Impact Statement included a trip from Ahwatukee Foothills Village to Downtown Phoenix using Interstate 10, not the proposed freeway. This trip would take 5 or 6 minutes less with the proposed freeway in place when compared with conditions without the proposed freeway. The duration of level of service E or F (represents stop-and-go traffic) for the existing conditions and future conditions without the proposed freeway are shown in Figure 1-9 and 1-10 in the Final Environmental Impact Statement. In both conditions there are more than 3 hours of congested conditions during the morning and evening commuting periods on a number of the region's freeways, especially Interstate 10.
12	**Purpose and Need**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
13	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
14	**Neighborhoods/ Communities**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.

Code	Comment Document

5022

MR. SHEEHAN: Where do I start? I had a nice little thing typed up, actually.

Basically, I feel that this is a ruse, to -- that's being suggested, that it's going to be just to relieve traffic. But it's actually going to become a glorified truck route, with the traffic to Canada, highways that we're talking about, and the fact that they're going to -- that you're going to be having vehicles that are not -- not under the same emissions standards that we have.

So it's going to be emitting all kinds of -- all kinds of diesel fumes, Jake brake noise, tires, and large engines that's going to be going up and down this -- our community. This --

Am I going too fast?

COURT REPORTER: No.

MR. SHEEHAN: Okay. This whole thing is 30 years too late.

Back when it was first voted in there, by the -- by the populous here, there wasn't 85,000 people living here and all kinds of houses and people that have moved into a highly sought-after area, like Ahwatukee is. It's a really great community.

And they -- They went in here because it is the world's largest cul-de-sac and nobody wanted to -- people wanted to move in there to have the good schools, to have the

Page 10

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Air Quality**	
4	**Noise**	
5	**Purpose and Need, Old Plan or Use of Old Data**	

Code	Comment Document

6 3 4 7 8 9 10 11 12 13

clean air, to have the relief from the city and from the highways.

And now we're going to have a glorified truck route, running up past -- past our community. It's going to bring in more crime, lots of noise, lots of emissions, not to mention the fact that the -- we're going to have to cut through a mountain and our State Park. And it's going to change all the wildlife that's living there, as well as the people that use it.

I feel that it's over, it's -- The cost for it, you know, the Proposition 400, when it was -- when it was pushed through, was -- it was kind of lumped together in the middle of a bunch of others projects. Most of the Valley that voted for it didn't even realize that they were voting for it to extend the taxes.

So that means we're just adding more and more money to it. And then having to tear down houses that the planning commission probably should have never allowed to build there, anyway, because this has always been such a long-term plan. They should have done something to stop those houses from going in there, so we didn't have millions of dollars having to be spent to take over people's property there.

So I'm -- I say: No action or look towards the 85, to put the route way far south of where the city is, anyway. I think that would be a better -- a better route to take, that

Page 11

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Biology, Plants, and Wildlife**	
9	**Purpose and Need**	The Southwest Loop Highway—the South Mountain Freeway predecessor—was integral to the Regional Freeway and Highway System approved by Maricopa County voters in 1985. Although other facilities were considered a higher priority early in development of the Regional Freeway and Highway System, the South Mountain Freeway has been included in every subsequent update. The same route was approved by the State Transportation Board in 1988. In 2004, Maricopa County voters approved Proposition 400, which was designed to fund completion of the remaining segments of the Regional Freeway and Highway System, including the proposed South Mountain Freeway (Final Environmental Impact Statement page 1-21).
10	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
11	**Neighborhoods/ Communities**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
12	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

they suggested in this other little handout that -- Keep using Route 85 to avoid the whole community in its entirety.

So I think that would -- I think that pretty much sums it up. Thank you.

Code	Issue	Response
13	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 9:31 AM
CALLER: RON SHERMAN	CALLER ADDRESS: 10433 E. EAST DRIVE, SUN LAKES, AZ 85248
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the Loop 202 South Mountain Freeway project. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:30 PM
CALLER: ARATHI SHETTY	ADDRESS: 6921 W. MALDONADO ROAD, LAVEEN, AZ 85339
PHONE: 623-385-6518	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 4:35 PM
CALLER MIKE SHIELDS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Yes, I'm in favor of the freeway going behind South Mountain and I think it's a very good thing and it would help Phoenix a whole bunch. Bye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: ADOT Loop 202 South Mountain Draft EIS
Date: Friday, May 31, 2013 11:54:35 AM

From: Kim Shirley [mailto:kim@21sthealth.com]
Sent: Friday, May 31, 2013 11:18 AM
To: Projects
Subject: ADOT Loop 202 South Mountain Draft EIS

AZDOT,

I am one hundred percent against the proposed 202 South Mountain Freeway. I moved my family here, to Ahwatukee because of its unique cul-de-sac quality. We are indeed part of Phoenix but we feel like a private suburb here in Ahwatukee. The freeway would allow passer biers access to our special neighborhoods and stores. I feel that the proposed freeway would also serve as more of a truck bypass on to the I-10. (1)

My family are also avid users of the South Mountain Trail System. I understand that the freeway will not interrupt any of the trail system but nobody wants to see cars running through from the top of a peak. It will cause noise and pollution. People come to South Mountain for peace, nature and its sheer beauty. (2) (3) (4) (5)

The alignment goes right up Pecos. On any given Saturday or Sunday morning there are hundreds of cyclists that use Pecos to ride up and down. Arizona was just ranked 10th out of 50 states for bike friendliness in 2013 by the League of American Bicyclists. With that much usage on Pecos where are we cyclists supposed to go? Ahwatukee is full of cyclists who ride on Pecos. There is no end to how the South Mountain 202 Loop would damage this very unique area. (6)

In conclusion, some things aren't worth wreaking. In my opinion the cons outweigh the pros. The proposed freeway system may help some but will take away much more that can't be given back. (7) (8)

Kimberly Shirley

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Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	
6	**Traffic**	The study has considered concepts for parallel multiuse paths, however the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
7	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document
1	Jason Shumberger Document Created: 4/27/2013 5:37:35 PM by Web Comment Form As an urban planning product, it is widely known that regardless of highway addition. it will not reduce traffic in the long run; only serve to create more car travelers. If this money were spent on public transit, walking and bike infrastructure; that has been shown to provide long term traffic reduction. Think not only about the traffic, but also the livability lessons of Portland, Minneapolis, etc. vs. Los Angeles and Houston.

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South mountain freeway
Date: Monday, May 20, 2013 8:45:33 AM

-----Original Message-----
From: ROY SID [mailto:roysid2@aol.com]
Sent: Friday, May 17, 2013 4:58 PM
To: Projects
Subject: South mountain freeway

1

We need this freeway for our state to expand in the right direction,

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 11:50 AM
CALLER: STEVE SIDOWSKY	CALLER ADDRESS: 11630 N. RIO VISTA DRIVE, SUN CITY, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am ecstatic over this Loop 202 to connect to the 10 South of Ahwatukee. It's long awaited and long overdue. Thank you very much. Still a working person using freeways, highways all the time. Thank you very much.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1
2
3

mitchell siegel Document Created: 5/22/2013 8:40:28 PM by Web Comment Form

I disagree with your proposed bridge to close off 32nd street along with specific concerns - too dangerous life to our homes, more traffic to 40th street - more pollution because of waiting too long, crash over to homes, more pollution area from 32nd street to 40th street bad health for kids and homes. If disaster happens, we don't escape to 32nd street - more traffic on Liberty lane and school entrance from pecos road. they block us for entrance to liberty lane from school. Please don't build. I drive to 32nd street and pecos road for 2-3 mins. If proposed to close off on 32nd street this will take me delay timing about 10-15 mins.

Code	Issue	Response
1	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located in close proximity to an existing high school. The City recommended that based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Health Effects**	

Code	Comment Document

From: Mitchell Siegel
To: Projects
Cc: Merrisa Marin; Mitchell Siegel
Subject: 202 L freeway
Date: Sunday, May 26, 2013 5:51:39 AM
Attachments: 32nd street Map2.pdf
ATT00001.htm
40TH ST Map1.pdf
ATT00002.htm

---

1 I have on the proposed bridge to close off 32nd street along with specific concerns:

--[if !supportLists]-->**1.** <!--[endif]-->**BIOHAZARDS:**

<!--[if !supportLists]-->• <!--[endif]-->Flying debris over homes, people

2 <!--[if !supportLists]-->• <!--[endif]-->Chemical spills, gas, etc

3 <!--[if !supportLists]-->• <!--[endif]-->Heavy traffic trucking – if crash or traffic – waiting times causes more pollution

4 <!--[if !supportLists]-->• <!--[endif]-->Increase air pollution to our area thru 40th street/ 32nd street Dead End

<!--[if !supportLists]-->• <!--[endif]-->Crash

5 <!--[if !supportLists]-->• <!--[endif]-->Destroy HOA private roads

<!--[if !supportLists]-->• <!--[endif]-->Destroy to the property homes by shaking, foundation, etc

6 <!--[if !supportLists]-->• <!--[endif]-->Schools – kids can't play ground outside due to health

<!--[if !supportLists]-->• <!--[endif]-->Causing great loss of life, damage, hardship to homes, kids, schools

7 <!--[if !supportLists]-->• <!--[endif]-->Threat to humans or to the environment

-

--[if !supportLists]-->**2.** <!--[endif]-->**DISASTER:** We can't escape to Desert Vista HS area - E. Liberty Lane to 32nd street/Pecos Road from E. Redwood Lane, 31st Way, 30th Place, 29th Way:

<!--[if !supportLists]-->• <!--[endif]-->Fire

8 <!--[if !supportLists]-->• <!--[endif]-->Emergency

Code	Issue	Response
1	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
2	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need, Truck Bypass**	
4	**Air Quality**	
5	**Traffic**	The E1 Alternative would affect the existing local street network. Approaches for reconfiguring the local street network include removing streets, constructing new streets, constructing the proposed freeway over existing streets, or dead-ending existing streets. Final design of local streets would be coordinated with emergency service providers, local jurisdictions, and other appropriate agencies and would continue through final design stages. See Final Environmental Impact Statement Figure 3-33, on page 3-57.
6	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Biology, Plants, and Wildlife**	
8	**Hazardous Materials**	Emergency assistance and first responder responsibilities would be through the Arizona Department of Public Safety and its Highway Patrol Division and through the local jurisdictions along the route. State and local special training and staffing needs, if any, would not be addressed until closer to the time of freeway construction and operation, if an action alternative were to become the Selected Alternative. The Department's Freeway Service Patrol serves the Phoenix metropolitan area by locating and assisting stranded motorists and eliminating road hazards. The Freeway Service Patrol uses specially staffed and equipped vehicles to patrol the region's freeways seven days per week, 18 hours per day.

Code	Comment Document
	<!--[if !supportLists]-->• <!--[endif]-->Meteors
	<!--[if !supportLists]-->• <!--[endif]-->Weather
	<!--[if !supportLists]-->• <!--[endif]-->School Events
	<!--[if !supportLists]-->• <!--[endif]-->Crash
	<!--[if !supportLists]-->• <!--[endif]-->Traffic
1	<!--[if !supportLists]-->• <!--[endif]-->No Entrance to 32nd Street for Schools
	<!--[if !supportLists]-->• <!--[endif]-->Sport Events
	<!--[if !supportLists]-->• <!--[endif]-->Parking from School events
1	--[if !supportLists]-->**3.** <!--[endif]--><u>**TRAFFIC:**</u>
	<!--[if !supportLists]-->• <!--[endif]-->No entrance to Loop 202 east from E. Chandler Blvd
	<!--[if !supportLists]-->• <!--[endif]-->No entrance to 32nd Street/Pecos Road
	<!--[if !supportLists]-->• <!--[endif]-->Delay Timing – 10-20 minutes
	<!--[if !supportLists]-->• <!--[endif]-->Bad Traffic thru E. Chandler Blvd, 40th Street and private roads – E. Liberty Lane to S. Lakewood Parkway W. to E. Brianwood Way
	<!--[if !supportLists]-->• <!--[endif]-->Schools
4	<!--[if !supportLists]-->• <!--[endif]-->Increase air pollution – waiting times, etc

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, July 22, 2013 8:54:33 AM

-----Original Message-----
From: Siegel, Shana [mailto:SSiegel@gc.cuny.edu]
Sent: Monday, July 22, 2013 6:59 AM
To: Projects
Subject: South Mountain Freeway

To the South Mountain Study Team-

1
2 3

Building a freeway, highway, or any other project on a site sacred to Native peoples in Arizona would be a violation of the internationally recognized human rights of Indigenous peoples. Thus, not only is the freeway unnecessary, and not only will its construction destroy of a portion of the environment, but it runs contrary to international human rights laws to which the US has bound itself. Is this the way you want the rest of the country to view your project? Rather than build on the land, the land should be returned to the Native peoples from whom it was taken, according to UN Special Rapporteur S. James Anaya. See for example: http://unsr.jamesanaya.org/notes/special-rapporteur-publishes-report-on-the-situation-of-indigenous-peoples-in-the-united-states and: http://unsr.jamesanaya.org/country-reports/the-situation-of-indigenous-peoples-in-the-united-states-of-america. By the way, public comment sessions do NOT constitute valid consultation and accommodation, or valid free, prior and informed consent --both of which are required under international laws (by which the United States has legally bound itself) prior to commencing projects on lands still claimed by Indigenous peoples.

4 5

Sincerely,
Dr. Shana Siegel
136 8th Street
Brooklyn, NY 11215

_____

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Code	Issue	Response
1	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Biology, Plants, and Wildlife**	
4	**Cultural Resources**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
5	**Cultural Resources**	The Federal Highway Administration and Arizona Department of Transportation have consulted with all interested agencies and Native American tribes. Consulting parties for this project include Federal Highway Administration, Arizona Department of Transportation, the Arizona State Historic Preservation Office, the Arizona State Land Department, the Arizona State Museum, the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs, the Bureau of Reclamation, the Western Area Power Administration, the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County, the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, and the City of Tolleson. (See Draft Environmental Impact Statement pages 2-4 through 2-7, 4-133 through 4-145, 4-147, and 5-29 through 5-30.) The Federal Highway Administration and Arizona Department of Transportation have consulted with the Advisory Council on Historic Preservation following National Historic Preservation Act Section 106 procedures. Strict adherence to Section 106 of the National Historic Preservation Act not only preceded the preparation and issuance of a Draft Environmental Impact Statement, but is ongoing and will continue in the future. The Draft and Final Environmental Impact Statements comply with Section 106 of the National Historic Preservation Act. All Native American tribes with cultural affiliation (as claimed at that time) with the Study Area were consulted about the project in 2001. All Arizona tribes were consulted in 2005. In 2001, the Federal Highway Administration and Arizona Department of Transportation initiated National Historic Preservation Act Section 106 consultations with all Native American tribes that claimed cultural affiliation to the Study Area. Consultations were initiated with the Ak-Chin Indian Community, Gila River Indian Community, the Hopi Tribe, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe. In 2005, the Federal Highway Administration and Arizona Department of Transportation consulted with all Native American tribes in Arizona to ensure all interested Native American were included in the process and had the opportunity to communicate their concerns. These tribes were the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community, the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe. Most of these tribes did not express an interest in the proposed project The proposed South Mountain Freeway project meets requirements of the National Environmental policy Act, Section 4(f) of the Department of Transportation Act, the National Historic Preservation Act, the Archaeological Resource Protection Act, the Religious Freedom Restoration Act, the Religious Land Use and Institutionalized Persons Act, and the United Nations Declaration on the Rights of Indigenous Peoples. The reader is referred to Chapter 2, *Gila River Indian Community Coordination*, and Table 4-48, "*Record of Section 106 Consultation*", on page 4-133, to illustrate the extensive outreach with Native American communities.

Code	Comment Document

From: Sierra Club on behalf of Ann Sierra
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 11:38:11 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to (3) effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more (5) vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a (7) freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Please do not destroy any more of what Phoenix used to be. Are you planning on paving every piece of country there is? Your slogan should be PAVE EVERY PART OF NATURE WE CAN

Sincerely,

Ms. Ann Sierra

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	715 N Queen Ave Tucson, AZ 85705-7658

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

5045

MR. SIIKI: Jiivik Siiki. Well, I'm from here. I was born and raised in the Gila River Indian community, and I'm 48 years old and I'm an enrolled member of the community. I also do a lot of the cultural work in the community. And the reason why I'm here is to oppose the freeway being placed not only on tribal land, but the desecration of this mountain, and in our language we call it Mohdahk.

And so this mountain is one of the centers of our cultural knowledge. It's -- we still use it a lot today and I'll go into that. And so one of the -- I've always worked for the community, and in one of those jobs I had was as an environmental control, or also did hazmat for the fire department. And in the documents that I read, there's no information regarding safety and how the community will be protected.

I know that the fire department has a hazmat team, and they also have limited response equipment, but primarily they depend on the Arizona Department of Emergency Management and the other mutual aid cities. So Ahwatukee or Phoenix Fire Department would have to be in coordination with the tribe's fire department on response should the freeway be placed on tribal land.

Page 21

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Alternatives**	The proposed freeway would not use any Gila River Indian Community land.
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Hazardous Materials**	
4	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

3

And from what I heard and talked with some of the fire department crew at the fire station, they haven't received anything. So that needs to be justified, why the tribe isn't being involved in any of the negotiation or the discussion. Meaning, community members. Not talking about a limited number of people on a committee.

So my big concern is the lack of protection of community members and our land. I used to do a lot of response on I-10 with semis, and there's a lot of hazardous material coming through and that's pretty dangerous to everyone. So that's one of the jobs I had. Another job I had was, I was a preschool teacher in District 7 which is in the community, and it's in the area of 83rd Avenue and Baseline. And during the wintertime, a lot of kids would get sick from all the smog from Phoenix that came and sat in between South Mountain and Estrella Mountain and that's tribal land. It wasn't pollution that we created, but the kids, you know, of course, asthma and all of those ailments.

And, again, in the documentation I've seen, there's nothing specifying the health hazards and the effects that it will have on the community from this freeway. That needs to be included. And

5

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Code	Issue	Response
5	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

6

we can easily receive that information from the tribe through the tribal hospital and also through Indian Health Service. Some of the people in the area either come to the clinic here in District 6, or they go to Phoenix Indian Medical Center. So we don't have that information either which needs to be included.

The political part of it, the fact that nontribal people have always practiced environmental racism upon tribal people is reflected in the need to place a freeway on tribal land, and this has been happening since '40s, you know. You know, do it to the Indians. They don't have enough laws, they don't have enough interest or, you know, we can do what we want to them.

Case in point is the Chandler, the Gila River Industrial Park which is right next to the casinos. Again, as part of the fire department, I responded to explosions there and where they had a medical waste incinerator which we put a stop to. But it was placed there because of the lack of laws in the tribe preventing them from doing that, and it's easier and cheaper to do it on tribal land. It doesn't hurt nontribal people. You know, it's "Not in my backyard" kind of mentality.

Page 23

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Code	Issue	Response
6	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

Code	Comment Document

So, again, this freeway's the same thing. Nontribal people see supposedly empty land that doesn't have grass and cookie cutter homes and they think they can use it, but that's not going to happen anymore. We put a stop to the freeway on tribal land. We should be able to put a stop to desecrating the mountain which, again, is central to our culture.

Environmental racism again is a big factor. It needs to be -- we need to defend against it. The Civil Rights Act, again, we are protected under that and that's a federal law. It's not a tribal law. It's a federal law affecting everyone. And so that hasn't been included in the documentation that has been provided to anyone, and so I'd like that to be brought up.

Finally, I mentioned that I do a lot of culture work, and I'm not going to go into details as far as what I do, but South Mountain is central to what we do. Has a lot of teachings. It has its own song, it has its own prayers, it has its own connection to us, the story that we use today. Not only that, it has a -- as a runner, we do a lot of running even today from the east side of South Mountain to the west side. There's trails that we follow. And we also take our young people up there

2

Code	Issue	Response

Code	Comment Document

and show them what needs to be protected. This, again, is a big part of our culture. Especially during the winter time, we go up there a lot and teach them what it means, what the name of the mountain means, why we need to take care of it.

And so all the running that we do in that mountain strengthens us, and we can't continue that if it keeps getting disrupted, you know, our culture continues to be disrupted, and we can't have that. I think that's all I have.

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain
Date: Monday, July 15, 2013 11:55:36 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Michael Silver [mailto:Michael.Silver@asu.edu]
Sent: Monday, July 15, 2013 11:52 AM
To: Projects
Subject: Loop 202 South Mountain

There is ample evidence that the Environmental Impact Study conducted for the extension of the loop 202 is both incomplete and misleading (i.e., biased toward its support of the current build option). This freeway project is both disruptive to the ecology and economy of the Ahwatukee Foothills and damaging to the overall quality of life for more than 100,000 nearby residents. What was true 30 years ago, when the project was first proposed, is no longer valid. I strongly oppose the departments pursuit of this project when, in fact, the resources it would command could be expended in a more suitable and beneficial manner.
Michael Silver
Phoenix

1 2 3 4

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Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 8:02 PM
CALLER: TONY SIMMONS	CALLER ADDRESS: 4901 W. FRIEND STREET, CHANDLER, AZ 85226
PHONE: 480-705-9281	EMAIL:
CALLER REMARKS/QUESTIONS: I support of South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Route 202
Date: Tuesday, June 25, 2013 3:13:33 PM

From: Simon, Harvey B.,M.D. [mailto:HSIMON@PARTNERS.ORG]
Sent: Tuesday, June 25, 2013 3:12 PM
To: Projects
Subject: Route 202

1

I appreciate the opportunity to comment on the proposed extension of Route 202. Like many other Phoenix residents, I support the road for it's ability to facilitate travel to remote parts of the Valley and for its role in easing vehicular congestion. As a resident of Ahwatukee, I am also concerned about the extension's potential impact on our community. I urge you to make every effort to preserve the architecture, quiet streets, and especially the small lakes in the region. I believe this is of great importance for both the quality of life and for our property values.

Thank you.

Harvey B. Simon
16013 S Desert Foothills Parkway

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway.
Date: Thursday, May 23, 2013 12:57:00 PM

From: JSimons4109@aol.com [mailto:JSimons4109@aol.com]
Sent: Thursday, May 23, 2013 11:56 AM
To: Projects
Subject: South Mountain Freeway.

1 2 3 4 5 6

I would to tell ADOT that myself and my wife are OPPOSED to the building of the freeway if it is located on what is now Pecos Parkway. There are better options including an I-8 to I-10 connector or the Gila river alignment. The highway plan is now 25 years out of date. The city of Phoenix, unlike Chandler and Gilbert did not set aside the land and has allowed both private and public improvements on what should be city easements. The building of this freeway will increase pollution to the immediate area as well as cause a drop in property values. I urge ADOT to stop the consideration of the Pecos parkway alignment until a better alternative is found.

Thank you for your consideration

James and Carolyn Simons

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Code	Issue	Response
1	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
2	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need, Lack of Support**	
4	**Acquisitions and Relocations**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Final Environmental Impact Statement.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138 -47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain 202 Freeway Comment
Date: Monday, July 01, 2013 8:45:29 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Mike Simonton [mailto:msimonton@cox.net]
Sent: Sunday, June 30, 2013 10:44 AM
To: Projects
Subject: South Mountain 202 Freeway Comment

South Mountain Study Team,

I am a Chandler resident that works at 43rd Ave. and Van Buren in Phoenix. Most times the I-10 or 101 to I-10 routes to the west side of town are too congested to consider taking. I predominantly take the beltline route across the reservation to access 51st Avenue in Laveen to and from work. I have occasionally checked into the status of this the South Mountain 202 Freeway project over the last 7 or so years. It seems to me that this project was contemplated and I thought even funded in the 80's. It is apparent that the need and desire of metro Phoenix area for this project is self evident; however, I believe the State's transportation engineers and planners have a much more sound and analytical handle on this need than my general presumption. I understand there are a multitude of competing interests and significant obstacles that have presented themselves since the project's origins, but I implore you as a concerned citizen, desperate commuter, and commentor in this public process to please diligently and expeditiously work through all issues to get this freeway built. I understand that obstacles are presented by homeowners and businesses in the Ahwatukee area that built up and settled in after this freeway was originally planned. Conversely, there are people like myself that moved to the Chandler area 7 years ago with eager anticipation that this freeway would come to fruition in a timely manner as was indicated on the ADOT website. Having experience in conducting sensitive public processes myself, I empathize with the challenges you are facing, however, this project is long overdue for shovels hitting dirt. It seems like no option makes a majority happy, in fact, your most successful outcome is likely if everyone is just a little unhappy. Simply put, my comment in this process is to build it. Build it now! I appreciate the hard work and diligence ADOT has put into this effort for years to satisfy as many competing interests as possible. Unfortunately, regardless of anyone's best efforts there will be disgruntled parties. For the benefit of the metro Phoenix area, this project must move forward as expeditiously as possible. Thank you for the opportunity to provide this comment.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

-Mike Simonton
30+ Year Arizona Resident
7 Year Chandler Resident
14 Year Frustrated Commuter
124 W. Oriole Way
Chandler, AZ 85286

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Code	Issue	Response

Code	Comment Document
1	Joel Simpson Document Created: 5/21/2013 2:33:57 PM by Web Comment Form I belive this project would be great for the valley and would reduce in town traffic and commute times.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

which had its own issues with highways, into Laveen, where when I bought my house, this highway was one of the reasons we bought, not knowing it would take this long to even be at this point. We've since relocated from Laveen; one of the reasons is due to the issues getting to and from. We had two kids, one with special needs, and getting in and out of Laveen became very difficult up in that 51st Avenue with truck traffic, getting to the I-10, getting to Central Phoenix through the tunnel and that sort of thing, so we actually sold our home and relocated. Knowing that it's going to be built is kind of bittersweet in the fact that if we still had our house there I think it would be a huge benefit.

And I believe it's going to bring a lot of businesses and revenues to Laveen; particularly, when we left there was a Target that may have been put in and some movie theaters and such, which never came about because it was just stagnant. So I'd like to say I'd like to approve the build. Thank you.

THE FACILITATOR: Thank you.

Joel Simpson.

MR. SIMPSON: Hello, Joel Simpson here. I've been a resident of the Valley for about 14 years now and I've had the displeasure of driving the I-10 for the same amount, and the traffic, you can definitely tell where

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 the stops are, as everybody's -- all the traffic, the
2 semi-trucks are coming from the west, California or
3 wherever, and it all kind of bottlenecks at about 75th
4 and doesn't clean up until about past the I-10 truck
5 route, which is about 27th or whatever Avenue, so I can
6 definitely see a need for this, and I'd like to see it
7 happen, just because I'm stuck in my house out in the
8 West Valley and have to commute to the East Valley, so
9 that's all I have to say. Thank you.
10 THE FACILITATOR: Thank you.
11 Wes Lines. Wes Lines.
12 MR. LINES: Hello. Are you ready for me? I
13 don't think I have three minutes' worth of stuff to say,
14 but I just want to come down and put in my two cents'
15 worth. My name is Wes Lines and I live in Laveen, I live
16 at 51st Avenue, and I have seen -- I've lived there since
17 2001 and I have seen the traffic along 51st Avenue
18 increase and increase and increase the whole time going
19 south onto the Indian reservation and into the town of
20 Komatke, and the road is completely overburdened and
21 overwhelmed.
22 It's a county farm road, it doesn't have
23 sidewalks or anything like that. That road is being used
24 as a highway for people to go all the way to Tucson. You
25 see people hitchhiking along with signs that say all the

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, July 22, 2013 8:51:12 AM

From: Kay [mailto:azlady13@hotmail.com]
Sent: Sunday, July 21, 2013 7:50 PM
To: Projects
Subject: South Mountain Freeway

1
2

Please do NOT put a freeway through the mountain. You can never get back what is lost. Please go listen to Big Yellow Taxi. This desert has already been destroyed. Don't destroy this sacred mountain. I wouldn't want it destroyed if it wasn't sacred. The people who work or live on the south side of the mountain knew it was there when they moved there or took the job. They should either move or change jobs if they don't want to drive around what was always there. Don't tear down the mountain and put up a 'parking lot'.
Kay Simpson
602-513-6963

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:38 PM
CALLER: SHAWN SINGLETON	CALLER ADDRESS: 4909 W. BEHREND DRIVE, GLENDALE, AZ 85308
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I do support the extension of the 202 South Mountain Freeway to the 10 in the west valley. It would be great for the community and reduce traffic. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/10/13	INCOMING CALL TIME: 11:21 AM
CALLER: AVA SIWEK	CALLER ADDRESS: 6034 N. 33RD STREET, PARADISE VALLEY, ARIZONA 85253
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I am in support of the South Mountain freeway. I think it's an excellent idea, and it's time to do that now before things continue to get more crowded. And I think it's great idea for growth of our city and for economic growth. It follows the population growth that's happening I think it's a smart move and I'm all for it. I think it's awesome that Phoenix is being progressive and staying ahead of the curve. I think it's great, so congratulations on letting our city grow in the correct direction.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Evan Skow Document Created: 7/24/2013 6:27:35 PM by Web Comment Form

1 2 3 4 5

Why does Pecos Road need to be changed into a freeway/interstate? Grand Avenue works just fine as it is. If Laveen wants an interstate through their community fine. The simple solution would be to build the freeway through Laveen as planned, connecting it to Pecos road and leave Pecos Road as is. No homes will need to be torn down, no mountains need to be destroyed, no damage to the environment. Then lets just see how much the South Mountain Loop 202 is used.

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	According to 23 Code of Federal Regulations §771.111(f)," the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope...". The proposed action should satisfy the project need and should be considered in the context of the local area socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need.
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Biology, Plants, and Wildlife**	

Code	Comment Document

4330

accommodate a smaller population, less car driving people who don't have the money quite frankly to drive and need mass-transit to get around. Those are the priorities now, not from 1985 when they passed this money and made it available. And that was based on the myth that every time growth happens, it's sustainable and we all should just expect it all the rest of our lives which is clearly not right. Thank you.

MS. SLAPKE: I just got a wake-up call. They never told us that when they changed the alignment from ten lanes to eight, that our house was no longer in line of demolition. We were never notified. We would have gotten out five, ten years ago when they changed that, but none of the homeowners, I know for a fact, none of us know this because I know everybody on our entire street. We weren't notified.

So here I sit and now I'm going to have a wall right behind my house when we were anticipating, okay, ADOT's going to have to buy our house. We'll sit tight. There's nothing we can do. We've lost all the value in our home, but at least we know ADOT's going to buy our home. I just found out, guess what, we're screwed. So put that into writing.

1
2
3

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Code	Issue	Response
1	**Design**	In response to lower-than-anticipated sales tax revenues, beginning in 2008, the Maricopa Association of Governments began evaluating methods of cutting project costs while still delivering the major elements of the *Regional Transportation Plan*. Through the process described on Final Environmental Impact Statement page 3-19, and beginning in 2008, the Arizona Department of Transportation responded with the lane reduction and constrained right-of-way. These design changes were made public shortly thereafter and have been known for several years.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	Noise walls would range in height from 8 feet to 20 feet tall in the Ahwatukee Foothills area. As mentioned in the sidebar on page 4-91, the Final Environmental Impact Statement is based on preliminary design and traffic information. As the design progresses to the Final Design phase, noise barrier locations and heights will be refined and finalized. During Final Design, more detailed information on the location, actual height, and distance from the property line of each noise barrier will become available.

Code	Comment Document

4
5

I don't know how to put it. We were never notified that our house was no longer in the line of demolition. And so what's ADOT's recourse to those of us homeowners who all these years had thought that our I'm home was going to be purchased by ADOT because we couldn't sell them. And now all of the sudden, we're not in the alignment anymore, our house is not going to be bought by ADOT, and I'm faced with a house that's going to be worthless.

And if they had told us, given us a written statement, something that notified us, your home is not in the line of demolition anymore, you know, we would have taken action at that time. Either get out somehow, and now we've lost all of that in our home and we have to move. Now what do I do?

We've been in limbo for years, but we were reassured, just sit tight, the freeway goes through, it's no big deal because they're going to have to take our house. At least we'll be able to get out and be recouped. Now we lost everything, everything. I don't know what we're going to do. My name is Erica Slapke, 3119 East Redwood Court in Phoenix, 85048.

MR. ROSE: My name's Scott Rose, R-o-s-e,

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Code	Issue	Response
4	**Acquisitions and Relocations**	Agencies may acquire only those properties located entirely or partly within the project right-of-way limits (see Final Environmental Impact Statement page 4-45).
5	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138 -47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 2:12 PM
CALLER: NANCY SLAWN	CALLER ADDRESS: 2702 EAST MICHIGAN AVENUE, PHOENIX, AZ
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I am for the freeway, thank you, we need it.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:39:17 AM

-----Original Message-----
From: Ed [mailto:edaz04@yahoo.com]
Sent: Saturday, May 11, 2013 3:04 AM
To: Projects
Cc: info@buildthe202.com; kathleenski@yahoo.com
Subject: Build the South Mountain Freeway

As a resident of the great state of Arizona I implore you to adhere to the citizens multiple requests to build the loop 202.

1

Enough with the delays. With all of the benefits this freeway provides it should have been built a decade ago!

It is time to move this project forward at last.

Ed Smith
Laveen, Az

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Southmountain Freeway
Date: Friday, May 17, 2013 8:49:28 AM

From: Tracy Smith [mailto:tracyb19@aim.com]
Sent: Friday, May 17, 2013 8:37 AM
To: Projects
Subject: Southmountain Freeway

1

I am not able to make the public hearing but I would like to show my support of it. I live in Laveen where this freeway would provide so much for our community. I live close to 51st Ave (the main drive to the casino). There is so much traffic that speeds through our quaint community. We need this freeway to alleviate that congestion.

We need more accessibility, we need more medical facilities, we need MORE!

Please get this going. When I moved to Laveen 10 years ago, we were told it is on the way. When I was in high school in Ahwatukee, my family was told, it is coming... Why so long? Get it moving!

Thank you for your time.

Tracy Smith
6114 S 46th Ave
Laveen

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain 202
Date: Tuesday, April 30, 2013 8:53:49 AM

From: Todd W. Smith [mailto:twsmith23@gmail.com]
Sent: Friday, April 26, 2013 1:14 PM
To: Projects
Subject: South Mountain 202

Hello,

1 I am writing to express my support for the approval and funding of the South Mountain 202. The freeway is a vital part of Laveen, Ahwatukee, and the entire SW Valley going forward.

There are many reasons for my support of the freeway. The first and simplest reason is for traffic alone. I live in Laveen and work in Chandler, at the intersection of I-10 and Chandler Blvd. And though I will probably be long gone from either my home or work by the time the freeway is finished, it will save thousands of hours on commuting for thousands of people in the future.

The second reason is for development in Laveen. It's no secret that Laveen has struggled mightily since the housing crash in 2008. Laveen was promised to many as 'The next Ahwatukee' when the many housing developments started popping up in the mid-2000's.

Since the housing crash, it's been virtually untouched by development, and mostly ignored by the City of Phoenix. It has finally started to turn things around in the last year, with new businesses coming in and being very successful (Jersey Mike's, Barro's, etc). Laveen needs more businesses and more development. There are several projects already in the works and ready to go at the first word that the freeway has been approved. See this proposed development at 59th Ave and Baseline as an example (and note the hospital pad as well).

Lastly, it's an important part to the overall infrastructure of the entire Valley. It is a freeway that has been proposed and on the books since 1985. That's almost 30 years! Meanwhile we've seen the development and building of the 303 (an area not at all vital to commuters or truck routes), the 153 (which subsequently was shut down and turned into a city street), an on/off ramp for a street that doesn't exist (64th St and the 101 - which has been 'temporarily closed' for four years because there isn't actually a street there), and countless other highways and roads built that will not be as important to the city as the South Mountain 202.

It is time we stop ignoring and pushing back this freeway. The longer you wait to approve and build it, the harder and more expensive it will, and the easier it will be to come up with excuses not to do it. The time is now.

Thank you,

Todd W. Smith
Laveen Resident

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Monday, May 20, 2013 8:47:29 AM

From: Kathleen Smith [mailto:kathleenski@yahoo.com]
Sent: Friday, May 17, 2013 4:10 PM
To: Projects
Subject:

1

I would really like to see the South Mountain Freeway (FINALLY) be built. I've lived in the valley for 16 years and it's been talked about for that long. Also, it's been approved for almost as long. I'm not sure what the delay is. We already know about all the benefits we would encounter from this. Are there disadvantages that outweigh the advantages??? Please, let's get the ball rolling on this project!

Kathleen Smith

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Vicki Smith

Document Created: 5/21/2013 8:40:28 PM by Web Comment Form

I live in Laveen. I work in Tempe. That is not only my story, but the story of the majority of people that live in Laveen. We all drive 30-40 minutes minimum to get to work every day. The only way we have to get to work is via city streets that are littered with stoplights. I sit idle in traffic that is stop and go. My husband works in South Chandler. He does the same thing. I dream of a day where my husband can take the 202 freeway and be at work in a matter of minutes. I dream of a day where I won't have to sit on Baseline Rd as long, because much of the west to east traffic will be diverted to the 202.

I work with many people that live in the West Valley (Avondale, Goodyear, Glendale). They drive to Tempe via I10. Actually, anyone that lives in the West Valley and works in Central, or South Phoenix, or the East Valley, sits in traffic on the I10 every day. Or what about those that live in the East Valley/Chandler and work downtown? The are stuck in traffic on the I10 as well, only the other direction. This sitting is wasting hours of our lives every day. It is wasting vehicle emissions that are expended by idle cars, or cars that take much longer to get to their destination than necessary. All of this wastes hours of people's lives, wastes extra gas and causes more pollution. This city is not shrinking, it is growing. This traffic problem on the I10 will only get worse. Laveen is also not shrinking; it is still growing. Additional home construction is taking place in multiple areas of Laveen right now. Laveen is going to grow and there will be even more vehicles sitting on city streets, wasting idle gasoline and causing additional pollution. We need a better way to transport ourselves and goods through the south part of Phoenix. Every time there is a major accident on the I10, or the I17, traffic almost always gets diverted to south to Laveen. This causes extreme commute times and extreme amounts of traffic. Why? Because the I10 is already too congested. This affects us in Lavven, but also affects ANYONE travelling to work on the I10. We need this freeway!

With this freeway comes additional jobs. Not just the the obvious construction jobs, but the economic growth that would include the addition of future office buildings, corporate office, even a hospital. If I had the chance to have a job in Laveen, I wouldn't even need to really commute. Imagine if a lot of people in Laveen had the chance to work in Laveen. Those same cars would be cutting down on pollution even more. Our local economy cannot grow properly without the 202. I can assure you, it WILL grow. Laveen will get larger, as will all of Phoenix. We can either makes this a better, more environmentally friendly place to live, by building the 202, or we can stay with what we have and only increase the amount of cars commuting, stuck in traffic, sitting idle, and causing pollution.

1 Please, I'm beggin you, build the 202!!!!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Lisa Smith Document Created: 5/28/2013 4:57:30 AM by Web Comment Form

1

While it would be more convenient for a connection around the southwest side of South Mountain for accessing work in the Capitol District of Phoenix, the negative impact of a freeway extension of the 202 would not be worth it. It seems to make little sense to put a large freeway through a residential area prized for the serenity and mountain views when I-10 exists for the very traffic that the freeway would aim to redirect. The I-10 freeway is surrounded by business and industry which relies on those trucks coming through and isn't disrupted by them coming through. On the other hand, bringing the freeway and that type of traffic through Ahwatukee would absolutely ruin the village for all the reasons that people want to be here and invest in properties here. Currently, we are planning to purchase a home in Ahwatukee where we have already become established with our family since moving here. WE came here for the peace, the mountains and the sense that it is a secret treasure of Phoenix with great schools and community. However, we have already had to hold off on choosing from homes we really like because of the threat of this freeway being right in the backyard. A wall does NOT solve the problem this will create. We are willing to continue

2

putting up with the lousy commute if it means keeping the blessings that exist in Ahwatukee undisturbed. This proposal is economically a horrible idea that will drive away the people that have come here to invest their families in this village.

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Economics, Socioeconomics**	There is no evidence that the proposed facility would cause people to leave the area. The regions' benefits would remain, and improved access to residences and businesses would make them more desirable.

Code	Comment Document

From: Lisa Smith
To: Projects
Subject: South Mountain Freeway
Date: Tuesday, June 18, 2013 4:57:57 PM

Hello,

I am a resident and live off of Liberty and 15th street in Phoenix. I do not support the freeway plan as it stands, being built along Pecos Road. The impact on home values, schools, safety and quality of life would be immeasurable. No study can tell us the damage it will do. (1) (2) (3) (4)

Please consider an alternate route south on the Gila reservation or Riggs Road. Do not build on Pecos. (5) (6) (7)

Thank you,

Lisa Smith

Code	Issue	Response
1	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
2	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Hazardous Materials**	
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
5	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/ State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
7	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4296

This environmental impact draft study doesn't seem to think that it will worsen the air quality on the sensor that's on 43rd Avenue, which will be two to three miles away from this construction. So it really needs to be understood that it could -- could risk Arizona losing its federal funds. And then the City and our citizens will have to pay the bill. This could turn into one of the more expensive highways. And I think a separate study of that impact is very, very important before we go to the final phase of the environmental study.

So thank you very much for your time. I appreciate the opportunity to comment.

MR. SMITH: They've already spent a lot of money studying this thing, right? And they might as well finish the project or a lot of people's work has been wasted already.

And as far as alignments go, I think, even though the one that's more expensive, that would link up to the 101, is probably a better option in the long run, even though it looks like it might be more expensive now. I don't think I have anything else to say.

MR. STROOP: Well, I just wanted to say that I am a Laveen resident and that I am for the proposal to build the freeway in any of the capacities that I saw today. I don't really have a preference on an alternative, but I would prefer it to get built as soon as possible.

MR. ALLEN: I don't know what ADOT's plans for

1

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

that you register. Thank you.

Another reminder, if anyone wishes to speak, please make sure that you register at the front desk. Your name will appear on the screen and we will call you in the order that you registered.

Todd Smith.

Mr. Smith, you have three minutes, here's your timer. Please begin.

MR. SMITH: Thank you. I'm sure you've heard many different versions of pretty much the same speech today. I'm here in support of the 202. There are many, many reasons I believe it should be built, not the least of which is I live on 51st Avenue and Baseline, I work at I-10 and Chandler Boulevard. Just like the last gentlemen and the woman before him, I'm on Baseline for 12 miles every day; makes me want to gouge my eyeballs out. It would cut my commute time in half or probably more to do that.

Beyond just the selfish reasons of the commute, look at what happened to Gilbert with the San Tan 202. There was nothing out there. They approved the freeway, they built it up, developments everywhere. Same thing is going to happen in Laveen, and if you guys are from Laveen or have been to Laveen, we desperately need things like shopping and restaurants and hospitals. There's

Code	Issue	Response
1		Comment noted.

Code	Comment Document

already a planned shopping center with restaurants, shopping and a hospital on 59th Avenue and Baseline, literally just waiting for the approval of the 202; doesn't need to be started, doesn't need to be built, it gets approved, they start working on this development.

Other things -- excuse me. It's not often you get the opportunity to build something that will not only benefit the people that will use the 202, but the people that won't use the 202. There are thousands of commuters every day that will never use the 202, but they're using the 10 that'll get the benefit of that 202 because of less cars on that. So you're not only benefitting the people that are going to be using it, but people that won't be using it get the same benefit we're going to get.

I'm 32 years old, this freeway, just like the last gentleman spoke about, was approved when I was four year old; 1985. It was approved again in 2004. It's been approved twice, this will be the third time. Phoenix is not getting any smaller at all, we all know that it is just going to continue to grow and grow and grow. This freeway has been in the plan before the 303, like the last gentleman said, and many other projects in the city, my personal favorite of which is the interchange at Loop 101 and 64th Street in Scottsdale

Code	Issue	Response

Code	Comment Document

they built five years ago to a street that literally does not exist; it's an onramp interchange to a street that is not there and hasn't been there since they built it five years ago.

We're spending money on those projects when we could be spending money on the freeway that the Valley desperately, desperately needs. It's time to do it, and again, I'm just here to throw my support in, I think it's time to do this. Thank you.

THE FACILITATOR: Thank you, sir.

If there's anyone else in the auditorium that would like to speak, please register at the front desk. Your name will be called and be placed on the screen and we'll take you in the order in which you registered.

Also, a reminder for those of you who may be speaking and there's an opportunity that you will go beyond the three minutes, there are court reporters in the next room that will take your comments beyond the three minutes.

We're going to take a five-minute break as we change off panelists. We will return at exactly five minutes. Thank you.

(The proceeding was at recess from 6:02 p.m. to 6:07 p.m.)

THE FACILITATOR: Good evening, everybody.

Code	Issue	Response

Code	Comment Document
1	Matthew Smith Document Created: 7/16/2013 8:48:57 PM by Web Comment Form PLEASE PLEASE PLEASE BUILD THE SOUTH MOUNTAIN FREEWAY EXTENSION. Building the South Mountain freeway is a necessary addition to the Valley of the Sun. It will make commutes between the East and West Valley very reasonable. It has the ability to positively affect the economy of Arizona. It will allow for positive growth of Arizona and the Phoenix metropolitan area. There are very few negatives about the freeway extension (South Mountain and South Mountain Park will still look beautiful and the freeway may just add to the number of visitors that traverse the park).

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Matthew Smith Document Created: 7/16/2013 8:52:28 PM by Web Comment Form I recommend the W59 Alternative as y favorite route. W71 in a distant second

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. My husband and I purchased our home off Desert Foothills Parkway earlier this year. We purchased close to the mountain, in part, because of the proposed freeway. However, we chose to purchase in Ahwatukee because the air is cleaner and it is a nice, bedroom community that will allow us a peaceful place to raise our son.

It is sad to consider that a freeway that was voted on 20+ years ago — long before the significant growth of Ahwatukee — is still on the books in its original form. There are so many more people that will be affected by pollution, loss of homes, loss of community gathering areas, and a peaceful lifestyle. But more critically, we want to know why the State of Arizona refuses to consider implementing eminent domain and seizing land from the Gila River Indian Reservation, to make this freeway possible. The land is undeveloped, not farmable, and barren. We fail to understand the State's decision to destroy homes →

Optional

Name Shannon Smith Email Shsmit72@live.com

Address 14235 S. 13th Place

City Phoenix State AZ Zip 85048

Phone 512-413-7923 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

1 2 3 4 5 3

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
5	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study
2013

Draft Environmental Impact Statement
COMMENT FORM

4 Additional Comments: and negatively impact the well-being of many taxpaying citizens in order for the reservation land to remain untouched.

If ever there was a time for the State to take a true leadership role, that is now. Ultimately, the Gila River tribe would benefit — regardless of whether or not they will admit so at this time — and the citizens of Ahwatukee, greater Phoenix and travelers passing through, would all benefit as well. Rather than considering the small group of people that is the Gila River tribe, why not consider the impact on the broader community as a whole? Why must those of us in Ahwatukee be pigeonholed by a freeway that was voted on long before the community grew like it did? (And, might I add, long before many of its citizens even moved here.) If the Gila River Indians can vote on it as recently as this Spring, why not allow current Ahwatukee residents a vote on it — rather than relying on votes cast in the 1980's?

5

6

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
6	**Public Involvement**	No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period. The proposed South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:48 PM
CALLER: RICK SMITH	CALLER ADDRESS: 4211 EAST SILVERWOOD DRIVE, PHOENIX, AZ 85048
PHONE: 480-759-1875	EMAIL:
CALLER REMARKS/QUESTIONS: I do support the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Phyllis Smith
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 11:05:43 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 3 4 5 I grew up in South Phoenix and spent the majority of my life in and around the area. I can personally attest to the destructive nature of this proposed freeway project. Not only is it environmentally unsound, the path that it would take crosses directly over Native American tribal lands that hold significant meaning both spiritually and in the way of artifacts and historical sites. This project will, in no way, positively impact the traffic patterns of the South Phoenix valley. It can only cause more gridlock, pollution and destruction of our beautiful South Mountain Preserve. I am a former Soil Conservation Service employee and have worked this entire area and documented the facts that were previously stated for the USDA.

DISCONTINUE THE DESTRUCTION OF THE DESERT!

Phyllis M. Smith

3 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

6

4 7 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

5 8 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Cultural Resources**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Section 4(f) and Section 6(f)**	
6	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
7	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Biology, Plants, and Wildlife**	

Code	Comment Document
9	The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.
1	Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you. Sincerely, Ms. Phyllis Smith 914 Paso Dr Lake Havasu City, AZ 86406-8216

Code	Issue	Response
9	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Draft Environmental Impact Study for the South Mountain Freeway
Date: Tuesday, July 23, 2013 3:42:30 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

From: Sandra Smith [mailto:SSmith@aamaz.com]
Sent: Tuesday, July 23, 2013 3:40 PM
To: Barbara Russell; Projects
Cc: SMF@aol.com
Subject: RE: Draft Environmental Impact Study for the South Mountain Freeway

Wonderful email - thank you Zacc and Barbara.
Please be advised that I have also forwarded to the Lakewood Board of Directors for their information.
We appreciate your written support and concern for the Lakewood Community!
Thank you

Sandra L. Smith, CMCA(r), AMS(tm), CAAM(r)
Community Manager
AAM, LLC
(602) 674-4343 (direct line)
(602) 480-821-2334
(602) 957-9191 (main line)

-----Original Message-----
From: Barbara Russell [mailto:bsuerussell@cox.net]
Sent: Tuesday, July 23, 2013 3:30 PM
To: projects@azdot.gov
Cc: SMF@aol.com
Subject: Draft Environmental Impact Study for the South Mountain Freeway

1

To Whom It May Concern:

My husband and I have been residents for ten years in the Lakewood Community in Ahwatukee. As you are aware, the Lakewood Community was established in June 1985. The lakes are fed by a "well" or "spring". Our grave concern is the protection of these existing wells or springs to continue as the source for the two lakes in our community.

We respectfully request that ADOT protect these existing wells as they review the route for construction of South Mountain Loop 202 Freeway. We recognize the importance of the freeway to the city of Phoenix and State of Arizona. We also recognize the importance of our community lakes and their existing properties including the wells that feed and sustain the lakes in this vital Phoenix community. Any negative change to the lakes would have a devastating impact on our community, residents and their future children.

We are proud citizens of our community and will be long term residents well into our retirement in Lakewood Community.

Sincerely,
Zacc & Barbara Russell
3421 E Wildwood Dr
Phoenix, AZ 85048
AssociatedAsset.com | HomeownerResources.com

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Code	Issue	Response
1	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 4:51 PM
CALLER: MARYBETH SMITH	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I'm in favor of it. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 12:24 PM
CALLER: GAYLE SNEED	CALLER ADDRESS: 3613 WEST MARSHALL, PHOENIX, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I strongly support the 202 [unclear]. I live in Chandler, I mean I work in Chandler. Live in West Phoenix and the bottle neck on I-10 is significant. I support the 202.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:57 PM
CALLER: CAROL SOBO	CALLER ADDRESS: 2230 EAST BEL AIR LANE, GILBERT, AZ 85234
PHONE: 480-926-2364	EMAIL:

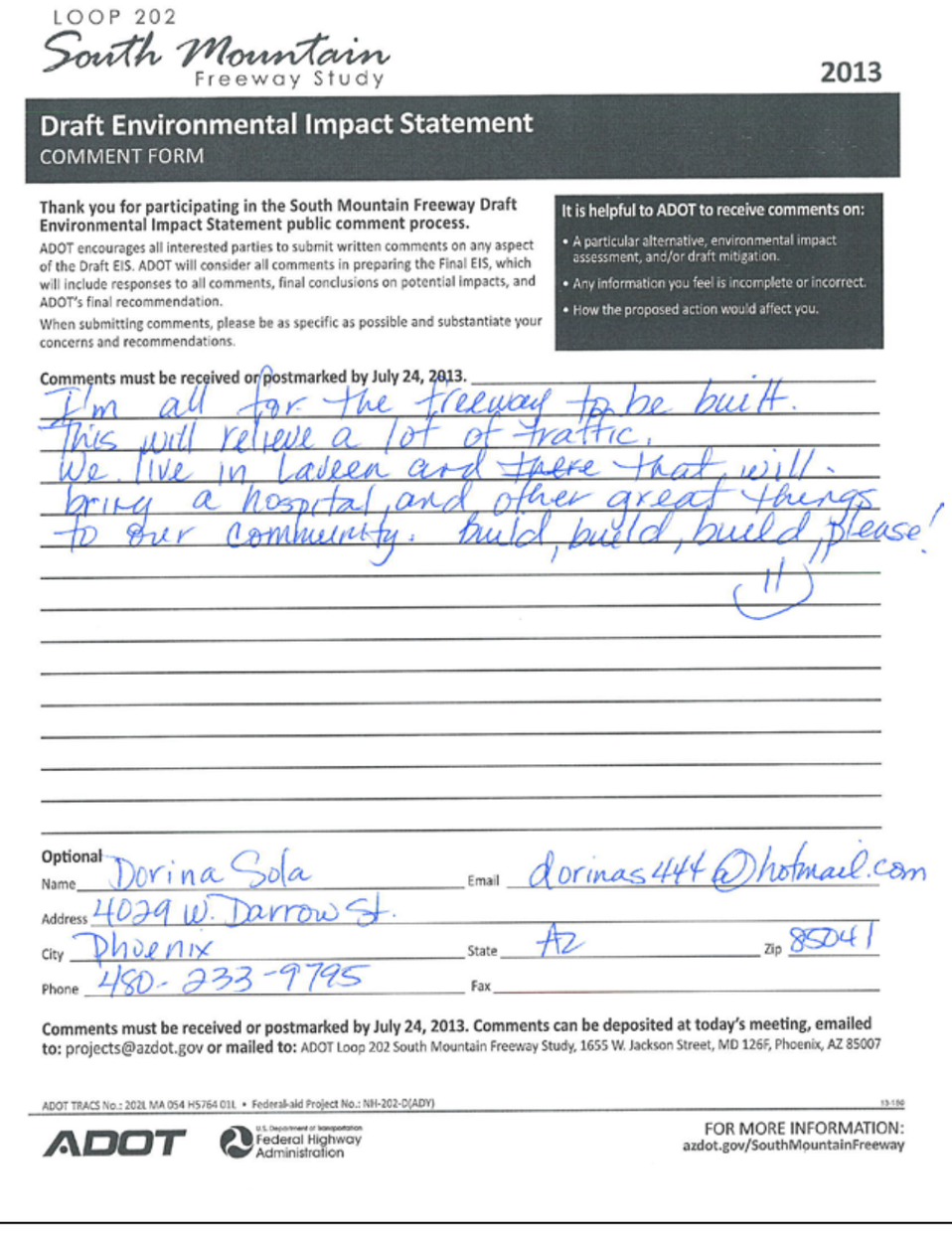
CALLER REMARKS/QUESTIONS:

1 I would like to voice my support for the new move around South Mountain.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	**From:** Ayo Sodimu **To:** Projects **Subject:** ADOT SR347 Study **Date:** Wednesday, May 29, 2013 6:33:41 PM Good Day, I propose that a bridge be built over the railway track. The traffic from the railway system causes a lot of hardship to commuters, and it has also made a lot home buyers to focus their home search away from communities after the railway track. Ayodele A. Sodimu Esq. LLB, BL, CIPP/US

Code	Issue	Response
1	**Alternatives**	The proposed project includes bridges over the Union Pacific Railroad for the freeway main line and the 59th Avenue frontage road (see page 3-42 of the Draft Environmental Impact Statement).

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I'm all for the freeway to be built.
This will relieve a lot of traffic.
We live in Laveen and there that will
bring a hospital and other great things
to our community. build, build, build, please!
(1)

Optional

Name Dorina Sola Email dorinas444@hotmail.com
Address 4029 W. Darrow St.
City Phoenix State AZ Zip 85041
Phone 480-233-9795 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-100

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 6:06 PM
CALLER: ALBERT SORENSON	CALLER ADDRESS: 15855 WEST EVANS DRIVE, SURPRISE, ARIZONA 85379
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 5:43 PM
CALLER: PEGGY SORONSON	CALLER ADDRESS: 9642 WEST DIANA AVENUE, PEORIA, ARIZONA 85345
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hello, I support the 202 freeway, South Mountain. It will be very helpful, I travel that way. So please, um I'll put in a vote for the approval of the freeway. Thank you goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

MR. LIPPEY: Mario Lippey.

So my comment would be I was concerned about -- I'm for the highway. However, where I live, which is the freeway -- the Foothills reserve area, right at the very end of Pecos, that's really close to the mountain.

And right now it's very quiet unless there are parties or loud vehicles that go through there. And those small noises bounce off the highway.

And with the highway coming so close to that area, my concern is that the noise levels will increase even if they put a barrier up. It will just bounce off the mountain.

In addition, the air pollution, again, we're right up against the mountain. The winds usually come from the south to north, anecdotally. I don't have any research.

But I'm concerned about the air quality being trapped right where we're located right up against the mountain. And I didn't read everything on the air quality, but those are my two main concerns, the air quality and the noise.

MR. SOSA: My name is Jesse Sosa, and I live right in the pathway of the freeway, and I'm really, obviously, in opposition to losing my home.

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www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 2 3 4 5 4

And, really, I don't even know if I'm going to lose my home, because I'm not sure where, you know, ADOT plans to actually build. But I'd be right in front of it. That's for sure. And I really feel that this would impact tremendously my family, my children, the building of it.

It's -- and I don't think that eminent domain is a fair thing to do. People struggle all their lives. They buy their homes. They take their -- take care of their homes. And I really don't understand, you know, the need to build something like this.

I get that all of this here is for that purpose, to demonstrate the need, to demonstrate the amount of pollution, supposedly, that it would decrease, the amount of money saved, the decrease in congestion of traffic. I get all of that.

But when we're talking to a certain little family that actually has a home, that cares for their home, that has, again, saved money all their lives to purchase a home, not to just say, well, this is going away because of progress, if you will, it just, you know, really upsets me, so ...

And, obviously, I oppose it. And whoever it goes to, hopefully they can kind of -- and I'm not the only one. I know that.

Page 3

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www.drivernix.com

Code	Issue	Response
1	**Alternatives**	Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the online hearing Web site, <azdot.gov/southmountainfreeway>.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Purpose and Need, Lack of Support**	
5	**Air Quality**	

Code	Comment Document

But that's my statement.

MS. BRENNAN: Catherine Brennan.

So I'm just -- I'm for the Loop 202 because it's going to help with economic development in Laveen and help bridge the two communities of the East and West Valley.

MR. RODARTE: My name is Randall, R-a-n-d-a-l-l. Last name is Rodarte, R-o-d-a-r-t-e.

I live on 51st Avenue and Baseline, and I'm really looking forward to the preferred freeway. I believe it's the 59 and the E1. I believe that's what they're called.

Wait a minute. Let me double check here.

Yep, W59 and E1 alternative.

I'm in favor of them, and I really was looking forward to another way to get to the East Valley besides going through Baseline or Southern, because it's horrible, the traffic, you know, the backup. It just takes so long.

There's only one lane each way on Southern Road, and that's sometimes impossible to get through. And Baseline, over the last 10 years, I've seen it just really get bogged down, especially on the weekends. Takes about 40 minutes to get to Arizona Mills.

Code	Issue	Response

Code	Comment Document

4244

multi-modal network, so we need commuter rail. I hope eventually we will have light rail coming up to Baseline and then to -- to connect with this freeway, so we do need all forms of public transportation, but we need this freeway.

Thank you.

THE FACILITATOR: Thank you.

Alexander Soto.

If you'd like to speak, please go out to the registration desk, get registered, and we'll have your name up here.

Thank you.

MR. SOTO: I'm Alex. So go?

(Speaks in foreign language) Alex Soto, (speaks in foreign language), I'm from the community cells of the Tohono O'odham Nation. I currently live here in Phoenix, Arizona, and I'm here to comment against this freeway.

Overall, this South Mountain Freeway is an attack on my civil rights as an indigenous person. And the lack of cultural consideration that is in this EIS is shocking. It is a fact that, I know there's a lot of civil rights statutes and protocol that an EIS would include towards communities of color, in particular ones that have been historically

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2
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Code	Issue	Response
1	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
2	**Cultural**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Environmental Justice/Lifestyle**	While the Preferred Alternative would have an adverse effect on environmental justice populations, impacts would be temporary and would not create undue hardship or be disproportionately high compared with projected impacts on all populations in the Study Area. All populations would benefit from the proposed action's implementation through improved regional mobility and reduced local arterial street traffic.

(Responses continue on next page)

Code	Comment Document

oppressed.

So this mountain is sacred to us as O'odham, and myself Tohono O'odham, you know, I may come from south of southern Arizona, but this freeway is -- this mountain is sacred to me. And all these mountains in Phoenix are sacred, so I just wanted to make that very clear that this is an attack of who I am as an indigenous person, let alone the generations to come. And overall with EIS, the lack of consideration for potential hazardous spills on this freeway is also shocking. There's really not any great detail in the EIS that pertains to what-ifs, you know, regarding hazardous waste.

And another consideration, which I actually wrote down, was also that back in 2005 the Joint Air Toxic Assessment Program Study that was done, was not considered in the EIS as well. And that's -- the report clearly shows that there's already toxic chemicals in the air in this area already, so of course, the freeways would add more to that. So I would hope that that would also be addressed in the EIS.

And the last one, on a bigger level, is the amount of semitrucks that will also be going towards the community as well. Of course, we all know, this

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Code	Issue	Response
4	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The mobile source air toxics emission modeling developed for the project (which factored in the U.S. Environmental Protection Agency's recent rules for the 2035 analyses) and discussed beginning on page 4-77 of the Final Environmental Impact Statement found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Purpose and Need, Truck Bypass**	
8	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

8

is part of a bigger transportation program, the Sun Corridor, which is part of the CanaMex indirectly or directly, depending on how your website wants to entail that, but this is bringing more trade to Mexico and Canada and back and forth, and the Gila River happens to be in the middle of it.

And due to my friends, my family, my relatives that lay at rest there, that's why I'm here today to comment against this. And I would hope that ya'll would consider that compared to, you know, holding Laveen residents hostage to have a hospital or more retail shops there.

As O'odham, we were the first people of this area, and I would hope that you would consider that. And a lot of people ask, well, why don't we concede or compromise, and we've been compromising for over 520 years. So I hope that ya'll would include this in your report because you're attacking who I am as an indigenous person. And, yeah, civil rights need to be addressed, because just like any other community of color, East L.A. or, you know, South Bronx, I mean, we all know freeways are meant to be biased, we call them borders, going back to the border on my reservation, the U.S.-Mexico border, so I hope you're able to address my concerns.

Code	Issue	Response

Code	Comment Document

So thank you.

THE FACILITATOR: Thank you.

If you'd like to speak, please register up front.

If you'd like to speak, please go to the registration desk out front.

Please feel free to use either microphone when you come up.

Thank you. Eric Cylwik.

Eric, could I ask you to use this mic over here, please.

MR. CYLWIK: Good morning. My name is Eric Cylwik. I first of all want to thank you so much to voice my opinion to you guys here that are here to listen to us today. I just wanted to say also, great job on pronouncing the name. That is correct.

So I grew up in Phoenix, kind of at the top of what is now the 51, and I remember growing up there, and my dad would have to fly out of town every single weekend, and the commute to the airport was awful. But then after the 51 was built, it made the rest of the town so much more accessible and it just made living up there a so much nicer place.

I've now moved to Tempe after graduating from ASU, and a lot of my friends are now moving away

Code	Issue	Response

Code	Comment Document

5044

1 MR. SOTO: My name is Alexander Soto.
2 Address 7211 West Alta Vista Road, Laveen, 85339.
3 And, yeah, I'm here today to make a comment against
4 this freeway. I'm not in favor of it. I'm in
5 opposition of it. As a Tohono O'odham, this freeway
6 will attack my civil rights because this freeway is
7 going to blast through South Mountain, and South
8 Mountain is a sacred site to all O'odham, the O'odham
9 in Gila River, the O'odham in Salt River, the O'odham
10 in Ak-Chin, and the O'odham in Mexico.
11 So my spiritual connection to this
12 mountain will be attacked if the freeway comes
13 anywhere in this area, let alone blasts through the
14 mountain which is current proposal that ADOT has,
15 will do. So my civil liberties, my freedom of
16 religion, all these things are being threatened.
17 And as a citizen of the United States, a
18 citizen of Arizona, citizen of my tribe, I feel I
19 have that right to keep my cultural practices going
20 and this freeway stops that. So that's why I'm in
21 opposition for it on a cultural level, but I'm also
22 in opposition because this freeway's overall
23 construction, it doesn't have any clear plan B for a
24 biohazardous spill if anything happens in the
25 community. So if it even was to be built, there's no

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Code	Issue	Response
1	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Hazardous Materials**	

Code	Comment Document

alternative for people if something bad happens with hazardous waste.

So it's not in the EIS. I'd like to note that it's not in the EIS. And on that level, this is a horrible freeway. And another level, in 2006 there was a transportation plan that came out, a study that clearly noted all the environmental impacts of this freeway at that time, all the chemicals and so on. And this current draft EIS, it's not in there, and this was conducted by the State of Arizona and other environmental agencies.

(4)

So I feel, you know, that's not transparent. You know, it's not, you know, not -- it clearly shows the bias in the project, you know. And also the state, this is a $2 billion freeway. Why do we need this? There's a lot of other things $2 billion can go to.

(5)

(6)

And the last one is a vision under the U.N. -- the United Nations indigenous people's declaration of human rights and business rights. This goes against that as well. So there's a variety of statutes and policies and things that are on record that this freeway's attacking, and I just want that to be known to be clear and, yeah, no 202.

(1)

Code	Issue	Response
4	**Air Quality**	Summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration's mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don't tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The mobile source air toxics emission modeling developed for the project (which factored in the U.S. Environmental Protection Agency's recent rules for the 2035 analyses) and discussed beginning on page 4-77 of the Final Environmental Impact Statement found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions.
5	**Environmental Justice/Lifestyle**	While the Preferred Alternative would have an adverse effect on environmental justice populations, impacts would be temporary and would not create undue hardship or be disproportionately high compared with projected impacts on all populations in the Study Area. All populations would benefit from the proposed action's implementation through improved regional mobility and reduced local arterial street traffic.
6	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, May 20, 2013 8:36:05 AM

From: Spano, Nancy [mailto:Nancy.Spano@Honeywell.com]
Sent: Friday, May 17, 2013 9:20 PM
To: Projects
Subject: South Mountain Freeway

1 2 3

I am against placing the South Mountain freeway along the Pecos Road route through South Mountain Park. I am only in favor of placing it on the Indian Reservation.

Nancy Spano

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Monday, July 15, 2013 2:10:39 PM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Deb Sparrow
Sent: Monday, July 15, 2013 2:10 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

Jul 15, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 Freeways always come with the idea that they will relieve congestion and the truth is they create more congestion.

South Mountain Park is a very special place. Temporary relief from congestion leading to far more congestion is not a good reason to diminish this park.

3 4 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks.

As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

5 6 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

7 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Health Effects**	
5	**Section 4(f) and Section 6(f)**	
6	**Biology, Plants, and Wildlife**	
7	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

Alternative. Thank you.

Sincerely,

Ms. Deb Sparrow
1715 S La Rosa Dr
Tempe, AZ 85281-6820
(480) 968-7908

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Code	Issue	Response

Code	Comment Document
1	Jake Speck Document Created: 5/21/2013 1:58:43 PM by Web Comment Form It's time to build the 202! Let's get out in front of this need. The traffic is getting worse and worse by the day. If we don't continue to develop our freeway systems it will only become worse. Our freeway systems are one of the most important yet under appreciated assets to our community. They allow us to move around the Metro area freely, get to work so we can make a living and support our families, as well as enjoy what the valley has to offer for recreation. Our infrastructure is also one of the most important aspects to attracting potential employers to our community which creates great economic gains for the entire state. After reviewing the EIS documents I think it is abundantly clear that the benefits far outweigh any potential risk of impacts and this freeway should be built!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

say.

THE FACILITATOR: Thank you.

MR. NEELY: Thank you.

THE FACILITATOR: Vicky Oliver.

MS. OLIVER: Hi, my name is Vicky Oliver and I'm for the 202 project because I think it will bring employment opportunities to our area, which we definitely need, and also will help the commute for a lot of people coming in the area. And also, it's been proven that freeways cut down pollution and also traffic accidents, and it'll keep some of the traffic off of our city streets.

THE FACILITATOR: Thank you.

Jake Speck.

MR. SPECK: Good afternoon. My name is Jake Speck, I'm here in support of the 202. I think this project is a great benefit to the community for a lot of different reasons: Reducing traffic, revitalizing economy, bringing over 30,000 jobs to the community, as well as a significant investment. I think it will attract potential employers as well, which would be great for growing the economy going forward.

After looking at the EIS, I think the potential impacts are vastly outweighed by the benefits this project brings, and I believe that now is the time to go

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

ahead and proceed with this project. This project has been approved several times and has the overwhelming support, based on recent polls, and I think it'll be a great benefit to our community. Thank you.

THE FACILITATOR: Thank you.

Ana Morago?

Tiffany Reddy.

MS. REDDY: Good afternoon. My name is Tiffany Reddy and I just wanted to come and show my support for South Mountain freeway. The congestion for the commuters in Phoenix has long been a problem for our community and I think it would greatly help our residents in Phoenix. Also, I love the idea of bringing 30,000 jobs to our community and to our people here in Phoenix, so we're in big support. Thank you.

THE FACILITATOR: Thank you.

If you'd like to speak and have not yet registered, please go out to the front registration table.

Chris Pattock. Could I ask you to use this microphone, please.

MR. PATTOCK: Sure. Thank you. My name is Chris Pattock, I'm a Tempe resident, I work downtown, I'm a lawyer. I'm not prepared to do this, I just got a phone call last night, apparently someone knew that I was

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: DEIS on South Mountain Freeway
Date: Wednesday, May 15, 2013 8:37:47 AM

-----Original Message-----
From: Steve Speight [mailto:stevesp8@cox.net]
Sent: Tuesday, May 14, 2013 8:35 PM
To: Projects
Cc: PARCtheSMF@aol.com
Subject: DEIS on South Mountain Freeway

Dear ADOT,

(1) (2) (3) (4)

I am a PARC member and I am opposed to the South Mountain Freeway on Pecos Road.
I have lived in Ahwatukee since 1992. I think it is wrong for you to try and run a "Truck By Pass" through my backyard. Its going to be bad for my air , my property values, and quality of life.

Steve Speight
538 E. Brookwood Ct
Phoenix, Az 85048

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Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Sierra Club on behalf of Jerry Spellman
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 6:35:23 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 I agree that the proposed freeway would cause more problems than it would solve.

Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Jerry Spellman
648 S Grand
Mesa, AZ 85210-2430

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	

Code	Comment Document

Document Created: 7/24/2013 11:33:22 PM by Web Comment Form

Dear Freeway Planners,

First, I must say that I support a loop 202 but I am adamantly opposed to the path that you have proposed. After reading all of your statements and attending a discussion that you held, I am still opposed to you planned route.

I do not believe that the planners have done everytging possible to make the best freeway with the least amount of impact. I was astounded at the supposed environmental impact study. It was very poorly done to say the least. The wildlife will die out and the South Mountain Preserve will suffer for the lack of wildlife and diversity. (1) (2)

The amount of land taken from South Mountain Preserveis deplorable! I know that given the right incentives a route could be done that would not impact the Preseve land. Working with GRIC and local land owners to push further south and west would be in the best interest of all. (2) (3)

I hope you reconsider your position.

Respectfully Yours,
Leslie Spencer-Snider

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

June 20, 2013

South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, AZ 85007

I am writing to state my strong opposition for the proposed expansion of Loop 202/South Mountain Freeway, in particular the Pecos Road alignment.

1 2 3 4 5 6

As a resident of Ahwatukee/Foothills, I believe the Pecos Road alignment would severely hurt our quality of life and cause damage to our community. Area residents would ultimately be affected by air and noise pollution. The proposed freeway would invite new traffic into the area, including large commercial vehicles that run day and night.

7

The Sierra Club's recent report "50 Best and Worst Transportation Projects in the United States", dated November 2012, lists the Loop 202/South Mountain Freeway as one of the worst projects in the United States based on oil, environmental, health, economic, and land use impacts. The findings and conclusions of this report need to being taken into serious consideration by the South Mountain Study Team.

2

I currently have enough highway access to all the facilities needed for a great quality of life. The South Mountain Freeway would forever change this area in the worst way. The Arizona Department of Transportation surely can produce alternatives to the destructive Pecos Road alignment that are better suited for our health and environment.

8

I advocate the "No Action" alternative as the best option that preserves the environment, quality of life, and health of residents.

Sincerely,

Elayne Spielman
3009 W Silver Fox Way
Phoenix, AZ 85045

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	
5	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
6	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Sierra Club Report**	The Arizona Department of Transportation and the Federal Highway Administration respectfully disagree with the referenced Sierra Club Report. As noted in the Final Environmental Impact Statement, when compared with the No-Action Alternative, the Preferred Alternative would result in less energy consumption (page 4-172), regional improvements to air quality (page 4-74) that would be expected to produce health benefits, and economic benefits of reducing regional traffic congestion (page 4-65), and would be consistent with local and regional long-range planning efforts (page 4-18).
8	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

June 4, 2013

South Mountain Study Team
Arizona Department of Transportation
1655 West Jackson Street, MD 126F
Phoenix, AZ 85007

I am writing to state my opposition for the proposed expansion of Loop 202/South Mountain Freeway.

1 2 3 4 5

As a new resident of Arizona, I believe it would be a poor choice to build this freeway through one of the most beautiful areas of Phoenix. Every day I see many bikers and joggers using Pecos Road. If the freeway were built, area residents would ultimately be affected by air and noise pollution. The proposed freeway would invite new traffic into the area, including large commercial vehicles that run day and night. In addition, South Mountain is sacred for the local Native Americans; a freeway would be harmful and disrespectful to their traditional culture.

6

The Sierra Club's recent report "50 Best and Worst Transportation Projects in the United States", dated November 2012, lists the Loop 202/South Mountain Freeway as one of the worst projects in the United States based on oil, environmental, health, economic, and land use impacts. Hopefully, the findings and conclusions of this report are being taken into consideration by the South Mountain Study Team.

7

In the short time I have lived here, I have found that I currently have enough highway access to all the facilities needed for a great quality of life. The South Mountain Freeway would forever change this area in the worst way. The Arizona Department of Transportation surely can produce alternative options that are better suited for our health and environment.

8

I advocate the "No Action" alternative as the best option that preserves the environment, health of residents, and respect for Native American culture.

Sincerely,

John Spielman
3009 W Silver Fox Way
Phoenix, AZ 85045

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix (see Figure 3-8 on page 3-15 of the Final Environmental Impact Statement). The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
4	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Cultural Resources**	
6	**Sierra Club Report**	The Arizona Department of Transportation and the Federal Highway Administration respectfully disagree with the referenced Sierra Club Report. As noted in the Final Environmental Impact Statement, when compared with the No-Action Alternative, the Preferred Alternative would result in less energy consumption (page 4-172), regional improvements to air quality (page 4-74) that would be expected to produce health benefits, and economic benefits of reducing regional traffic congestion (page 4-65), and would be consistent with local and regional long-range planning efforts (page 4-18).
7	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
8	**Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Scare Tactics
Date: Monday, May 20, 2013 8:30:20 AM

From: Robert Spiller [mailto:respiller1@yahoo.com]
Sent: Saturday, May 18, 2013 9:57 AM
To: Projects
Subject: Scare Tactics

1

Why does my state have to follow the rest of the friggin democrats and use scare tactics for everything. "your commute times will get longer and the air quality will get worse". Bull Shit.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Bailly, Becky

From: Sierra Club <information@sierraclub.org> on behalf of Eric & Cedra Spragett <elnced@cox.net>
Sent: Wednesday, May 29, 2013 5:20 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

May 29, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.

3 ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 5 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

6 7 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

8 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Eric & Cedra Spragett
4035 E Bloomfield Rd
Phoenix, AZ 85032-7411
(602) 283-4700

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 3:03 PM
CALLER: MERRILEY SPRAGUE	CALLER ADDRESS: 2407 N. 123RD DRIVE, AVONDALE, AZ 85392
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the planning and construction of the South Mountain Freeway and the proposed alignment. My husband is a commercial truck driver and the proposed route will allow trucks to bypass the city. The freeway will keep traffic away from congested Downtown Phoenix.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

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curve. At times it's -- well, every morning and every afternoon it's nearly a parking lot. I would very much appreciate -- well, I believe it's also a bit of a hazard, there's been several accidents on the 10 recently that have shut down the 10. Having other means to commute around that would definitely be beneficial.

And also, the economic impacts that come along with a new freeway, property values go up and the person before me just mentioned the social and economic impact for Laveen would be enormous, so I support the construction of the 202. Thank you again for your time.

THE FACILITATOR: Thank you.

Tiffany Sprague.

MS. SPRAGUE: It's so quiet in here, it's a little intimidating to walk up to.

Good afternoon, my name is Tiffany Sprague and I'm a resident of Phoenix, and I'm very strongly opposed to the South Mountain freeway. I urge ADOT to select the no-action to this project. ADOT must begin looking towards real solutions for our transportation needs and this freeway is not it. This is more than evident by our increasingly congested roads and freeways. Widening routes and building new ones only provide short-term relief. More vehicles will soon fill these uncongested areas.

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.

Code	Comment Document

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ADOT is forcing people to remain dependent on vehicles, rather than looking towards real solutions that focus on getting people off the road. ADOT absolutely must shift its focus toward reducing the number of vehicles congesting our roadways, and this can only be accomplished by planning for and investing in alternative transportation solutions, including rail, bus, walking, and biking.

ADOT claims that this freeway is necessary to help the air quality within our region. However, as it's been shown by other areas of the Valley and in other cities in our nation, this freeway will just spread out the air quality problem and will in time cause it to worsen significantly.

Again, whatever congestion relief is provided by this freeway will be short-lived, as is evident by all our seriously congested freeways in the region, some of which are brand new or were just recently widened. By encouraging more vehicles to use our roadways, air quality will continue to worsen, endangering public health, negatively affecting our environment, and risking funding from the federal government.

The DEIS frequently notes that the South Mountain freeway is necessary in order to better utilize the San Tan portion of the Loop 202, but what's meant by

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Code	Issue	Response
4	**Purpose and Need**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

3 6 7 8 9 5 10

better utilization of this portion of the freeway? Every afternoon I hear about how congested the San Tan portion is, so it seems like the South Mountain freeway will just increase congestion on this roadway, or is that what ADOT considers to be better utilization, more congestion and increased travel time.

Overall, this freeway is not worth the cost. It will destroy a portion of South Mountain Park, an area that was set aside to protect natural resources and to provide public benefit. It will destroy wildlife habitat and movement corridors. It will exacerbate air quality concerns and climate change. It will endanger public health, and it will do all of this without any real added benefit to our communities, so we should not build the South Mountain freeway. Thank you.

THE FACILITATOR: Thank you.

Ana Morago?

If you'd like to speak and are not yet registered, please go out to the front desk registration.

Steve Schwab. Please feel free to use either microphone.

MR. SCHWAB: Good afternoon. My name is Steve Schwab. I've been in the Valley for 31 years and I have witnessed a lot of freeway growth here and I strongly, strongly urge you to accept the action alternative here.

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Code	Issue	Response
6	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Section 4(f) and Section 6(f)**	
8	**Biology, Plants, and Wildlife**	
9	**Air Quality**	This document does not incorporate an analysis of the greenhouse gas emissions or climate change effects of each of the action alternatives because the potential change in greenhouse gas emissions is very small in the context of the affected environment. Because of the relative insignificance of the greenhouse gas impacts, those impacts would not be meaningful to identification of the Preferred Alternative. The Federal Highway Administration is working to develop strategies to reduce transportation's contribution to greenhouse gasses—particularly carbon dioxide emissions—and to assess the risks to transportation systems and services from climate change (see Final Environmental Impact Statement pages 4-85 through 4-86). Construction best practices represent practicable project-level measures that, while not substantially reducing global greenhouse gas emissions, may help reduce greenhouse gas emissions on an incremental basis and could contribute in the long term to meaningful cumulative reduction when considered across the Federal-aid highway program.
10	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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RTP there was also a freeway system, which working together to provide, you know, all modes of travel for the community.

With regard to the funding itself, there are some firewalls built into the regional transportation plan and it does limit the ability to both use freeway funds for transit projects, as well as to take money from transit projects and use them for freeways.

So that would be something that would have to probably be, you know, vetted at the top of MAG. It would be a decision made by them, but there are fire walls built in that would really limit or do not allow the mixing of those funds.

THE FACILITATOR: Scott Sprague. "In pre-design meetings for I-11, ADOT representatives have repeatedly stated that no part of the I-11 or scenic drive has been identified beyond a very wide 30-mile swath between Phoenix and Las Vegas. Upon approaching Phoenix, ADOT has insisted that many alignments through and around the city are still on the table. This contradicts what the map shows tonight. Please explain the disconnect."

MR. SPARGO: Can I have you repeat just the part about where the information was coming from that

1

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Code	Issue	Response
1	**Alternatives**	The Interstate 11 study is outside the scope of this study. Please see <i11study.com/wp/> for more information.

Code	Comment Document

it's not --

THE FACILITATOR: ADOT representatives.

MEMBER OF PUBLIC: I can clarify, if you like. In pre-design meetings with the I-11 route, they, ADOT, has provided maps for where they're looking and they purposefully, upon request of a more refined map, they said there's nothing set. This is all that's been decided is this 30-mile swath, and again, I have no, this is just a guess, but there's a swath between Phoenix and Las Vegas and then their map has actually several arrows that spread out at the Vegas end and Phoenix end, and they said even those areas aren't even in consideration at this point or they're pre-designed. That's the next step is entering Phoenix, so I'm just curious, if that's very pertinent to that meeting, so if it's set, it's going to be over there, it's more important to me for that meeting than this meeting.

MR. SPARGO: I guess I'm not in tune with all the things going on with I-11 study. I don't know if anybody wants to add anything, but we can follow up after this meeting with more information regarding that, with the I-11 team that's doing that study.

THE FACILITATOR: Scott Sprague. "If

Code	Issue	Response

Code	Comment Document

it's not --

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THE FACILITATOR: Scott Sprague. "If

Code	Issue	Response

(Comment codes begin on next page)

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1

transit, light rail is truly a priority for the future of the Valley's transportation infrastructure, why was a co-located line not considered as part of this project?"

MR. SPARGO: A co-located line, I mean, we do in the Draft EIS discuss the option to co-locate lines. There are some of those that are in the plan today along I-10 west from downtown, as well as the potential for something in around the SR 51 corridor. I think the unique part is that being more of a loop facility, it doesn't facilitate as much for the type of uses that the light rail is, where it's being developed more as a -- more in the spokes from the downtown area.

And just like ADOT and MAG do, you know, regional freeway planning and sort of put this system together that works together, you know, Valley Metro and the transit planners have looked at where the best places are based on the density of population, the jobs, and the housing and things like that to put together their plan. And they've identified the corridors that you see in the RTP at this time. Which are more geared towards those other areas and not this area.

THE FACILITATOR: Okay. Let's do the

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Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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follow-up to your question, then I'll wrap up with the last one.

Yes, ma'am.

MEMBER OF PUBLIC: Okay. Regarding the Game & Fish being approached in 2002 and 2003, have the discussions continued since then, because a lot of information has been learned about appropriate wildlife crossing structures since 2002, and made leaps and bounds of discovery since that time.

UNIDENTIFIED SPEAKER: Not specifically on that topic, no.

MEMBER OF PUBLIC: Okay.

THE FACILITATOR: One last question, the others remaining here we either addressed earlier tonight or have been referenced in the EIS, the draft. So we'll put the responses to these on the Internet so we have time for closing. Fair enough?

The last question, then, from Scott Sprague, "What about the Tucson Shovelnose Snake?," is that what it's called, it is another candidate species in the region.

MR. SPARGO: Yeah, it is a candidate species, so therefore, as a candidate species therefore it isn't something that has a regulatory requirement, but it will be considered. The initial

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Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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assessment is that there really is not much appropriate habitat.

THE FACILITATOR: Okay. That concludes the open questions from the general public.

I'd like to introduce Chaun Hill. And before Chaun comes up or while she's coming up, please keep in mind we do have a quorum and we need to close the meeting out shortly thereafter, but Chaun has a couple comments. I have a closing comments, and then we'll return.

CAT MEMBER: I have a question. What are they going to do with these after the meeting?

THE FACILITATOR: What are we going to do with the Draft EIS documents after the meeting?

MR. SPARGO: We use them at the public hearings, to provide the public an opportunity to look through. We'll have them at the public forums as well. Beyond that, we don't have any.

CAT MEMBER: My community has their annual meeting next week and having one of these available would be beneficial.

MR. SPARGO: We've made them available for people on the Citizens Advisory Team that have made that request. So if you would like one, just talk to me at the end and we can make that arrangement.

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on this, so if I botch up some words, let me know. Are these all from the same --

MEMBER OF PUBLIC: No.

THE FACILITATOR: Have you identified who is who?

MEMBER OF PUBLIC: No.

THE FACILITATOR: Let's do that. Okay.

MEMBER OF PUBLIC: Sure.

THE FACILITATOR: What Fred is passing out is the meeting evaluation form, please fill it out. The first question is from Tiffany Sprague.

MEMBER OF PUBLIC: Sprague.

THE FACILITATOR: "Has the Arizona Game & Fish been consulting regarding wildlife habitat and mitigation efforts. For example, planning for any wildlife proxy requires a multi-year effort to determine the species, attempted crossing locations, and where to place structures, in-depth analysis on appropriate site, etc. Was Game & Fish consulted on multi-functional design based on available information such structures do not work for many species?"

MR. SPARGO: Curt, go ahead.

UNIDENTIFIED SPEAKER: Yes, in early, I think it was 2002, 2003, Game & Fish was approached

1

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	Not for mitigation specifically. The Federal Highway Administration and Arizona Department of Transportation have committed to continue coordination with the Arizona Game and Fish Department and U.S. Fish and Wildlife Service regarding wildlife concerns that could result from the proposed freeway's implementation. This commitment will be carried forward in the Final Environmental Impact Statement and Record of Division.

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about the opportunity for providing structures on the west end of the South Mountain Preserve area and a meeting was held with FHWA and Game & Fish to talk about the options. It was determined by Game & Fish that the jurisdictional washes there, the corridors, the movement corridors, the obvious locations for multi-functional crossings would best serve wildlife, and -- you can't hear?

In 2002, 2003, a meeting was held between FHWA and Arizona Game & Fish Department to discuss the opportunity for placement of wildlife crossings. It was determined that the jurisdictional washes provided the best opportunity, those are movement corridors for a wide variety of wildlife. And it was determined that because of the, let's say, the population densities of wildlife in the area, it was most beneficial on the western side of the South Mountain Preserve to kind of access between the floodplains and the Gila River; as far as the designs, that's something that I think is potentially still on the books to discuss. It was determined that those were the best locations and opportunities for any kind of crossing structures in the project area. And that area has the most impact in terms of lack of development.

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TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/10/13	INCOMING CALL TIME: 10:44 AM
CALLER: PENNY SPRAY	CALLER ADDRESS: 5525 E. LINCOLN DRIVE #114, PARADISE VALLEY, ARIZONA 85253
PHONE: 480-949-8711	EMAIL:
CALLER REMARKS/QUESTIONS: I'm backing the South Mountain freeway. I can be reached at…	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4075

SOUTH MOUNTAIN PUBLIC HEARING
(Public comments to reporter)
May 21, 2013
10:00 a.m.
REPORTED BY:
April Lassiter, CSR #1521

DANIELLE SPRING: I'm a part of the community river of the Gila community. I live in District 6 in the village of co-op. I live on 67th Avenue and Elliot and I am appalled by the loop 202 extinction being pursued through the South Mountain. I don't believe the EIS has proper address on this freeway. I don't even see that they are acknowledged as living there, even though we have lived there for thousands and thousands of years before Christ was born -- our people have lived there.

1

We are not a tribe that was relocated though the "Trail of Tears" or anything like that. We have always lived here. We were created here. We have always been here.

They did not succeed in killing us off completely yet. I know with the 202 that is their intentions of killing our people. I think this genocide in our community, I don't believe it has been addressed -- the pollution for the next five years, 20 years, 40 years and beyond. Our people have lived here for thousands of years and you can't project thousands of years.

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I know these Laveen people don't care about that, because they've only lived five, 10 years, maybe 30. When the pollution comes, they're gonna leave. They didn't come from here. They don't belong here. They're going to go home where they belong. Who's going to be stuck here if we're still around the atrocities of what's happening to our community?

I think that, as I said, it has not been properly addressed. They do not see. And I've seen in the Title IV, that it has no bearing; this EIS, but that's ridiculous, because we are a minority.

The Gila River is comprised of about twenty thousand community members, all of which do not live on the reservation. They've been displaced by lack of jobs and

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Environmental Justice/Lifestyle**	While the Preferred Alternative would have an adverse effect on environmental justice populations, impacts would be temporary and would not create undue hardship or be disproportionately high compared with projected impacts on all populations in the Study Area. All populations would benefit from the proposed action's implementation through improved regional mobility and reduced local arterial street traffic.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
4	things of that nature, so they had to move off the reservation, especially in the District 6 area -- thousands of people. So we're on the verge of extinction. It's very sad. They continue to push onto our people, onto our community. I don't see any preparation (sic) from the dusty lane area in Laveen. I don't believe they even have the right-away in that area; for the Ahwatukee Foot Hills. They don't explain how pollution is going to affect them, how the pollution will sit between the South Mountain and the Estrella Mountains. It's no outlet for it. It's the only place in the valley that I believe any freeway system will be going through that is right between the valleys of these two mountains. They're not far apart. They're close together. There's no way for the two to escape.
1	I heard the EIS spoke with the Gila River community. They work in conjunction. I don't see that reflected in the EIS. They don't address the effects of our community as folks on that mountain. They might speak on it occasionally, but it's not thorough. I know it says that the community doesn't allow certain information. They didn't want it to be made public, but that is just certain locations. They didn't want it to be made public, which I don't understand why they would care, since they're going to blast through it. They have no regard for that. It's not cultural significance, but it is.
5	They say there aren't any historical sites back there, but there are plenty historical sites back there. They have ancient trails back there. They aren't recreational trails, as if people are going to buy groceries -- icing these trails. That's why they're not made historical sites, because people aren't going to use them to go buy groceries. It's crazy. Who uses those mountains to go buy their groceries? That's stupid. I think that's ridiculous. I don't think that's a reason to not be historical. It is historical. It's been there thousands of years. Also, it has not been addressed -- oh yeah, I was talking about the minority of the people. Community people are a minority -a small minority, as related to the Phoenix area. There's millions of people, millions of people. Like I said, in District 6 there's only

Code	Issue	Response
4	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
5	**Cultural Resources**	Prehistoric trails have been identified through archaeological survey and consultations with Native American tribes.

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3 4

17 about 3000 people. In District 7 there's less than a
18 thousand people. All of that pollution is going to
19 cloud that area, right between Estrella and South
20 Mountain. And when the wind comes and it blows, there's
21 nowhere for it to go but south. When it goes to the
22 south region, then that's going to affect the rest of
23 our community members.
24 District 5, 2, 3, 1 -- there's no where else to go,
25 because those mountains just make the valley for the
1 Gila River community. It's one valley. I didn't see it
2 addressed in the EIS about the Gila River environmental
3 award in 2010, how we have clean air. We won a national
4 award. I don't see that addressed in that -- how it's
5 going to address our people.
6 When the Phoenix area is heavily polluted, you can
7 see the clouds and smoke. It's ridiculous. They want
8 to bring that down to our area. I don't agree with
9 that. I don't believe it's a good policy they should be
10 having, regardless.
11 To that one point, nine billion dollars on a freeway
12 for 3 -- two miles is a huge waste of resources. They
13 could use that money for something better -- do
14 something more constructive with their time with that.
15 I see that they said that there's going to be a lot
16 of traffic if they don't build this freeway.
17 Oh yeah, they came to our community in District 6,
18 and I think they told us that if we didn't build a
19 freeway, then the projections in 2030 would be that
20 there would be 15 to 16 thousand vehicles traveling 51st
21 Avenue. Ok. But then, the freeway - if the freeway's
22 built, it's going to be 250 thousand vehicles traveling
23 on that freeway. That's stupid. That's retarded.
24 That's dumb.
25 Why is that better for our community to have 250
1 thousand communities, rather than 16 thousand? It
2 doesn't make sense. It's retarded. That is outrageous.
3 I can't believe it.
4 Hold on, I got more. Let me think. Those people are
5 too much for me.
6 Also, if it hasn't been made aware that our culture
7 is still alive, we're still here. We're not dead. We
8 haven't been extinct yet. We are still practicing our
9 culture and we still go to the mountain. We still pray
10 at those sites that they're planning to blast through.

6

Code	Issue	Response
6	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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1	11 We leave our blessings there. We leave our prayers, our 12 words of strength, guidance. We go to this mountain to 13 gather those things for the types of things that we have 14 to go through on a daily basis. We need that strength. 15 We need that power that comes from our community. And 16 we call it Nulduck (sic). That is our sacred place of 17 being. That's where our creator was born. That's why 18 he came out of the ground after the floods came and he 19 created our people. That's why we live here, the 20 Alamalech (sic), them people -- A-I-K-E-M-L -- I don't 21 know how to spell it. Another -- which is O-T-H-O-M, I 22 think I spelled it right. That's why the creator 23 created the Othom people, to protect the land, to 24 look after it. All the sites, the creator gave to us. 25 That's what South Mountain means to us. That our 1 creator was from there, and he created us from out of 2 clay. That was used on the mountain. 3 Maybe you people don't believe in any of that. You 4 don't care. You just came out of nowhere, the dust of 5 something. We don't know where you came from -- where 6 you came from. We know where we came from and our 7 beliefs. We know where we were created. I don't know 8 where you people were created and you probably don't 9 know either. That's why it's probably not significant 10 to you. That's not our fault. That's your fault for 11 leaving your land, then you would know where you came 12 from. Let me see. Ok. I'm running out of stuff to 13 say. Thank you.

Code	Issue	Response

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You're also welcome to provide additional comments to the court reporter in the next room. Your time is up.

Andrew Pedro. Andrew, are you in the auditorium?

Claudine Reifschneider. If you could turn the microphone and address the front, you'll be able to see the time better that way.

MS. REIFSCHNEIDER: Thank you.

THE FACILITATOR: Thank you.

Just a note, remember, there are two microphones, one on either side, so if you'd please feel free to use either one.

Danelle Spring.

MS. SPRING: Hello, my name is Danelle Spring, I live in Co-op Village in Gila River Indian Community, District 6. I live on 67th Avenue and Elliot in that area, so the freeway affects me even though it's on 59th Avenue, it's only a few miles away from my house. It's really a tragedy to see this coming to be. I'm definitely against this freeway being built. And the EIS, I didn't see anywhere in there that it said the effect it would have on our community and our community members that live between the South Mountain and the Estrella Mountains. It really doesn't, I guess, affect

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Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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Laveen because Laveen's kind of north of that, but we live in the valley that's right between it. I don't see anywhere in the EIS that addresses that, not in the last five years, but 10, 20, 30, 40 years, what are the projections from this pollution that's going to be trapped in those mountains, in those little valley areas? I didn't see that addressed anywhere.

In our community in the district we only have maybe 2- or 3,000 people that live there, so we're a small minority. I know we're not Phoenix area where they have six million people so, of course, their voices are going to be louder than our voices can possibly be. There's more of them, there's few of us. When we talked about extinction and things of that nature, I think our people are going to be extinct if you project those projections, what is it going to say, that they're all

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going to be sick from cancer and who knows all what other diseases that will come up from those toxins that come in there, and there's no way for that pollution to escape.

I'm sorry for all you people. I know you don't care, because you don't live out there, you live over there on the north side and wherever you live, I know you people don't concern yourself with us, just because we've

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been here since way before any of you people ever even have thought of coming out here. Our people have lived

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Code	Issue	Response
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Environmental Justice/Lifestyle**	While the Preferred Alternative would have an adverse effect on environmental justice populations, impacts would be temporary and would not create undue hardship or be disproportionately high compared with projected impacts on all populations in the Study Area. All populations would benefit from the proposed action's implementation through improved regional mobility and reduced local arterial street traffic.

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out there for hundreds of years, not in the last couple of decades, no, we've been out there for hundreds of years, thousands of years, truly. It affects us more than it affects anybody else.

1 I mean, besides the fact that the mountain is sacred to us, yeah, it is sacred. I looked in the EIS and it says oh, some people might be upset about this that live in the community. Yeah, upset is not the word that I would use for that. It's really disgusting, really, how we feel about that, but I'm just talking

2 specifically about the pollution and how it affects our people. I didn't see anything of that in the EIS. It didn't even really act like we live there. I'm even -- I don't even think it talked about the effects that would have on the people that live in Ahwatukee and in the Laveen area, because they would all be affected too. There's all that congestion that's at the I-10 now already where the Litchfield is and all that area, all that pollution just stands there, stays there. If the

3 wind is blowing to the south it'll come straight down between the bypass, come straight down through our community, all the way to the other end.

So I have to say we're against this freeway being built, it's just awful and tragic, and I would like to see that addressed in EIS. What are your projections

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for the future in 10, 15, 20 years for the people that live out there? Thank you.

THE FACILITATOR: Thank you very much.

Andrew Pedro.

MR. PEDRO: Hello, I'm from the Gila River Indian Community and I'm one of our community managers, our community manager, David White for Gila River, he stated that transportation officials were to be taking cultural awareness training, and has that ever happened for people part of the 202? Anyone? And if it were, who would be taking those cultural awareness training classes; would it be construction? Would it be ADOT officials themselves? And in the DEIS it does say that if any uncovered cultural items, that construction would stop immediately. How are they supposed to know if training never happened?

And like Danelle said, it is a sacred place to us and we have been here thousands of years, you people have been here 200 years. And that thing in the EIS, except for saying that it could cause loss of cultural property and that is like -- that's a violation of our religious rights, that is a sacred place. How is ADOT able to go through there with being that it's a public park and it's a public preserve, so it's owned by the public; how are you supposed to get those right-of-ways

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THE REPORTER: Please state your name.

MS. SPRING: My name is Danelle Spring. I'm a member of the Gila River Indian Community. I live in District 6 in the Co-Op Village. And I read the EIS, and I believe that it is old, and it should be updated. I think I read it, it was in like 12 years ago, that they did this statement, and 10 years ago. We just barely got our new hospital. We just got our dialysis center. We just got different things that have been built around the area, that they're proposing to put this freeway, and I don't think they took any of that into consideration. As a matter of fact, I don't think they took the effects it would have on the Gila River Indian Community into consideration very much.

It doesn't talk about the award that we got for the clean air in 2010, because this State EIS was done over a decade ago. So I think that that's not right, that they should do it again and be more accurate. And I think the study area should be expanded because of the vicinity between District 6 between Estrella Mountain and South Mountain and it should be considered more in depth.

For the next 20 years, 30 years, not just

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Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the Responses to Frequently Submitted Public Comments beginning on page B733 of this appendix. The current study began in 2001, however, the Draft Environmental Impact Statement was published for public review for the first time in April 2013. The Draft Environmental Impact Statement considered developments on the Gila River Indian Community as provided by the Gila River Indian Community (see page 4-2 of the Draft Environmental Impact Statement).
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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1 the next coming-up years, but in the future, how it's
2 going to look and how it will affect the people that
3 live in the Valley area right here, between, like I
4 said, the Estrellas and South Mountain.
5 I looked at the alternatives, and the
6 alternatives are just different ways to build the
7 freeway. I don't see alternatives for different
8 types of roads or different kinds of transportation,
9 other than a freeway. There's just alternatives to a
10 different freeway, because that's not alternatives.
11 Alternatives are more than one choice, you get more
12 than one choice. You get alternatives to one
13 freeway.
14 I would like to say that the impacts of
15 blasting through South Mountain in our community
16 culturally is just disgusting, really, that they
17 would attempt to do that. They hold sacred buildings
18 that they built 10 years ago, 20, 30, they hold that
19 as some kind of special building, and yet a place
20 that we consider to be our church can just be
21 demolished, and they know that there are sacred sites
22 up there that they're going to demolish, and they say
23 in the EIS that that could affect some community
24 members, they don't know whether they're hemda
25 [phonetic] or not, it doesn't matter, it still

Code	Issue	Response
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.

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affects them. It still affects them. And it affects all of us and the future of our people and how we perceive ourselves, especially in our district.

We know that we are the original people in this land. We did not move here. We did not migrate here. And our creation stories are from that mountain, saying that we were born from the mountain or grandfather created us. And that's how we know ourselves to be who we are as O'odham people. And no study can really explain that to you. Either you have that feeling and you know that or you don't know it. You can't study that. You can't explain that. You can't feel that way unless you're one of us. If you're not one of us, then you wouldn't know, and you never will know.

Most of the people that do these studies are from other countries, from other lands, they have to be, because they're not originally from here. Maybe their ancestors lived here for a couple of decades, but our ancestors have lived here from the beginning of time. You can't understand that unless you live in a place where your ancestors came from and you will never know what that's like. And it can't be explained.

I know that there are six million people

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in Phoenix, and there's only 20,000, maybe 10-, 11,000 of us that live in this community, that live in this area. Of District 6, there's only about 3,000 people that live here. So our voices are not being heard as loudly as the voices on the outside. And our voices could not possibly be heard as voices on the outside. It's not possible. And that's due to already taking away our land and already killing our people from different things, stealing our water, and things of that nature. Killing off all our elders and not having enough of us out here. It's already been done. And this is a continuation of that genocide on my people. It just keeps going and going, and there's never enough. They take a little bit for one road and then they want more and more and more. And they're just trying to get rid of everybody, it seems like. They have no feelings or concerns for the original people that live here.

(5)

In studying the alignment, I don't see why it has to be a freeway. Why can't it just be the roadways that go through there? Why does it have to be a freeway? Pecos Road already comes down to just a little bit below the mountain and it's on the south side, and it's four lanes, but there's two lanes going east and westbound. And then on Gila River

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Code	Issue	Response
5	**Environmental Justice/Lifestyle**	While the Preferred Alternative would have an adverse effect on environmental justice populations, impacts would be temporary and would not create undue hardship or be disproportionately high compared with projected impacts on all populations in the Study Area. All populations would benefit from the proposed action's implementation through improved regional mobility and reduced local arterial street traffic.
6	**Alternatives**	In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.

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side, there's the Vee Quiva Casino, and that has two, the same thing, it has two lanes, two ways to go on north and -- east and west, north and south. So I don't understand why one of the alternatives is just to not connect those two pieces of road and have them be together. And then that would open up that area for the people. But not to allow big diesel trucks on those roads. Not to allow hazardous material on those roads, but really just to be for local traffic. That makes more sense than blasting through the mountain. That would save all of the Pecos people's homes in Ahwatukee. That will save all of the Laveen people's homes that live on Dusty Lane. And it doesn't seem like it's necessary to blast through the mountain and put an eight-lane freeway, so that all these trucks can pass through there, giving off all their diesel fuel and things like that.

It doesn't make any sense at all, when they already have the road that goes down south and comes around the Estrella Mountains. That's already supposed to be a truck bypass. They're using that truck bypass, the 303. The 303 is coming through; then why do you need the 202? The 303 is already almost put together, so why would they need the 202 as well to be expanded over here? It doesn't make

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Code	Issue	Response
7	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Purpose and Need, Truck Bypass**	
9	**Hazardous Materials**	
10	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
11	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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any sense. It seems like it's a significant waste of money and resources and trying to kill people is outrageous to me.

Also, I got to keep remembering, now I lost my train of thought. Also, there's a lot of traffic congestion on the 10, near 51st Avenue and 75th, I mean, that's already out of control over there, so I don't see how adding to that through this freeway going north towards 51st Avenue where they intersect with the 10 is going to make that any better. I don't see how that could be possible. It doesn't seem possible. It seems like it would just make it even worse congestion that's already over there, I don't know, but if you ever tried to travel westbound in the City of Phoenix to Litchfield, Jesus, that is ridiculous. And now you add more traffic to that area with this freeway going up to that same area? I mean, at least -- they could have at least put it through to the 91st area where it would have connected with the 101 over there. That might have been a little bit more better than to have all that traffic converging on one little area. To me that doesn't make sense. I don't understand who is doing this and why they think that that is a good idea. I don't understand that. It doesn't make

Code	Issue	Response
12	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
13	**Alternatives , W59 Alternative Versus W101 Alternative**	

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sense.

Also, they came to our community, and they have a whole chapter devoted to the Gila River Indian Community, blah, blah, blah, and they don't seem to take note that every time they come to the Gila River Indian Community, we've been saying no for 20 years, 30 years, however long this has been coming up, everybody has been saying no. We don't want it in our community. We have our resolutions against it. We have resolutions to try to protect the mountains and we intend to push our council representatives to take a lawsuit against the State of Arizona for continuously taking advantage of us, and for not listening to us, and not taking our opinions into their EIS. They just overlap it, and don't even consider it.

I mean, I read the whole chapter and it seems pretty stupid. And it says that the community won't allow them to share, or whatever, they won't tell them what's the significance of the mountains to us. I don't understand that. It doesn't make any sense. I think we have told them numerous times, but it just doesn't seem to get into the EIS report.

All I know is that if ADOT continues to push this freeway through our community, we will be

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14	**Alternatives**	No alternative is proposed to be on or use Gila River Indian Community land.

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forced to take action on them through a lawsuit, through a civil suit, whatever we have to do, that's what we plan to do. To join with the people in Ahwatukee who don't want it to come through there and some people in Laveen who don't want it to come through there, and there's some that do, but whatever. We're going to have to keep moving on, keep fighting this. Because this is ridiculous.

That's it. Thank you.

THE REPORTER: Thank you very much.

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From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Friday, May 24, 2013 11:22:32 AM

From: Barbara Spurlock [mailto:spurs@cox.net]
Sent: Friday, May 24, 2013 11:08 AM
To: Projects
Subject: South Mountain Freeway

Finally!!! The benefits far outweigh the hindrances.

1 We, however, trust that the people whose homes or businesses are being affected or lost will be very fairly compensated. And..we trust that they will also receive the help and guidance they might need to start over again somewhere else.

Thank you! Please.... enough planning. 28 years should do it. Let's get this done!!

Steve and Barbara Spurlock
Laveen

Barbara Spurlock
SPURS HOME INSPECTION SERVICES
SPURS MECHANICAL SPECIALTIES
P.O. BOX 769
LAVEEN, AZ 85339
602-795-0695
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http://www.SpursHomeInspections.com

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Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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MR. ST. LEGER: My name is Jim and last name is St. Leger. I've been living in Arizona 17 years. When my wife and I moved here, we didn't have children at the time. We looked long and hard before we decided where in the Phoenix metro area we would live. The factors that impacted our choices were quality of life, access to the outdoors and clean air.

I have a distinct memory of looking at pollution maps that showed the prevailing winds in the Phoenix metro area pushing more pollution to the northeast area including Scottsdale and that part of town, and was extremely happy to see that Ahwatukee had some of the cleanest air in Phoenix which is why I moved there.

I was aware of the potential freeway at the time, but then watching Loop 202, Loop 101 get built, the impact of what might come hit home. When I look at the -- who might use this highway, I can't fathom the need in an Ahwatukee area of a six to ten lane freeway. The population clearly can't justify it nor can the traffic.

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However, if I drive up I-10 into downtown and lived in that corridor, I would love to see all of that traffic off-loaded onto Santan Freeway, Loop

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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202. Which as a resident, I absolutely never want to see happen because of the diesel particulates from the tractor-trailers, the noise, the traffic, the congestion and frankly what it will do to my quality of life, and specifically the three children I now have today being impacted by it.

So from that perspective, I'm tremendously against a full freeway. If the argument is valid that people that live in the Phoenix metro area absolutely need it themselves, then put in a four lane parkway and ban the use of tractor-trailers. That would meet the local metro needs for traffic while eliminating the truck pollution problem, including trucks from Mexico that are not required, nor do they meet EPA air standards today.

Beyond that, I just struggle to see why we need to destroy our environment, South Mountain. For me the single most logical solution to the overarching metro traffic problem including I-10 through traffic would be to create a bypass that would be a shorter route for trucks likely off of I-8 through some other desolate area that doesn't impact any people or environments. And I think that's enough.

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Code	Issue	Response
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	
4	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system, including the shift of access to Foothills Reserve and Calabrea from Pecos Road to Chandler Boulevard. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
5	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
7	**Alternatives**	In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.
8	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Trucks**	
10	**Section 4(f) and Section 6(f)**	
11	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

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Code	Issue	Response
12	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

Code	Comment Document

From: Larry Stackhouse
To: Projects
Cc: PARCtheSMF@aol.com
Subject: SMF Study
Date: Tuesday, June 18, 2013 2:55:08 PM
Attachments: SMF 202 Ext ltr to ADOT 613.doc

To Whom It May Concern:

I have attached a letter voicing my opinions on the DEIS report for the South Mountain Freeway (202 Extension). It is important for those of us residing in the Ahwatukee community to express our concerns regarding this proposed highway and the impact it will have on our unique area.

1

It is hoped this letter will be read and appreciated for its content. The primary concern is the quality of life for those of us who reside in Ahwatukee.

Regards,

Larry Stackhouse

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

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Lawrence L. Stackhouse
14620 S. 8th Street
Phoenix, AZ 85048

June 18, 2013

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD 126F
Phoenix, AZ 85007

To Whom It May Concern:

The most critical point of concern regarding this or any construction of highways in our state must be the welfare of its residents. Any number of studies can focus on important issues but none that I have seen address this most important aspect.

(2) (3) (1)

In reviewing this latest proposal from DEIS, it appears perfectly clear that this roadway will be a truck bypass. It will disrupt, degrade and pollute the Ahwatukee subdivision and the Gila River Indian Community. It does not enhance the quality of life or even maintain our present community attributes.

(4)

In speaking to neighbors and others residing in the area, less than 1% have told me they would use this highway. This is a clear sign that it is not meant to improve our quality of life but rather make it easier for commercial vehicles to save travel time by means of this bypass.

(5)

This has been proven by listening and talking to a number of trucking companies whose terminals are in close proximity to the I-10 junction of this extension. In fact, I have personally been told that no less than 100 trucks per hour will be using this 202 Extension.

(6)

This does not include the truck traffic that will originate in Mexico, which allows higher levels of sulfur in diesel fuel. They will be well into Arizona and past Phoenix before they will need to refuel. This will most definitely add to an already high level of pollution.

Code	Issue	Response
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Purpose and Need, Lack of Support**	
5	**Purpose and Need**	Commercial trucks would use the proposed freeway. As with all other freeways in the region, trucks would use it for the through transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary users of the proposed freeway would be automobiles.
6	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
7	**As the proposed highway marches toward the Estrella Mountain Range it will make a bend to the north to either circumvent South Mountain or be tunneled under it. This area is already plagued by pollution. The area between the northeast section of the Estrellas and the northwest part of the South Mountain range forms a funnel that does not allow for air to move through the pass. This is true now and will only become more troublesome if this roadway is built. Additionally, on the north side of South Mountain, at 43rd Avenue and Broadway there is an air quality monitor. The station already reports air quality levels that are above acceptable levels and more traffic will not improve this fact.**
8	
3	
9	**There has also not been a comprehensive report and study on emergencies and hazardous spills that could occur on this freeway. Access by emergency vehicles does not seem to be addressed or defined by the plans in the report. People will die and be exposed to everything from fuel spills, chlorine and any number of other highly dangerous substances.**
10	**There are a number of public schools, at least five, and private schools that are located within a half mile of the proposed new road. Studies have shown the negative effect upon children whose schools are in close proximity to highways. Asthmatic conditions are heightened and other health risks are adversely affected.**
11	**The design also is planned to displace a community church at the corner of Pecos and 32nd Street. I have never known this to happen in several other major metropolitan areas in which I have resided. Again, another example of degrading the life of community residents.**
4	**What I also do not understand is the selection of this route, when it could be the most expensive limited access highway ever built. It will also add to an already poor air quality and cause additional traffic delays during high travel periods. I-10 on the west side of the city is already one of the most backed up of stretches in the valley. Adding more stopped cars is not going to improve travel, air quality and the quality of life for the people in the area.**
3	
1	
12	**The only realistic option I can imagine for a highway that is meant to bypass the downtown part of the city is one that is west of the Estrella Mountains. A highway that will travel south to Route 8 and connect to I-10 near the 303 makes much more sense. This would displace the least amount of people, provide a true truck bypass with less impact on residents, add much less pollution to an already poor air quality area and cost a lot less money.**
13	**If this SMF proposal is meant to be a benefit to the area, then why not restrict it to non-commercial vehicles? This has been done in and around the Baltimore/Washington DC area, Philadelphia, PA, Florida and numerous other areas around the country.**

Code	Issue	Response
7	**Alternatives**	The Draft Environmental Impact Statement provides a summary of the project team's analysis of the Tunnel Alternatives. Please see pages 3-14, 3-16 and 3-17, and 5-18 through 5-20. Options to build a tunnel under the South Mountains were eliminated from further study not just because of high costs. They would not protect the South Mountains. Tunnel Alternatives would create safety and constructibility concerns, undesirable intrusion-related impacts, and maintenance issues. Tunnel Alternatives would not achieve avoidance of the South Mountains or meaningfully reduce use-related impacts under Section 4(f). Tunnel Alternatives would have less visual, noise level, and habitat acreage impacts than would the open-cut design of the proposed action.
8	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
9	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Health Effects**	
11	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
12	**Alternatives**	The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
13	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County.

Code	Comment Document
	This proposal has left me highly suspicious. I can only hope that land owners and politicians are not taking advantage of a situation to improve their own standing at the expense of the tax paying public.
2 1	**In conclusion, there seems to be little advantage to building this highway as proposed. With the millions of dollars spent on studies, reports and analysis, it is one of the least comprehensive studies of have ever seen. The only benefit I can draw from the information provided is to conclude it would be an excellent truck bypass for companies both far and near. It certainly would not improve the quality of life for those living in the area.**
	Respectfully,
	Larry Stackhouse
	Cc: PARC

Code	Issue	Response

Code	Comment Document

5037

LARRY STACKHOUSE: To whom it may concern: The most critical point of concern regarding this or any construction of highways in our state must be the welfare of its residents. Any number of studies can focus on important issues but none that I have seen address this most important aspect.

In reviewing this latest proposal from DEIS, it appears perfectly clear that this roadway will be a truck bypass. It will disrupt, degrade, and pollute the Ahwatukee subdivision and the Gila River Indian Community. It does not enhance the quality of life or even maintain our present community attributes. In speaking to neighbors and others residing in the area, less than one percent have told me they would use this highway.

This is a clear sign that it is not meant to improve our quality of life, but rather make it easier for commercial vehicles to save travel time by means of this bypass. This has been proven by listening and talking to a number of trucking companies whose terminals are in close proximity to the I-10 junction of this extension.

In fact, I have personally been told that no less than 100 trucks per hour will be using this 202 extension. This does not include the truck traffic that

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www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Purpose and Need**	Commercial trucks would use the proposed freeway. As with all other freeways in the region, trucks would use it for the through transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary users of the proposed freeway would be automobiles.

Code	Comment Document

6

7

8

2

9

will originate in Mexico which allows higher levels of sulfur in their diesel fuel. They will be well into Arizona and past Phoenix before they will need to refuel. This will most definitely add to an already high level of pollution.

As a proposed highway marches toward the Estrella Mountain range, it will make a bend to the north to either circumvent South Mountain or go through it. This area is already plagued by pollution. The area between the northeast section of the Estrellas and the northwest part of South Mountain range forms a tunnel that does not allow for air to move through the pass. This is true now and will only become more troublesome if this roadway is built.

Additionally, on the north side of South Mountain around 43rd Avenue and Broadway there is an air quality monitor. This station already reports air quality levels that are above acceptable levels and more traffic will not improve this fact.

There also have not been comprehensive reports and studies on emergency and hazardous spills that could occur on this freeway. Access by emergency vehicles does not seem to be addressed or defined by the plans in the report. People will die and be exposed to everything from fuel spills, chlorine, and any number of

Code	Issue	Response
6	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Alternatives**	The Final Environmental Impact Statement provides a thorough summary of the project team's analysis of the Tunnel Alternatives. Please see pages 3-14, 3-16 and 3-17, and 5-18 through 5-20. Options to build a tunnel under the South Mountains were eliminated from further study not just because of high costs. They would not protect the South Mountains. Tunnel Alternatives would create safety and constructibility concerns, undesirable intrusion-related impacts, and maintenance issues. Tunnel Alternatives would not achieve avoidance of the South Mountains or meaningfully reduce use-related impacts under Section 4(f). Tunnel Alternatives would have less visual, noise level, and habitat acreage impacts than would the open-cut design of the proposed action.
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Code	Comment Document

other highly dangerous substances.

There are a number of public schools, at least five, and private schools that are located within a half mile of the proposed new road. Studies have shown the negative effect upon children whose schools are in close proximity to highways. Asthmatic conditions are heightened and other health risks are adversely affected.

The design is also planned to displace a community church at the corner of Pecos and 32nd Street. I have never known this to happen in several other major metropolitan areas in which I have resided. Again, another example of degrading the life of community residents.

What I also do not understand is the selection of this route when it could be the most expensive limited access highway ever built.

It will also add to an already poor air quality and cause additional traffic delays during high travel periods. I-10 on the west side of the city is already one of the most backed up stretches in the Valley. Adding more stopped cars is not going to improve travel, air quality, and the quality of life for the people in the area.

The only realistic option I can imagine for a highway that is meant to bypass the downtown part

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Code	Issue	Response
10	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
12	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

13

of the city is one that is west of the Estrella Mountains. A highway that will travel south to Route 8 and connect I-10 near the 303 makes much more sense.

This would displace the least amount of people, provide a truck route bypass with less impact on residents, add much less pollution to an already poor air quality area, and cost a lot less money.

If this SMF proposal is meant to be a benefit to the area, then why not restrict it to non-commercial vehicles?

This has been done in and around the Baltimore, DC area, Philadelphia, Florida, and numerous other areas around the country.

This proposal has also left me highly suspicious. I can only hope that landowners and politicians are not taking advantage of a situation to improve their own standing at the expense of the tax-paying public.

In conclusion, there seems to be little advantage in building this highway as proposed. The millions of dollars spent on studies, reports, and analyses, it is one of the least comprehensive studies I have ever seen. The only benefit I can draw from the information provided is to conclude it would be an excellent truck bypass for companies both far and near.

1

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Code	Issue	Response
13	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

Code	Comment Document

It certainly would not improve the quality of life for those living in the area.

Respectfully, Larry Stackhouse.

Code	Issue	Response

Code	Comment Document

Brian Stadnick

Document Created: 5/20/2013 5:20:37 PM by Web Comment Form

1

The South Mountain Freeway will get built, better to build it sooner that latter as it will only get more expensive as time goes on.

•The money to build the freeway is in the budget. It was approved by voters twice, first in 1985 and again in 2004.

•The project will create 30,000 jobs during the five to six year construction period and result in a $2 billion investment in the Phoenix-area economy.

•If we don't build the South Mountain freeway, traffic in the region will get much worse over the next two decades. According to ADOT's own study:

•Traffic on I-10 between Ahwatukee and Goodyear will grow 28%
•Another 103,000 cars will use the Broadway Curve each day
•Another 38,000 cars will jam the Tunnel every day
•Morning and evening commute times will increase 39% to 82%
•Traffic congestion on city streets will increase 46%

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Brian Stadnick Document Created: 5/21/2013 2:06:19 PM by Web Comment Form The project will create jobs for the local community and reduce traffic conjestion on the I-10 freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

MS. DOROMAL: Hi, good afternoon. My name is Lisa Doromal and I am a resident of Laveen and I am for the Loop 202 to bring sustainability to our community and have the hospital brought in, it is all contingent with the 202 being built. Thank you.

THE FACILITATOR: Thank you.

Mike Doromal.

MR. DOROMAL: Good afternoon. My name is Michael Doromal, I'm also for the Loop 202. Laveen is an underserved community, there's a lot of services and businesses that will come into Laveen once the 202 is built. The residents are looking for it. It's been an option since the '80s, so let's get this freeway built. Thank you.

THE FACILITATOR: Thank you.

Brian Stadnick.

MR. STADNICK: Yes, good afternoon. I'm Brian Stadnick, I'm a resident of Glendale, but I use the West Valley freeways extensively and I think it's with the help to aid the traffic congestion in the I-10, plus I think that now is the perfect time to build this freeway. The contracting environment and the economy the way it is, I think there's no time like the present to be able to build this thing for the cost savings of the public, so let's get this thing built. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 4:01 PM
CALLER: ROBERT STALDER	CALLER ADDRESS: 2582 W. IRONWOOD DRIVE, CHANDLER, AZ 85254
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway construction.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 2:03 PM
CALLER: TODD STANISTEVEN	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain freeway. We've spoken about it twice approving it, it's time to build it. It makes sense with regard to the economy. It makes sense with regard to lowering the traffic. It makes sense with regard to getting started on it early and now. So I support the freeway and getting started on it now. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 9:09 AM
CALLER: DENISE STANSON	CALLER ADDRESS: 10134 E. [UNCLEAR] ROAD, TEMPE, AZ
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Construct the 202 South Mtn freeway
Date: Monday, May 20, 2013 8:29:14 AM

From: JOAN STEDMAN [mailto:halstedman@msn.com]
Sent: Saturday, May 18, 2013 12:32 PM
To: Projects
Subject: Construct the 202 South Mtn freeway

Thanks for the opportunity to give input regarding this subject. I think that this unique by-pass would really alleviate the traffic congestion on I-10 going east into Phoenix, especially during the "rush hour" period. This is an obvious statement. I feel that then air quality in Phoenix would be impacted in a positive way.

1

The alignment I prefer is a continuation of the existing 101 west to the south from I-10.

Hal Stedman.
Goodyear, AZ

Sent from Windows Mail

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the 202
Date: Monday, May 20, 2013 8:28:09 AM

From: Tony Stedry [mailto:tsted31@yahoo.com]
Sent: Saturday, May 18, 2013 1:01 PM
To: Projects
Subject: Build the 202

1

I commute to the west side of Phoenix/Glendale and would love to see this freeway finished. It was supposed to be built years ago and the homes that were built in its path were put there with the knowledge of this freeway project. Yet they chose to build there anyway. We owe them nothing and the freeway should go on as proposed. Please help me cut my commute time in half by finishing the project that should have already been started.

Thank you,
Anthony Stedry

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Wednesday, May 22, 2013 10:54:00 AM

-----Original Message-----
From: Ashley Steele [mailto:ap_steele@hotmail.com]
Sent: Tuesday, May 21, 2013 11:20 AM
To: Projects
Subject: 202

1 I am writing in support and vote YES to the Loop 202 South Mountain Freeway, specifically the W59 alternative

Sent from my iPhone

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Donna Lee Steele
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 8:44:14 AM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

No, No, NO AND NO!!!!!!!!!!!!!!!!

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to (3) effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more (5) vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be (7) destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Ms. Donna Lee Steele
1524 N Sunset Dr
Flagstaff, AZ 86001-1440

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 9:34 AM
CALLER: FREDERICK STEIN	CALLER ADDRESS: 5732 W. SHANNON, CHANDLER, AZ 85226
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I think that the Loop 202 South Mountain Freeway should be built. It would be a shame if this project is not passed.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Southmountain Freeway comments
Date: Friday, May 24, 2013 8:42:23 AM

From: Ray Steinhart [mailto:rsteinhart@mastermolding.com]
Sent: Friday, May 24, 2013 8:38 AM
To: Projects
Subject: Southmountain Freeway comments

1

I understand the purpose of the freeway is to relieve traffic on I-10 through metro Phoenix.

2

I commute from the Northwest Valley North/South on the West Loop 101 Aqua Fria freeway to I-10 east to 59th avenue. During the high traffic season August through May when winter visitors as well as students/teachers add traffic to the freeways, I-10 is backed up from the Loop 101 all the way to I-17 daily. Why would ADOT want to add more traffic?

I believe adding the Southmountain Freewau route in general is going to encourage more traffic off of I-8 and bring it to I-10

I can not understand why the preferred route would be anywhere east of the Loop 101 and utilizing I-10. Additionally, the W59 has the most disruption to people and businesses. How could this be considered the preferred route?

3

At a minimum this route should start at the West Loop 101. Now that the Loop 303 is starting to take shape, why has this connection not being considered?

If in fact the study shows that the traffic is not metropolitan but regional, the Loop 303 would take even more traffic out of the metro area and would allow easy access to I-17 to the north and route traffic away from any part of I-10 east of the Loop 101.

4

I operate a capital intensive manufacturing facility at 55th avenue just south of I-10. Although I do not believe my business will be impacted, if it were, it would cause me considerable financial losses if I have to move my facility due to the amount of power and process piping that is required for my business.

Sincerely,

Ray Steinhart

--

Raymond C. Steinhart
President
Mastermolding, Inc.
1715 Terry Drive
Joliet, IL 60436
815-741-1230
Fax 815-741-2965

5525 W. Latham St. Suite #1
Phoenix, AZ 85043
602-415-1230
Fax 602-272-3286

Code	Issue	Response
1	**Purpose and Need**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives**	Alternatives as far west as State Route 303L were considered in the corridor screening process (see Final Environmental Impact Statement pages 3-6 and 3-7 and Figure 3-4, on page 3-7). They were eliminated early in the alternatives development process for the reasons identified on those pages, chiefly for not meeting the project purpose and need criteria.
4	**Acquisitions and Relocations**	Agencies may acquire only those properties located entirely or partly within the project right-of-way limits (see Final Environmental Impact Statement page 4-45).

Code	Comment Document
	rsteinhart@mastermolding.com Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:47:35 AM

-----Original Message-----
From: Jeff S [mailto:stempakj@yahoo.com]
Sent: Friday, May 17, 2013 4:49 PM
To: Projects
Subject: 202

1

I do believe that building the 202 SMF will be beneficial to the people of Arizona. I drove in NY traffic for years & our freeways are definitely getting congested. Considering the projected growth that should be a factor as well.
Thanks & Regards
Jeff Stempak

Sent from Jeff's iPhone

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Jill Stephens
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Tuesday, June 04, 2013 9:37:21 AM

Jun 4, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) (4) Two billion dollars? To encourage more pollution and destroy this rare open space jewel in the city? Why not use OUR money to improve clean transportation/public transportation, supporting OUR health and slowing the rise of OUR health care costs ?
The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) (2) (5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) (7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. If you get any flack from oil companies, refer them to me. Thank you!

Sincerely,

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Ms. Jill Stephens
9296 E Camino Del Santo
Scottsdale, AZ 85260-4352
(208) 412-6549

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Karen Stepp
To: Projects
Subject: South Mountain Project Public Comment
Date: Wednesday, July 24, 2013 11:48:05 PM

To whom this may concern,

1 The proposed South Mountain Freeway project would have a negative effect on my family by increasing the traffic and congestion on S. 17th Ave between W. Chandler Blvd and E. Pecos Road--the proposed freeway.
<!--[if !supportEmptyParas]--> <!--[endif]-->

2 I have a current student enrolled in the Tempe High School district and South 17th Avenue is a Tempe Union High School bus route for picking up and dropping off my student. The street is also a Kyrene Middle School bus route for picking up and dropping off other local students. I fear for the safety of these students because of the increase traffic and lack of proper crosswalks.
<!--[if !supportEmptyParas]--> <!--[endif]-->
If the freeway must be built, please consider extending W. Liberty Lane out to S. 27th Avenue (in addition to the W. Chandler Blvd extension) to alleviate the increased traffic along South 17th Ave.
<!--[if !supportEmptyParas]--> <!--[endif]-->
Thank you for your consideration.
<!--[if !supportEmptyParas]--> <!--[endif]-->
Sincerely,
<!--[if !supportEmptyParas]--> <!--[endif]-->
<!--[if !supportEmptyParas]--> <!--[endif]-->
Karen M. Stepp
Local resident of Ahwatukee
Foothills Club West
kmstepp@gmail.com

Code	Issue	Response
1	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The daily traffic volume on 17th Street in 2011 was approximately 4,500 vehicles per day just north of Pecos Road (see <phoenix.gov/streets/traffic/volumemap>). With the proposed freeway in place, an additional 4,000 vehicles day would use 17th Avenue to gain access to residences west of 17th Avenue. The total daily traffic would be well below the capacity of a two-lane road (approximately 15,000 vehicles per day). The extension of the Liberty Lane to the west is not part of the proposed project. This road would likely be built in the future along with the development of the Arizona State Land Department property.
2	**Design**	The extension of Liberty Lane to the west is not part of the proposed project. This road would likely be built in the future along with the development of the Arizona State Land Department property. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway. The traffic volume on 17th Street in 2011 was approximately 4,500 vehicles per day just north of Pecos Road (see <phoenix.gov/streets/traffic/volumemap>). With the proposed freeway in place, an additional 4,000 vehicles day would use 17th Avenue to gain access to residences west of 17th Avenue. The total daily traffic would be well below the capacity of a two-lane road (approximately 15,000 vehicles per day).

Code	Comment Document

Joan Stern

Document Created: 5/28/2013 1:22:59 PM by Web Comment Form

1 2 3 4 5

You only show cars on the proposed 202. You know it will be bumper to bumper of semi's on this short cut around Phoenix. We moved to Ahwatukee Foothills to be away from the noise of the city and the smog. I am apposed to the current alignment mainly due to the pollution it will leave us in. The mountain will lock in the smog to settle down around us like a blanket gradually killing off wild life, plant life and human life.

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
5	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 4:47 PM
CALLER: KATHY STERNBERG	CALLER ADDRESS: 5700 NORTH CANYON DRIVE, PHOENIX AZ 85016
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I'm calling to voice my support for the South Mountain Freeway Loop 202. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4269

they need to be listened to rather than people who don't live in that area. I've been around long enough that I know the Sierra Club and Don't Waste Arizona, when they worked against medical waste incinerators in the Laveen and South Phoenix area. People [unintelligible] because their studies then were very important to stopping those incinerators. Now, however, some of the same people who worked to stop those incinerators seem to think this freeway is a great idea, because it saves them five minutes' driving. So that's crazy to me. It's still the health of the individuals that are more important, the children who are going to school and the people living and working in the area along where this freeway will be built. It needs to be put somewhere where it's not as dangerous healthwise for the people living there.

Thanks.

THE FACILITATOR: Thank you.

Don Steuter.

MR. STEUTER: Thank you.

Use this one?

THE FACILITATOR: Yes, please.

MR. STEUTER: My name is Don Steuter.

Thanks for this opportunity to talk to you about the

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

South Mountain Freeway and your Draft Environmental Impact Statement. I've had an opportunity to read quite a few different Environmental Impact Statements over the years, and there's a lot of good information in your document. I appreciate that, and I must say it does seem to be, as opposed to being an objective document, it seems to be predisposed biased in favor of the freeway, so I have to say that at the outset. But there is a lot of good information in there, and I do appreciate that.

The main thing I want to tell you about is that I think that the freeway, I remember when it was first proposed back in the 1980s, and at the time I would have to say I was probably in favor of it or didn't give it a whole lot of thought. But today, in 2013, it seems like quite an outdated idea. The challenges that we're up against seem to be considerably different than what we were dealing with back in the 1980s. And foremost among those is things like climate change that we don't want to think about, but seem to be upon us, whether we want to deal with it or not. And I noticed that the draft EIS does talk about CO2 emissions, but it talks about those emissions in the context that the EPA has not made any decisions. There's no cap. There's no

1

2

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Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].

Code	Comment Document

limits. Nationwide on CO2 emissions, and so, therefore, Arizona Department of Transportation thought that it's not in their purview to have to address that.

But it's hard to know if we don't start talking about it, at least start talking about these things at the local level. How are we going to get anywhere with dealing with it? And I'm sure that many others of the 50 states are basically in the same situation, they're looking around and having freeways that they're considering building. And if everyone has that attitude, we're going to end up still with a lot of freeways that, admittedly, a lot of people want, but there are many other, you know, long-term considerations that we need to start talking about.

So I would hope that in the final EIS that you take more time and flesh out the old CO2 issue further, try to figure out which other states might be trying to address it, and if there are some things that Arizona could pick up on and follow up on that.

A lot of people -- I'm a hiker, and a lot of us are very jealous, as I'm sure you heard today, about our parks and preserves in the Phoenix area. And personally, I've been involved in several over

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the last 25 years, fights over trying to project, enhance our Phoenix Mountain Preserves, and whenever something happens, we worry. I guess it's hikers, outdoor people's nature that when we see something happening to one of our parks or preserves, we get very worried. We think it possibly could be a precedence. In the past there's been a lot of wonderful activists who have worked to protect the preserves, but, you know, I hate to say it, but we're all starting to get more gray hair, if we're still around even. And so we hate to see projects like this that take a chunk out of the park without really being mitigated in any way, shape, or form.

We're going to, in effect, lose about 30 acres of South Mountain Park and --

THE FACILITATOR: Would you wrap up?

MR. STEUTER: Sure. And there is no proposal really to do anything about that. We've planned, but not built other freeways in the past, the Paradise Freeway was planned, never built. The 143 extension north never happened, so we do sometimes concede the freeways and we don't build them, so it's possible we could live without the South Mountain Freeway as well.

Thank you very much for your time.

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Code	Issue	Response
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Section 4(f) and Section 6(f)**	Mitigation measures to address impacts on the Phoenix South Mountain Park/ Preserve are discussed throughout Chapters 5 and 6 in the Draft Environmental Impact Statement.

Code	Comment Document
1	Michael Stewart Document Created: 4/26/2013 3:07:45 PM by Web Comment Form At some point whether it's part of this project (W101 Alternative)or not, the I10-Eastbound to Loop101-Northbound interchange needs to be expanded from 1 lane to 2 lanes. Traffic is currently backed-up Eastbound on I10 before the Loop 101 interchange for a mile or so every morning during rush hour and it causes frequent collisions. Thank you.

Code	Issue	Response
1	**Traffic**	The recommended improvement is not within the scope of the Preferred Alternative. The Arizona Department of Transportation and Maricopa Association of Governments continually evaluate bottlenecks within the existing regional freeway system and identify opportunities for fixing problems.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Public Hearing for South Mountain Freeway
Date: Wednesday, May 22, 2013 10:54:07 AM

From: Dorrana Stewart [mailto:dorrana.stewart@gervinprepacademy.org]
Sent: Tuesday, May 21, 2013 9:24 AM
To: Projects
Subject: Public Hearing for South Mountain Freeway

1

What is the pathway of the proposed freeway? What area of town? Please advise.

Dorrana L. Stewart
GGPA - Office Manager
2801 E. Southern Ave.
Phoenix, AZ 85042
480-219-2121 P
602-633-6787 F
Dorrana.stewart@gervinprepacademy.org
www.georgegervinprepacaademy.org
Knowledge is your birth right!

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Code	Issue	Response
1	**Alternatives**	The Study Area for the proposed action is located in southwest Phoenix. The Preferred Alternative includes the W59 and E1 Alternatives. The proposed freeway would connect Interstate 10 (Maricopa Freeway) to Interstate 10 (Papago Freeway).

Code	Comment Document

4224

the mountain with the hauling of hazardous materials. Nitrates, fuel, and chlorine. And the existence for clear and present endangerment, i.e., death, if you live within the wind distance of these things being carried by the winds in the event of a crash and an imminent subsequent explosion. And all are.

Nothing -- this is criminal negligence by ADOT to the citizens of this city and by HDR, their $21 million consultant whom they depend upon like they were biblical. They are all guilty of criminal negligence to the citizens directly affected and to the citizens of Phoenix, and I unalterably oppose this. Thank you.

THE FACILITATOR: Please refrain from applause or boos. Be respectful of both build and no-build discussions today. This is a hearing and we appreciate your patience.

Michelle Stewart. Michelle Stewart. Those of you whose names have been registered now to speak, you should make your way to the front of the room; that will help speed this up a little bit.

MS. STEWART: Good morning. Speak this way? Hi, everyone, thanks for -- my name is Michelle Stewart. Thank you for listening to our comments today, and I'm addressing you. And you. I'm an

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1 educator and parent in the Valley here. I've lived
2 here 12 years, and I'm speaking today to say that my
3 belief is no-build. Speaking to let you know that
4 because I value really, most of all, I value my son
5 and really all people who enjoy breathing clean air.
6 Their ability to have that clean air. And also
7 because it seems irresponsible to continue to pursue
8 the alternative of building the freeway when a
9 satisfactory plan has not been developed in these
10 decades that have gone on. I was a member of the
11 South Mountain Citizens Advisory Team for about a
12 year and a half, I believe, 2005 to '6.
13 And at that time really nothing's changed
14 in those years, as far as what's being offered.
15 Definitely to impact South Mountain in any way is not
16 a good option for anyone in the community, it's a
17 world-class resource. Both in terms of the habitat
18 that it provides to wildlife and in the gift that it
19 offers to anyone who values that land, which really,
20 you know, just speaking for myself and my family,
21 it's invaluable. It is an amazing place.
22 In terms of what we're doing to our world
23 with continuing the same old path of build more
24 roads, build more roads, we -- studies have shown
25 that it continues to foster more congestion. It's a

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Section 4(f) and Section 6(f)**	
4	**Biology, Plants, and Wildlife**	
5	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.

Code	Comment Document

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6

short-term Band-Aid for the problems that are cited as a reason to build a freeway of there's not enough road space. It doesn't solve the problem. So I'm suggesting no-build. And instead, alternatives such as better land planning involving mixed uses, looking to railway and other non-polluting alternatives, especially given current realities about what the level of carbon dioxide is in the atmosphere. I think we reached 400 parts per million last week. It is a really important thing. And no matter what a person believes regarding the state of the atmosphere, whether we should continue to do the same old thing, it seems only responsible in terms of our future clean air, as well as just general lung health for all people who are breathing this air, to pursue a path that would invite that air and the parts per million of carbon to decrease.

So if you could look at railway, light rail, not building the road, and maybe I'll have some more time -- I think I just went over. Yes?

THE FACILITATOR: Yes, you did. You're also welcome to provide additional comments to the court reporter in the room next door, but your time is up.

MS. STEWART: So thank you for listening

Code	Issue	Response
6	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
7	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].
8	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

to me, and thanks. Good-bye.

THE FACILITATOR: Andrew Pedro. Andrew, are you in the auditorium?

Claudia Reifschneider.

MS. REIFSCHNEIDER: Here.

THE FACILITATOR: If you would, if you could turn the microphone and address the front, you'll be able to see the time better that way.

MS. REIFSCHNEIDER: Perfect. Thank you. I'm here in favor of the 202 South Mountain Freeway. I think it's time that we build it, and keep the congestion off of our highways, make our air circulate better so we don't have cars that are idling on the freeway, and producing more poor air that we breathe. I -- also, you'll probably hear today not only a lot about air, but you're going to hear about the South Mountain Park and the mountain there. I believe there are some people that believe that it is sacred land, but I'm here to say that it is federal and state land. And as far as I know, it hasn't been deemed as sacred.

Although it is a beautiful park and we all love it, we have many states in our country that have had to make tough decisions and had to shave off small portions of their mountains throughout our

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:05 PM
CALLER: LYLE STEWART	CALLER ADDRESS: 1947 E. DIAMOND DRIVE, TEMPE, AZ 85283
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am definitely in favor of the 202 south loop around South Mountain Freeway. In fact, I support working with the Indian tribe to put it on the res and not cut into the corner of the mountain taking advantage of the easy build job and saving all the money to not go through the mountain and not worry about all the houses that have been bought in Ahwatukee, etc. etc. I sure something can be worked out with the tribe. I just think they are going to delay it as long as possible to get the best possible price. Just like the Pima Freeway. I don't think there's any [voicemail unclear] there, but I strongly support it. I think it needs to move ahead as fast as possible, the traffic is a mess and that will be much improved from the big cul-de-sac in Ahwatukee. I live just off the 101 and Guadalupe.

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

ADOT

I strongly disagree with the extinction of Rd 202 to be able to connect to our ~~Ahwatukee~~ AHWATUKEE neighborhood.

1 2 It will destroy our Schools, Churches, Homes & Pollute the Area.

3 4 We do not need an "National Interstate" to transport goods from the Lower Americas to Canada - using our AREA.

Optional

Name CAROLYN D. STEWART Email carolynstewart39@Yahoo.com

Address 15650 So. 13th PLACE

City PHOENIX, AZ. State AZ Zip 85048

Phone 602-399-1102 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need, Truck Bypass**	
4	**Trucks**	

Code	Comment Document

Michelle Stewart

Document Created: 7/23/2013 10:51:50 PM by Web Comment Form

Hello and thank you for accepting my comments on the Draft Environmental Impact Statement for the proposed South Mountain freeway. The best alternative to put into action regarding this proposed freeway is to not build it. (1)

My family and I deeply value clean air, public health and South Mountain Park. This freeway would be terrible on all three accounts.

The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them. (2) (3)

South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be emptied into our air, worsening asthma, cancer, and other diseases. (4) (5)

The freeway would also harm our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area. (6) (7)

The freeway will also make our existing urban sprawl even worse. The expenses associated with its construction, with increased air pollution and traffic congestion will only further burden Arizona's taxpayers. The building of this freeway would simply continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center. (8) (4)

Instead of this proposed freeway, we need to encourage innovative, incentive-based programs to optimize carpooling and biking opportunities, as well as the optimal use of public transportation. As well, we need increased funding for public transportation options like fuel-efficient buses and rail projects. (3)

Thank you.
Respectfully,

Michelle Pulich Stewart

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

Thomas Stillwell

Document Created: 5/21/2013 5:13:45 PM by Web Comment Form

I have lived in the Ahwatukee Foothills Village since 1989. I relocated my law office to the same area 10 years ago and I continue to live and practice there. I have spoken at public meetings regarding this freeway going back at least 10 years. It is fascinating to me that ADOT claims to have considered the no-build option, yet I cannot remember that ever being the case...we've been told that it's going to happen eventually, and despite the fact that it's an old idea and far too expensive, here we are again having to speak out against it. (1) (2)

A fundamental question that must be answered, in order to justify the expense and societal costs of this freeway, is whether or not the SMF will signficantly reduce traffic on I-10. The proponents used to (during past public meetings) cite "studies" that they argued supported a "yes" answer to that question. In particular, an engineer from ADOT explained how they had counted trucks at I-10 and Chandler Blvd, and again on I-10 in the West Valley. From that "study" they concluded that most trucks currently passing through Central Phoenix were merely passing through, and would be likely to take the SMF, thus bypassing downtown and reducing I-10 truck traffic signficantly. (3)

I rose and questioned the engineers' methodology and logic. I pointed out that they had made no attempt to see whether the trucks they counted on the incoming side were the same trucks they counted on the outgoing side. The reason that is significant is that Central Phoenix is home to a) one of the largest trucking company yards in America, and b) many other truck-dependant shipping operations (e.g. the airport-bound truks of the various delivery companies, and the Amazon warehouses.) Trucks coming into Phoenix that are headed for such major trucking centers would NOT use the SMF. In an astounding bit of deception, the SMF proponents no longer cite that "study," but instead merely claim that the freeway will accomplish its goals...totally ignoring the above facts. (4) (5)

The EIS Panel must, of course, weigh impact against benefit. Having already addressed the shaky claim of at least one benefit, let me point out the reality of the impact. Our neighborhood has the lowest crime rate in the Valley. That is in no small part due to the fact that we are isolated by the lack of entrance/egress to the south and west. This freeway would fundamentally change the nature of our neighborhood, and the EIS has completely failed to address this change. (6)

The EIS has also failed to address the impact of this freeway in the instance of traffic accidents...only the impact of the "ideal" situation has been included. For example, if there were a fatal accident (e.g. a freeway closure) on the eastbound SMF, on the east end near I-10, traffic would have to exit the freeway at one of the proposed exits (40th St? 32nd St? 24th St? 17th Ave?) and take surface streets over to I-10. The streets of the Ahwatukee Foothills Village are not designed to handle a large volume of detoured trucks, let alone such a huge influx of other vehicles, and in fact, such detoured traffic would have to be directed to use Ray Road to I-10, which would take them through a school zone on weekdays! Such decisions should not be made solely on the basis of a best-case-scenario, and when looks at (7)

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Old Plan or Use of Old Data**	
3	**Purpose and Need**	In 2035, the average daily traffic on the proposed freeway is projected to range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-62). The estimated volume depends on location. The purpose and need for the South Mountain Freeway are not solely to relieve congestion on Interstate 10 (Maricopa Freeway). Facilitating mobility in the Maricopa Association of Governments region does not mean just relieving congestion on the Broadway Curve (see Final Environmental Impact Statement page 1-21). Among other criteria, the proposed freeway is to permit the entire Regional Freeway and Highway System to function as designed. Optimal function of that design includes completing all the segments of the State Route 202L system (see Final Environmental Impact Statement pages 3-35 and 3-37). With implementation of the South Mountain Freeway, many motorists would be able to get from Point A to Point B, a route that never included needing to use Interstate 10.
4	**Purpose and Need**	Commercial trucks would use the proposed freeway. As with all other freeways in the region, trucks would use it for the through transport of freight, for transport to and from distribution centers, and for transport to support local commerce. Nevertheless, the primary users of the proposed freeway would be automobiles.
5	**Traffic**	The responsiveness of the proposed freeway to purpose and need criteria is presented in the Draft Environmental Impact Statement, beginning on page 3-27. Information related to total daily traffic on other regional freeways, including Interstate 10, with and without the proposed freeway, is presented in Figure 3-12. Information related to traffic distribution on Study Area freeways and arterial streets, with and without the proposed freeway, is presented in Figure 3-13. Information showing hours of congestion on the region's freeways, with and without the proposed freeway, is shown in Draft Environmental Impact Statement Figures 3-15 and 3-16.
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
7	**Traffic**	The Arizona Department of Public Safety (which includes the State Highway Patrol) has primary responsibility for enforcing traffic laws. It also has primacy when calling in support for traffic accidents, including hazardous materials accidents (see text box on Final Environmental Impact Statement page 4-166). The Arizona Department of Environmental Quality maintains a list of contractors who provide emergency response services, as well as local municipalities whose fire and police departments operate in cooperation with the Arizona Department of Public Safety on incidents within their jurisdiction.

(Responses continue on next page)

Code	Comment Document
	just that easily-imagined example, one sees that this freeway could spell future nightmares on the streets of my neighborhood. Finally, our area would be much better-served if the billions of dollars this freeway will cost were spent to get more cars off the existing freeways, or to use the existing freeway locations more efficiently. ONE bus line serves the area. NO light rail is planned or even being considered. No consideration appears to have been given to the possibility of multi-level freeways (as is commonly done in California) using the existing freeway locations. I personally would probably benefit if this freeway were built, because west-side clients would consider me as their attorney, but IT'S NOT WORTH IT. Nor are the weakly-supported benefits that the Valley will allegedly enjoy. Ruining the quality of life of hundreds of thousands of people for purely speculative benefits is simply ridiculous. The EIS is merely a slick retelling of the same arguments ADOT has been making for years. This current process is clearly designed to diffuse opposition and allow ADOT to politely claim it listened. I oppose this freeway. I always have, and I always will, and no number of displays and videos will change the facts I've stated above.

Code	Issue	Response
8	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
9	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Alternatives**	The double-deck option suggested in the comment would have similar benefits and impacts as the Bridge Alternatives evaluated in the Draft Environmental Impact Statement (see pages 3-13 and 5-20). Options to build a bridge through or over the South Mountains were eliminated from further study because of incident management, constructibility and maintenance issues, future expansion limitations, substantially higher estimated construction costs, and undesirable intrusion-related impacts.
11	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Sierra Club on behalf of Joyce Stoffers
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 9:14:26 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) Enough with more freeways. It's time for mass transit! Stop sectioning up the land and destroying our wild treasures. The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(5) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(6) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

(7) Sincerely,

Ms. Joyce Stoffers
14202 N Baywood Ct
Sun City, AZ 85351-2331
(623) 875-6960

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support the 202
Date: Monday, May 20, 2013 3:58:17 PM

From: Luke Stokebrand [mailto:luke@billluke.com]
Sent: Monday, May 20, 2013 3:15 PM
To: Projects
Subject: Support the 202

1

I wanted to drop you a note to say I support the plan to Build The 202. It's a much needed freeway for the valley and will benefit locals and interstaters alike! Lets get building!!

Thanks,
Luke Stokebrand, MBA
Taxpayer, Phoenix, AZ

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
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Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

MR. STOKEBRAND: I sent an e-mail to ADOT regarding just how I support the 202. It's much needed for the people living -- it will bring much needed funds to the City of Phoenix in terms of tax revenue and for all us citizens who leave Laveen and City of Phoenix to go to Goodyear, Avondale, and other cities. I will be a lot happier to keep those tax funds inside of our city for community centers, things of that sort. And I'm someone who lives close, within half a mile of the proposed freeway and I still support it just because it will make my life better, easier to get around the city, and alleviate some of the congestion on Baseline Avenue.

That's about it. The rest of it is pretty well documented, so I don't have anything else to add.

Thank you.

MR. THOMAS: My name is Jim Thomas. I live in Goodyear, Arizona. I work at Broadway and 40th Street, so I drive I-10 every day and the traffic is bad in the morning and it's horrible in the afternoon. I normally get to the office between 5:30 and 6:00 and it takes me 35 minutes, it's about 30 miles. In the evenings, it takes me at least 45 minutes, sometimes an hour to get home so this would be very helpful.

And I think, if they would take the bypass off of the 101 -- if you go down to 59th, you're just

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www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Debra Stone

Document Created: 6/12/2013 6:31:00 PM by Web Comment Form

1

The loss of entrance ramps at 51st Ave. will be bad for business and the community. 51st Ave is the gateway to the Maryvale area. There is considerable traffic that enters and exits the I-10 freeway at 51st Av. One major impact will be on the traffic to and from the Maryvale Baseball Park where spring training games are held. Map 21 shows a confusing and illogical design that will keep thousands of cars on roads longer and lead to more conjestion and poor air quality of neighborhoods. It also appears that you are diverting even more traffic into the area with the loss of ramps at 59th Av. South of I-10 are 2 major truck stops that will have a huge negative business impact due to traffic's inability to exit. I am a community leader in an adjacent neighborhood and I oppose this part of the plan.

Code	Issue	Response
1	**Design**	The majority of motorists who enter and exit Interstate 10 at 51st Avenue are coming from or going to the east. The ramps on the east side would not be affected by the proposed freeway. To allow for the freeway-to-freeway connection, local access along Interstate 10 between 51st Avenue and 67th Avenue would be reconfigured (see Draft Environmental Impact Statement Figure 3-29 for more details). The new configuration includes access roads between 67th Avenue and 51st Avenue on the northern and southern sides of Interstate 10 to allow vehicles to gain access to Interstate 10.

Code	Comment Document

flat community. The bulk of Ahwatukee slopes up from Pecos Road up into the Foothills, well above the noise abatement wall. Noise travels, it bounces off the mountain and is amplified back, so you'll have a significant noise increase farther away from the freeway than your measurements would indicate.

Essentially, what this boils down to is ADOT is sacrificing a community of 85,000 for the purpose of building a truck bypass, a truck bypass that could be easily done using the I-8 to 85 corridor and improving the 85 highway from I-8 to I-10. If the purpose is to provide and route trucks away from Central Phoenix, this is a far better alternative than the Loop 202 truck bypass. Thank you.

THE FACILITATOR: Thank you, Mr. Knight.

Again, as a reminder, out of mutual respect and as a courtesy to all participants, we ask that you refrain from clapping and making reactions to speakers' comments.

I'd like to invite our next speaker, Tim Stone.

MR. STONE: Do I introduce myself? I don't know the rules.

THE FACILITATOR: Thank you, Mr. Stone. You have three minutes.

MR. STONE: My name is Tim Stone, I've been a

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

member of the South Mountain advisory team since back in 2007. My recommendation is a no-build on the 59th Avenue alternative. To me it's the wrong highway in the wrong location. We were advised that the 202 loop was designed to relieve the current and future congestion at the Broadway curve, and if that's our goal we need to start diverting the expected traffic flow through the west -- further west than 59th Avenue. In the past we have seen where they talked about the Loop 101 and the 202 matching up out by 99th Avenue; that's something that would be better. Or better still, if we just push it further west and kept all of the heavy traffic that just wants to skirt Phoenix well south of the population areas of Phoenix. My recommendation on that would be to go to the furthest away from like the Estrella mountains, the Salt River, and then the reservation as a guideline to keep things further south and away from the city.

In part of our hearings they were indicating that the traffic creating the exhaust emissions, 85 percent of it or 81 percent of it would be based on diesel-type vehicles, rather than cars, which to me indicates a lot of semi-tractor-trailer-type traffic. They told us there would be 19,000 semis that would not be stopping in the Valley at all, just transiting through heading to the East Coast or whatever, but that the

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	
3	**Alternatives**	There is an existing route (Interstate 8 and State Route 85) that provides a bypass of the Phoenix metropolitan area. Signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. This route continues to be available for interstate and interregional travel.
4	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Trucks**	The referenced statement would be that 85 percent of the emissions are caused by diesel-type vehicles, not that the percentage of trucks on the proposed freeway would be 85 percent. The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Air quality and noise modeling for the Draft and Final Environmental Impact Statements used this forecast truck traffic (see Final Environmental Impact Statement pages 4-68 and 4-100, respectively). Based on 10 percent truck traffic, this would be 19,000 trucks as indicated in the comment. Not all of these trucks would be passing through the Phoenix metropolitan area without stopping (see Final Environmental Impact Statement page 3-64).

Code	Comment Document

Loop 202 would be carrying up to 129,000 vehicles per day. If 81 percent of that is semi-type diesel, that's an awful lot of semi-trucks that, in my mind, we need to try and keep away from neighborhoods and congested areas with a lot of people and schools.

And we were provided by a presentation at the CAT meeting by a Pete Hyde from the school of engineering at ASU, they provided us with a health study on nine selected sites here in the Valley who wanted I-10 and 27th Avenue as the closest to the freeway put down by the facts and progressively getting further away. The data it shows was incidents of cancer and the incident rate for that first site was 700 per million and as you got further away the furthest remote one was out by Roosevelt Lake and that was 100 cases of cancer per million that far up. And as you work your way through it, it definitely showed a connection between in some method cancer and petrol chemical vehicles and cars, trucks, and gas.

So to me, we need to keep the roadway once again further away from neighborhoods and a lot of people than -- we're hearing at the meetings that they were talking about making the 202 a narrower footprint than like we have, say, on the southern part of the Loop 101.

THE FACILITATOR: Thank you, Mr. Stone, your

6

7

Page 60

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Health Effects**	

Code	Comment Document

4425

the build of Loop 202, we get none of that. Shame on us if we bury our heads in the sand.

MR. STONE: Tim Stone, S-t-o-n-e.

I'm a member of the South Mountain CAT Team that undertook part of the study of the Loop 202. In our April meeting we were provided with the results of the Sonoma Technology, Inc., presentation on State Route 95 near Las Vegas and its effects on two schools in that area as they were producing and building the road and then using it afterward. The study concentrated on black carbon impact on the schools. What the school -- what the study indicated was that there was significant downwind effects that would occur if the school was in close proximity to the highway, but it would mitigate as it comes further away, more remote from the highway.

This is of concern because along the Loop 202 route, Betty Fairfax High School is not all that remote from it. It's close. And there's another elementary school down near the Pecos Road. And these downwind effects would be adverse to the children there.

In their study they indicated that with proper filters, the classrooms could remain safe, but outdoor activities would be at hazard, especially as it -- if it occurred near peak traffic transit; in other words, the rush hour time for morning or afternoon, with the kids

1

Page 16

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

outside, like high school kids and -- practicing baseball, football, soccer, or whatever. It's not advantageous to them.

Let's see. The other item of concern that I noted was in the study they provided us, they talked about a noncontinuous sound and noise and dust wall along the side of the highway. I think it needs to be throughout the area near the crest where it's most effective rather than down at the property line where the highway is supposed to be up to a 23-foot level, would be way over it unless they built an atrociously tall wall. So it would be better to put it up near the side of the road. But it needs to cover all communities along it, not selective ones or areas just like the school.

2

That's all I had to add over what I said in there, so...

Okay? Thank you very much.

MR. MARTINEZ: H-e-n-r-y, Henry. Martinez, M-a-r-t-i-n-e-z.

I understand that this is voted on by the people of Phoenix to get the 202. We were offered three different places where it could be put in. And as of June 2006, ADOT changed their mind. They didn't give us that fourth option, the option of today where it's at 59th Avenue. Because here it's at -- sorry --

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Noise modeling is used to determine the most appropriate and effective location for noise barriers. All noise-sensitive land uses are included in the noise analysis and noise abatement considerations.

Code	Comment Document
1	Melinda Stone Document Created: 7/12/2013 12:25:26 AM by Web Comment Form I love traveling through Arizona to visit friends and family and know from their stories how little taxpayer dollars are flowing into their communities. This project is WASTEFUL and unnecessary. There are better ways to create good long-term jobs and spend the few precious tax dollars we have by keep existing social programs funded. Please, do not build another freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 6:58 PM
CALLER: LISA STONE	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 3:29 PM
CALLER MR. STONE	CALLER ADDRESS: 10845 W. BOSWELL BLVD., SUN CITY, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I'm totally in favor of the South Mountain Freeway. I work for an engineering company and that would be great work for us in the future. So let's get this baby going for design and let's build them bridges. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: present alignment of Loop 202
Date: Thursday, July 18, 2013 2:11:16 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Richard Strassel [mailto:riverside123@gmail.com]
Sent: Thursday, July 18, 2013 1:17 PM
To: Projects; Mark Strassel
Subject: present alignment of Loop 202

1 I wish to express my concern as to exactly where this alignment will be at the intersection,currently of Dusty Lane & 45th Ave. I would like to see the exact location of the freeway and then the realignment of Dusty Lane.

If i understand the projections, the freeway might be as wide as 1,000'.

2 it is crucial for me to understand how the freeway will proceed along the border of the Gila River Reservation line in the area of 45th Ave and Dusty lane and the adjoining Monterey rd.

I reside @ 4436 w Monterey RD, i am sure you can understand my concern.

Please feel free to contact me, as follows:
Richard C. Strassel, MSJ Trustm trstee
4436 w montereyRd
Laveen, AZ 85339
781-254-5147
riverside123@gmail.com

sec/lot:28 twn/blk:1s rng/tr: 2E
SW4 E2 NW4 OF LOT 4 SEC 28 EX S 25F RD

Thank you in advance for your attention to this matter. I wish to raise these concerns before the deadline of closing DRAFT EIS of 7/24/13

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the

Code	Issue	Response
1	**Alternatives**	Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the online hearing Web site, <azdot.gov/southmountainfreeway>. The maps covering the noted area are numbers 8 and 9. In this area, the freeway's right-of-way footprint is approximately 400 to 500 feet wide. Access to the residential area would be provided by way of Dusty Lane and an underpass at Ivanhoe Street. All other connections to Dusty Lane would be cut off by the freeway. Internal roads would be reconfigured and reconnected (see Figure 3-33, on page 3-57 of the Final Environmental Impact Statement). Your contact information was forwarded to the Arizona Department of Transportation Right-of-way Group for further coordination.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

7/18/13 Gmail - present alignment of Loop 202

Gmail

present alignment of Loop 202

Richard Strassel <riverside123@gmail.com> Thu, Jul 18, 2013 at 1:16 PM
To: projects@azdot.gov, Mark Strassel <mixmastermark@gmail.com>

1 I wish to express my concern as to exactly where this alignment will be at the intersection,currently of Dusty Lane & 45th Ave. I would like to see the exact location of the freeway and then the realignment of Dusty Lane.

If i understand the projections, the freeway might be as wide as 1,000'.

2 it is crucial for me to understand how the freeway will proceed along the border of the Gila River Reservation line in the area of 45th Ave and Dusty lane and the adjoining Monterey rd.

I reside @ 4436 w Monterey RD, i am sure you can understand my concern.

Please feel free to contact me, as follows:
Richard C. Strassel, MSJ Trustm trstee
4436 w montereyRd
Laveen, AZ 85339
781-254-5147
riverside123@gmail.com

sec/lot:28 twn/blk:1s mg/tr: 2E
SW4 E2 NW4 OF LOT 4 SEC 28 EX S 25F RD

Thank you in advance for your attention to this matter. I wish to raise these concerns before the deadline of closing DRAFT EIS of 7/24/13

https://mail.google.com/mail/?ui=2&ik=0b105824f5&view=pt&search=sent&th=13ff36d49ce8caaa 1/1

Code	Issue	Response
1	**Alternatives**	Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the online hearing Web site, <azdot.gov/southmountainfreeway>. The maps covering the noted area are numbers 8 and 9. In this area, the freeway's right-of-way footprint is approximately 400 to 500 feet wide. Access to the residential area would be provided by way of Dusty Lane and an underpass at Ivanhoe Street. All other connections to Dusty Lane would be cut off by the freeway. Internal roads would be reconfigured and reconnected (see Figure 3-33, on page 3-57 of the Final Environmental Impact Statement). Your contact information was forwarded to the Arizona Department of Transportation Right-of-way Group for further coordination.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 11:23 AM
CALLER: JOHN STRAVERS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway. It's needed to alleviate congestion on the I-10 Corridor through downtown Phoenix.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comment on South Mountain Freeway - Draft EIS
Date: Tuesday, April 30, 2013 8:52:27 AM

From: Dan Streyle [mailto:dgstreyle@cox.net]
Sent: Sunday, April 28, 2013 12:50 PM
To: Projects
Subject: Comment on South Mountain Freeway - Draft EIS

ADOT:

Thank you for the opportunity to comment on the above Draft EIS.

1

While I have only done a cursory review I definitely would prefer the W101 Alternative for the western section compared to the W59 or W71 options. In the "big" picture it just does not make sense to continue to funnel all traffic along I-10 in the section between L101 and 59th Avenue (in the W59 option). This is true for both directions of travel. Having the W101 option serve as an extension of L101 appears to "complete the loop" to provide the bypass around Phoenix that is the primary purpose of the South Mountain Freeway. In travelling this area every day the AM traffic typically moves well until the I-10 and L101 traffic must merge on I-10. The W101 alternative will better help to alleviate this congestion.

Daniel Streyle
11120 W. Citrus Grove
Avondale, AZ 85392

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain freeway
Date: Tuesday, April 30, 2013 8:54:21 AM

From: mpstrohmeyer [mailto:mpstrohmeyer@msn.com]
Sent: Friday, April 26, 2013 10:29 AM
To: Projects
Subject: South Mountain freeway

1

100% support.

Martin Strohmeyer
4628 W Ellis St
Laveen, 85339
Homeowner
480-525-3705

From my Android phone on T-Mobile. The first nationwide 4G network.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

This environmental impact draft study doesn't seem to think that it will worsen the air quality on the sensor that's on 43rd Avenue, which will be two to three miles away from this construction. So it really needs to be understood that it could -- could risk Arizona losing its federal funds. And then the City and our citizens will have to pay the bill. This could turn into one of the more expensive highways. And I think a separate study of that impact is very, very important before we go to the final phase of the environmental study.

So thank you very much for your time. I appreciate the opportunity to comment.

MR. SMITH: They've already spent a lot of money studying this thing, right? And they might as well finish the project or a lot of people's work has been wasted already.

And as far as alignments go, I think, even though the one that's more expensive, that would link up to the 101, is probably a better option in the long run, even though it looks like it might be more expensive now. I don't think I have anything else to say.

MR. STROOP: Well, I just wanted to say that I am a Laveen resident and that I am for the proposal to build the freeway in any of the capacities that I saw today. I don't really have a preference on an alternative, but I would prefer it to get built as soon as possible.

MR. ALLEN: I don't know what ADOT's plans for

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:35 PM
CALLER: CATHY STRUNK	ADDRESS: 2880 S. NOLINA PLACE, CHANDLER, AZ 85286
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in favor of the South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

Wildlife corridors!
While I see display boards that address wildlife movement corridors, I wish to emphasize the importance of these corridors to the long-term survivability of our dwindling fauna! The Estrellas + South Mountain are host to many mammal species — from mountain lions to small rodents and each has different corridor needs: one size does not fit all. Flyovers above natural drainages, large box culverts and smaller culverts all need to be in the mix. Additionally, more is better than only a few.
Wildlife-friendly fencing: This also needs special attention where fencing is a necessity.

Optional

Name: Diana Stuart Email: diastu460@gmail.com
Address: P.O. Box 15329 (Tempe resident; wildlife biologist by degree)
City: Phoenix State: AZ Zip: 85060
Phone: 602-525-3151 (cell) Fax:

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-516

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 11:13 AM
CALLER: CLORIS STUART	CALLER ADDRESS: 83RD & CAMELBACK
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I would love to see the freeway to come to the west side. I definitely support the freeway coming through. Thank you. Bye bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 12:04 AM
CALLER: GARY STUDEBAKER	CALLER ADDRESS: 2067 E. POWELL PLACE, CHANDLER, AZ 85249
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I work in Tolleson and I drive through the reservation every day and this would shorten my trip and make it much more enjoyable. I totally support the 202 extension around South Mountain. Please make this possible.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support For South Mountain 202
Date: Monday, May 20, 2013 8:49:47 AM

From: Paul Sublasky [mailto:PSublasky@apollopros.com]
Sent: Friday, May 17, 2013 2:30 PM
To: Projects
Subject: Support For South Mountain 202

My name is Paul Sublasky, I work in the Aerospace / Manufacturing / IT Staffing Industry. I am a life long resident of The east valley and think that the

South Mountain Loop 202 Freeway, which has been approved by Maricopa voters twice, first in 1985 and again in 2004 should be built immediately. The traffic jams are stupid and unnecessary. Arizona residents want it, it will bring jobs and money to our economy. Infrastructure is the key to growth- if you build it they will come!!!! What is the delay? is it you? If you do not approve this to get this going than why are you running the show? Maybe we need new officials. This is an outrage that it has taken so long to build. Don't you work for the people of Arizona? DO YOUR JOB OR GET OUT.

Paul Sublasky
Account Manager

Apollo Professional Solutions, Inc.
1811 South Alma School Road
Suite 148
Mesa, AZ 85210-3042

480-223-4412 Direct
866-APS-EDGE Toll Free
480-730-3004 FAX
PSublasky@apollopros.com

www.apollopros.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build The South Mountain Freeway
Date: Monday, May 20, 2013 8:29:33 AM

From: John Sullivan [mailto:psychojack02@yahoo.com]
Sent: Saturday, May 18, 2013 11:19 AM
To: Projects
Subject: Build The South Mountain Freeway

Dear ADOT Representative,

1 I am in support of the building of the South Mountain freeway; Because, as our communities increase in population and many more travelers passing through our communites; It is imperative to have the freeway built to help limit gas emissions, congestion, and allow the flow of traffic to continue; So, it can limit road rage!
I thank-you for hearing my concerns in support of the building of the South Mountain freeway.

Sincerely,

John H. Sullivan
10540 E. Apache Trail, Lot #539
Apache Junction, AZ 85120-3359
(H) 480-807-0678

ARIZONA'S VALLEY OF THE SUN WHERE FAMILY AND FRIENDS

CAN REST AND RELAX WITH ME!!!

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Monday, July 15, 2013 11:07:11 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: jgw1953@cox.net [mailto:jgw1953@cox.net]
Sent: Monday, July 15, 2013 11:06 AM
To: Projects
Subject: South Mountain Freeway

I am offering my public comment about the proposed South Mountain Freeway.

(1) First off, I don't have any illusions my comments will have any impact on the final decision. I strongly believe the decision has been made and this is just a formality to satisfy some legal requirements. Nonetheless, I will submit my comments.

When the freeway alignment was proposed 30 years ago (approximately), there was nothing in the area to impede construction. At that time, even though I didn't live in the Ahwatukee Foothills area, I thought the loop was a good idea.

(2) (3) (4) (5) However, many things have changed since then. First and foremost, there is a complete community (Ahwatukee Foothills) that will be affected. Despite the findings in the EIS, I do not believe there will be little or no adverse impact on the community. Ahwatulee Foothils will be trapped between the freeway and South Mountain. Noise and pollution WILL SIGNIFICANTLY increase. Just the fact this freeway will be a truck by-pass makes this consequence inevitable.

(6) (7) Second, there is the Kyrene de los Lagos elementary school that butts up to the free alignment. I firmly believe the noise and pollution from the freeway will have a serious adverse impact on the children. Given what we know today about the effects of noise and pollution on children, It is unconscionable to put a freeway so close to a school.

(8) Personally, I live about 1/2 mile from the alignment (40th and Pecos) . I know I will experience increased noise and increased pollution. I can hear freeway noise coming from the I-10, and that is 1-1/2 miles away.

(9) (10) I have 2 questions for ADOT. First, is there any possibility this freeway will not be built? Second, if the freeway is built, can I sue the state for adversely affecting my property values?

Sincerely,

Craig Sullivan
3853 E Tanglewood Dr
Phoenix AZ 95048
480 759 8915
jgw1953@cox.net

Code	Issue	Response
1	**Public Involvement**	Public comments are a vital component in the decision-making process. Public comments have been solicited from project inception and through key milestones in the environmental impact statement process. The interests and needs of the public, along with all other social, economic, and environmental issues and impacts, must be fully analyzed and included in the Draft and Final Environmental Impact Statements. Comments made during development of the Draft Environmental Impact Statement have been used to adjust plans, explore new questions, or make changes—all within the scope of the National Environmental Policy Act. Public comments received on the Draft Environmental Impact Statement were reviewed and addressed in the Final Environmental Impact Statement. Public comments received on the Final Environmental Impact Statement will also be considered and addressed as appropriate. More information about the entire public involvement process is available in Chapter 6, *Comments and Coordination*, of the Final Environmental Impact Statement
2	**Purpose and Need**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	
4	**Air Quality**	
5	**Purpose and Need, Truck Bypass**	
6	**Noise**	According to the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, interior noise levels are considered only for noise-sensitive land uses with no active outdoor use area. These are not common, because homes, schools, childcare centers, etc., all typically have outdoor use areas that are considered for noise mitigation. Typical building construction reduces interior noise levels by 25 -30 decibel compared with outdoor noise levels, so if the outdoor noise standard is achieved, the interior noise level will be well below the interior noise standard. Insulating buildings to achieve greater noise reduction is a noise abatement strategy of last-resort (because of cost) and can only be done for publicly owned, public-use buildings, according to Federal Highway Administration regulations. While this may be possible for schools, noise barriers are usually much less expensive and more effective because they also reduce outside noise for the playgrounds that building insulation alone does not achieve. Because of Federal Highway Administration regulations and other laws regarding using public funds for private property benefits, it is not possible to provide building insulation for homes or private childcare centers.
7	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
89	**Noise**	Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered "acceptable" by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.
9	**Alternatives**	After publication and receipt and consideration of public and agency comment on the Final Environmental Impact Statement, a decision regarding the Selected Alternative will be made by the Federal Highway Administration in its record of decision. This process is described in Draft Environmental Impact Statement pages S-2, S-3, and 6-23. The Selected Alternative could be the No-Action Alternative (see page 3-40).
10	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area..

Code	Comment Document

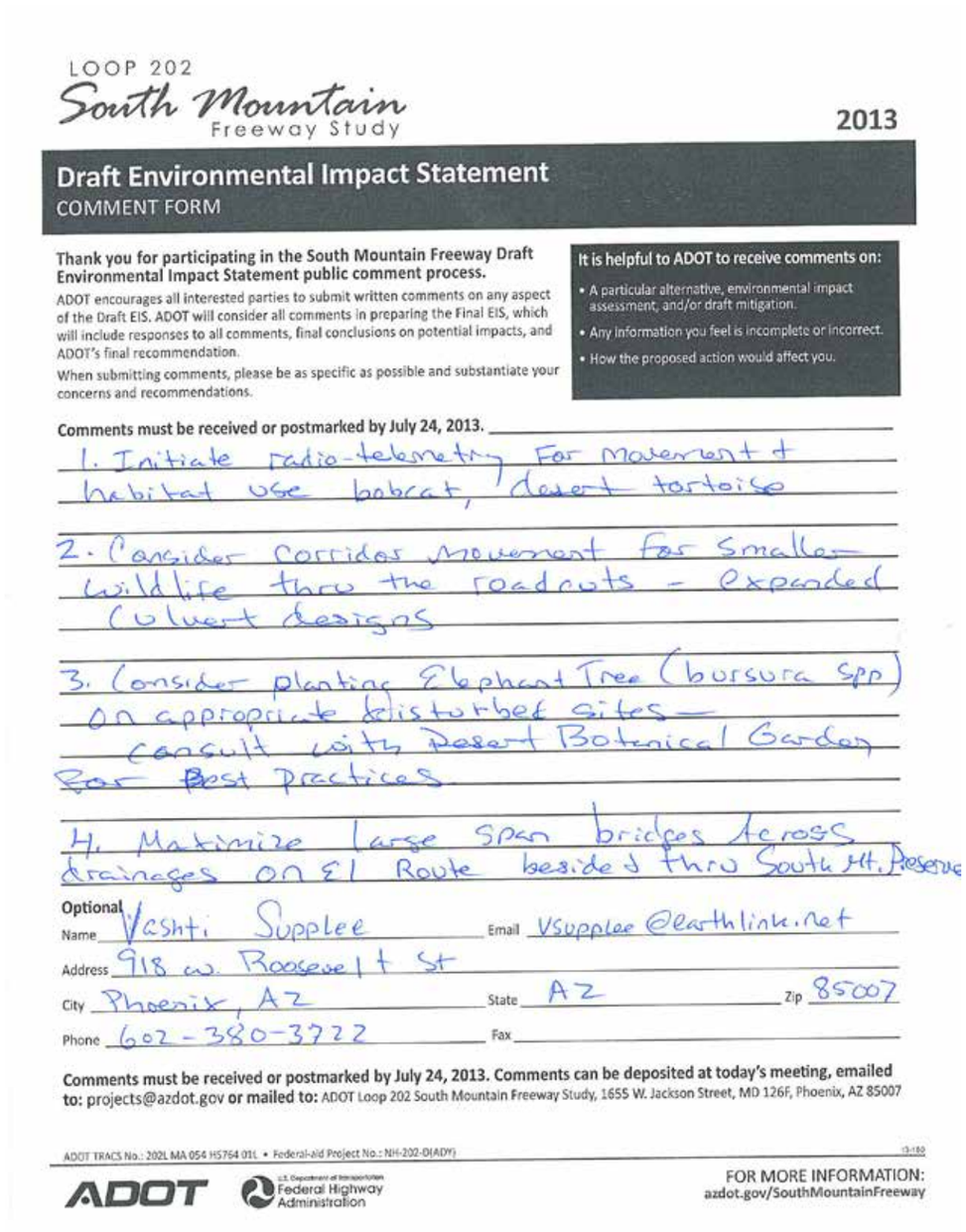
TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 12:05 PM
CALLER: LANELLE SUMMERS	CALLER ADDRESS: 8048 W. YUVIE(?) [UNCLEAR] AVENUE, PEORIA, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Yes I support having the freeway put in to reduce traffic flow.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 1 2 1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1. Initiate radio-telemetry for movement + habitat use bobcat, desert tortoise

2. Consider corridor movement for smaller wildlife thru the roadcuts - expanded culvert designs

3. Consider planting Elephant Tree (bursura spp) on appropriate disturbed sites — consult with Desert Botanical Garden for best practices

4. Maximize large span bridges across drainages on EI Route beside thru South Mt. Preserve

Optional

Name Vashti Supplee Email VSupplee@earthlink.net

Address 918 w. Roosevelt St

City Phoenix, AZ State AZ Zip 85007

Phone 602-380-3722 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants, and Wildlife**	Final Environmental Impact Statement pages 4-138 and 4-139 describe the relevant mitigation that would be used for revegetation. All disturbed soils that would not be landscaped or otherwise permanently stabilized by construction would be seeded using species native to the project vicinity.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

Thank you for taking time for such a thorough public input process!

I oppose the SW Loop 202 freeway project. This is an idea whose time has come and gone. (1)

We have passed peak oil. Young people and those my own age are driving less. This freeway doesn't connect residential areas with employment centers. (2) (3)

It won't serve any real purpose, but it will encourage continued sprawl. We cannot afford that. (1) (4)

Thanks for listening!

Optional

Name Suzanne Email

Address

City State Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	The comment is based on national trends for travel; however, the local conditions and setting of the Phoenix metropolitan area are not consistent with areas of high-density cities in other parts of the country. In Maricopa County, daily vehicle miles traveled levels increased by almost 2 percent between 2011 and 2012, and the 2012 daily vehicle miles traveled approached the 2007 prerecession peak in. (*Source:* the Arizona Department of Transportation's Multimodal Planning Division's Highway Performance Monitoring System Data for calendar years 2012 and 2011) Even if the recently observed national trend of per capita vehicle miles traveled decreasing continues, total vehicle miles traveled in the region would still increase along with increases in total population. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
3	**Purpose and Need**	Information related to origins and destinations of motorists that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Final Environmental Impact Statement. The definition of freeway users considers only those motorists who travel through the South Mountains; so, motorists who begin their trips in Ahwatukee Foothills Village and travel east to Interstate 10 (Maricopa Freeway) or motorists who begin in Laveen Village and travel north to Interstate 10 (Papago Freeway) are not counted in the analysis. The analysis of origins and destinations shows that 73 percent of travelers would be involved in trips beginning or ending in the Study Area or areas immediately surrounding it. Seven percent of the trips would begin, end, or begin and end outside of the Maricopa Association of Governments region; ten percent would either begin or end in Pinal County.
4	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

From: Sean D. Sweat
To: Projects
Subject: Loop 202 South Mtn Freeway: OPPOSED
Date: Wednesday, July 24, 2013 9:40:29 AM

Hello,

1 2 The draft EIS for the South Mtn Freeway was sloppy, ignoring induced demand and making an utterly false claim that to build this mega-project would actually improve air quality -- absolutely false and as an alumnus of MIT with a graduate degree in Transportation, I'm ashamed that this state's top transportation professionals would peddle such a dishonesty to the public.

3 Stop studying the South Mtn Freeway which wastes our taxpayer dollars.
Stop trying to build the South Mtn Freeway which will damn our region to more auto-centric development in the midst of an environmental, health, and economic crisis which more highways will only make worse all around.

4 5 Start putting more resources into the Phoenix-to-Tucson rail project, which will open up the region to better development patterns and connect our economic abilities.
Start helping cities build better transit, bike, and pedestrian infrastructure.

6 This is an opportunity for ADOT to change gears and become leaders of a better future for Arizona. The first step to doing so, however, is to stop creating EIS documents based on disproven traffic engineering assumptions that haven't changed since the 1970's, and to stop pursuing this damaging Loop 202 extension project.

Sincerely,
Sean D. Sweat
President, Thunderdome Neighborhood Association for Non-Auto Mobility

Code	Issue	Response
1	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need**	The analysis used to assess the purpose and need for the proposed freeway followed Federal Highway Administration guidance. The proposed freeway is needed to serve projected growth in population and accompanying transportation demand and to correct existing and projected transportation system deficiencies. See Chapter 1, *Purpose and Need*, in the Draft Environmental Impact Statement. Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
4	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
5	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.
6	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the Responses to Frequently Submitted Public Comments beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: objection to freeway
Date: Wednesday, May 15, 2013 8:37:13 AM

From: Violet R. Syrotiuk [mailto:syrotiuk@asu.edu]
Sent: Wednesday, May 15, 2013 8:32 AM
To: Projects
Subject: objection to freeway

Dear ADOT,

(1) I am unable to attend the public hearings this time. (I have attended others in the past.) I would like to express my objection (again) to the construction of the South Mountain Freeway. Apparently not building a freeway still remains an option, and that is my preferred option.

(2) (3) I would highly prefer to see the funds allocated used to extend the light rail system. It would be much better to encourage people to use mass transit rather than private vehicles. Please build the light rail south down I-10 instead!!! In my opinion, it would be a much better use of the money. And it would modernize our city and prepare it for the rest of the 21st century.

A few of the reasons for my objection include:

(4) 1) I think the impact on the freeway on Phoenix South Mountain Park/Preserve is too great. Right now, the park is an oasis in the middle of the city that I frequently enjoy. You can be hiking in the park and not hear any road traffic; it is like you are not in the city, and that's really wonderful and should be preserved. Of course, there are many other negative impacts on the park.

(5) 2) I do not like the placement of the freeway. I do not wish to see it connect to Pecos Road on the south side of Ahwatukee. If it has to be built, I prefer a route further south (even beyond the Gila River native community if needed).

But really, I prefer that the freeway not be built at all.

Please note my objection.

Violet R. Syrotiuk, Phoenix resident
403 E Brookwood Ct.
Phoenix, AZ 85048-1957

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
3	**Alternatives. Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Section 4(f) and Section 6(f)**	
5	**Alternatives, Gila River Indian Community**	

Code	Comment Document

LOOP 202
South Mountain Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- Any information you feel is incomplete or incorrect.
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Comments must be received or postmarked by July 24, 2013.

1 I believe the environmental impact studies have been significantly reducing the actual air pollution effects the eastern section would have on the homes just south of South Mountain. The freeway would encourage significant increases in truck traffic. The freeway would frame the Ahwatukee Foothills bedroom community between the roadway and South Mountain. This would have the consequence of condensing the pollutants upagainst South Mountain and directly over the homes directly to the north of the freeway. Environmental studies have ignored this problem. The public statements say the data is inconclusive. The video conveniently doesn't show one

2 American truck traveling down the proposed freeway,

3 this is actually [illegible] pertaining to the residents affected.

Optional

4 Name JIM SZABO

Address 714 E. BROADWOOD CT.

City PHX State AZ Zip 85048

Phone 480.460.4602 email: Fax antongeneese@yahoo.com

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Trucks**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

5012

1 MR. SZEJN: Brian Szejn. I'm extremely
2 against the proposed freeway for many reasons,
3 health, truckers coming up from Mexico is another
4 reason, pollution, movement of the church at 24th
5 Street and the homes that would have to be moved. I
6 feel there's a much better route that could be
7 attained by just a little bit of thought. I believe
8 that there are people that are going to profit from
9 the alignment on Pecos, and those people should be
10 looked at to find out why the Pecos alignment has
11 been the only route really looked at.
12 Yeah, I'm very touchy about this one. I
13 feel like in the past, ADOT has not listened to
14 people that are actually against the freeway and
15 welcomed all others who are for it. That's pretty
16 much it. Thank you.
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Page 26

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Air Quality**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

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1 I feel the freeway would cause major air and pollution
2 I live along Liberty Lane and would decrease the value
3 4 of my home. I don't want to sit on my patio and listen
to a freeway. It would ruin the beauty of the desert
5 6 along Pecos and cutting into South Mountain. All the
homes and our Church would be torn down. The schools
7 along Pecos area would be affected by the air pollution.
8 It would become a major truck route for trucks coming
from Mex. It would benefit the native americans to
9 10 have the freeway farther South to aress their casinos,
11 hotels, and shopping. It needs to be presented to them.
Phoenix doesn't need another freeway if it ruins
12 3 neighborhoods.

Optional

Name Rhonda Szeja Email BSZEJN@Aol.com

Address 16862 S. 18th Way

City Phx State Az Zip 85048

Phone 480-460-4794 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION: azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-169 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
6	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
8	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Purpose and Need**	
10	**Trucks**	
11	**Alternatives, Gila River Indian Community Alignment**	
12	**Purpose and Need, Lack of Support**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:48 PM
CALLER: MARK TACK	CALLER ADDRESS: AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I live at South Mountain. I support the South Mountain Freeway. I think it needed to happen twenty years ago. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

May 25, 2013

ADOT Environmental Planning Group
1655 W. Jackson St.
Phoenix, Arizona 85007

Subject: Loop 202 South Mountain Freeway Study

Over 30 years ago, my husband and I saw a large model for housing developments south of South Mountain (Ahwatukee). The model showed a proposed new freeway. It was a selling point for the developers.

Over 20 years ago, at a planning and zoning meeting, my husband proposed a route for the freeway to connect with Interstate 10. Your representatives dismissed it as ludicrous. Today it is your "Preferred Alternative."

Over the last 20 years vehicular pollution has hurt EVERYONE. The congestion (bumper to bumper, stop and go) on downtown Interstate 10 has made it many times worse.

Now, what are you going to gain by another "study?" Who is doing the "studies?" How much money are they making? Can they use me, a retired industrial engineer? People who do "studies" have no incentives to stop.

1 Please, just build the freeway.

Donna Taddia

Donna Taddia

P.O. Box 578
4216 W. Carver Rd.
Laveen, Az. 85339

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Ron Tafoya Document Created: 6/26/2013 1:28:06 PM by Web Comment Form I wholeheartedly support the recommended construction of the Loop 202 using Pecos on the south, and the 59th Ave. alternative. I prefer to see it happens as soon as possible. My home is near Chandler Blvd. and 17th Ave. which is near one of the proposed exits. I am originally from the Los Angeles area where poorly planned transportation routes have taken a major toll on quality of life. Population expansion and development will continue in metro Phoenix. It will only get more expensive as time passes to deal with transportation infrastructure. This freeway can be added now, with relatively minimal impact to the environment and without excessive cost due to eminent domain (property acquisition). Those against this freeway have no argument. I live in the Ahwatukee Foothills and assert that my property values, quality of life, and convenience will all be enhanced as a result of the construction of this freeway. The 50 MPH speed limit on Pecos, which dead-ends at 27th Avenue is inconvenient. The community will still be relatively secluded, except with the added convenience of nearby major highway access. Failure to provide better access to and through this area will continue to box Ahwatukee into a corner and isolate it from downtown Phoenix. If L.A. is any indication of the future of this city, that commute will get much worse in the coming years, and providing 2 routes to and from downtown will help. Not to mention, those who commute from East to West Valley or vice versa would be able to avoid downtown altogether. There is a clear benefit to building this freeway. I support it, and would like to see the project expedited.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 3:44 PM
CALLER: PAUL TANDY	CALLER ADDRESS: 20080 W. PINEWISH COURT, SURPRISE, AZ 85374
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the South Mountain Freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Dong Tang

Document Created: 6/2/2013 8:05:51 PM by Web Comment Form

1 2 3 4 5 6

I have major concern regarding building the freeway by cutting ridges off the South Mountain, destroying parkland and disturbing wildlife. I would consider this highway a truck bypass largely since people live along the path will not benefit a lot from transportation convenience perspective. Actually I am troubled knowing that quite a number of houses and communities will be leveled to make room for the freeway. If such a freeway is really necessary for re-routing traffic, can we just make the current exiting path of US-85 a freeway instead?

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants, and Wildlife**	
3	**Purpose and Need, Truck Bypass**	
4	**Purpose and Need, Lack of Support**	
5	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
6	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:38:19 AM

From: lptanner1@yahoo.com [mailto:lptanner1@yahoo.com]
Sent: Saturday, May 11, 2013 11:28 AM
To: Projects
Subject: Build the South Mountain Freeway

1

I support building the South Mountain Freeway

Lawrence Tanner

Sent from Samsung tablet

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

1
2 3 4 5
6 7

Rene Tanner Document Created: 5/21/2013 9:21:17 PM by Web Comment Form

The resources to build a freeway through South Mountain should be used on other projects including increasing the light rain, bus operations and making Phoenix a more livable city. Adding additional miles of freeway encourages urban sprawl and increases air pollution including carbon emissions, which are warming our planet.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
3	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative). As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
5	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].

Code	Comment Document

5049

1 MR. TASHQUINTH: In this EIS report, it has nothing
2 to do with my people. In this EIS report, it says about the
3 cultural significance. They don't understand the cultural
4 significance of South Mountain to us and what it means to
5 the -- to the Gila River Indian community. But not only to my
6 community, but to the Salt River and to the Tohono O'oodham and
7 to the Ak-Chin communities.
8 You see this basket here? This basket, my mother
9 told me, you divide it into four. You divide it into four.
10 And, in birth, you come to the opening. And you begin your
11 journey into life by going through all the twists and turns.
12 You learn how to walk, how to talk, how to feed yourself. You
13 learn how to bathe.
14 You go through all of life like that, as a baby, as
15 a youth, until you get down here to the bottom. At the bottom
16 you start to go through all the twists and turns of life as a
17 youth. You go through all of the difficulty. You get lost.
18 You stumble around, and you try to figure out how to get out.
19 And, even into adulthood, you go through all of
20 that. Down here at the bottom: The twists and turns of life.
21 You go through growing up as an adult, looking for
22 a job, taking care of your families, taking care of yourself.
23 You get lost in here, those twists and turns, until
24 you get to be an elder. When you become an elder, you come out
25 to the outside on this side. You find your way back, all the

1

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

way through here, until you come to the very center.

The center of this maze is Mawduc, South Mountain. To us, that's the center of the universe. That is where our creator, Siuuhu, he lives there, Elder Brother. He lives in that area. That's his house. He built this maze to get away from his enemies.

But in our way, we use this to show what life is about. That's our culture. That's our religion. That is our tradition. It's our way of life, what we call our -- what we say is our himduc.

That is the religious significance to us and our way, because he's our creator. Elder Brother is our creator. Elder Brother made us. That's why that mountain is very significant to us. We hold -- you know, to go up there and do ceremonies.

2 There are animals up there. There's the desert tortoise. There's the Gambel's quail.

There's vegetation up there that's still used as herbal medicines by our people, a root that's up there that's used to heal with: the greasewood, shegoi. Greasewood, that's used to heal. Drink it when you have a cold. Drink it when you're sick, like a tea. And you use that to help clear yourself.

3 There's a lot of places up there that are old prehistoric trails, where all the Hohokam used to go, our

Page 30

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
2	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Section 4(f) and Section 6(f)**	

Code	Comment Document

ancestors. Our ancestors walked up there and did their ceremonies up there. That's the center of the universe for all of us. That's where we come from.

Your -- If somebody wanted to go downtown and build a freeway through St. Mary's Basilica downtown, all the Catholics would get up, and they would be angry about it. They would get mad about it and they would say, "No."

That is the same thing. We don't want that. We don't want that freeway through there. We don't need that freeway through there. Our people have been here for hundreds and thousands of years.

When the forty-niners first came through here, our people were the ones that helped find those forty-niners that were lost. Our people went out with mercy patrol, with gourd water, gourd canteens with water in them. They had corn and melon, all these different things, looking for the forty-niners that were lost out there in the desert.

And when they found them, they gave them the water and told them, "Go. Go that way. Follow the mountains back there. Follow, see where Mawduc is and the Camelback Mountain and the Estrellas."

Below those mountains are our people, all along the Gila River. Our people took care of them, helped them.

In 1847 the United States sent their first cavalry patrol through here. And when they came through here, they

Code	Issue	Response

Code	Comment Document

asked Antonio Azul if they could trade horses with them so that they could continue on to California. And he agreed, on a handshake. On a handshake, he said, "Yes," and he traded horses with them.

The Spanish garrison that was over in Tucson, they wanted those horses. They tried to come and take it. They wanted to take it away from us. Antonio Azul said, "If you want those horses, come and get them. But you're going to have to fight for them."

They never came back and got those horses because Antonio Azul said, "I made a promise, on a handshake, that I would take care of these horses for those white people that went through here, came through here. And they'll be back, and I'll give them back to them."

From that time on, our allegiance and our loyalty was given to the United States of America. Our great-grandfathers and our grandfathers, our fathers and our brothers and our uncles fought alongside many of the white people from the State of Arizona, when they fought in World War I, World War II, Korea, Vietnam, all the way up to now, to Iraq and Iran.

All over the world, our young men and women are standing, side by side, with many of those people. We're all a -- We're all a part of the -- We're all a part of the Creator. We're all a people of the Creator. We're all

Code	Issue	Response

Code	Comment Document

children.

And we need to understand that nobody owns the land, the way our elders told us. No one owns the land. The land belongs to everyone. It was made and given to us so that we can live in harmony and balance with all of the vegetation, with the mountains, with the waters, and with all of the little animals and all the birds in the sky. We live in harmony and balance with one another and to take care of one another.

That's why we, as Akimel O'oodham and Pee Posh people, we -- we are the caretakers of this land. That's what we're supposed to be doing.

We don't want that freeway. We don't need that freeway. They're not telling us about what the pollution is going to do. They're not telling us about the toxins that's going to come off of those tires after it rains. It's going to pollute our waters that we're sitting on top of.

Our river doesn't run anymore because the people that -- that are on the east side, those people are cutting -- cutting, to take the water away from us. That water was our life. That water, the river, was what made us who we are. But it's not running anymore.

The white man has come and is strangling us. They're taking that water away from us. Now they want to destroy our mountain that's sacred to us, but not only to us but also to the Salt River, to the Tohono O'oodham, to the

Code	Issue	Response

Code	Comment Document

Ak-Chin community, to many of the tribes that are in the surrounding areas. It's significant to them, in their ways, too.

All we have is a little bit of strip of land, from 110th Avenue, Phoenix International Raceway, that corner along the Salt River, all along to here, to South Mountain, all the way towards Coolidge, all the way towards Casa Grande and Maricopa and coming back around, back to the Estrellas, of all the land we had. When we were strong, when we were a true Nation, our land stretched from the headwaters of the Gila River, outside the city of Silver City, New Mexico -- that's where the Gila River begins -- all the way down to almost to the Colorado River.

Many of our -- Many of our Hohokam relatives, ancestors, their homes are up along the Mogollon Rim, all along that way. They're up there because our land stretched that far, all the way into Mexico.

When the Spanish first came, they called this whole area Pima-eria Alta. Pima-eria Alta, the Northern First Ones. We have relatives in Mexico. They are the Baja Pima-eria. They are the Southern First Ones.

This is who we are, since the coming of the European settlors, coming through here, stealing land from us, lying to us, cheating us, just as they're doing now, telling us lies and half-truths, what they really want, by either stealing

Code	Issue	Response

Code	Comment Document

or cheating from us, making bad deals with people who want to -- think that money is good.

That time -- That's how we lost both of our lands. That's how we lost this whole state.

But not only us, but all the rest of the other tribes, too. The 21 tribes that are here in this state have been reduced to small little pockets, reservations. And all their traditional lands have been stolen from them.

All tribes are fighting. All tribes are trying to stand up. All tribes are trying to take back what was theirs. But it's hard because the white man will not listen to us. The white man is too greedy. They're thieves and liars. So it has been said, from a long time ago. But all tribes have dealt with them. That's what they've come to find out.

We'll continue to fight. Those of us that are against it, we'll continue to try and stop it, any way we can. And, if all the other tribes in the outside understand, stand with this, then, all together, we can make one last stand and we can prevent the white man from coming through here and taking what doesn't belong to them.

That's all I have to say.

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 10:12 AM
CALLER: GLENDA TATUM	CALLER ADDRESS: 12718 WEST SOLA COURT, SUN CITY WEST, ARIZONA 85375
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am a voter, I live on the West side and I do support that freeway. It is a needed freeway, it is something that would help us connect to the east side from west side. I work in Chandler, so having to take the 10 and no other connection is really an inconvenience. I support that freeway and I look forward to that freeway construction. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 22, 2013 10:56:29 AM

From: Nikki Taylor [mailto:tntaylor2001@gmail.com]
Sent: Monday, May 20, 2013 7:33 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I am a Phoenix resident. I live in north Phoenix (district 2 85024 zip code), but my sister lives in Laveen. I visit her home often and would like the 202 to go through this area. Thank you.

Nikki Taylor

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:19 PM
CALLER: NANCY TAYLOR	CALLER ADDRESS: GILBERT, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am calling in support of the South Mountain Freeway. I feel it will help relieve some of the congestion that we now have on I-10 and the 101 that is all traffic and just trying to bypass to get to the other end of town or other side of the city. I live in Gilbert, Arizona and I definitely support it. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Project
Date: Monday, July 15, 2013 8:05:05 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Joe Taylor [mailto:jlt9@msn.com]
Sent: Sunday, July 14, 2013 10:50 AM
To: Projects
Subject: South Mountain Freeway Project

ADOT Loop 202 South Mountain Freeway Study

Where to join the 202 with I-10.

Resident Comment:

1 The most logical and practical and best plan for the overall long term city traffic flow is to join in the 202 at the 101W and I-10 interchange. Connecting the 202 to I-10 at 51st Ave would cause extreme traffic congestion on that section of I-10, especially between 51st Ave and 101W which is an already over-crowded freeway section leading to more traffic accidents and deaths. Freight transport trucks attempting to by-pass Phoenix will be using this route heavily. The increase truck traffic this would cause on this section of I-10 will only add to the problem and more accidents.

2

Connecting the 202 to 101W and I-10 interchange will reduce traffic on I-10 between I-17 and 101W and provide an overall more seamless and safer freeway system with fewer accidents and traffic deaths. And isn't providing the safest freeway system for the parents and children traveling them the ultimate goal. Look at the big picture. Plan to reduce the congestion, not increase it.

Thank you.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	

Code	Comment Document

Joe Taylor
Laveen, AZ

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Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 Comment
Date: Tuesday, July 23, 2013 5:02:20 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Howard Teeter [mailto:hteeter@cox.net]
Sent: Tuesday, July 23, 2013 5:00 PM
To: Projects
Subject: Loop 202 Comment

1 2 3

I had high hopes that the GRIC negotiations would be successful but they appear to have fallen through.
At this point all I can ask is that the proposed route be moved or abandoned entirely due to the serious, detrimental
effects that it would have on the immediate community of Ahwatukee Foothills. The congestion, the pollution (noise
and air)and the added pressure of traffic and people would all contribute to the degradation of our neighborhoods,
our schools and our health. Neighborhood preservation must be a priority.
Our community abutting Pecos Road will suffer…which was never an issue at the time of inception, but is very much
an issue now. Thank you for listening.

Howard Teeter.
2719 E. Amberwood Dr.
Phoenix, Az 85048

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Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 4:43 PM
CALLER SUSAN TELLER	CALLER ADDRESS: 9122 W. HARBOR HILLS, SUN CITY, ARIZONA
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I support the freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Estudio de la Autopista
South Mountain
LOOP 202

2013

Reporte Del Impacto Ambiental
FORMULARIO DE COMENTARIOS

Comentarios Adicionales:

I've awated this freeway for a couple of decades or more. I believe this freeway has long been needed, specifically for routing semi trucks out of the down town AREA. This freeway would give a second route to get from West PHX To Chandler or further sooth To Tucson.

I cannot believe that 10 or so more freeways have been built without any objections, And yet this freeway which is definitely needed has been PUT ON Hold for decades because of A few people in AHWATUKEE.

I live in LAveen And Am All for building IT, Now, in my life time.

Let's get it done.

1 I like the 59TH AVE Route

Arthur M. Telles
9439 S. 18 Ave
PHX AZ 85043
602-663-1939

ADOT U.S. Department of Transportation Federal Highway Administration

PARA MÁS INFORMACÓN:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 3:10 PM
CALLER: MICHAEL TENNET	CALLER ADDRESS: 26621 S. LAKEWOOD DRIVE, SUN LAKES, AZ 85248
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the planning and construction of the South Mountain Freeway. The freeway will reduce Downtown Phoenix traffic, including the tanker and boxcar trucks. This is a great way for moving traffic through Phoenix. It would be an excellent idea to help improve the economy.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 2:19 PM
CALLER: MELINDA TERRINGTON	CALLER ADDRESS: 113 E. LOBO DRIVE, PHOENIX, ARIZONA 85022
PHONE: 602-992-2473	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I do believe that the Loop 202 of the South Mountain below Ahwatukee should be built. I've lived here my whole life and I've always thought there should be a freeway down there. I thought it should be built before Ahwatukee was expanded and built upon. Thank you and I do hope that the freeway will go through because I do think it would alleviate a lot of pressure in Central Phoenix. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	David Terry Document Created: 5/21/2013 7:41:13 PM by Web Comment Form From what I have heard this will benefit certain business interests that stand the most to gain and that more thought should be put toward the environmental impact that this might have on the area. Maybe an unbiased study should be conducted without the pressure of the monied interests involved before proceeding ahead with irreparable damage being done to the communities involved.

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Thomas Thaete Document Created: 7/23/2013 3:17:21 PM by Web Comment Form

1 2 3 4

I am AGAINST the build of the Loop 202 South Mountain Freeway along Pecos Road. I am a resident of the Ahwatukee neighborhood and ask the ADOT to find a different or another alternative. This will take away from my hard earned property value; it is a destruction of well established neighborhood, churches, schools and local communities.
regards
tgt

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138 -47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Oppose Loop 202 South Mountain Freeway
Date: Tuesday, June 25, 2013 4:27:10 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: eltheiseno@gmail.com [mailto:eltheiseno@gmail.com] **On Behalf Of** Nicholas Theisen
Sent: Tuesday, June 25, 2013 4:21 PM
To: Projects
Subject: Oppose Loop 202 South Mountain Freeway

To whom it may concern,

1 I would like to express my formal opposition to the proposed 202 expansion project. The spending of public funds on a freeway around the south-side of South Mountain does not reflect the best interests of Arizona residents, and I believe in prioritizing public funds, it
2 does not currently warrant funding ahead of other public transportation options (expanded light rail, Tucson-Phoenix rail, etc).

The Regional Freeway System, approved by voters in 1985, reflected a need for expanded freeways that existed at the time. This has created substantial benefits for the community in Maricopa County, but it has also shaped our society in a number of negative ways. Unfortunately, population growth has followed the construction of the freeways, and rather than build up to take advantage of the many advantages urban density provides, Phoenix has
3 grown ever-outward, to the detriment of more central communities. This has led to more cars on the roads driving longer distances, and in turn dirtier air, and greater health problems. Current popular sentiment has turned, such that I believe a large portion of the population now wants to pull back from this course on which we have set ourselves.

"If you build it, they will come" is the general sentiment here. WE get to determine how we want to shape our society. If we want to create a society that commutes from Chandler to Avondale and vice versa, and expands ever-outward at the margins, then this plan makes
4 sense. If we want to further promote Arizona as a drive-through State, and bring more regional trucks onto our roads by making it easy to bypass Phoenix, then we will be well
1 served by this freeway. OR we could instead invest our public funds in making Phoenix and Maricopa County a destination. We could expand our light rail lines that have already sparked a tremendous amount of local development and given our citizens something to be proud of. Or we could connect our Capital City with our southern neighbor, Tucson, via a high-speed rail line, further reducing traffic on our freeways.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Purpose and Need**	The Southwest Loop Highway—the South Mountain Freeway predecessor—was integral to the Regional Freeway and Highway System approved by Maricopa County voters in 1985. Although other facilities were considered a higher priority early in development of the Regional Freeway and Highway System, the South Mountain Freeway has been included in every subsequent update. The same route was approved by the State Transportation Board in 1988. In 2004, Maricopa County voters approved Proposition 400, which was designed to fund completion of the remaining segments of the Regional Freeway and Highway System, including the proposed South Mountain Freeway (Final Environmental Impact Statement page 1-21).
4	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

The choice is ours, and I strongly urge ADOT to choose to invest in one of the latter options. Thank you for your consideration.

Regards,

Nick

--
Nick Theisen
nicholas.theisen@gmail.com
(602) 820-1182

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Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. GOOD PRESENTATION ON MAY 21, 2013 AT PHX CONVENTION CENTER. PRETTY MUCH AGREE WITH PLAN AS PRESENTED (W59) STRONGLY SUGGEST GIVEN PRESENT INDIAN COMMUNITY ATTITUDE THAT ANY CONNECTIONS NOW OR LATER GIVING ACCESS TO TRIBAL LAND BE PAID FOR ENTIRELY BY THE INDIAN COMMUNITY. (1)

CONSIDERATION SHOULD BE CONSIDERED FOR ADDING ADDITIONAL LANE(S) TO I-10 WEST BOUND FROM 59TH AVE AND FROM I-10 CONNECTION 304TH FROM 202. (2)

Optional

Name NORMAN & SANDRA THIELKING Email NONE

Address P.O. BOX 2000

City GLENDALE State AZ Zip 85311

Phone 623-815-4690 Fax NONE

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-156

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives**	Federal law prohibits the denial of access to any community. Thus, traffic interchanges would be located along the freeway where it borders the Gila River Indian Community (see Draft Environmental Impact Statement page 3-51). Roadway connections on Gila River Indian Community land to the traffic interchanges would be the responsibility of the Gila River Indian Community, in coordination with appropriate jurisdictions.
2	**Design**	Construction of the proposed freeway would include widening along Interstate 10 to facilitate entrance and egress of vehicles between the two freeways. Additional information related to the Interstate 10 modifications can be found in Figure 3-26 on page 3-49 and Figure 3-29 on page 3-53 of the Draft Environmental Impact Statement. The design of the connection to Interstate 10 and the widening along Interstate 10 were developed in accordance with the Federal Highway Administration's Interstate System Access Informational Guide and has received an initial determination of operational and engineering acceptability from the Federal Highway Administration.

Code	Comment Document
1	Mary Thomas Document Created: 5/21/2013 6:15:36 PM by Web Comment Form I am an elder from the Gila River Indian community. My faith in our fellow human beings, remains strong, it has not been a pleasant journey. We have been subjected to neglect, fraud, stereotyping, out right cruelty since they discovered our homelands. We have given up so much and still give of ourselves to this great state and nation, all we ask in return is respect for our land..it is our survival.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Wednesday, May 22, 2013 10:51:58 AM

From: kingbobthomas@gmail.com [mailto:kingbobthomas@gmail.com]
Sent: Tuesday, May 21, 2013 1:28 PM
To: Projects
Subject: 202

1

Hi. I support the 202. It would provide greater access. Thank you.

Pastor Bob Thomas
4907 west Maldonado Rd
Laveen Az. 75339
602-733-7317

Sent from my HTC EVO 4G LTE exclusively from Sprint

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Audra Thomas

Document Created: 5/30/2013 10:08:45 AM by Web Comment Form

1
2

I'm very much in favor of using the E1 Alternative, unless Gila River Indian Community and it's Members decide otherwise, and tying the freeway into Loop 101 using the W101 alternatives. In terms of system planning, and looking at the transportation facility from a regional perspective, tying it into L101 makes the most sense. I worry that utilizing either the W59 or W71 alternatives will pour additional traffic onto a facility not able to address it, and futher, will reduce the viability and attractiveness of the South Mountain Freeway as a transportation facility to those looking to move north/west and/or south/east.

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 5:09 PM
CALLER ADA THOMAS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I would support building the freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4169

MR. STOKEBRAND: I sent an e-mail to ADOT regarding just how I support the 202. It's much needed for the people living -- it will bring much needed funds to the City of Phoenix in terms of tax revenue and for all us citizens who leave Laveen and City of Phoenix to go to Goodyear, Avondale, and other cities. I will be a lot happier to keep those tax funds inside of our city for community centers, things of that sort. And I'm someone who lives close, within half a mile of the proposed freeway and I still support it just because it will make my life better, easier to get around the city, and alleviate some of the congestion on Baseline Avenue.

That's about it. The rest of it is pretty well documented, so I don't have anything else to add.

Thank you.

MR. THOMAS: My name is Jim Thomas. I live in Goodyear, Arizona. I work at Broadway and 40th Street, so I drive I-10 every day and the traffic is bad in the morning and it's horrible in the afternoon. I normally get to the office between 5:30 and 6:00 and it takes me 35 minutes, it's about 30 miles. In the evenings, it takes me at least 45 minutes, sometimes an hour to get home so this would be very helpful.

And I think, if they would take the bypass off of the 101 -- if you go down to 59th, you're just

1

Page 2

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www.drivernix.com

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

adding trucks and a longer length of I-10 that will congest the traffic even more, so the faster you can get them off I-10, the better off we will all be.

Other than that, I hope that they build it quickly, you know, cause this would not take forever to build.

Okay. Thank you very much.

MR. HUSTON: I just want to say that I am in favor of the project and after I've reviewed all the boards and the entire process, it seems to make sense what they've narrowed it down to. I think, based on cost alone, it seems like 59th is the best alternative. If cost weren't a factor, I think some of the ones that go further to the west would also be nice to help tie into the west valley. It seems like a long time coming.

It seems like a great project. I think it would be good for, not only our freeway system, but putting people back to work. Overall I just think it would be a really good thing for the community.

That's it.

MR. BAREHAND: My name is Harlan Barehand. I'm from the Gila River Indian Community. I'd like to thank ADOT for finally listening to us and not putting it on the Reservation. I just got through seeing a video next door; it was beautiful. I think it works out fine.

Code	Issue	Response

Code	Comment Document
1 2 3	Sean Thomas Document Created: 7/12/2013 12:20:27 PM by Web Comment Form South Mountain is a sacred site and should not be desecrated in the name of progress. This freeway is unneeded, it's as if you are purposely destroying a beautiful park for nothing.

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Purpose and Need, Lack of Support**	

Code	Comment Document

EDITH THOMAS: My name is Edith Thomas. I'm a member of the Gila Indian River community who just happens to be also an archeologist.

I would like to bring several issues to the attention of the DEIS regarding the archeology of South Mountain. South Mountain is known to us. I am Akimel O'Odham, Pima. I grew up within the Gila Indian River community. I'm going to present two perspectives based on my own personal experience based on the traditions, him-dag, of my People. I'd also like to present the archeological perspectives, which are also based on the Akimel O'Odham.

1

South Mountain is a culturally significant location for the members of the Gila River Indian community. It is part of our songs. Our songs are significant because it is a cultural perspective. Our songs are part of our historical record. It's a recording or a recounting of the history of our People that dates back to over thousands of years ago. For our People this is a factual account that is recorded within the songs.

South Mountain is part of the migration pattern of my People, so it is not just a mountain as the non -- the non-members of the Gila Indian River community may view it. It's not a mountain; it's a sacred site.

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Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

And that word "sacred" also has special meaning to us. It is not sacred in comparison to a church or to a religious aspect.

"Sacred" means to us that it's part of who we are. It's where we derive from. It's where we originate. Everything is connected to us: The land, the plants, the animals. There is no differentiation between all of these things. They are not just objects. They are part of our whole life cycle, so to try to classify it as just a geological formation would not be accurate.

What I'm trying to convey to you is that South Mountain is extremely significant to us. Muadag, South Mountain, is part of our story, part of who we are.

Also, based on my archeological expertise, we have several archeological sites that were not cited within the DEIS report. There are artifact scatters on the surface. As an archeologist, it is well documented that when you have an artifact scatter, that's part of the community, there are significant remains underneath the surface of the ground. So when you have your maps or your location within the report, that was not shown.

I would like to bring my concerns or point out that there needs to be further archeological investigations conducted by ADOT or for the DEIS because this was not represented accurately. This is significant

1 2

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Code	Issue	Response
2	**Cultural Resources**	For protection from vandalism and desecration, archaeological sites are not shown on maps provided to the public. The Arizona Department of Transportation will continue to survey the proposed alternatives for archaeological resources. Any negative impacts on archaeological sites would be mitigated through excavations.

Code	Comment Document

3

to us because it is the historical and prehistoric evidence of our ancestral remains.

Another issue that I have a concern about is that because of the sacred designation, I guess you could classify it as "sacred," we are not being treated equally. I believe that, if this were possibly a sacred site such as from Europe like the Vatican or something comparable, that this would be held more in higher significance to the rest of the population, but because we are Native American and that we are indigenous, our voices and our concerns are not being held at a higher level than they are.

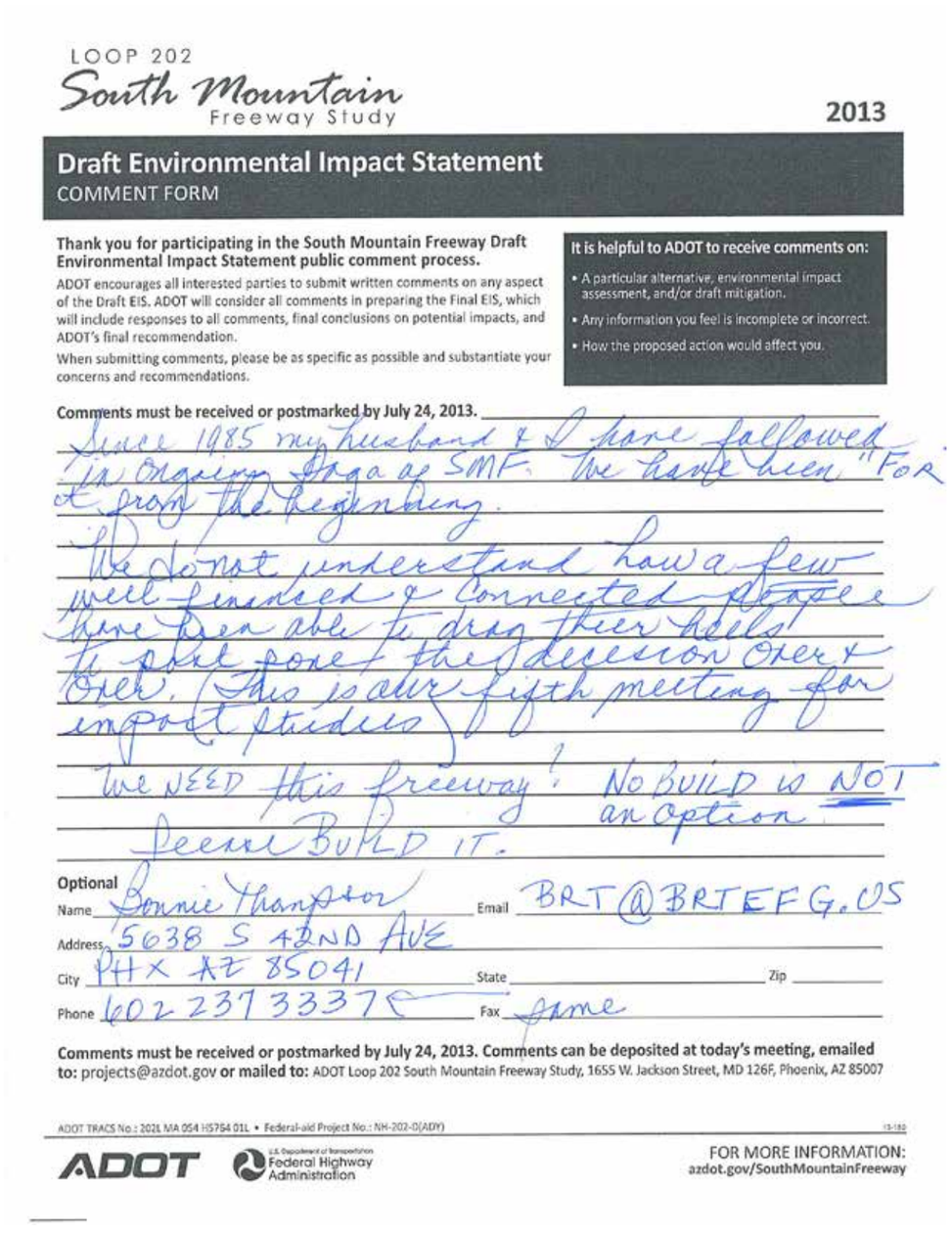
I'm hoping that all of my comments will be taken seriously and be looked at professionally because I felt that there weren't enough experts contributing to this report where it didn't accurately depict the meaning of what this location and the desecration that the 202 would do to our mountain and how it would impact our community.

Thank you.

* * * *

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
3	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

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Comments must be received or postmarked by July 24, 2013.

Since 1985 my husband & I have followed the ongoing saga of SMF. We have been "for it" from the beginning.

We do not understand how a few well financed & connected people here been able to drag their heels & shut down the discussion over & over. This is our fifth meeting for input studies.

We NEED this freeway! NO BUILD is NOT an option.

Please BUILD IT.

Optional

Name Bonnie Thompson Email BRT@BRTEFG.US

Address 5638 S 42ND AVE

City PHX State AZ Zip 85041

Phone 602 237 3337 Fax none

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5754 01L • Federal-aid Project No.: NH-202-D(ADY) 13-180

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Public Involvement**	Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:21 PM
CALLER: FORMER STATE REPRESENTATIVE MARK THOMPSON	CALLER ADDRESS: 1429 E. WATSON DRIVE, TEMPE, AZ 85283
PHONE: 480-839-6979	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I give my full support as a business owner in south Tempe, for the South Mountain Freeway expansion. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 No Action! Lakewood Owns Wells!

2 I am very Concerned how it is going to affect Lakewood and the Lake. The Wells were on the books before the Freeway. Also, I am concerned about the Water to the Lake @ Miralago where my Brother owns.

3 4 The Freeway On Pecos will severely affect Lakewood because reclaimed water will smell!! Also, the Lagos Jr. School is right on Pecos. It is going to hurt our Property Values! Lakewood already has Crime due to its proximity to the Freeway. Easy Access in and out.

Optional

Name Geri Thompson Email geri thompson@gtcallhome.com

Address 15830 S. 36 TH

City PHX State AZ Zip 85048

Phone 480 239 7589 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)
3	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
4	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 12:20 PM
CALLER: DAVID THOMPSON	CALLER ADDRESS: 2405 WEST OLNE AVENUE, LAVEEN, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am calling in support of the Loop 202 freeway. Been hoping for it to be done for quite awhile now. I expect it will reduce traffic congestion along Baseline significantly. I know friends that live in the East Valley that have to come in through I-10 West 60 to get into Phoenix and some of them have commented that coming around Loop 202 would be faster for them. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 6:06 PM
CALLER SANDRA THURSTON	CALLER ADDRESS: 15970 W. JACKSON STREET, GOODYEAR, ARIZONA
PHONE: 602-423-0027	EMAIL:

CALLER REMARKS/QUESTIONS:
And I'm glad you guys work for the freeway, for the 202. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Tuesday, May 28, 2013 12:20:37 PM

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Nancy Tierney
Sent: Tuesday, May 28, 2013 10:16 AM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve, while providing only short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) (5) Despite the claims of the Draft Environmental Impact Statement, the South Mountain Freeway would worsen air quality in the region over time, increasing public health risks. More vehicles would introduce more pollution, aggravating conditions of asthma, cancer, and other diseases.

(6) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Ms. Nancy Tierney
101 N 7th St Unit 244
Phoenix, AZ 85034-1038
(602) 296-4900

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

Tom Tillery

Document Created: 7/15/2013 12:38:18 PM by Web Comment Form

I just want to officially voice my objection for the following reasons:

1 * The original proposed freeway was not as extensive as what is currently planned. This is much greater noise, pollution, congestion and therefore accidents than what the original residents (such as myself) had planned.

2 3 4 * A bypass already exists in Case Grande. If this is inadequate, it would be less expensive to upgrade this system.

5 * The study does not include Pima County, why? This area is still growing and has the higher growth potential.

6 * A compromise to all parties would be to continue Pecos road connecting the West side of town - no Freeway.

7

Code	Issue	Response
1	**Traffic**	The alignment identified as the Preferred Alternative (W59 and E1 Alternatives) closely follows the alignment identified in the 1988 Environmental Assessment and Design Concept Report (see Final Environmental Impact Statement Figure 1-2 on page 1-6 and text on page 1-8 for more information). In 1988, the freeway was proposed as having three general purpose lanes in each direction with an open median for a future high-occupancy vehicle lane in each direction. This configuration is similar to the existing loop freeways. The current proposed freeway, as depicted in Figure 3-34 on page 3-58 of the Final Environmental Impact Statement includes constructing three general purpose lanes and a high-occupancy vehicle lane in each direction. With respect to the number of lanes and location, the proposed freeway has remained relatively the same.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
5	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
6	**Alternatives**	The Maricopa Association of Governments regional travel demand model does include Pinal County. The potential freeway users with origins or destinations in Pinal County are included in Final Environmental Impact Statement Figure 3-18, on page 3-36. They would represent 10 percent of the total freeway users.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Alternatives**	The study evaluated the concept of extending Pecos Road as a parkway. In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: A vote no for South Mountain Freeway-F.Y.I.
Date: Monday, July 15, 2013 10:45:34 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Thomas Tillery [mailto:tilleryt@gmail.com]
Sent: Monday, July 15, 2013 10:41 AM
To: Projects
Cc: Ann Tillery
Subject: A vote no for South Mountain Freeway

Hello,

I just want to officially voice my objection for the following reasons:

1
2 3 4
5
6
7

- The original proposed freeway was not as extensive as what is currently planned. This is much greater noise, pollution, congestion and therefore accidents beyond what the original residents had planned when they invested in their Ahwatukee property.
- A bypass already exists in Case Grande. If this is inadequate, it would be less expensive to upgrade this system.
- The study does not include Pinal County, why? This area is still growing and has the higher growth potential.
- A compromise to all parties would be to continue Pecos road connecting the West side of town - no Freeway.

Regards,
Tom Tillery

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Code	Issue	Response
1	**Traffic**	The alignment identified as the Preferred Alternative (W59 and E1 Alternatives) closely follows the alignment identified in the 1988 Environmental Assessment and Design Concept Report (see Draft Environmental Impact Statement Figure 1-2 on page 1-6 and text on page 1-8 for more information). In 1988, the freeway was proposed as having three general purpose lanes in each direction with an open median for a future high-occupancy vehicle lane in each direction. This configuration is similar to the existing loop freeways. The current proposed freeway, as depicted in Figure 3-34 on page 3-58 of the Final Environmental Impact Statement includes constructing three general purpose lanes and a high-occupancy vehicle lane in each direction. With respect to the number of lanes and location, the proposed freeway has remained relatively the same.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
5	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.
6	**Alternatives**	The Maricopa Association of Governments regional travel demand model does include Pinal County. The potential freeway users with origins or destinations in Pinal County are included in Final Environmental Impact Statement Figure 3-18, on page 3-36. They would represent 10 percent of the total freeway users.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Alternatives**	The study evaluated the concept of extending Pecos Road as a parkway. In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I approve south mountain freeway.
Date: Monday, May 20, 2013 8:42:30 AM

From: na [mailto:taftsheffield@aol.com]
Sent: Friday, May 17, 2013 6:45 PM
To: Projects
Subject: I approve south mountain freeway.

5/18/13

1 Yes I agree the south mountain freeway should be built. I also support any freeway starting from AZ Casino/ Mcdowell rd extenteding to 202. This is not an argument or debate. Its what is needed no matter what some individuals may think. Consider the in domain law, Dot what are you waiting for.

Thanks
Tim

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.
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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comment on the South Mountain Freeway Loop 202 Draft Environmental Impact Statement.
Date: Friday, July 05, 2013 9:31:04 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Jeannine Maldonado [mailto:jeanninemal@me.com]
Sent: Friday, July 05, 2013 9:23 AM
To: Projects
Cc: Jeannine Maldonado
Subject: Comment on the South Mountain Freeway Loop 202 Draft Environmental Impact Statement.

ADOT,

I wish to comment on the South Mountain Freeway Loop 202 Draft Environmental Impact Statement.

1 2 3 4 5

ADOT must desist from proposing to build 202 on Pecos Road. This proposed leg of the freeway will degrade the quality of life in Ahwatukee Village, disrupt wildlife and recreational use in South Mountain Park Preserve and destroy a Gila River Indian Community sacred site.

We bought our home in Ahwatukee Foothills because my daughter and I suffer from asthma and we place high value on the better quality of air in the area, in particular during the summer months. We treasure the relative quiet and small-town feeling of Ahwatukee Foothills, the easy access to quiet and scenic hiking trails in our backyard of South Mountain Park, the low-traffic roads near our schools and in our neighborhoods, and its proximity to our Gila River Indian Community neighbors, which affords us a scenic view of relatively undisturbed desert land in our daily commute.

But by building the South Mountain Freeway on Pecos Road and through South Mountain Park Preserve:

6 7 2 8 9 10

1) There will be a substantial increase in vehicle traffic in the Ahwatukee Foothills neighborhood and local arterial streets.
In addition, the proposed freeway will become the truckers route of choice.

2) The overall impact on the quality of life in the Ahwatukee Foothills area will suffer tremendously as sound walls cannot prevent the noise rising over due to elevation (upwards) in the Foothills.

3) Ahwatukee would have two elementary, one middle and one high school either immediately adjoining or within 1/8 of a mile of the proposed freeway. The air quality our children breathe will suffer permanent damage as the estimated 140,000 vehicles/day traverse the proposed freeway.

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Section 4(f) and Section 6(f)**	
5	**Cultural Resources**	
6	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 of the Final Environmental Impact Statement). The daily traffic volume on 17th Street in 2011 was approximately 4,500 vehicles per day just north of Pecos Road (see phoenix.gov/streets/traffic/volumemap). With the proposed freeway in place, an additional 4,000 vehicles day would use 17th Avenue to access residences west of 17th Avenue. The total daily traffic would be well below the capacity of a two-lane road (approximately 15,000 vehicles per day).
7	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered “acceptable” by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.
9	**Noise**	As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway,

(Response 9 continues on next page)

Code	Comment Document
5 3 4 11 12 13	4) Destruction of a portion of South Mountain Park Preserve, which the Gila River Indian Community view as a sacred mountain, is unacceptable. 5) The proposed routes through South Mountain Park Preserve will permanently damage native Arizona plants and wildlife. 6) Growing business opportunities is not a need for residents in Ahwatukee. We find there is already in place everything we need and want. In summary, I object to the building of the South Mountain Freeway on Pecos Road and through South Mountain Park Preserve as it will do permanent harm to our environment. ADOT should seriously reconsider the alternative of building 202 through uninhabited parts of Maricopa. Jeannine Maldonado Timmes 410 E Brookwood Ct. Phoenix AZ, 85048 Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
9 (cont.)		nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
10	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
11	**Purpose and Need, Lack of Support**	
12	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
13	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: comment on south mountain freeway loop 202 environmental impact statement
Date: Friday, July 05, 2013 8:38:51 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Francis Timmes [mailto:fxt44@mac.com]
Sent: Thursday, July 04, 2013 9:35 PM
To: Projects
Cc: Francis Timmes
Subject: Re: comment on south mountain freeway loop 202 environmental impact statement

ADOT,

A wish to comment on the south mountain freeway loop 202 environmental impact statement.

1 2 1) There will be a substantial increase in vehicle traffic in the Ahwatukee Foothills neighborhood and local arterial streets.
In addition, the proposed freeway will become the truckers route of choice.

3 4 5 2) The overall impact on the quality of life in the Ahwatukee Foothills area will suffer tremendously as sound walls cannot prevent the noise rising over due to elevation (upwards) in the Foothills.

6 7 3) Ahwatukee would have two elementary, one middle and one high school either immediately adjoining or within 1/8 of a mile of the proposed freeway. The air quality our children breathe will suffer permanent damage as the estimated
140,000 vehicles/day traverse the proposed freeway.

8 9 4) Destruction of a portion of South Mountain Park, which the Gila River Indian Community view as a sacred mountain, is unacceptable.

10 5) The proposed routes through South Mountain Park will permanently damage native Arizona plants and wildlife.

11 12 13 In summary, I object to the building of the south mountain freeway on pecos road.
I suggest you consider building the freeway through uninhabited parts of maricopa.

Sincerely,

frank timmes
410 e brookwood ct.
phoenix az, 85048

_____

Code	Issue	Response
1	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 of the Final Environmental Impact Statement). The daily traffic volume on 17th Street in 2011 was approximately 4,500 vehicles per day just north of Pecos Road (see phoenix.gov/streets/traffic/volumemap). With the proposed freeway in place, an additional 4,000 vehicles day would use 17th Avenue to access residences west of 17th Avenue. The total daily traffic would be well below the capacity of a two-lane road (approximately 15,000 vehicles per day).
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
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4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered “acceptable” by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.
5	**Noise**	As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
6	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Health Effects**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Cultural Resources**	
10	**Biology, Plants, and Wildlife**	
11	**Alternatives, Gila River Indian Community**	
12	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study. In addition, nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. Tribal sovereignty is based in the inherent authority of Native American tribes to govern themselves. While this notion of sovereignty is manifested in many areas, generally Native American land is held in trust by the United States. Native American communities have the authority to regulate land uses and activities on their lands. States have very limited authority over activities within tribal land (see page 2-1 of the Final Environmental Impact Statement). From a practical standpoint, this means that the Arizona Department of Transportation and Federal Highway Administration do not have the authority to survey tribal land, make land use (including transportation) determinations directly affecting tribal land, or condemn tribal land for public benefit through an eminent domain process.
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Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 6:39 PM
CALLER: AARON TIMMONS	CALLER ADDRESS: 15393 WEST MONTECITO AVENUE, GOODYEAR, ARIZONA 85395
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the 202, Loop extension, South Mountain freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain
Date: Wednesday, May 22, 2013 10:49:40 AM

From: Jenn Tingwald [mailto:jennifertingwald@gmail.com]
Sent: Tuesday, May 21, 2013 4:56 PM
To: Projects
Subject: Loop 202 South Mountain

To Whom it May Concern:

I am writing to inform you of my support of the Loop 202 South Mountain project that is currently pending.

1

As a resident of South Phoenix (on the boarder of Laveen- off of 51st Avenue and Ellwood) I strongly support this initiative, even though I know that it will literally place a freeway in my back yard. As a home owner and business owner, this project is imparative to the vitality of the southwest valley.

Please, continue moving forward this project. The revenue it will bring to this area is badly needed, and the ability to connect to the rest of the city will vastly improve our way of life.

Sincerely,

Jennifer Tingwald

--

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Study Team
Date: Thursday, May 02, 2013 9:39:24 AM
Attachments: image002.png

From: Jason.Tollefson@Microchip.com [mailto:Jason.Tollefson@Microchip.com]
Sent: Thursday, May 02, 2013 9:27 AM
To: Projects
Subject: South Mountain Study Team

Hi South Mountain Team,

1 As a Foothills Club West resident I am opposed to the Pecos alignment in entirety.

2 I would support an alignment that is 1-2 miles south on the Gila River Reservation.

3 I do not support the Pecos alignment for the following reasons:
Pollution
4 Traffic Noise
5 Truck Noise
6 Crime
7 Loss of Bike way
Increased traffic density in community
8 Increased accidents

Thanks,

MICROCHIP
Jason Tollefson
Sr. Product Marketing Mgr.
MCU16 Division
480•516•9078 (c)
480•792•7717 (o)
Jason.Tollefson@microchip.com
Skype: jasontollefson

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community**	
3	**Air Quality**	
4	**Noise**	
5	**Noise**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Air quality and noise modeling for the Draft and Final Environmental Impact Statements used this forecast truck traffic (see Final Environmental Impact Statement pages 4-68 and 4-100, respectively). Noise mitigation is designed for this predicted noise level, including the noise from trucks.
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
7	**Traffic**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
8	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The daily traffic volume on 17th Street in 2011 was approximately 4,500 vehicles per day just north of Pecos Road (see phoenix.gov/streets/traffic/volumemap). With the proposed freeway in place, an additional 4,000 vehicles day would use 17th Avenue to access residences west of 17th Avenue. The total daily traffic would be well below the capacity of a two-lane road (approximately 15,000 vehicles per day).

Code	Comment Document

5008

MR. TOLLEFSON: I'm Jason Tollefson. So I think the one thing after talking with several of the project team members that stands out in my mind is that there is no replacement for recreation on Pecos. So currently there's a lot of people that go out all week long on Pecos Road riding bikes and jogging, whatever, and there's no alternative once this project happens. So that's a pretty big concern for me because I use that and lots of people I know use that.

A second overall concern is noise. And I saw that the plan currently is to raise the freeway from the current grade. And talking with one of the planning engineers, he noted that that actually increases noise level. So I understand the way to try and mitigate that is a wall, but my location and my house is such that if the freeway's additionally raised and then there's a wall, it's going to have a severe obstruction to my view from my home, and also concerns me with the noise. The fact that it's that much higher and could transmit over to my house, which we already get Pecos noise, and this will probably be more.

And then I guess the last concern is truck noise. I believe that this freeway will be

Page 17

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Traffic**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Final Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Visual Resources**	For most of the alignments of each of the action alternatives, the proposed freeway would be elevated above the natural grade of the surrounding land. This elevated profile would allow noise to carry farther, creating noise impacts at greater distances from the freeway. Depressing the profile of the freeway below grade might reduce traffic noise levels adjacent to depressed sections. However, it would be necessary to also construct at-grade noise barriers to achieve noise reduction goals at receiver locations adjacent to depressed freeway sections (see page 4-99 in the Final Environmental Impact Statement). This strategy would reduce visual impacts associated with high noise barriers on elevated freeways, but would entail ground-level noise barriers and their associated interference with views. Thus, with either approach to noise reduction, views of nearby mountains could be disrupted. The specific impacts would depend on the geometrics of the height of any noise barriers constructed, the intervening topography, and the distance of the barriers from the residences in question.
4	**Noise**	As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
5	**Noise**	Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered “acceptable” by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway.

(Responses continue on next page)

Code	Comment Document

7

used quite a bit as a bypass to Phoenix, and so that's going to bring just additional noise 24/7. It's one thing to have commuter noise, you know, which -- which goes down in the evenings, but truck noise is something that I think won't cease because truckers are trucking 24/7. So that's -- those are my concerns and hopefully they're taken into consideration.

8

So I just want to make it clear that I'm not opposed to a freeway, but I'm opposed to the current alignment of the freeway. I noticed during the selection process there were lots of alternatives. Of course some of them are very difficult because they involve the Indian reservation, but I oppose that.

9

And the last thing I'd like to add to that is it really doesn't -- in my opinion, it doesn't help this community as much as it helps the communities outside of this community because it helps the people on the west side get to the east side, and the people on the east side get to the west side, but it really doesn't benefit us who live here that much.

We already have easy access out to the freeway, and personally I'm willing to do the commute

Code	Issue	Response
6	**Noise**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Air quality and noise modeling for the Draft and Final Environmental Impact Statements used this forecast truck traffic (see Final Environmental Impact Statement pages 4-68 and 4-100, respectively). Noise mitigation is designed for this predicted noise level, including the noise from trucks.
7	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Alternatives, E1 Alternative**	
9	**Purpose and Need, Lack of Support**	

Code	Comment Document

to the west side and take some additional time because I really have no reason to be out there. All my business is in the east and downtown area, so those are my comments.

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SouthMountain Freeway Construction
Date: Wednesday, July 17, 2013 2:07:52 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Bob Toloskiewich [mailto:bobtolo@cox.net]
Sent: Wednesday, July 17, 2013 12:19 PM
To: Projects
Subject: SouthMountain Freeway Construction

I am a member of Phoenix Mountains Preservation Council (PMPC) and Preserving Arizona's Resources and Children (PARC) and am writing to express my opposition to the proposed South Mountain Freeway.

1 2 3 4 5 6 7 8

The proposed route would run through South Mountain Park and would result in three ridges being leveled with the removal of 4 million cubic yards of earth in order to accommodate this 10 lane thoroughfare. We, the citizens of this valley, are very protective of our parks and we, the citizens, were not asked if we approved of this alignment.

I am also concerned about air pollution in the South Mountain area. The freeway route sits in a natural valley, one where air pollution is already a significant problem. The addition of this truck route would increase the air pollution significantly. We are already in danger of losing over a billion dollars in federal funding due to poor air quality. More trucks in this valley is not what we need.

I believe that a freeway should be built along the path of US85. No parklands would be destroyed, no homes and businesses would have to be leveled and relocated, and it would keep the large polluting trucks out of the valley.

I implore you to do what you can to stop the construction of this freeway through South Mountain Park.

Sincerely,

Bob Toloskiewich

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Design**	The proposed freeway would be eight lanes wide, not ten lanes. See Figure 3-34, on Final Environmental Impact Statement page 3-58.
3	**Public Involvement**	No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period. The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
6	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The State Route 85/Interstate 8 Alternative was evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Thumbs up to S. Mountain loop 202
Date: Thursday, July 18, 2013 10:41:39 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Krone McMogulson [mailto:4daylive@gmail.com]
Sent: Thursday, July 18, 2013 10:40 AM
To: Projects
Subject: Thumbs up to S. Mountain loop 202

1

Let's build a better Arizona. Let's build the South Mountain 202 loop.

Thanks
Tom

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I oppose the $2.6B-wasting, sprawl-enabling, pollution-increasing Loop 202 extension
Date: Tuesday, July 23, 2013 1:42:17 PM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT Communications

From: Tom [mailto:goodgnus@gmail.com]
Sent: Tuesday, July 23, 2013 1:39 PM
To: Projects
Subject: I oppose the $2.6B-wasting, sprawl-enabling, pollution-increasing Loop 202 extension

1 2 3 4 5 6

I do not trust the dishonest Draft EIS which critically ignores the well-documented dynamic of induced demand.

As a cyclist, motorist and valley resident since 1996, Phoenix does NOT NEED more freeways. This kind of development post housing boom and in a down economy is a waste of money. Driving in the Phoenix Metro area is easy, too easy. It discourages smart development, alternative transportation and pollutes our valley. The valley has gone downhill since 1996 in my opinion. We're an urban sprawl hell.

Thank you,

-Tom
Mesa, AZ

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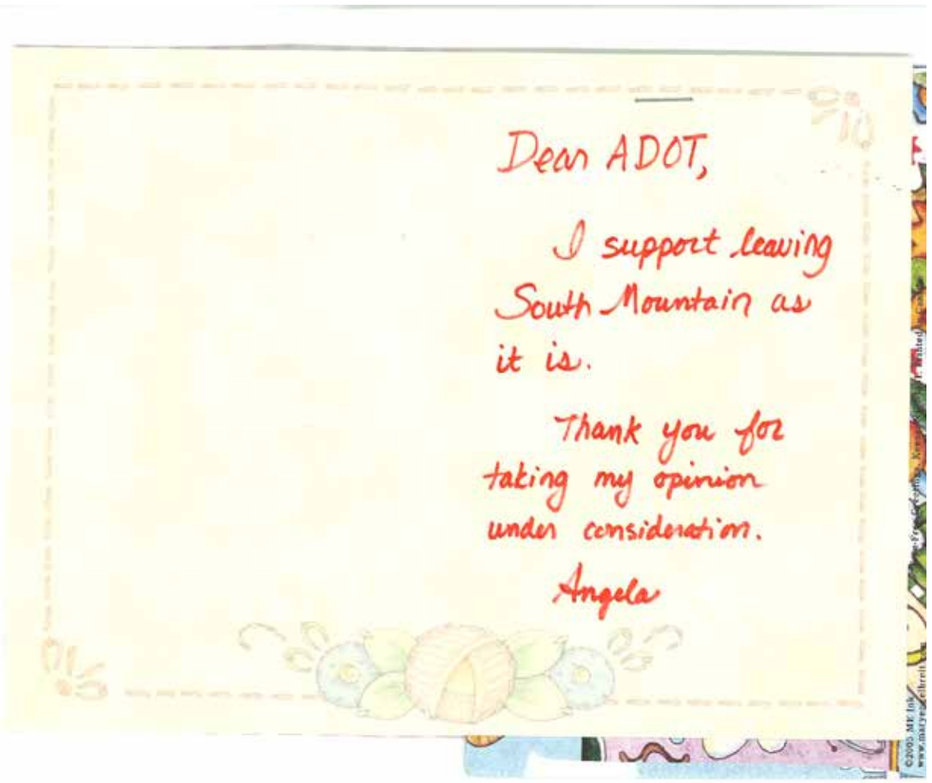
Code	Issue	Response
1	**Secondary and Cumulative**	Induced travel and induced growth are addressed under subheadings of those names on Draft Environmental Impact Statement pages 4-170 through 4-174.
2	**Secondary and Cumulative**	The proposed freeway is a response to existing and anticipated travel demand in the metropolitan Phoenix area. It is not meant to increase travel beyond that expected to be generated from existing and anticipated population and employment growth and related land development. It is important to consider that improvements proposed for any type of transportation system (e.g., a new bus route, rail transit line, commuter rail service) would likely lead to changes in travel behavior, which, in turn, would lead to increased use of the particular system. Improvements made to a given transportation system are meant to attract new users (see Final Environmental Impact Statement pages 4-170 through 4-174). If this were not a primary goal, the improvements would be neither effective nor warranted. For the proposed action, a goal is to attract users of other segments of the Regional Freeway and Highway System and the local arterial street network, now and in the future, to the proposed action to optimize, in part, the entire regional transportation system (as outlined in the proposed action's purpose and need in Chapter 1).
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
4	**Purpose and Need**	The worldwide recession that began in late 2007 generated a substantial downturn in growth rates for new housing and employment across the United States. Arizona particularly suffered the effects of this recession because, beginning in the early 2000s, Arizona in general and Maricopa County specifically experienced some of the fastest population, housing, and employment growth rates in the country. Because the need for the proposed freeway is predicated in part on projected growth, one might conclude the recession reduced that need. An economic downturn associated with a given recession is, however, generally considered a short-term phenomenon with respect to the longer-term planning horizon established for the proposed freeway. Socioeconomic indicators have steadily and consistently increased in the region since the early 1900s. The critical factors underlying these indicators remain unchanged. (See the sidebar on Final Environmental Impact Statement page 1-11.)
5	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
6	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document
1	

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Code	Issue	Response

Code	Comment Document
1	Heather Tommasi Document Created: 7/24/2013 8:40:05 PM by Web Comment Form Please approve the loop 202 freeway. It will improve so many lives and the economy. Let's finish this! :)

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Document Created: 7/16/2013 7:16:35 PM by Web Comment Form You are proposing to link the new 202 to Interstate 10 at about 51st Avenue. I am sure this is the easiest place to place the junction in terms of acquiring right-of-way. It is an area whose citizens will offer little resistance to eminent domain. The problem with this alignment and subsequent junction is that it will create one of the worst bottlenecks that Arizona has ever seen. The expansion of interstate 10 to accommodate the huge number of westbound trucks that will choose this route to avoid the center of Phoenix will need to be immense. I have already seen how you folks join routes: Exhibit 1: the junction of northbound 51 to westbound 101- a nasty little bottleneck. Exhibit 2: the junction of the westbound 101 to northbound I-17-another unfortunate piece of bottleneck engineering. A more sensible alignment (albeit more problematic and costly) would be to join the 202 to the existing 101and avoid that already congested corridor of Interstate 10 between 51st and 99th Avenues. I know, this makes way too much sense. Thanks for listening. Frank Tonis Associate Broker HomeSmart Real Estate.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Jerry Tooley

Document Created: 6/19/2013 9:01:44 PM by Web Comment Form

1 This proposal does not cover even half of the impact this extension of Loop 202 will have on the population in Ahwatukee and surrounding area. The air quality will be severely impacted. The noise generated by the traffic will be trapped in the residential area by the mountain.

2

3 There is no reason to construct this freeway. It will be simply a truck by-pass. Very few people in the Ahwatukee area will benefit from this.

4 Those who feel the freeway will benefit them when commuting to their work should consider moving closer.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes that may be elevated above the road, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Phoenix metropolitan area and across the country.
3	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Purpose and Need, Lack of Support**	

Code	Comment Document

children with the status quo, using the exorbitant right-of-way freeway paid the landowners the highest buildout cost. The Arizona legislature has done that to us.

Nor should we ignore the many deaths, semi rollovers, and the expensive public responders to the many and frequent crash freeway accidents.

Now, what we need is safe, efficient, useful, sustainable, affordable, state-of-art regional connective transportation.

And even considering a fast train, high-speed elevated train, from Tucson to Phoenix around this Broadway Curve as a viable alternative.

MANUEL TOPETE: And I live in Laveen, 51st and Baseline. And I can't wait for this to happen. As simple as that.

My only regret is I won't live to see it. Just I wish it was already done. I think you should also hear this, aside from all this bad.

KARIN GRAY: I have been a resident of Ahwatukee for over ten years, moved here from Texas, and absolutely love South Mountain. One of the reasons I moved to that area was to have access to all 15 miles of the Nation Trail, from one end to the other on South Mountain, the biggest city park in the United States.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Document Created: 6/16/2013 11:41:18 AM by Web Comment Form

To whom it may concern:

1
2

It thoroughly disgusts me your idea to degrade the value of properties in the Ahwatukee area by insisting in building the Loop 202 project. It is preposterous that after developing this area as a quiet residential zone and 20 something years planning this road to benefit a few at best, you still vow to disrupt our tranquil lives by building such a monstrosity so close to our homes. I suppose that I don't have to reiterate my opposition to such a project, but I will go further than that. If you insist on building this road, you will lose another taxpayer from the state because I will move from Arizona. I will also tell you that around this area there are

3

many people sharing my sentiments in regards to the project and moving from the state if this venture ever comes to fruition.

Sincerely,

Jose A. Torres

Code	Issue	Response
1	**Acquisitions and Relocations**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Final Environmental Impact Statement pages 4-17 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to the Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Acquisitions and Relocations**	There is no evidence that the proposed facility would cause people to leave the area. The regions' benefits would remain, and improved access to residences and businesses would make them more desirable.

Code	Comment Document

From: Jose Torres
To: Projects
Subject: Loop 202 Project
Date: Sunday, June 16, 2013 9:42:56 AM

To whom it may concern:

1 2 3

It thoroughly disgusts me your idea to degrade the value of properties in the Ahwatukee area by insisting in building the Loop 202 project. It is preposterous that after developing this area as a quiet residential zone and 20 something years planning this road to benefit a few at best, you still vow to disrupt our tranquil lives by building such a monstrosity so close to our homes. I suppose that I don't have to reiterate my opposition to such a project, but I will go further than that. If you insist on building this road, you will lose another taxpayer from the state because I will move from Arizona. I will also tell you that around this area there are many people sharing my sentiments in regards to the project and moving from the state if this venture ever comes to fruition.

Sincerely,

Jose A. Torres

Code	Issue	Response
1	**Acquisitions and Relocations**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
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3	**Acquisitions and Relocations**	There is no evidence that the proposed facility would cause people to leave the area. The regions' benefits would remain, and improved access to residences and businesses would make them more desirable.

Code	Comment Document
1	Gerardo Torres Document Created: 7/1/2013 12:45:38 AM by Web Comment Form Why is map 16 missing off-ramp and on-ramps? It's missing off/on-ramps southbound on lower buckeye and northbound on Broadway. It really would not make sense to have to drive a mile and wait for another stoplight. Especially people driving north from Broadway. This would create a jam of people coming north from broadway and people going north on lower buckeye. Thanks!

Code	Issue	Response
1	**Design**	The interchanges at Broadway Road and Lower Buckeye Road have been designed as half-diamond interchanges due to the future State Route 30 traffic interchange that is planned to connect to State Route 202L in this location. A full diamond interchange would create potential weaving issues with the addition of the system ramps from the future State Route 30 traffic interchange.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: LOOP 202
Date: Wednesday, May 22, 2013 10:55:03 AM

From: Mary and Dallas [mailto:dmtousley1@cox.net]
Sent: Monday, May 20, 2013 4:50 PM
To: Projects
Subject: LOOP 202

Ref: Loop 202 South Mountain Freeway

1 2 3 Please let it be known that we as property and home owners in the Ahwatukee Foothills do strongly oppose this freeway in this area. It will become a Truck Route for all trucks adding pollution to this area. Especially, Mexican trucks using this route which will add pollution due to their diesel fuel mixtures regarding sulphur. Chemical spills are another great concern.

4 Plus all the homes that will have to be destroyed disrupting many families.
Again I would like to appeal to you to NOT build this freeway in this area.

Thank you

Dallas & Mary Tousley
16035 S. 13th Place
Phoenix, AZ 85048
480-460-8770

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Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Hazardous Materials**	
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 11:09 AM
CALLER: ANDREA & ANDREW TOWN	CALLER ADDRESS: 517 W. KNOX, CHANDLER, AZ 85225
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
We do support the new highway. Thank you and have a good day.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Monday, May 20, 2013 8:32:37 AM

From: tom townsend [mailto:tomjt1944@yahoo.com]
Sent: Saturday, May 18, 2013 5:28 AM
To: Projects
Subject:

1 2

i am against the 202 using pecos road, any reasonable person would opt for a more southern route meeting the west 101

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

kind of crap won't be happening anymore.
Thanks.
Thanks for typing.
THE FACILITATOR: Good afternoon. I'd like to introduce the 2:00 to 4:00 p.m. panel, with the Arizona Department of Transportation, Brock Barnhart, with the Federal Highway Administration, Director Moreno, and with the Arizona Department of Transportation, Brent Cain.
Our next speaker is Richard Tracy, Sr.
Mr. Tracy, you now can pick up the microphone.
MR. TRACY: Can I have about five minutes to catch my breath?
THE FACILITATOR: Most certainly.
MR. TRACY: It wasn't always this way, you know. I just lived here 43 years too long.
THE FACILITATOR: Welcome, Mr. Tracy, you have three minutes.
MR. TRACY: All right. Thank you very much. It was quite difficult for me to come here. It's been difficult for me to attend meetings all over the Valley and send letters, and disappointing when nobody pays any attention to it. I hope this is -- okay, as I say, it was difficult to come here.

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

THE FACILITATOR: Before you start, I'm going to reset your clock so you have a full three minutes.

MR. TRACY: Fine. Thank you. And it was difficult to go to many meetings around the Valley, because I spoke for such things as having the stadium in the middle of the community. It's over on the outskirts. I spoke against people who wanted to have the light rail to the Mormon Temple rather than to the stadium where 20 or 30 people congregate and spend three or four hours going and coming from events.

The selfish people in this community are their worst enemy. We've had a lot of projects fail, and this is going to be another one. We have a traffic jam at 60 and 10. A continuation of 60 across to Avondale will relieve that traffic jam. A highway on the other side of South Mountain will give the casinos another opportunity to destroy our economy.

I have prepared a number of things that I would like somebody that's in authority to review. They don't only deal with the 202; they deal with the whole community. Because you're not just deciding what's going to happen out there, you're deciding

1

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Code	Issue	Response
1	**Alternatives**	The alternative proposed by the commenter is similar to the U.S. Route 60 Extension and Interstate 10 Spur alternatives evaluated for the proposed project. The reasons these alternatives were eliminated from further study are presented on page 3-12 of the Final Environmental Impact Statement.

Code	Comment Document

2

3

what's going to happen at Washington and Central. We have a large area between Baseline and Washington Street that should be rejuvenated. The transportation should be available. When I went to school, I had the subway, I had buses. There are people here who cannot work because they don't have a car. It's an absolute necessity. 110 degrees.

But the 202 is important to the people who, for example, recommend that we go with the light rail out to the trailer park area instead of to the west side where there are people jammed up in the morning. I ask for a fair review of this. Believe me, when it comes to corruption, Phoenix has led the nation. And this is another attempt by certain people to gain what should be given to the populace. As I say, the west side and the south side of Phoenix should be built up so we have decent transportation, so people like me don't get COPD.

I thank you for your opportunity to do something constructive for a change. The hockey stadium out in the middle of Glendale is going to go bankrupt. It's a threat to people who can't afford it. It should be in Scottsdale, but ASU took that property for their own benefit. They could have put that Windsong anywhere in the County --

Code	Issue	Response
2	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
3	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

THE FACILITATOR: Thank you, Mr. Tracy.
MR. TRACY: -- the middle of Scottsdale, which should be -- our population area should be the arena. Thank you.
THE FACILITATOR: Thank you. If you have additional feedback, we really encourage you to go next door and speak with a court reporter.
Thank you, Mr. Tracy.
MR. TRACY: Thank you.
THE FACILITATOR: Our next speaker is Stan Hemry.
MR. HEMRY: Hello.
THE FACILITATOR: Welcome, Mr. Hemry. You have three minutes.
MR. HEMRY: All right. Thank you. On this Environmental Impact Statement, I didn't see an inclusion of it about the ecosystem that's in that area and the watersheds coming from both the western range of the South Mountains, and off the Estrella Mountains, and I'd like to see more of that. I want to know what systems will be impacted when a, you know, like a carbon emitting bisection of that area takes place. And there's no animal studies done as to the migration patterns of the animals.
So I think this study is probably

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MR. TRACY: I am Richard Tracy, 2238 South Cottonwood Street in Mesa, Arizona. I have been a resident here for 43 years, lived in an area within a mile of the Black Canyon, and it contributed to the fact that I have HOPD now -- COPD. I'm sorry. It's like H. But I'm on 24-hour oxygen as a result of living too close to the freeway.

The 202 Extension is just a pie-in-the-sky idea of some Las Vegas and Phoenix people who wish to create more casinos, various other economic advantages. It's a highway to nowhere. It will not reduce the congestion we have on our roads. It may -- important place is what they call the curve or the bend between Route 60 on 10 and into Washington Street. And that traffic could be relieved with a road that would continue 60 into Phoenix. There are many, many roads off of that Baseline alignment that would be served. The community along Baseline should be rejuvenated.

There's no doubt in my mind the selfish interests did such things as making sure that the light rail went to the unnecessary Mormon temple rather than to the stadium. They fought efforts to put the stadium for the Cardinal football team in the center of the community. As a result, people are traveling three and four hours to get to and from when they have a sporting event, which is

Page 8

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
3	**Alternatives**	The alternative proposed by the commenter is similar to the U.S. Route 60 Extension and Interstate 10 Spur alternatives evaluated for the proposed project. The reasons these alternatives were eliminated from further study are presented on page 3-12 of the Final Environmental Impact Statement.

Code	Comment Document

totally unnecessary.

Chasing the hockey group out to Glendale rather than putting it in Scottsdale, again, was a selfish effort by certain leaders, the same people who now are trying to get the 202 rather than a very useful road that would go from 10 over to the 59th Avenue would relieve the traffic, would relieve the effort in downtown Phoenix which has everybody routed through the small area of Washington or McDowell. It's a plan for the future to have a freeway in the alignment between Baseline and Broadway.

I have many articles that I'd like to submit. And one of them, of course, is the fact that Phoenix leads the nation in scams. And anytime there's been a fraud on a large scale, Phoenix has been the leader. We are last in the educational support. We're last in helping people who need help.

The community is divided between the very rich and the very poor, which is not a healthy situation. But it has existed, and it's perpetuated by outfits like John Birch Society and today the Tea Party and various other interests rather than a blended community which would help everybody. We don't have that here, and it's unfortunate.

I was fortunate. I went to college and

Code	Issue	Response

Code	Comment Document

4 5 6

school. I didn't need a car. I could use the bus. And people all over this country that have many advantages that we don't have here for our average middle class citizen. And this particular road will deprive us of a road and light rail where it's really needed, where it would really help.

And I appreciate this opportunity. It was difficult, in my condition, to come down here. But I'm glad I did, and I appreciate the young lady being so patient. Thank you.

Can I put this with my material?

MR. FRANKLIN: All right. Now, this is a speech that I was going to have for the room, but I just -- I have to go and run, so...

Good afternoon, Panel. My name is Ross Franklin. That's R-o-s-s, F-r-a-n-k-l-i-n. And I'm a resident of Laveen, Arizona. I appreciate you letting us all speak in front of you today. You will hear much emotional testimony today regarding the impact of building the Loop 202 western loop connector. I will stick to the facts and leave the emotion to others.

Over the past 15 years, the population of Laveen and Southwest Phoenix has doubled. The EIS projects that number to more than double again over the next 25 years. While new highways like the Eastern

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Code	Issue	Response
4	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
6	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

Richard T Tracy Document Created: 7/24/2013 9:52:05 PM by Web Comment Form

If The extnsion of 202 was inportant to traffic and clean air it would not have needed millions of PR and twenty years to build. My fear is each group make it impossible to develope a stainable community.We needed a stamium and it ended up ten miles from the center. Same the Arena. Things fail here because of prtty greedy inconsistent leadership.

1 The 202 extention is not as important as a rail line from Tucson or Mexico to Vages.

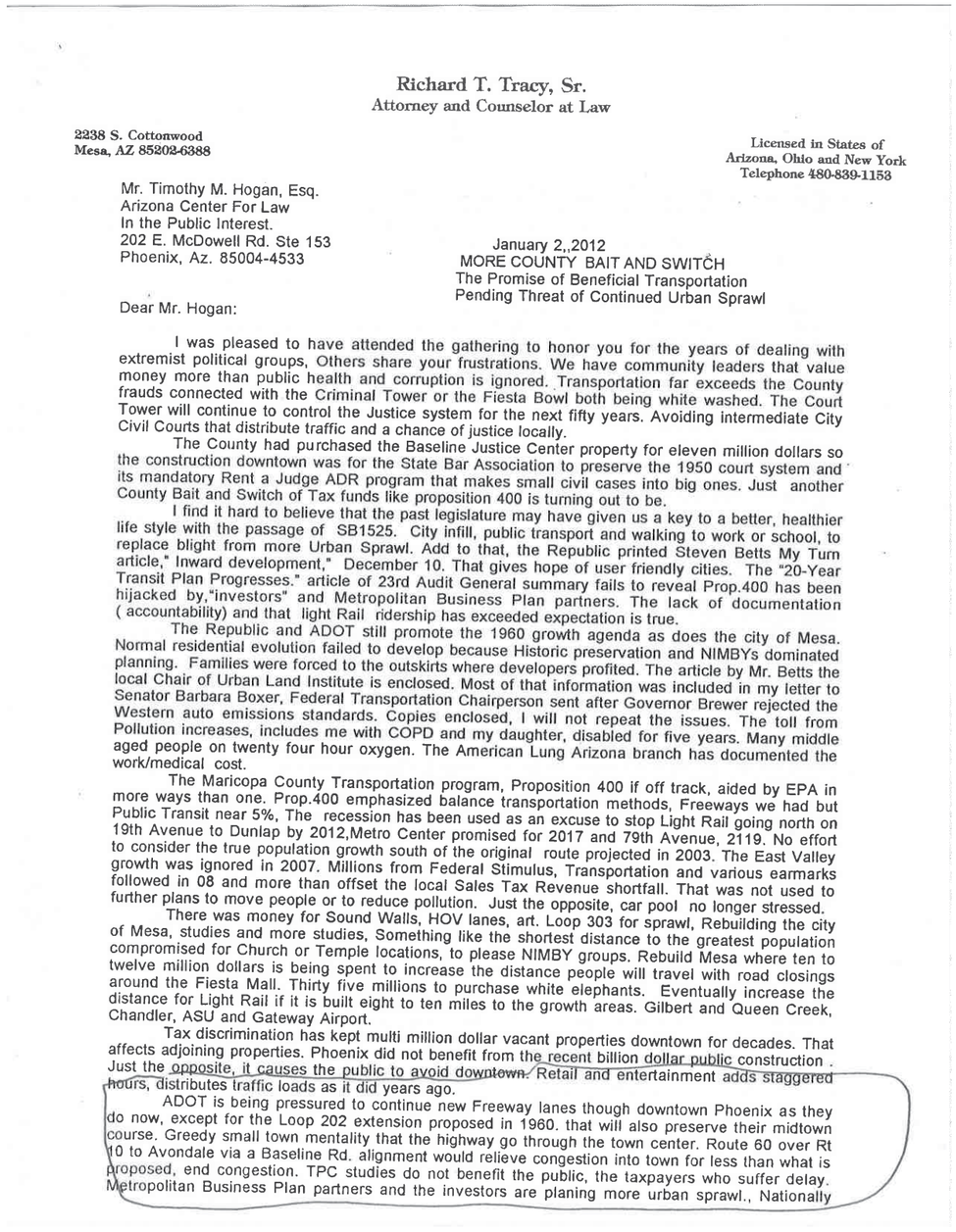
2 It is not going to benefit any one but the highway builders and the casinos. Light rail from Baseline to Washington St and extra Lanes I- 10 where 60 joins it will save lives money and

3 jobs. 202 will gice us fewer jobs and tourists. Damage a Park that will grow in importance as

4 the population grows. From an COPD family please reduce not increase auto use with sprawl.

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Secondary and Cumulative**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document



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In the Public Interest.
202 E. McDowell Rd. Ste 153
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January 2,,2012
MORE COUNTY BAIT AND SWITCH
The Promise of Beneficial Transportation
Pending Threat of Continued Urban Sprawl

Dear Mr. Hogan:

I was pleased to have attended the gathering to honor you for the years of dealing with extremist political groups, Others share your frustrations. We have community leaders that value money more than public health and corruption is ignored. Transportation far exceeds the County frauds connected with the Criminal Tower or the Fiesta Bowl both being white washed. The Court Tower will continue to control the Justice system for the next fifty years. Avoiding intermediate City Civil Courts that distribute traffic and a chance of justice locally.

The County had purchased the Baseline Justice Center property for eleven million dollars so the construction downtown was for the State Bar Association to preserve the 1950 court system and its mandatory Rent a Judge ADR program that makes small civil cases into big ones. Just another County Bait and Switch of Tax funds like proposition 400 is turning out to be.

I find it hard to believe that the past legislature may have given us a key to a better, healthier life style with the passage of SB1525. City infill, public transport and walking to work or school, to replace blight from more Urban Sprawl. Add to that, the Republic printed Steven Betts My Turn article," Inward development," December 10. That gives hope of user friendly cities. The "20-Year Transit Plan Progresses." article of 23rd Audit General summary fails to reveal Prop.400 has been hijacked by,"investors" and Metropolitan Business Plan partners. The lack of documentation (accountability) and that light Rail ridership has exceeded expectation is true.

The Republic and ADOT still promote the 1960 growth agenda as does the city of Mesa. Normal residential evolution failed to develop because Historic preservation and NIMBYs dominated planning. Families were forced to the outskirts where developers profited. The article by Mr. Betts the local Chair of Urban Land Institute is enclosed. Most of that information was included in my letter to Senator Barbara Boxer, Federal Transportation Chairperson sent after Governor Brewer rejected the Western auto emissions standards. Copies enclosed, I will not repeat the issues. The toll from Pollution increases, includes me with COPD and my daughter, disabled for five years. Many middle aged people on twenty four hour oxygen. The American Lung Arizona branch has documented the work/medical cost.

The Maricopa County Transportation program, Proposition 400 if off track, aided by EPA in more ways than one. Prop.400 emphasized balance transportation methods, Freeways we had but Public Transit near 5%, The recession has been used as an excuse to stop Light Rail going north on 19th Avenue to Dunlap by 2012,Metro Center promised for 2017 and 79th Avenue, 2119. No effort to consider the true population growth south of the original route projected in 2003. The East Valley growth was ignored in 2007. Millions from Federal Stimulus, Transportation and various earmarks followed in 08 and more than offset the local Sales Tax Revenue shortfall. That was not used to further plans to move people or to reduce pollution. Just the opposite, car pool no longer stressed.

There was money for Sound Walls, HOV lanes, art. Loop 303 for sprawl, Rebuilding the city of Mesa, studies and more studies, Something like the shortest distance to the greatest population compromised for Church or Temple locations, to please NIMBY groups. Rebuild Mesa where ten to twelve million dollars is being spent to increase the distance people will travel with road closings around the Fiesta Mall. Thirty five millions to purchase white elephants. Eventually increase the distance for Light Rail if it is built eight to ten miles to the growth areas. Gilbert and Queen Creek, Chandler, ASU and Gateway Airport.

Tax discrimination has kept multi million dollar vacant properties downtown for decades. That affects adjoining properties. Phoenix did not benefit from the recent billion dollar public construction . Just the opposite, it causes the public to avoid downtown. Retail and entertainment adds staggered hours, distributes traffic loads as it did years ago.

ADOT is being pressured to continue new Freeway lanes though downtown Phoenix as they do now, except for the Loop 202 extension proposed in 1960. that will also preserve their midtown course. Greedy small town mentality that the highway go through the town center. Route 60 over Rt 10 to Avondale via a Baseline Rd. alignment would relieve congestion into town for less than what is proposed, end congestion. TPC studies do not benefit the public, the taxpayers who suffer delay. Metropolitan Business Plan partners and the investors are planing more urban sprawl., Nationally

1

2

Code	Issue	Response
1	**Secondary and Cumulative**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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freeways are being converted to Rail. light or Commuter. Such Infill would solve our problems. Four dollar a gallon gas changes things.

The MAG Transportation Policy Committee is not on the public's side. Legal promises broken, conflict of interests ignored, corruption, no accountability and breach of Fiduciary duty all apparent in the past few years. Ignoring our pollution offenses all of seven months last year, yet ADEQ proposes to weaken the Clean Air standards. The Maricopa Association of Governments and ADOT are abandoning their public obligation to provide balanced transportation. See prop.400 summary, all funds were to be used. They plan no reduction of auto traffic, our major contributor of ozone along with road dust .TPC is submitting programs that would limit future Public Transportation to rubber tired vehicles. The," investors" even ASU wants Toll Roads to off set tax cuts.

Hearing on various transportation issues will take place soon and will mean nothing without the prospect of action like that filed December 2009 against EPA. (Bahr v Jackson) The EPA has found the 5% PM 10 reduction is inadequate to protect the health of residents of Maricopa County. MAG, mostly small town officials want more sprawl, less Light Rail in large cities, $10 rush hour Toll fees in spite of failures nationwide. Gas prices go up but some businessmen want to end the tax on gasoline rather than an increase to cover road maintenance.

Note the recent T.P.C. Summary seeks to satisfy," Stakeholders" investors, not to fulfill their obligation to existing residents promised in the passage of Proposition 400. Now with less that twenty miles completed MAG is setting Metro adrift. The Governor's Transportation Oversight Committee Chairman, Roc Arnet, also Chairman of the East Valley Improvement Committee was a cheerleader for the tracks to the dead end at the Mesa Mormon Temple, not Gilbert or San Tan.

3

That TPC Summary calls for widening I-10, adding H.O.V. lanes on I-10 between I-17 and I-60 with the implementation of a local express lane system to provide additional capacity along I-10 (That is code for private Toll Roads at public expense). What they call sustainable transportation is non-sustainable residence support. The extension of Loop 202, a 22 mile road to nowhere was planned in 1960. Now mainly for casinos operated from Los Vegas, will kill our economic future.

The small map shows projected population in the pre 2004 campaign material, That stated,"By 2007, nearly 150 miles of Freeway will be complete. Now is the time to look at the next round of transportation investments." That give the impression that public transportation was ending workers daily ordeal of traffic delays. Note the TPC Summary last paragraph does not address the public need or traffic congestion but rather the, "difficulty of developers in assembling various land parcels." Infill in south Phoenix would reduce congestion, there is our hope for the future.

When the 2007 scoping took place to determine the future course of Light Rail as stated above only Central Mesa was discussed and considered. Projected growth did not occur, Mesa's Conservatives rejected progress. Gilbert's population increase, 83% and Queen Creek San Tan area went from 4.400 in 2000 to over 30,000, Gateway and ASU plus the Fiesta Area with its College and Hospital presented the obvious need for the Light Rail that would serve the South East Valley best. Drawing from both east and west. Main Street to Power would add eight or nine miles and about twenty minutes and draw very little from the east or north. Mesa business view, let them drive 5 or 10 miles. Who will pay to operate that branch, Mesa's debts are climbing.

Metro approved Light Rail to Mesa Drive, a location so lacking potential riders that almost immediately the need to extent from the Temple to Gilbert Road became vital. Five hundred thousand dollars bought that commitment from Metro Light Rail. Downtown Mesa property owners have hit the lottery, Several million for environmental adjustment, Thirty-five million for property that has had little value, now being negotiated and failing businesses subsidized during two years of Construction. The substandard older homes and buildings had been housing for thousands undocumented, mostly construction workers families. Wealthy property owners moved to Gilbert or new Lehi. Mesa is said to have twenty thousand homes vacant or in foreclosure but millions of dollars has been provided by congress to start construction of Tempe style housing along the Light Rail track. Being built without a University or employment opportunity nearby like Tempe.

I enclosed material that reveals the deception and explains the problems and promise of increased health hazards. Election promises are contracts. Because of Media confusion and public apathy we have no community leaders demanding enforcement. The press supports sprawl, most people feel it is no use trying to buck the system. Major employers representatives and professionals are enlisted to keep people from objecting unless that is what the powers that be want at the time.

I hope that your office and the Sierra Club will intercede and provided the public mass transit as promised for Maricopa County, with truly Happy New Years. Urban sprawl has caused waste and driven up costs the middle class and small business. Public interests are not considered.

Very truly yours

Richard T. Tracy,Sr.

CC Sandra Bahr

Code	Issue	Response
3	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Phoenix must look to inward development

12-16-11

MY TURN
STEVEN BETTS
Urban Land Institute

In this post-recession environment, much is being made about great forces of change — population and demographic shifts, economic drivers, environmental concerns — that will dramatically reshape community building for the rest of the century.

In this time of change, it is critical to anticipate how the impact of urban design and development will meet expectations of Valley residents for livability, amenities, flexibility and choice.

This much is clear: Where we've been is not where we are headed.

How much of the anticipated population growth for the U.S. will be happening in Greater Phoenix? Is Phoenix appealing to talented workers? Does Phoenix have an adequate supply of housing that is both affordable and close to jobs? And, how can future development help position Phoenix as being progressive and innovative for the 21st century?

Research from the Center for Neighborhood Technology tells us that in the Phoenix metropolitan area, residents in outer communities (where the majority of Valley residents live) spend more than 45 percent of their income on housing and transportation alone. Most drive more than 18,000 miles per year for work and errands, and most have seen their auto gas costs double, even quadruple, since 2000. This is simply not a sustainable growth model.

Building the Phoenix metropolitan region in a way that conserves land and energy, de-emphasizes auto dependency, and enhances the natural environment is critical to our region's success. Less new construction and a greater emphasis on reusing and adapting existing space is our future. We need to do a better job of developing inward, utilizing parcels already benefiting from municipal services and infrastructure.

Phoenix must build the region in a way that conserves energy and land, enhances the natural environment and de-emphasizes auto dependency. This is critical to our future. ROB SCHUMACHER/THE REPUBLIC

Seventy-five years ago, the Urban Land Institute was founded to research, analyze, and encourage responsible patterns for long-term urban growth, and explore what constitutes sound real-estate development projects and practices.

For the Urban Land Institute Arizona, December 14, 2011, is a new starting point — a date to think ahead about what's to be accomplished for the next 75 years. As ULI founder J.C. Nichols once wrote, "An intelligent city plan ... does not forget the greater needs of tomorrow in the press of today. It is simply good, practical sense."

Whether we've learned from the past will be measured by how much of what we build remains relevant, appealing and worth preserving in 75 more years.

Steven A. Betts is chairman of the Urban Land Institute, Arizona District Council.

Code	Comment Document

MAG Transportation Director Eric Anderson's press release of October 8, 2011 spoke nothing of MAG joining in a plan that replaces the objectives and funding of Prop.400. The Metropolitan Business Plan means more sprawl less funding for clean air. Note funding committed all sources. Now MAG TPC is using that to fund Toll Roads, fringe development and doubling I-10. And extending Loop 202. Funds for Light Rail committed areas but are personal piggy banks for some. Clean Air and Sunshine was what made Phoenix, not pie in the sky developments scams. Dirty air and dirty politics may destroy it.

Anderson on MAG on not funding what was promised:

MAG Transportation Director Eric Anderson's press release of October 8, 2011 spoke nothing of MAG joining in a plan that replaces the objectives and funding of Prop.400. The Metropolitan Business Plan, means more sprawl less funding for clean air.

MAG Director Eric Anderson"Some Valley freeway projects will be delayed up to five years by a sharp downturn in revenues prompted in part by the recession, regional transportation officials say.

Proposition 400, approved by Maricopa County voters in 2004, imposed a countywide half-cent sales tax for 20 years to fund regional transit projects - freeways, streets, buses and light rail. The tax expires in 2025.

However, revenues are now expected to be $2.2 billion, or 24 percent, lower than projected for the remaining 15 years of the program, according to the Maricopa Association of Governments, a coalition oflocal governments that serves as a planning agency for the Greater Phoenix area. The regional transit plan is overseen by MAG.

When Prop. 400 was implemented, MAG projected $14.6billion in revenues through the life of the program. The new projection is $8.7 billion.

While the effect on transit programs is still being reviewed, MAG has determined that at least 11 Valley freeway projects will be delayed. It is too early to say whether they will be eliminated entirely from the current 20-year plan. Completion of those projects would require an extension of the program for an extra five years and a new Error! Hyperlink reference not valid. source - potentially including another voter-approved ballot initiative.

"I would expect, following the pattern of Prop. 400, by sometime after 2020, there would be a move to renew that tax source. Conceivably, it could happen sooner than that," said the MAG Director.

Read more: http://www.azcentral.com/news/election/azelections/articles/20111 0/08/20 III 008maricopa-county-proposition-400- funds-shortage.html#ixzz 1 hncyR 1 AO

Sample Ballot

Proposition 400

If approved by the voters of Maricopa County, Proposition 400 would continue the one-half cent sales tax for 20 years, through December 31, 2025. This sales tax would be used for construction of new freeways, widening of existing freeways and highways, improvements to the arterial street system, regional bus services and other special transportation services, and high capacity transit services such as light rail, bus rapid transit and express buses. All projects to be funded from the proposed sales tax are specified in the Maricopa Association of Governments (MAG) Regional Transportation Plan.

Regional Transportation Plan

Utilizing input from the community, the MAG Transportation Policy Committee developed the Regional Transportation Plan (the Plan). The 22-member committee included elected officials and representatives from cities and towns across the region, the business community, the Arizona Department of Transportation, Maricopa County, the freight industry, transit, and the Citizens Transportation Oversight Committee.

The Regional Transportation Plan includes $15.8 billion in proposed projects, taking into account all regional funding sources. About half of the funding, $9 billion (based on 2002 dollars and including $500 million set aside for interest expense) would come from the passage of Proposition 400.

Mesa Republic 12/10/11

After a campaign to give Phoenix Mesa Gateway Airport an internationally identifiable name I made efforts to get to plans for the Light Rail at Sycamore and Main Street to go south to the Airport or San Tan. I spoke again to the Gateway Board made up mostly of the Mayors of the surrounding cities that are involved. The Chairmen that day was Mesa Mayor Scott Smith. He did not seem receptive at all. I then went to the Board of the Maricopa Association of Governments and guess what Mayor Smith was also the Chairman and no more receptive. The same was true at the Mesa City Council meeting.

You see at completion of Loop 101 the sleeping downtown Mesa business and property owners awoke. The highway no longer ran through their Main Street, there was no business. It was in the newly developed Fiesta and Val Vista areas. That started efforts and publicity to attract the public downtown. Keep the Light Rail going east not south where there had been a population explosion over the past ten years.

Richard T. Tracy, Sr. Mesa 480-839-1153

Code	Issue	Response

Code	Comment Document

TPC Meeting Summary

Update on the Southeast Corridor Major Investment Study

The TPC heard an update on the Southeast Corridor Major Investment Study. The purpose of the study is to examine the existing transportation investments proposed for the Southeast Corridor, which primarily encompasses the Interstate 10 corridor from Central Phoenix to the East Valley. These investments include widening of Interstate 10; reconstruction of the traffic interchange connecting I-10, State Route 143 and 48th Street; connection improvements to the US-60 (Superstition Freeway) and the Interstate 17 (Black Canyon Freeway) traffic interchanges; construction of an additional HOV lane on I-10 between I-17 and US-60; and implementation of a local express lane system to provide additional capacity along I-10. The Arizona Department of Transportation is currently completing an Environmental Impact Statement for the I-10 corridor within the study area.

Along with reviewing these investments and other parallel facilities, the Southeast Corridor Major Investment Study will study the travel demand between the East Valley and Central Phoenix to identify the potential for alternative transportation mode strategies to accommodate demand, along with freeway widening scenarios.

Staff reported that the consultant conducting the study has developed and analyzed three "bundles" of more than 25 different transportation alternatives. The bundles include a basic mobility bundle ($350 million investment), peer competitive bundle (systems common in peer regions, a $2.8 billion investment), and transit focus bundle ($5.1 billion investment).

Sustainable Transportation – Land Use Integration Study

Staff provided an update on the Sustainable Transportation – Land Use Integration Study. The study was launched in 2010 and includes a market analysis and research of best practices for sustainable transportation. Staff noted that one issue is that many people interpret the words "sustainable transportation" differently, with definitions ranging from traffic demand reduction to mode choice to the environment. Eight factors typically found when measuring sustainable transportation performance include a neighborhood street network, housing and employment density, mixed-use neighborhoods, regional accessibility (especially job centrality and concentration), frequent/convenient transit service, demand management/incentives, transit-oriented development (including mixed income housing), and demographics.

Staff noted that a focus group found the existence of obstacles that make infill development a higher risk than fringe development in the Valley. These include parking availability and zoning laws, as well as difficulty for developers in assembling various land parcels. The focus group expressed interest in bus options, and suggested the region take a hard look at "rubber tire" transit options. Additional observations based on stakeholder input were that mobility solutions are needed throughout the region, but that limited parts of the region can support transit oriented development and high capacity transit in the near term. Next steps will include identifying mobility priorities, modeling various scenarios, and developing policies, with an eventual outcome of recommended policies, investments, and pathways.

Mag interest in Urban Sprawl

not modern Rail.

clean Rail.

Code	Issue	Response

Code	Comment Document

Agenda Item #5

MARICOPA ASSOCIATION OF GOVERNMENTS
INFORMATION SUMMARY... for your review

DATE:
November 9, 2011

SUBJECT:
Update on the Southeast Major Investment Study

SUMMARY:
The fiscal year (FY) 2010 MAG Unified Planning Work Program and Annual Budget, approved by the MAG Regional Council in May 2009, was amended in March 2010 to include $300,000 to conduct the Southeast Corridor Major Investment Study. On May 17, 2010, the MAG Regional Council Executive Committee selected HDR, Inc. to conduct the study.

The Arizona Department of Transportation (ADOT) is in the process of completing an Environmental Impact Statement (EIS) for the widening of Interstate 10, the Maricopa Freeway, between the SR-51/SR-202L/Red Mountain "Mini-Stack" and SR-202L/Santan-South Mountain "Pecos Stack" traffic interchanges. The subject of this EIS is an environmental clearance that would allow the reconstruction of the Interstate 10/SR-143/48th Street traffic interchange, connection improvements to the US-60/ Superstition Freeway and the Interstate 17/Black Canyon Freeway traffic interchanges, construction of an additional high occupancy vehicle (HOV) lane between Interstate 17 and US-60, and implementation of a local-express lane system to provide additional capacity along Interstate 10 that could accommodate more than 400,000 vehicles per day. ADOT is in the process of wrapping up this EIS and proposes obtaining a Record of Decision (ROD), the final action in the EIS process, in early 2012.

Presently, the Regional Freeway and Highway Program of the MAG Regional Transportation Plan provides approximately $650 million for an initial phase of the project between 32nd Street and SR-202L/Santan-South Mountain Freeways. The remaining sections of the project, from 32nd Street to SR-51/SR-202L/Red Mountain Freeway, is estimated to cost $850 million and is presently identified for implementation in the fifth phase of the Regional Transportation Plan.

During the course of the EIS, questions have been raised by MAG member agencies about the investment being made in this corridor and the need for alternate transportation options, in addition to widening Interstate 10 and improving the system traffic interchanges, to accommodate the growing travel demand between the East Valley and Central Phoenix. In response, MAG began developing the Southeast Corridor Major Investment Study for these purposes. The work program for this Study has the following tasks:

- Review of all transportation investments proposed for the Southeast Corridor, including those proposed along other parallel facilities, such as SR-101L/Price Freeway and SR-202L/Red Mountain Freeway;
- Study of the travel demand shed between the East Valley and Central Phoenix to identify the potential for alternative transportation mode strategies to accommodate demand in addition to freeway widening scenarios;
- Consultation with project stakeholders on the project's findings and recommendations; and

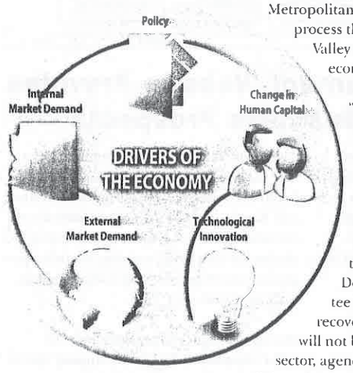
Code	Issue	Response

Code	Comment Document

r-MAGAZine
Quarterly Newsletter Focusing on Regional Excellence
November 2011—January 2012 Vol. 16: No. 4

MAG Launches Metropolitan Business Plan

With the Valley just beginning to climb out of one of the most significant economic downturns in U.S. history, the Maricopa Association of Governments (MAG) and economic development leaders from across the region have launched a Metropolitan Business Planning process that will move the Valley toward a more secure economic future.



"We have experienced tens of thousands of foreclosures in the Valley, and the pain isn't over yet," said Litchfield Park Mayor Thomas Schoaf, who chairs the MAG Economic Development Committee (EDC). "The region's recovery from the recession will not be driven by a single sector, agency or individual. A collaborative approach is needed to make dramatic changes in our economy."

Mayor Schoaf said MAG is coordinating with a range of stakeholders to develop a business plan that will help put the region back on the path to prosperity. In August, MAG was selected by the Brookings Institution as one of only a handful of pilot cities to participate in a collaborative partnership to develop a Metropolitan Business Plan. Other partners in the project include the Greater Phoenix Economic Council (GPEC), Arizona State University, the Thunderbird School of Global Management, Maricopa Community Colleges, and the Arizona Commerce Authority.

"Not only are we tapping into some of the brightest minds in our region, the value of working with Brookings is that they can help us identify new opportunities through their connections with best practices around the country," said MAG Chair and Tempe Mayor Hugh Hallman. "This will help us leverage key assets to better compete in a global economy," he said.

Mayor Hallman pointed out that the effort will build upon the hard work that has already taken place in the region, including incorporating economic development plans already underway.

"We are relying on the expertise of our partners in economic development and on our regional leaders to identify the actions necessary for revitalizing our economy," said Hallman. "The great advantage of this project is that it gives us a chance to work together instead of in our individual silos to create a unified economic development strategy."

GPEC President and CEO Barry Broome said he is excited about the partnership, agreeing that it is time to change the way we think about economic development.

"If we want to transform Greater Phoenix into a world-renowned region of excellence, we need a shift in

Continued on page 10

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MARICOPA ASSOCIATION of GOVERNMENTS

Code	Issue	Response

Code	Comment Document

Mr. Robert Forrest
Metro Light Rail, Suite 1300
101 North 1st Ave.
Phoenix, Az 85003

2238 S Cottonwood St
Mesa, Az. 85202

Dear Mr. Forrest:

TRANSIT PARTS CONSIDERED SEPARATELY
COUNTY TOTAL EPA SCORE, POOR, WHY?

May 27,May 26,count back to December19 before you can find a good air day in Maricopa County. Once known for its clean air, a respiratory cure center and laid back life style, is now a place compared to Los Angles. Urban sprawl. Traffic delays, smog-obscuring view.. The EPA and Federal Departments of Transportation, free of local influences are guilty of betraying their obligation to the residents. They give lip service to anti pollution measures but support federally funded projects that contribute to poor planing of a community, waste, traffic jams, accidents and increased pollution.

The Light Rail is badly needed where there are young families, working middle class and college students. Light Rail's goal to reduce traffic instead is being diverted to a retirement area. First stop Mesa Dr. along mostly abandoned Main Street to the Cemetery, large park across from the LDS Temple, Historic single family home districts. They want it, because it's almost free. All local funds are going to redevelop east of Mesa Drive that is where the Mormon Community of Lehi is being reborn.,

The future plan after 2016 is to extend to Gilbert Road a trailer park area on the north, mostly vacant six-month a year. Growth and traffic jams are miles to the South. Help would come to finance a connection between the two major airports, but to go east to Power Rd. then south, would add nine miles and at least twenty minutes to the trip and maybe twenty years before completion.

The East Valley at the last census has grown to over a million people. Mainly in the Gilbert, San Tan, Queen Creek, Chandler areas. Only a small percentage reside north of Route 60. Mesa Main Street died when Route 60 moved south and residents resisted change. Mesa has ten thousand homes empty or in foreclosure. The ADOT Citizens Overview Committee and MAG Chairman, the Mesa Mayor, are both strong Mormon leaders ignore the facts. And public interest. Suggest people can drive five to ten miles to Light Rail. EPA and Metro have a responsibility to get traffic off the road on to rail, but for five years only Mesa Central Main was considered.

The Maricopa Association of Governments are controlled by Developers, it encourages only Urban Sprawl, not infill and we have thousands of empty newer buildings, they and people are not a developers concern, only buying BLM land, building and making a profit. ADOT is planning roads for the developers into 2024. Travel time, empty buildings pollution all increase, as do no-burn days. The community already so spread out the two car families have grown to three or four with teen agers. Excessive travel demands, costs and blight are not a concern of County Planners.

Light Rail should go south from Sycamore to the Fiesta Mall area with its Hospital and College campuses, dozens of empty buildings and locations for apartments. Actual, not just potential riders. Then through Gilbert southeast ending near Mesa Gateway Airport and San Tan Village. ADOT's plan a twenty four lane road west of Tempe that could become a Toll Road. More about that in the attached addition to go with the Exhibits and articles.

Very little is done to get express buses between cities except for the West Valley to Downtown Phoenix and that did provide results. There is very little effort to get the single driver of the road. Proper placement of Light Rail and extending Rt. 60 just does not fit the powers to be plan for this large county that is run like a hick town by people who remember it as it was, do not know how it could be. It is clear to an impartial observer that there is not sufficient passenger prospects for Light Rail at Central Mesa and there is not enough room for proper traffic movement in Central Mesa, but then drivers will avoid going there, the public and private investment wrote it off when Freeways developed south then north. Its common the greedy take from the needy around here.

Sincerely

Richard T. Tracy, Sr.

Code	Issue	Response

PURPOSE OF STUDY

1. Identify a transit alternative that increases efficient access to employment opportunities throughout the Central Phoenix/ East Valley region for City of Mesa residents.
2. Identify a transit alternative that provides improved travel times in a congested environment over local bus.
3. Identify a transit improvement

THE SCOPING PROCESS

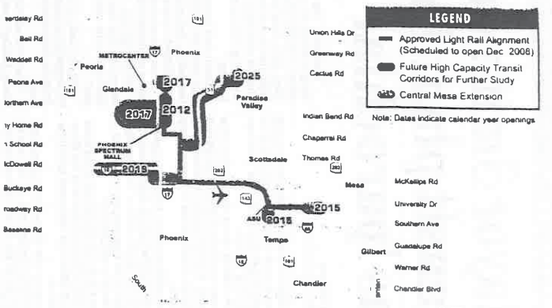
aug 2007

What is it. Why do it?

Scoping is a study process designed to inform the public, interested groups and participating agencies about the proposed project, potential alternatives under consideration, and issues for public and agency review and input. The main goal is to encourage the active participation of the community and public agencies early in the decision-making process. It provides the public an opportunity to communicate issues and concerns to help develop alternatives before considerable resources have been expended.

The scoping process defines the alternative routes and alignments that will be examined in the study, identifies potential impacts that

FIGURE 1: REGIONAL TRANSPORTATION PLAN TRANSIT CORRIDORS



Mesa wrangles with how to pay for light rail

2002

1.1-mile segment's cost ranges from $20M to $40M

BY JASON EMERSON
TRIBUNE

Pressured to move along with plans to build about a mile of light-rail line on the city's western border, Mesa officials have yet to figure out how to pay for it.

The project moved forward last week when Valley leaders on the Regional Public Transportation Authority voted 6-1 to begin looking for an engineering firm to build the system. Mesa Mayor Keno Hawker cast the dissenting vote.

While Hawker, who represents Mesa on the authority, favors building a 1.1-mile segment to the Tempe border to the East Valley Institute of Technology at Longmore and Main Street, said he wants his full council to vote on it, he wants to know how much it will cost and he wants to know who will run the rail system.

"I would like to see some of those (questions) answered," Hawker said Monday. "And I'm not going to move forward on my vote until I'm sure the council is supportive," he said.

The City Council will discuss the light-rail project at 7:30 a.m. Thursday in the council chambers, 57 E. First St. A formal vote is expected sometime during the next two months, said City Manager Mike Hutchinson.

Plans call for 20.3 miles of rail to run from 19th Avenue and Bethany Home Road in Phoenix through downtown Tempe, ending about a mile into Mesa. Total cost is estimated at about $1 billion.

Some officials worry that if Mesa backs out of the project, it would wreak havoc with the schedule.

"It would probably cause a delay," said Jack Tevlin, Phoenix's deputy city manager.

Tevlin points to the project's lengthy environmental study, which was done based on a 20.3-mile system. If the track is shortened because Mesa backs out, a new study might have to be done, he said.

Tevlin met with each Mesa City Council member in late March to extol the merits of light rail.

"Phoenix realizes that without us, they'll have to redesign the project," said Mesa City Councilman Bill Jaffa.

Others are concerned that if Mesa backs out, Tempe may shorten its segment. Instead of extending the track to Mesa's border, which currently is planned, Tempe may cut costs and stop the rail at McClintock Road or Mill Avenue, officials said. Tempe Mayor Neil Giuliano could not be reached for comment.

'I would like to see some of those (questions) answered. And I'm not going to move forward on my vote until I'm sure the council is supportive.'

KENO HAWKER
Mesa mayor

Mesa is being asked to commit up to $40 million to build its segment at a time when the city is facing a $33 million revenue shortage for fiscal year 2002-03.

In the past, Hawker has estimated the system would cost Mesa $40 million, but Monday he revised his estimate to $30 million. The new number is based on the information that Mesa's segment will be 1.1 miles instead of 1.5 miles, Hawker said. Wulf Grote, the project director, has said Mesa's share will be about $20 million.

Some federal money might be available to reduce Mesa's cost, Tevlin said. The federal government is expected to pay about half the cost of building the system.

Code	Comment Document

Report of Bob Hazlett MAG Senior Engineer 10-19-11 on
Managed Lanes(Toll Road) to MAG Transportation Committee

Lanes Network Study will look at the concept of priced managed lanes or placing a toll on HOV lanes. He stated that there are four phases to the project, with the first phase underway.

Mr. Hazlett stated that the study will evaluate future HOV needs, the viability of managed lanes, and legislative and institutional requirements. He said that stakeholders includes representatives of MAG member agencies, the Arizona Department of Transportation, and the Federal Highway Administration.

Mr. Hazlett stated that managed lanes are dedicated lanes for one or more user groups. He said that HOV lanes in this region are managed lanes. Mr. Hazlett stated that managed lanes can be high-occupancy toll (HOT) lanes, express lanes, express toll lanes, or value priced lanes. He said that names and branding vary by region and reflect different strategies. Mr. Hazlett noted that there are more than 130 managed lanes facilities in the United States, and he added that once the HOV lanes on Loop 101 are completed, the MAG region will have the fourth largest managed lanes network in the country in terms of lane miles, behind Los Angeles, San Francisco, and Seattle. Mr. Hazlett remarked that the evolution of the region's freeway system since 1985 is a remarkable achievement.

Mr. Hazlett stated that 12 projects in the country currently use price managed lanes, and the Managed Lanes Network Study consultant identified where they are being contemplated. He noted that some are express toll lanes where you must stay in the lane and cannot weave in and out. Mr. Hazlett stated that one of the more ambitious projects is in the Dallas area, where Interstate 635 will be double decked. He explained that the top lanes will be the existing lanes and the bottom lanes will be managed lanes. Mr. Hazlett stated that truck-only toll roads are being considered in Atlanta and New Jersey.

Mr. Hazlett then addressed the lessons learned from SR-91 in Orange County, California, considered the granddaddy of managed lanes, constructed in 1996. He said that it was the first managed lane facility to use value pricing and the first fully automated toll facility in the United States. Mr. Hazlett stated that SR-91 is in an area with few competing routes, and it introduced the concept of variable pricing for tolls. He said that toll setting is an ongoing process; they review the data monthly and set the tolls, with a goal of keeping traffic moving. Mr. Hazlett stated that the toll amounts vary and the peak hour toll is about $10.

Mr. Hazlett stated that SR-91 was a public-private partnership, and as a result, a lot of codicils were added that made it difficult for Orange County to do a lot of planning. He said that a buy-back by Orange County was necessary to overcome a restrictive non-compete clause contained in the lease, for example, CALTRANS could not add any lanes on nearby freeways that would compete with SR-91. Mr. Hazlett stated that SR-91 generates about $45 million in revenues annually.

Mr. Hazlett then addressed lessons learned from Interstate 95 in Miami-Dade County, Florida. He said that the project converted 21 miles of single HOV lanes to dual HOT lanes. Mr. Hazlett stated that drivers previously could enter or leave the lanes at any time, but once the lanes were converted, drivers could enter or exit only through dedicated points. From this it was learned that a good

An Increased effort to create Congestion has been apparent, No real effort to promote car pools, use public transportation or stagger hours etc. in recent years, Congestion is good for Toll Road business, Light Rail and Express Bus or extending Route 60 over I-10 bad.

Code	Issue	Response

MESA REPUBLIC
WEEKEND, JANUARY 15, 2011 mesa.azcentral.com Z11 SECTION M

End of the rail line is 'no-man's land'

2 team on MLK tribute

Mesa father and daughter fear future generations won't grasp King's messages.

Mesa rail stop leaves bad impression

Plan to extend light rail gives city 2nd chance to help business, views

By Jim Walsh
THE REPUBLIC | AZCENTRAL.COM

West Mesa's assortment of boarded-up fast-food restaurants, an abandoned supermarket, run-down motels and unattractive trailer parks didn't exactly impress a woman from Ohio riding the Metro light rail for the

Drive stations.

In each case, Metro plans to build the stations east of the intersection, combining functionality with the best potential for economic development, he said.

"Economic development was certainly one of the primary considerations," Limmer said,

He said the Sycamore Station now serves as mainly an access point for commuters because it is at the end of the rail line, with

Cold, dry weather contributing to bad air quality

DIRTY AIR
Continued from B1

themselves outdoors. The ADEQ says the air could get bad enough to make Saturday a high-pollution advisory day.

The advisory, and predictions about more to come, are based on air-monitoring data and weather forecasts.

This is a La Niña year, meaning equatorial waters in the eastern Pacific Ocean are colder than usual.

That leads to a dry, cool winter in the western United States — the exact conditions which trap winter-dust pollution in the Phoenix area.

"We anticipate a dry, stagnant weather season, and expect to see a high number of high-pollution advisories. There is a potential for a record year," county Air Quality Department spokeswoman Holly Ward said.

When winters are warm and wet, rain and wind washes away the brown cloud.

But when high-pressure ridges settle in, air is trapped. In summer, an air bubble as high as 10,000 feet collects ozone. But in the winter, cooler air drops the bubble below 5,000 feet.

"It's like a lid on top, the air doesn't mix," said Paul Iniguez, a meteorologist with the National Weather Service in Phoenix.

"Long term, we are trending toward a lot more high-pressure ridges holding over the Valley, trapping the high pollution in," said ADEQ spokesman Mark Shaffer.

The period between Christmas and New Year's Day is expected to be the worst of it, Shaffer said.

That's because the most severe pollution this week has come from fine particles, called PM-2.5 because they are smaller than 2½ micrometers in diameter. Smoke is a key contributor and with many people home for vacation, more home fires will be burning.

But the county faces another longer-term challenge from coarse, PM-10 dust, which is as large as 10 micrometers, or one-seventh the width of a human hair.

This fall, the U.S. Environmental Protection Agency told local officials that regional plans to reduce PM-10 by 5 percent were inadequate and would be rejected next month.

That starts a lengthy process that jeopardizes some federal-transportation funding, and ultimately could result in all such funds being withheld from local projects.

Next month, the county is set to clamp down on one source of the 73,000 tons of coarse dust that blows through the Valley: off-road vehicles.

Off-road vehicle fans could face stiff fines next year if a proposed county ordinance takes effect to limit driving in certain areas.

On Wednesday, the Maricopa County Board of Supervisors set for Jan. 12 a public hearing to change existing law.

The county bans all off-road driving on unmarked trails in unincorporated areas, but the new rules impose increasing fines, rather than cite first-time violators with a misdemeanor. Fines would start at $100 and climb to $250.

The proposed law says: "Vehicles in operation on either unpaved public or private properties in the unincorporated areas of Maricopa County shall remain on roads or highways."

Off-road enthusiasts can drive on unpaved trails only when they have written permission from a private landowner, or on public lands where trails are clearly marked by signs or on official websites.

Private-property owners are allowed to drive their off-road vehicles on their properties, but only if they limit the dust they kick up, apply for a dust permit or otherwise comply with other county dust-pollution laws.

The county also plans to tweak a separate law that regulates parking on unpaved lots in urban parts of the county. Violators could face fines starting at $50 and climbing to $250.

The county Air Quality Department has not issued any violations under the existing off-road vehicle law, enacted in 2008.

Law enforcement agencies have been tapped to warn off-roaders to not drive during high pollution days.

Likewise, in the last two years, the county has issued no citations under its leaf-blower or fireplace ordinances, but has warned 16 and 27 violators, respectively, said Ward.

County inspectors rely on calls from the public to enforce bans on wood-burning, leaf-blowing and off-road driving, Ward said.

Ward encourages the public to visit www.cleanairmakemore.com to check on current health advisories and anti-pollution restrictions or report violations.

Code	Comment Document

RICHARD T. TRACY, SR.
2238 S. COTTONWOOD ST.
MESA, AZ 85202

Mountain Study Team
ADOT MD 126F
1655W Jackson St.
Phoenix, Az 85007

July 21,2013

Dear Study Team:

1 My big concern is the High way to nowhere 202 Extension will waste $2 billion, which could solve problems in the south east Valley of Phoenix.

2 Extending Rt. 60 over and west to 59th Ave. Light Rail to the San Tan Area via Fiesta mall and Alma School Road. where people who will pay for the system live.

And most important the start of RT I-11.

3 We will be left out if we get money for 202 and the try to get money for I –11 Tucson to Vegas. Other states will claim it is their turn after we get
What would be needed to satisfy the road builder. Rail is our future not more freeways. Just like Solar but we have people fighting to keek coal.

4 My enclosed items tell the truth about the proposed extenuation of 202 on or near Pecos Road. The editorials on the other hand has a lot of false information. The so call South Mountain Freeway will not help relieve traffic. The vote on Prop 400 was to help move people with mass transit. Those people did not keep their promise. the Indians do not want their land made like Rt. 101 for the benefit of the Los Vegas investors. Look at the shacks years later, Some investors have held options on the proposed area and for years. We have too many casinos already. They have damaged the Scottsdale economy. Now wreck Chandler with 202.

5 The Light Rail did not progress for years because Maricopa Association of Governments is not moving traffic but rather edges of Cities. What MAG and East Valley movers and shakers want and what we need are set out in their Minutes of meetings. The Metropolitan Business Plan will create more blighted areas like those referred to by the citizens in the makeover question of the Feb .16th Mesa Republic article. South Phoenix is the largest area in need of a makeover. Investors gladly accept Government tax credits but develop out side the cities. Areas north and west were to have light Rail by this time. Instead money was held back for projects they call

6 Progress but leaves out our main industry Tourism. Road and home building can not take its place for long. We have the sun but pollution hides it and people do not come back when its hard to breath and every thing is twenty miles away, Not organized like Denver for example or San Degas.

Singerely
Richard T. Tracy Sr.

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
3	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
5	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	

Code	Comment Document

SEEK FUNDS FOR BETTER FUTURE

oads and rail. These tra-
ditional means of tra-
versing vast expanses of
d sound almost old-fash-
ed in an era when informa-
n gallops across the ether.
But there's nothing retro
ut a new interstate highway
ween Phoenix and Las Ve-
, or a proposed passenger-
l line from Tucson to Phoe-
.

Both of these ideas move
zona beyond old-fashioned
ions that can hold back
ngress.

One offers an alternative to
traditional reliance on cars
personal transportation,
l the other facilitates oppor-
ities for international trade
t have been sublimated to
ncerns about illegal activity
at the border.

Consider the passenger-rail line between the state's two largest metropolitan areas.

The drive on Interstate 10 from Tucson to Phoenix takes an hour and a half to two hours. Increased traffic from population growth will slow things down. Arizona Department of Transportation planners say the trip will take five-and-a-half hours by midcentury even if the entire stretch of road is widened to three lanes in each direction.

That represents lost time and productivity, as well as increased air pollution. It also projects an image of a backward state that failed Planning 101.

These are not the kind of messages Arizona should send to those looking to invest or move here.

As part of a three-year, $6.3 million study, ADOT narrowed the possible rail routes to three, with a final recommendation expected by the end of the year. All three have stations at international airports in Phoenix and Tucson, and all connect with transit in the urban areas.

No funding has been identified. The options include public, private or a combination of sources.

Money is also a missing piece on another important proposed infrastructure improvement: Interstate 11 from Phoenix to Las Vegas.

This new highway is an important part of Arizona's awakening to a new age of increased international trade and commerce.

A north-south route connecting Mexico and Canada through Arizona has long been discussed. This Canamex corridor has great potential to help the state take advantage of our proximity to Mexico, Arizona's top trading partner and a nation with a growing middle class.

In addition to facilitating trade, a report from transportation officials in Arizona and Nevada says an I-11 between the growing metro areas of Phoenix and Las Vegas would keep up with anticipated growth and enhance economic development.

It also sets up what could be a very lucrative "Southwest Triangle" with Los Angeles.

A north-south interstate alternative between California and Texas would bring a variety of economic opportunities to Arizona.

Planning is still preliminary, but a key component — the new Hoover Dam bypass bridge — is in place. What's more, Congress has designated a general route through Arizona as I-11. This is a critical first step.

Arizona's delegation needs to actively pursue funding for both of these projects. They are not pork or earmarks. They are investments. Both prepare Arizona to embrace a more prosperous future.

e vital for commerce

7-2-13

Sean Holstege
Republic | azcentral.com

A major interstate highway
st be built between Phoenix
d Las Vegas to keep up with
e region's rapid population
owth and to facilitate global
trade, says a report released jointly Friday by transportation officials in Arizona and Nevada.

The 105-page report offered justification for constructing an Interstate 11, a multibillion dollar project to improve the link between the two metropolitan areas.

The report sets the stage for preliminary route, design and environmental studies ahead of any decision to build I-11, the nation's most ambitious interstate project in a generation.

As envisioned, the project would convert U.S. 93 into a four-lane divided highway from Las Vegas to Wickenburg, taking advantage of the new Hoover Dam Bypass bridge. From Wickenburg, planners envision the freeway eventually heading south into area west of the Hassayampa River and connecting with Interstate 10, about 40 miles from downtown Phoenix. From there, it would loop southwest, through Rainbow Valley, before rejoining I-10 near Casa

See INTERSTATE 11, Page B3

This is long overdue. Rail will move traffic efficiently and at night freight. There will be no need for I-10 expansion. ADOT and investors want it and must people do not understand our concern. The whole idea of fighting is the attitude here. Infill good for urban sprawl, from 2012 build Rail over I-10 to solve the gridlock at rush hours.

Code	Issue	Response
7	**Secondary and Cumulative**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
8	**Alternatives**	The alternative proposed by the commenter is similar to the U.S. Route 60 Extension and Interstate 10 Spur alternatives evaluated for the proposed project. The reasons these alternatives were eliminated from further study are presented on page 3-12 of the Final Environmental Impact Statement.

Code	Comment Document

THE AIR WE BREATHE

A POLITICAL TUG-OF-WAR OVER CLEAN AIR

IT'S REGULATION FEARS VS. HEALTH CONCERNS

By Shaun McKinnon
The Republic | azcentral.com

In February 1998, the Governor's Air Quality Strategies Task Force delivered to Gov. Jane Dee Hull a thick report recommending actions that could reduce levels of ozone, carbon monoxide and dust particulates in metropolitan Phoenix.

Some of the recommendations were enacted, such as requiring cleaner-burning gasoline during the winter months and cleaner-burning fireplaces in new homes. Other ideas were rejected, such as a pollution tax to pay for dust reduction or limits on gas-powered landscaping equipment.

Nearly 14 years later, the task-force report remains the last attempt to address air quality in Arizona with comprehensive, forward-looking proposals.

Since then, state and local agencies have acted almost exclusively

See REGULATION, Page A6

REPUBLIC SPECIAL REPORT
Why the air matters to everyone.

TODAY: Arizona has mostly failed to take air quality into account when dealing with growth, development.
» The EPA is a four-letter word for many in Washington, D.C. **A6**
» Rundown of the seven-part series. **A7**

MORE ONLINE: Read the full series and learn more about air qual-

Sterling Stokes, 12, has asthma and must take care to keep her air passages open. The Queen Creek child is

Freeway

Continued from Page B1

tribe's requirements to qualify the petition, tribal elections officials said.

For tribe members who wanted no freeway, it was a victory, but it may be short-lived.

The action comes as the Arizona Department of Transportation nears a July 24 deadline for public comment on its environmental study on the $2 billion, 22-mile extension of Loop 202. That study says that the Laveen-to-Chandler freeway is vital to regional mobility and that the only option is to cut through South Mountain Park.

"I'm glad it's over and done with, because now, we can work on protecting the mountain," Lori Riddle, an activist who wants no freeway, said after last week's decision.

ADOT expects to finish the environmental work and seek federal approval to build the freeway next year.

The study recommends building the freeway, including cutting a 280-foot notch in the mountain, and favors among three options a 59th Avenue alignment in the West Valley.

Activists with Protecting Arizona's Resources and Children, a group established to oppose the South Mountain Freeway, have gathered enough money to hire experts to challenge ADOT's study. They've said they will sue to stop the freeway. But those who favored moving it think such hopes are deluded.

"I don't think anybody can stop that freeway going through the mountain," petition backer Joseph Perez said.

"To me, this is an historic travesty, not because of the freeway but because tribal government refuses to listen to individual people who want change."

Nathaniel Percharo, a tribal landowner and petition organizer, called the outcome a "done deal" and a "heartbreak."

"It makes you a little discouraged. If you talk to 1,500 people, and they want a recount, that's something to look at," he said, referring to the number of tribe members who signed petitions calling for a second vote in a year on the freeway.

In 2012, a plurality of tribal voters favored no freeway over the planned Pecos Road alignment or landowners' goal of a route roughly half a mile to the south.

Tribal spokeswoman Zuzette Kisto issued a statement, saying: "The community will continue to work with all the interested parties, both within the tribe and outside the tribe, to ensure that the Loop 202 process is brought to the best possible conclusion for the community."

The tribe has not taken a formal position on the options in the environmental impact statement. In statements or in meetings leading up to the decision, tribal government officials did not document the basis for rejecting the signatures.

The tribe launched an investigation after reports that petition gatherers suggested the state would pay each tribe member $2,000 if the freeway was built. Some tribal landholders were paid $50 for entering an agreement with Perez's development firm, Pangea Development Co. LLC.

Tribal police were asked to determine whether the electioneering was clean.

They issued a report, but the findings were never released. Last week, tribal-election staff said that 20 people said they didn't remember signing the papers.

An additional 173 were deemed fraudulent, without evidence or explanation.

Perez and others said the elections office gave supporters two voter lists, one 1,000 names longer than the other, and in February determined they had enough valid signatures. Pangea and the landowners asked the Bureau of Indian Affairs to intercede, but the BIA wrote back that the issue was an internal matter between the tribe and its members.

No-build activists, such as Riddle, say the tribal government is upholding tribe members' views by holding fast on the 2012 referendum.

Last week's drama on the reservation sent ripples throughout the region.

For Laveen-area residents eager to get heavy truck traffic off local streets, the no-vote ruling ends decades of uncertainty.

In Ahwatukee Foothills, the reaction was more mixed.

"This is not a positive thing for the southern part of my district. It just isn't," said Phoenix Councilman Sal DiCiccio, who has worked to move the freeway onto tribal land.

more cleanup and tax free development

A billion dollar highway to nowhere, Vegas wants more

The Tucson to Vegas rail is best no freeway

Code	Issue	Response

Code	Comment Document

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In the Public Interest.
202 E. McDowell Rd. Ste 153
Phoenix, Az. 85004-4533

January 2,,2012
MORE COUNTY BAIT AND SWITCH
The Promise of Beneficial Transportation
Pending Threat of Continued Urban Sprawl

Dear Mr. Hogan:

I was pleased to have attended the gathering to honor you for the years of dealing with extremist political groups, Others share your frustrations. We have community leaders that value money more than public health and corruption is ignored. Transportation far exceeds the County frauds connected with the Criminal Tower or the Fiesta Bowl both being white washed. The Court Tower will continue to control the Justice system for the next fifty years. Avoiding intermediate City Civil Courts that distribute traffic and a chance of justice locally.

The County had purchased the Baseline Justice Center property for eleven million dollars so the construction downtown was for the State Bar Association to preserve the 1950 court system and its mandatory Rent a Judge ADR program that makes small civil cases into big ones. Just another County Bait and Switch of Tax funds like proposition 400 is turning out to be.

I find it hard to believe that the past legislature may have given us a key to a better, healthier life style with the passage of SB1525. City infill, public transport and walking to work or school, to replace blight from more Urban Sprawl. Add to that, the Republic printed Steven Betts My Turn article," Inward development," December 10. That gives hope of user friendly cities. The "20-Year Transit Plan Progresses." article of 23rd Audit General summary fails to reveal Prop.400 has been hijacked by,"investors" and Metropolitan Business Plan partners. The lack of documentation (accountability) and that light Rail ridership has exceeded expectation is true.

The Republic and ADOT still promote the 1960 growth agenda as does the city of Mesa. Normal residential evolution failed to develop because Historic preservation and NIMBYs dominated planning. Families were forced to the outskirts where developers profited. The article by Mr. Betts the local Chair of Urban Land Institute is enclosed. Most of that information was included in my letter to Senator Barbara Boxer, Federal Transportation Chairperson sent after Governor Brewer rejected the Western auto emissions standards. Copies enclosed, I will not repeat the issues. The toll from Pollution increases, includes me with COPD and my daughter, disabled for five years. Many middle aged people on twenty four hour oxygen. The American Lung Arizona branch has documented the work/medical cost.

The Maricopa County Transportation program, Proposition 400 if off track, aided by EPA in more ways than one. Prop.400 emphasized balance transportation methods, Freeways we had but Public Transit near 5%, The recession has been used as an excuse to stop Light Rail going north on 19th Avenue to Dunlap by 2012,Metro Center promised for 2017 and 79th Avenue, 2119. No effort to consider the true population growth south of the original route projected in 2003. The East Valley growth was ignored in 2007. Millions from Federal Stimulus, Transportation and various earmarks followed in 08 and more than offset the local Sales Tax Revenue shortfall. That was not used to further plans to move people or to reduce pollution. Just the opposite, car pool no longer stressed.

There was money for Sound Walls, HOV lanes, art. Loop 303 for sprawl, Rebuilding the city of Mesa, studies and more studies, Something like the shortest distance to the greatest population compromised for Church or Temple locations, to please NIMBY groups. Rebuild Mesa where ten to twelve million dollars is being spent to increase the distance people will travel with road closings around the Fiesta Mall. Thirty five millions to purchase white elephants. Eventually increase the distance for Light Rail if it is built eight to ten miles to the growth areas. Gilbert and Queen Creek, Chandler, ASU and Gateway Airport.

Tax discrimination has kept multi million dollar vacant properties downtown for decades. That affects adjoining properties. Phoenix did not benefit from the recent billion dollar public construction . Just the opposite, it causes the public to avoid downtown. Retail and entertainment adds staggered hours, distributes traffic loads as it did years ago.

ADOT is being pressured to continue new Freeway lanes though downtown Phoenix as they do now, except for the Loop 202 extension proposed in 1960. that will also preserve their midtown course. Greedy small town mentality that the highway go through the town center. Route 60 over Rt 10 to Avondale via a Baseline Rd. alignment would relieve congestion into town for less than what is proposed, end congestion. TPC studies do not benefit the public, the taxpayers who suffer delay. Metropolitan Business Plan partners and the investors are planing more urban sprawl., Nationally

ommuter. Such Infill would solve our problems. Four

ittee is not on the public's side. Legal promises
, no accountability and breach of Fiduciary duty all
ollution offenses all of seven months last year, yet
ards. The Maricopa Association of Governments and
to provide balanced transportation. See prop.400
no reduction of auto traffic, our major contributor of
rograms that would limit future Public Transportation
U wants Toll Roads to off set tax cuts.
will take place soon and will mean nothing without
2009 against EPA. (Bahr v Jackson) The EPA has
protect the health of residents of Maricopa County.
awl, less Light Rail in large cities, $10 rush hour Toll
o up but some businessmen want to end the tax on
aintenance.
to satisfy," Stakeholders" investors, not to fulfill their
e passage of Proposition 400. Now with less that
adrift. The Governor's Transportation Oversight
of the East Valley Improvement Committee was a
Mesa Mormon Temple, not Gilbert or San Tan.
10, adding H.O.V. lanes on I-10 between I-17 and I-
ane system to provide additional capacity along I-10
xpense). What they call sustainable transportation is
sion of Loop 202, a 22 mile road to nowhere was
d from Los Vegas, will kill our economic future.
ulation in the pre 2004 campaign material, That
ill be complete. Now is the time to look at the next
the impression that public transportation was ending
TPC Summary last paragraph does not address the
"difficulty of developers in assembling various land
ongestion, there is our hope for the future.
determine the future course of Light Rail as stated
considered. Projected growth did not occur, Mesa's
tion increase, 83% and Queen Creek San Tan area
y and ASU plus the Fiesta Area with its College and
ht Rail that would serve the South East Valley best.
to Power would add eight or nine miles and about
or north. Mesa business view, let them drive 5 or 10
's debts are climbing.
e, a location so lacking potential riders that almost
nple to Gilbert Road became vital. Five hundred
Metro Light Rail. Downtown Mesa property owners
ental adjustment, Thirty-five million for property that
failing businesses subsidized during two years of
and buildings had been housing for thousands
ilies. Wealthy property owners moved to Gilbert or
nd homes vacant or in foreclosure but millions of
construction of Tempe style housing along the Light
oloyment opportunity nearby like Tempe.
ption and explains the problems and promise of
contracts. Because of Media confusion and public
g enforcement. The press supports sprawl, most
. Major employers representatives and professionals
that is what the powers that be want at the time.
o will intercede and provided the public mass transit
opy New Years. Urban sprawl has caused waste and
ess. Public interests are not considered.

yours

Tracy

cy,Sr.

Code	Issue	Response

Code	Comment Document

Mr. Robert Forrest
Metro Light Rail, Suite 1300
101 North 1st Ave.
Phoenix, Az 85003

2238 S Cottonwood St
Mesa, Az. 85202

Dear Mr. Forrest:

TRANSIT PARTS CONSIDERED SEPARATELY
COUNTY TOTAL EPA SCORE, POOR, WHY?

May 27,May 26,count back to December19 before you can find a good air day in Maricopa County. Once known for its clean air, a respiratory cure center and laid back life style, is now a place compared to Los Angles. Urban sprawl. Traffic delays, smog-obscuring view.. The EPA and Federal Departments of Transportation, free of local influences are guilty of betraying their obligation to the residents. They give lip service to anti pollution measures but support federally funded projects that contribute to poor planing of a community, waste, traffic jams, accidents and increased pollution.

The Light Rail is badly needed where there are young families, working middle class and college students. Light Rail's goal to reduce traffic instead is being diverted to a retirement area. First stop Mesa Dr. along mostly abandoned Main Street to the Cemetery, large park across from the LDS Temple, Historic single family home districts. They want it, because it's almost free. All local funds are going to redevelop east of Mesa Drive that is where the Mormon Community of Lehi is being reborn.,

The future plan after 2016 is to extend to Gilbert Road a trailer park area on the north, mostly vacant six-month a year. Growth and traffic jams are miles to the South. Help would come to finance a connection between the two major airports, but to go east to Power Rd. then south, would add nine miles and at least twenty minutes to the trip and maybe twenty years before completion.

The East Valley at the last census has grown to over a million people. Mainly in the Gilbert, San Tan, Queen Creek, Chandler areas. Only a small percentage reside north of Route 60. Mesa Main Street died when Route 60 moved south and residents resisted change. Mesa has ten thousand homes empty or in foreclosure. The ADOT Citizens Overview Committee and MAG Chairman, the Mesa Mayor, are both strong Mormon leaders ignore the facts. And public interest. Suggest people can drive five to ten miles to Light Rail. EPA and Metro have a responsibility to get traffic off the road on to rail, but for five years only Mesa Central Main was considered.

The Maricopa Association of Governments are controlled by Developers, it encourages only Urban Sprawl, not infill and we have thousands of empty newer buildings, they and people are not a developers concern, only buying BLM land, building and making a profit. ADOT is planning roads for the developers into 2024. Travel time, empty buildings pollution all increase, as do no-burn days. The community already so spread out the two car families have grown to three or four with teen agers. Excessive travel demands, costs and blight are not a concern of County Planners.

Light Rail should go south from Sycamore to the Fiesta Mall area with its Hospital and College campuses, dozens of empty buildings and locations for apartments. Actual, not just potential riders. Then through Gilbert southeast ending near Mesa Gateway Airport and San Tan Village. ADOT's plan a twenty four lane road west of Tempe that could become a Toll Road. More about that in the attached addition to go with the Exhibits and articles.

Very little is done to get express buses between cities except for the West Valley to Downtown Phoenix and that did provide results. There is very little effort to get the single driver of the road. Proper placement of Light Rail and extending Rt. 60 just does not fit the powers to be plan for this large county that is run like a hick town by people who remember it as it was, do not know how it could be. It is clear to an impartial observer that there is not sufficient passenger prospects for Light Rail at Central Mesa and there is not enough room for proper traffic movement in Central Mesa, but then drivers will avoid going there, the public and private investment wrote it off when Freeways developed south then north. Its common the greedy take from the needy around here.

Sincerely

Richard T. Tracy, Sr.

Code	Issue	Response

Code	Comment Document

MESA REPUBLIC
WEEKEND, JANUARY 15, 2011 mesa.azcentral.com Z11 SECTION M

End of the rail line is 'no-man's land'

MORE ON Z11

2 team on MLK tribute

Mesa father and daughter fear future generations won't grasp King's messages.

Mesa rail stop leaves bad impression

Plan to extend light rail gives city 2nd chance to help business, views

By Jim Walsh
THE REPUBLIC | AZCENTRAL.COM

West Mesa's assortment of boarded-up fast-food restaurants, an abandoned supermarket, run-down motels and unattractive trailer parks didn't exactly impress a woman from Ohio

Drive stations.

In each case, Metro plans to build the stations east of the intersection, combining functionality with the best potential for economic development, he said.

"Economic development was certainly one of the primary considerations," Limmer said.

He said the Sycamore Station now serves as mainly an access point for commuters because it is at the end of the rail line, with

Code	Issue	Response

Code	Comment Document

Code	Issue	Response

... Daily Tribune | eastvalleytribune.com

CENSUS DATA

Suburban population explodes in A

By Howard Fischer
CAPITOL MEDIA SERVICES

The suburbs are where the action — and the growth — is.

New figures Thursday from the U.S. Census Bureau show that the areas just outside the state's major cities grew far faster than the long-established communities they surround. In fact, if the trend continues, they could overwhelm them.

Consider the case of Prescott Valley. The area was not even a city until 1978.

As of last April 1, when the government did its official decennial count, there are 38,822 people living there, 60 percent more than at the time of the 2000 census.

By contrast, Prescott, one of Arizona's first cities, exceeds its rapidly growing suburb now by barely more than 1,000.

In the southern part of the state, Sahuarita, incorporated in 1994, has ballooned in the last decade by a factor of close to six, to 25,259.

And Tucson? It managed less than a 7 percent growth in the entire decade, with its official population now at 520,116.

The pattern also shows that the farther out you go from the central cities, the faster the growth.

In the East Valley area of Maricopa County, Chandler, for example, grew by about a third. Gilbert shot up by 83 percent. And Queen Creek ballooned from 4,400 in 2000 to more than 26,000 now.

That is not surprising as there is more available land.

But there may be limits in how far people whose jobs still are likely in the major cities are willing to drive: Florence, further down the road from those East Valley cities, managed to grow by only 47 percent during that same period.

Census numbers released last December said there were 6,392,017 people living in Arizona last April 1. That does not include another 20,683 people who are considered Arizona residents but living overseas.

Figures show the farther you are from cities the faster the growth

That final statewide tally also showed that the annual estimates done by the federal government overstated the population increase.

The figures released Thursday provide the first look not only at where and how Arizona grew but also the change in the state's overall demographics.

Arizona is nowhere close to becoming a "majority minority" state. Hispanics still make up less than 30 percent of the population.But the Census Bureau reports that the growth in the number of those who identify themselves as Hispanic is close to three times that of other groups.

Looking at the population by race, the figures show that more Arizonans are refusing to put themselves into a single category.

While the percentage who say they are of two or more races is still small — just 3.4 percent — that is up by 49 percent from the same time a decade earlier.

A total of 73 percent of Arizonans list themselves as being white alone. Another 4.6 percent said they are American Indian, 4.1 percent are blacks, 2.8 percent Asians — and 11.9 percent who said on their census forms they were some other race.

also showed fast growt
have and Yavapai cou
The loser in all of th
be southern Arizon
Pima County's decad
decade growth just l
cent. And Greenlee Co
tually lost population.
Less clear is how the
patterns will affect cong
nal representation.
The statewide numb
nounced last Decembe
large enough to entitle
na to a ninth member
U.S. House of Represent
Here, too, the requirem
the Independent Redist
Commission is to draft di
with equal population.
Given the rapid grow
Maricopa and Pinal cou
it is likely that new distri
be carved out of existin
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OUR VIEW

Mesa, Chandler doing work necessary to land jobs

3-23-11

Arizona lost a higher percentage of jobs than most states during the recession. But the Southeast Valley is turning that around.

Major job-creation announcements have been made in recent weeks, including Intel's $5 billion plant in Chandler that will employ 1,000 and First Solar's $300 million factory in Mesa that will employ 600.

These are quality jobs in growing industries, the kind that create spinoff work for local suppliers and spread economic benefits across the Southeast Valley.

First Solar ...

acres with an option for 100 more on the former General Motors Desert Proving Ground. Its location — at Elliot and Signal Butte roads, northwest of Phoenix-Mesa Gateway Airport — is significant. The factory could serve as a catalyst for similar development in an area that is projected to become one of the state's largest employment centers.

First Solar could one day employ 4,800 people on the site, making it slightly larger than Boeing's Mesa campus and the city's largest private employer.

Future phases will be ... size. But the solar industry is rapidly expanding in the Southwest, and unlike other factories in the region, the Mesa plant is not simply assembling components that were manufactured overseas.

It will have the capability to turn a raw piece of glass into a finished product in 2½ hours, a state-of-the-art process that will likely involve significant research and development. That should boost the demand for highly skilled engineers and create additional opportunities to partner with researchers at ... have gone anywhere to build its plant. Competition from New Mexico and Texas was particularly fierce.

Yet, unlike several years ago, when Southeast Valley cities gave away millions of dollars to encourage retail development, Mesa snagged the plant without offering tax breaks or other traditional incentives.

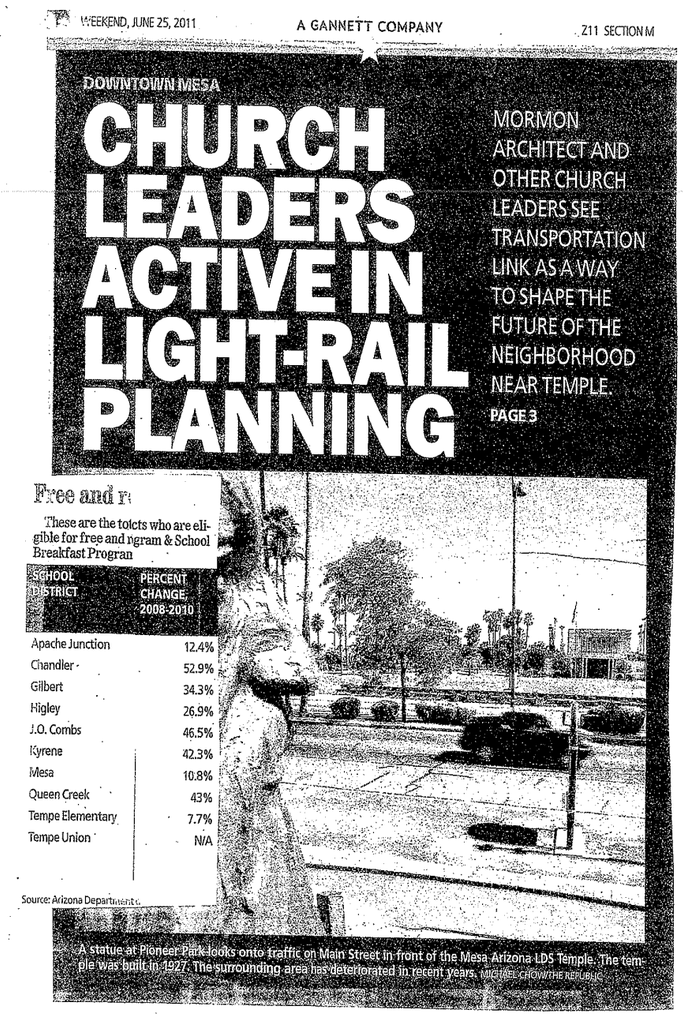
It didn't need them. Company officials said they chose the city because of its location, its shovel-ready site and its willingness to expedite the construction pro- ... er-chip manufacturing lines.

That doesn't come by accident.

Chandler and Mesa spent years planning for these uses, conducting engineering studies, granting land entitlements and setting cash aside to widen roads and extend water and sewer lines. They were ready to strike when opportunity came their way.

It's been said many times on these pages that cities should use this economic slowdown to prepare for when ...

Code	Comment Document



WEEKEND, JUNE 25, 2011 A GANNETT COMPANY Z11 SECTION M

DOWNTOWN MESA

CHURCH LEADERS ACTIVE IN LIGHT-RAIL PLANNING

MORMON ARCHITECT AND OTHER CHURCH LEADERS SEE TRANSPORTATION LINK AS A WAY TO SHAPE THE FUTURE OF THE NEIGHBORHOOD NEAR TEMPLE.

PAGE 3

Free and r

These are the tolcts who are eligible for free and ngram & School Breakfast Progran

SCHOOL DISTRICT	PERCENT CHANGE 2008-2010
Apache Junction	12.4%
Chandler	52.9%
Gilbert	34.3%
Higley	26.9%
J.O. Combs	46.5%
Kyrene	42.3%
Mesa	10.8%
Queen Creek	43%
Tempe Elementary	7.7%
Tempe Union	N/A

Source: Arizona Departments

A statue at Pioneer Park looks onto traffic on Main Street in front of the Mesa Arizona LDS Temple. The temple was built in 1927. The surrounding area has deteriorated in recent years. MICHAEL CHOW/THE REPUBLIC

With a group of MajorsSmith Mesa Mayor met with President Obama June 19,2011, Smith referred to our air as "dusty. "Federal Bureaucracies stifling investment". With Trailer Parks in citiy centers, these developers get help building on the city edges.

"It's a little unnerving when the president looks at you right across the table and says, 'Scott, tell me what's happening in Mesa'," Smith said.

Smith used the opportunity to tell Obama that overreaching federal bureaucracies are stifling local investment.

As one example, he cited the Valley's long battle with federal bureaucrats who have threatened sanctions over our dusty air.

Code	Issue	Response

Code	Comment Document

VALLEY METRO

101 N. First Avenue Suite 1100 Phoenix, AZ 85003
ValleyMetro.org T 602.262.7433 F 602.523.6099 TTY 602.251.2039

March 8, 2011

Mr. Richard T. Tracy, Sr.
2238 S. Cottonwood
Mesa, AZ 85202

Dear Mr. Tracy:

Thank you for your inquiry on the LINK bus route. According to your recent correspondence, I have provided the information that you are seeking. The Mesa Main Street route travels between Superstition Springs Transit Center and the Sycamore Station on Main Street to meet the light rail service.

"Cost of operation including equipment purchase for the first year of operation of the double buses for the Main Street Route. I would also like to receive the cost of operation and riders for the period of August 2010 and January 2011."

Equipment purchase: Each bus costs $756,305 for a total of 10 buses and will operate for an average of 10 years each.

December 28, 2008 - June 30, 2009: 187,291 miles x $5.25* per mile = $983,277
July 1, 2009 – June 30, 2010: 362,187 miles x $5.11* per mile = $1,850,775
August 2010 - January 2011: 152,293 miles x $5.30* per mile = $807,153
*These figures are based on fiscal years as that is when rate costs change.

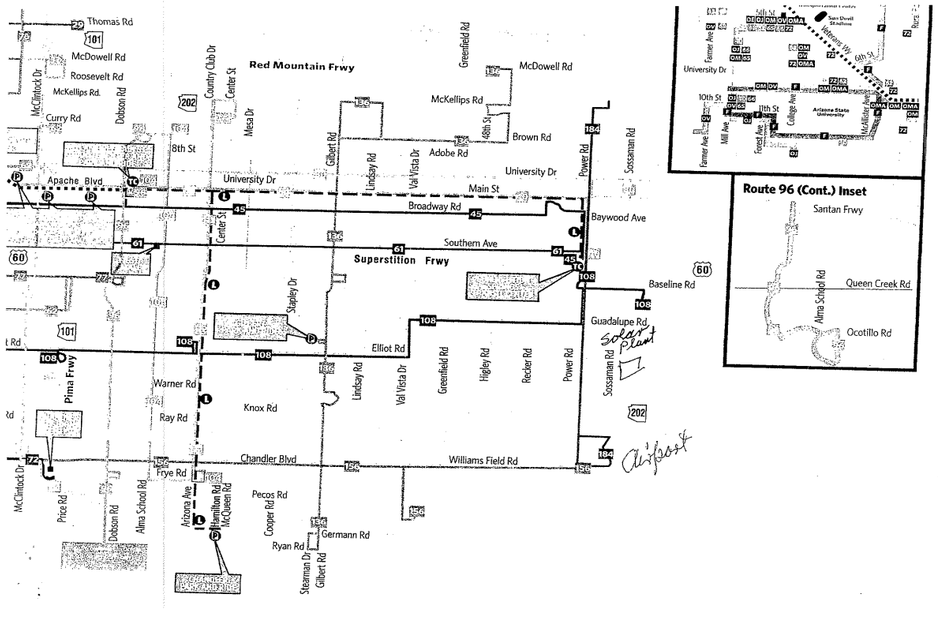
Ridership 2010	Average Daily Passengers
August	1,238
September	1,174
October	1,127
November	1,315
December	1,218
January 2011	1,361

We hope that you find this information helpful.

Sincerely,
Susan A. Tierney
Public Information Officer

Code	Issue	Response

Code	Comment Document



Code	Issue	Response

Code	Comment Document

are accessible to persons with disabilities. Any individual who requires special assistance, such as a sign language interpreter, to participate in a scoping meeting should contact Jodi Sorrell, City of Mesa, 600 SE Sixth Street, Mesa, AZ 85211 (Telephone 480-644-5541) at least 48 hours in advance of a meeting in order for METRO and the City of Mesa to make the necessary arrangements.

In addition, a scoping meeting will be held for governmental agencies as shown:

Tuesday, Aug. 21, 2007 at 10:00 a.m.
METRO

involvement will be provided throughout the study process as discussed in the Public involvement section of this document.

This scoping information booklet has been developed to provide information about the scoping process itself, the background information leading to the need for the study, the project development process, the initial alternatives being considered, the environmental impact and financial analysis processes, and opportunities for public involvement. METRO and the City of Mesa welcome your participation to help identify important issues and to bring fresh ideas and suggestions to our attention. We encourage

FIGURE 1: REGIONAL TRANSPORTATION PLAN TRANSIT CORRIDORS

Mesa wrangles with how to pay for light rail

1.1-mile segment's cost ranges from $20M to $40M

BY JASON EMERSON
TRIBUNE

Pressured to move along with plans to build about a mile of light-rail line on the city's western border, Mesa officials have yet to figure out how to pay for it.

The project moved forward last week when Valley leaders on the Regional Public Transportation Authority voted 6-1 to begin looking for an engineering firm to build the system. Mesa Mayor Keno Hawker cast the dissenting vote.

While Hawker, who represents Mesa on the authority, favors building a 1.1-mile segment from the Tempe border to the East Valley Institute of Technology at Longmore and Main Street, said he wants his full council to vote on it, he wants to know how much it will cost and he wants to know who will run the rail system.

"I would like to see some of those (questions) answered," Hawker said Monday. "And I'm not going to move forward on my vote until I'm sure the council is supportive," he said.

The City Council will discuss the light-rail project at 7:30 a.m. Thursday in the council chambers, 57 E. First St. A formal vote is expected sometime during the next two months, said City Manager Mike Hutchinson.

Plans call for 20.3 miles of rail to run from 19th Avenue and Bethany Home Road in Phoenix through downtown Tempe, ending about a mile into Mesa. Total cost is estimated at about $1 billion.

Some officials worry that if Mesa backs out of the project, it would wreak havoc with the schedule.

"It would probably cause a delay," said Jack Tevlin, Phoenix's deputy city manager.

Tevlin points to the project's lengthy environmental study, which was done based on a 20.3-mile system. If the track is shortened because Mesa backs out, a new study might have to be done, he said.

Tevlin met with each Mesa City Council member in late March to extol the merits of light rail.

"Phoenix realizes that without us, they'll have to redesign the project," said Mesa City Councilman Bill Jaffa.

Others are concerned that if Mesa backs out, Tempe may shorten its segment. Instead of extending the track to Mesa's border, which currently is planned, Tempe may cut costs and stop the rail at McClintock Road or Mill Avenue, officials said. Tempe Mayor Neil Giuliano could not be reached for comment.

'I would like to see some of those (questions) answered. And I'm not going to move forward on my vote until I'm sure the council is supportive.'
KENO HAWKER
Mesa mayor

Mesa is being asked to commit up to $40 million to build its segment at a time when the city is facing a $33 million revenue shortage for fiscal year 2002-03.

In the past, Hawker has estimated the system would cost Mesa $40 million, but Monday he revised his estimate to $30 million. The new number is based on the information that Mesa's segment will be 1.1 miles instead of 1.5 miles, Hawker said. Wulf Grote, the project director, has said Mesa's share will be about $20 million.

Some federal money might be available to reduce Mesa's cost, Tevlin said. The federal government is expected to pay about half the cost of building the system.

Code	Issue	Response

Code	Comment Document

Cold, dry weather contributing to bad air quality

DIRTY AIR
Continued from B1

themselves outdoors. The ADEQ says the air could get bad enough to make Saturday a high-pollution advisory day.

The advisory, and predictions about more to come, are based on air-monitoring data and weather forecasts.

This is a La Niña year, meaning equatorial waters in the eastern Pacific Ocean are colder than usual.

That leads to a dry, cool winter in the western United States — the exact conditions which trap winter-dust pollution in the Phoenix area.

"We anticipate a dry, stagnant weather season, and expect to see a high number of high-pollution advisories. There is a potential for a record year," county Air Quality Department spokeswoman Holly Ward said.

When winters are warm and wet, rain and wind washes away the brown cloud.

But when high-pressure ridges settle in, air is trapped. In summer, an air bubble as high as 10,000 feet collects ozone. But in the winter, cooler air drops the bubble below 5,000 feet.

"It's like a lid on top, the air doesn't mix," said Paul Iniguez, a meteorologist with the National Weather Service in Phoenix.

"Long term, we are trending toward a lot more high-pressure ridges holding over the Valley, trapping the high pollution in," said ADEQ spokesman Mark Shaffer.

The period between Christmas and New Year's Day is expected to be the worst of it, Shaffer said.

That's because the most severe pollution this week has come from fine particles, called PM-2.5 because they are smaller than 2½ micrometers in diameter. Smoke is a key contributor and with many people home for vacation, more home fires will be burning.

But the county faces another longer-term challenge from coarse, PM-10 dust, which is as large as 10 micrometers, or one-seventh the width of a human hair.

This fall, the U.S. Environmental Protection Agency told local officials that regional plans to reduce PM-10 by 5 percent were inadequate and would be rejected next month.

That starts a lengthy process that jeopardizes some federal-transportation funding, and ultimately could result in all such funds being withheld from local projects.

Next month, the county is set to clamp down on one source of the 73,000 tons of coarse dust that blows through the Valley: off-road vehicles.

Off-road vehicle fans could face stiff fines next year if a proposed county ordinance takes effect to limit driving in certain areas.

On Wednesday, the Maricopa County Board of Supervisors set for Jan. 12 a public hearing to change existing law.

The county bans all off-road driving on unmarked trails in unincorporated areas, but the new rules impose increasing fines, rather than cite first-time violators with a misdemeanor. Fines would start at $100 and climb to $250.

The proposed law says: "Vehicles in operation on either unpaved public or private properties in the unincorporated areas of Maricopa County shall remain on roads or highways."

Off-road enthusiasts can drive on unpaved trails only when they have written permission from a private landowner, or on public lands where trails are clearly marked by signs or on official websites.

Private-property owners are allowed to drive their off-road vehicles on their properties, but only if they limit the dust they kick up, apply for a dust permit or otherwise comply with other county dust-pollution laws.

The county also plans to tweak a separate law that regulates parking on unpaved lots in urban parts of the county. Violators could face fines starting at $50 and climbing to $250.

The county Air Quality Department has not issued any violations under the existing off-road vehicle law, enacted in 2008.

Law enforcement agencies have been tapped to warn off-roaders to not drive during high pollution days.

Likewise, in the last two years, the county has issued no citations under its leaf-blower or fireplace ordinances, but has warned 16 and 27 violators, respectively, said Ward.

County inspectors rely on calls from the public to enforce bans on wood-burning, leaf-blowing and off-road driving, Ward said.

Ward encourages the public to visit www.cleanairmakemore.com to check on current health advisories and anti-pollution restrictions or report violations.

Code	Issue	Response

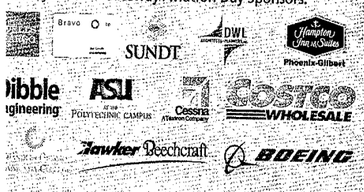
Code	Comment Document

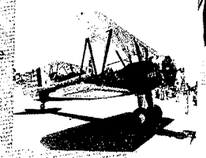
Gateway Aviation Day Sets Attendance Record

An estimated 10,000 people attended Gateway Aviation Day, presented by Wells Fargo Bank, on Saturday, March 12 to see aircraft and meet with Airport tenants and personnel. Previously known as the Airport Open House, the event was canceled the past two years due to budgetary constraints. However, thanks to corporate sponsors, the event returned and plans are now underway to host the event next year on Saturday, March 10, 2012.

"We had a good showing of aircraft on display," said Patrick Oakley, community relations coordinator and event planner. "We're grateful for the support of the U.S. Military and local aircraft owners for sharing their aircraft and love of aviation with the community. I hope to see everyone out at Gateway again next year."

Thank you 2011 Gateway Aviation Day Sponsors:





Gateway Airport Brings $685 Million to Local Economy

The Phoenix-Mesa Gateway Airport helped generate $685 million in economic benefits last year, and supports more than 4,000 jobs in the region. That's according to a new study from the W. P. Carey School of Business at Arizona State University, which looks at how the airport contributes to the local economy.

The study examined the direct spending from both on-airport activity and air visitors' activity off the Airport for fiscal year 2010. That summed up to $378.5 million. When added together with the successive rounds of re-spending that money, the total came out to $685 million for the fiscal year.

"A well-functioning airport serves as a portal that welcomes commerce and visitors into the region," says research Professor Lee McPheters, Ph.D., who headed up the study on behalf of the L. William Seidman Research Institute at the W. P. Carey School of Business. "Compared to just two years ago, visitor spending from travelers arriving at the Phoenix-Mesa Gateway Airport is up by more than 80 percent. These air visitors alone spent more than $68 million last year, and that created more than 1,000 local jobs."

In his analysis, McPheters describes how the airport truly benefits not only the rapidly growing East Valley area, but also Maricopa and Pinal counties overall. Here are some specific details:

- Forty-four employers and 1,145 jobs are at the airport.
- About 212,000 visitors arrived at the airport in fiscal year 2010.
- Air visitors spent $68.9 million off the airport in the fiscal year, supporting 1,024 jobs.
- Capital improvement and construction projects at the airport were valued at $36.4 million and created employment for 259 workers in fiscal year 2010.

The numbers are especially impressive when you consider all of this happened during one of the worst times recorded in Arizona's economic history.

PhxMesa **Gateway** Airport

GatewayArrivals is a publication of Phoenix-Mesa Gateway Airport. For inquiries, please contact Tiffany Johnson at (480) 988-7606 or tjohnson@phxmesagateway.org.

Code	Issue	Response

Code	Comment Document

Code	Issue	Response

OUR VIEW

Plenty of ideas for Fiesta District but no action

Mesa's Fiesta District needs help. This is nothing new.

The area near Alma School Road and Southern Avenue used to be the Southeast Valley's shopping epicenter. Now, its shopping centers are mostly empty and fighting disrepair.

Chandler Mayor Jay Tibshraeny, who owns an office nearby, recently tweeted that the Fiesta District "needs some attention from the city."

That's a recurring theme on the iMesa website, where residents can suggest and vote on ideas to improve the city. "Fix the corner of Southern and Alma School; it's the anchor of urban blight in the city," is currently the fourth-most-popular idea.

Both have a point. Given how interconnected our neighborhoods and economies are, blight in such a prime, central location is bad news for Mesa and the Southeast Valley.

So why is the city stinning its wheels?

It's not for a lack of

The Mesa Fiesta shopping center is empty but well-kept, a re
the bustling shopping destination that the city's Fiesta Distri

Where did that $500,000 go. The following week the 3:1 election loser, majority of committee Transportation Boss was 1.55 mile short

2nd light-rail extension studied

By Gary Nelson
The Republic | azcentral.com

Long before tracks are laid for Mesa's next leg of light rail, the city is doing early spade work on an additional two miles of the line.

The first light-rail extension, 3.1 miles from Sycamore Street to about Mesa Drive, is scheduled to open in 2016, provided federal and county money is available as promised.

It is seen as a likely catalyst for redevelopment along Main Street, the western stretches of which are marked by numerous empty storefronts.

But Mesa has said for years that ending the line near Mesa Drive doesn't make sense, transportationwise. Pushing it to Gilbert Road, planners say, would greatly increase ridership by giving far more people easy access to the trains.

So far, that idea has been nothing but talk.

On Monday night, however, the City Council is likely to approve spending $500,000 to do early planning for the extra two miles. Mesa will contract the study with Valley Metro Rail Inc., which in turn will hire HDR Inc. to conduct the study.

HDR did much of the planning for the Mesa Drive extension, which is now being designed.

Mike James, Mesa's transportation director, said the study will assess how much the extra tracks will cost, funding sources and issues for future environmental assessments.

In a report to the council, James also said the study "involves identifying station locations, street configuration, significant utility relocations" and necessary support facilities.

Public input would be part of the process.

Money for the study became available, James said, through one-time savings in this year's transportation budget.

The Maricopa Association of Governments has approved the Gilbert Road extension as a future project, but there is no commitment for funding from the Proposition 400 county street and rail sales tax that county voters approved in 2004.

Federal funding is equally uncertain because of Capitol Hill budget battles.

Even Mesa leaders know the light rail will dead end at Mesa Drive. But there will be an old Steam Engine there, No Rest Room along the whole empty line.

Fiesta Mall whose people will go has been written off by Major Smith, none deceiving in his answers to our protest. Even in the Rosie Bottom.

Code	Comment Document

Code	Issue	Response

THE REVERSE SIDE SHOWS CHANDLER WITH MANY NEW BUILDING THAT ARE EMPTY. IF SOUTH MOUNTAIN FREEWAY IS BUILT IT WILL PREVENT AN EFFECTIVE BY-PASS OF THE BROADWAY CURVE AND THE COMMERCIAL BUILDING THAT WILL TAKE PLACE ON THE TAX FREE RESVERATION WILL FURTHER DAMAGE THE SOUTH EAST BUSINESSES.

OPINIONS

MESA REPUBLIC

A11 FRIDAY, JUNE 10, 2011

VP/GENERAL MANAGER: Michael Ryan, 602-444-5810
OPINIONS EDITOR: Joanna Allhands, 602-444-7772
OPINIONS WRITER: Cindy Hernandez, 602-444-7748

SEND A LETTER: e-mail your thoughts to se.letters@arizonarepublic.com. Include your name and city of residence with your response.

OUR VIEW

ADOT right to move ahead on freeway

News from the Gila River Indian Community regarding the South Mountain Freeway is that there is no news. The Tribal Council has yet to vote on whether the freeway can be built on the reservation.

Fortunately, the freeway's reality does not hinge on that decision alone.

The Arizona Department of Transportation is studying the environmental impact of the Pecos route in Ahwatukee Foothills, a plan that has been on the books for decades. The draft should be complete by the end of the year and then

South Mountain Freeway would ease traffic on I-10. It would connect Chandler and Laveen, and complete the Valley's Loop 202. Commuters have been looking forward to the convenience of using the freeway to bypass congested downtown Phoenix.

Tribal leaders' willingness to study the freeway was a welcome first step to moving it from Pecos to spare a church, homes and parts of the South Mountain Preserve. As undesirable as that would be, an Ahwatukee route is still a possibil-

)OT has bought homes on that route, has upset opponents of the Pecos ment, particularly because the tribe greed to study the freeway. But the is obligated to proceed with its plan ve the greater good.

nade sense for ADOT to buy homes own economy rather than use emi- lomain or buy in a robust real-es- arket if discussions with the tribe

bute on tribal land is the ideal out- as those leaders know. If a deci- omes about in time to build there, it be welcome. But the state can't s plans for that news. The South ain Freeway is too important to the

SUNDAY, JANUARY 31, 2010

Ties to land hound DiCiccio

Critics say councilman's advocacy on freeway extension represents a conflict

By Sean Holstege and Scott Wong
THE ARIZONA REPUBLIC

The proposed South Mountain Freeway has defined Sal DiCiccio's return to politics.

A year ago, the Phoenix real-estate broker filled a vacancy on the City Council, reclaiming the seat he held a decade earlier. Ever since, he's championed moving the planned Loop 202 extension south from Ahwatukee Foothills to the Gila River Reservation.

To supporters, DiCiccio is working to find the best outcome for his Phoenix constituents. Opponents say his development deals along the freeway blur personal and public matters and represent a conflict of interest.

The Arizona Republic took a closer look at DiCiccio's possible stake in the planned 22-mile freeway, examining city financial forms and court records, plus letters, e-mails and other documents obtained under a public-records request. The picture that emerged shows that DiCiccio:

» Benefited financially from a business partner's purchase of land that was resold to the state for the proposed South Mountain Freeway. The purchase, which *The Republic* uncovered in records, allowed the business

See **DICICCIO** Page B7

Sal DiCiccio returned to city politics last year.

Code	Comment Document

MAG Celebrates Native American Participation, Contributions to Region

MAG's membership includes three Native American Indian Communities: the Fort McDowell Yavapai Nation, the Salt River Pima-Maricopa Indian Community, and the Gila River Indian Community. The leaders of these tribal nations serve on the MAG Regional Council and bring the voices of their communities to the regional table. To celebrate their continued contributions to our region, MAG is presenting the second in a three-part series, this time focusing on the Salt River Pima-Maricopa Indian Community (SRPMIC).

SRPMIC President Diane Enos

Salt River Pima-Maricopa Indian Community

10005 E. Osborn Rd.
Scottsdale, AZ 85256
480-362-7400
www.srpmic-nsn.gov

Two Tribes, Two Cultures, One Home

The history of our people, the Pima and Maricopa, tells a story richly woven within legend and fact. Our traditions tell us that both tribes have always lived in the Southwest, settling in the Phoenix Valley of Arizona. Our presence here today is proof of the unbroken continuum that began with the Creator, was passed down to our ancestors, and is now held by us.

With two distinct backgrounds and cultures, the Salt River Pima-Maricopa Indian Community comprises two Native American tribes: the Pima, "Akimel O'odham" (River People); and the Maricopa, "Xalychidom Piipaash" (People Who Live Toward the Water). Surrounded by the cities of Scottsdale, Tempe, Mesa and Fountain Hills, the Salt River Pima-Maricopa Indian Community is a rural oasis encircled by urban growth.

Growth is also abundant in our Community: our population now has reached 9,000 enrolled members, with half under the age of 25. Our diverse economic base is also generating many business opportunities for our members and for the region, with exciting projects taking shape in our Community.

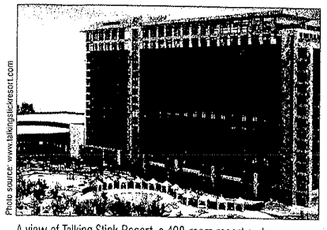


Photo source: www.talkingstickresort.com

A view of Talking Stick Resort, a 498-room resort and spa, scheduled to open in spring 2010.

Two Tribes: New Opportunities

Over the past century, our Community has been enveloped by urban sprawl. With this sort of growth, we have seen remarkable changes, faced challenges and embraced opportunities for our people.

As farmers, our ancestors built elaborate canal irrigation systems in the Salt River Valley. Today, the Salt River Pima-Maricopa Indian Community has diversified holdings. Besides two successful gaming operations and a golf club, the Community operates a cement plant, a real estate development company and a telecommunications enterprise that has wired the Community with Internet service.

Our newest venture: Talking Stick Resort, a 498-room resort featuring luxurious accommodations, 100,000 square feet of meeting space, a state-of-the art spa and a cultural arts center. The resort will open in spring 2010 adjacent to our new Casino Arizona complex, featuring several upscale restaurants, entertainment lounges, a showroom and a wide variety of gaming options.

Our Community is also embarking on a new project: a $100 million spring training facility for the Arizona Diamondbacks and Colorado Rockies major league baseball teams. The 11,000-seat facility, scheduled to open in early 2011, will be the first professional sports facility ever built on Indian land.

Two Tribes: A Shared History

With this tremendous growth, we build for our future. But our Community is also dedicated to preserving our past.

The Pima consider their ancestors to be the "Huhugam," a people who created an advanced society in central Arizona from about A.D. 300 to A.D. 1200. The word "huhugam" translates as "those who have gone before." Archaeologists refer to the Huhugam as the Hohokam.

The ancestors of the Maricopa are the Patayan, who lived in what is now northwest Arizona. The Maricopa originated from the Parker/La Paz area as five separate groups of people. Over years

Continued on page 9

Code	Issue	Response

Code	Comment Document

Dec. bankruptcy filings soar 67% over year earlier

BANKRUPTCY
Continued from B6

down," said bankruptcy attorney John N. Skiba of law firm Jackson White in Mesa. "I don't want to run into a bankruptcy a week or two before Christmas and, besides, (filing) cuts off credit-card use," he said.

But those traditional seasonal — everyone's feeling the pain," a loss of job," he said. "They had been trying to hold on putting it all on credit cards but just couldn't do it anymore."

With so many people filing for bankruptcy, the stigma has diminished, said Kevin Gallegos, a vice president at Freedom Debt Relief in Tempe. "Doctors, lawyers, people in lower senior-management jobs and for 2009 as a whole.

Chapter 13 debt-repayment plans accounted for most of the

Nationally, consumer bankruptcies increased 32 percent in 2009 compared with 2008, according to the American Bankruptcy Institute, relying on data from the National Bankruptcy Research Center.

Overall, consumer filings jumped to nearly 1.41 million

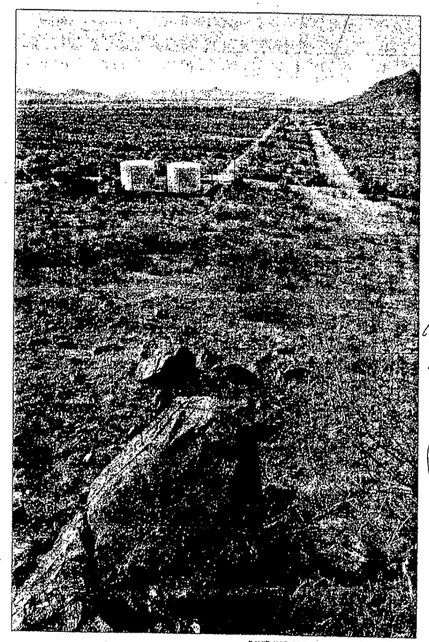
Valley bankruptcies top 25,000

Bankruptcy filings in metro Phoenix finished 2009 at 25,104, representing a gain of nearly 82 percent over 13,817 in 2008.

Monthly bankruptcy totals:

Loop 202 could find a new path

Tribe's offer may spare S. Mountain, Ahwatukee



DAVID KADLUBOWSKI/THE ARIZONA REPUBLIC

Current plans for a Loop 202 extension call for a 22-mile route that cuts through this land and slices through a ridge in South Mountain (top right). The Gila River Indian Community has agreed to talks on moving the proposed freeway onto tribal land instead.

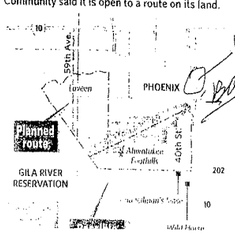
By Sean Holstege, Scott Wong and Cathryn Creno
THE ARIZONA REPUBLIC

The controversial South Mountain Freeway could move onto tribal land if recent behind-the-scenes negotiations gather momentum.

The Gila River Indian Community, which long has opposed the Loop 202 extension through its land, has agreed to start what could be delicate talks toward reaching a pact to move the proposed freeway. That first step would involve the tribe asking the state for a formal proposal to build the freeway south of the current

South Mountain Freeway

In recent negotiations, the Gila River Indian Community said it is open to a route on its land.



Code	Issue	Response

Code	Comment Document

Think Slip

Our stand: City Council should tell Donald Trump to move it or lose it

Three words from the City Council tonight could define the future of Phoenix:

"Donald, you're fired."

Barring legal delays and maneuverings, the council faces two basic choices at City Hall this evening: reaffirm its longstanding respect for the quality and vitality of our city's neighborhoods, or bow to New York developers by approving Donald Trump's proposed $200 million condominium/hotel project in the Camelback East corridor.

The choice is clear: The council should support homeowners and reject Trump's plan for a 150-foot high-rise on the site of the old Hard Rock Café.

In the face of neighborhood protest[s] project's height has been whittled fr[om] 190 feet to 150 feet. But even at 150 f[eet] condo/hotel is still about three times [the] lowable height in this area — 56 fe[et].

The revised condo/hotel at 26th S[treet] and Camelback Road also juts clo[se] neighbors to the south, a setback [that] amounts to a final indignity to re[si]

For all its trendy and upscale [ap]peal, Trump project is in the wrong lo[ca]tion.

A project of this height and d[en]sity belongs in downtown Phoenix, alo[ng] Central Avenue, or several blo[cks] west along Camelback, where there'd be no widespread neighborhood opposition.

In both of these alternatives, there would be easy access to Phoenix's planned light-rail line.

It's understandable why Trump, in partnership with the New York-based Bayrock Group, wants to capitalize on the site he gained control of in bankruptcy court.

The area around 24th Street and Camelback Road is Phoenix's fledgling answer to New York's Fifth Avenue, Beacon Hill in Boston and Chicago's Michigan Avenue.

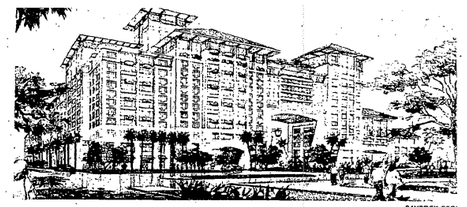
Many area homeowners, however, worry about living literally in the shadow of the Trump hotel and future high-rise buildings. They want to preserve their neighborhood's

Didn't the Arizona Republic and Coldwater Tram[s] and remaining mountain views.

[D]evelopers is nothing new [to] The Coyote Team in Bankruptcy may leave the area. Not unexpected since those controlling public opinion and governing [the] property use evolution with the religious theory rule location, location, location. There are so many that confuse the successful theory of [the] occupy the former Los Arcos mall site for the good of the same title. A caring person would have allowed the Hockey team to [re]locate at the Tempe location. They knew the Airport safety claim was false. Metropolitan Phoenix has been allowed to [re]main Councilman [a] major, costly taxpayer supported errors. You know what they have been and who has been responsible remember. The light [rail] show in the landing flight path, the Grand Prez race downtown, Patriot Square loss and emptied Civic Plaza to support the [Fi]esta Bowl. Suns basketball team owners. In Mesa, Bartley's Brake Shop stepped urban renewal. Central Phoenix has four hundred's significant ca[se]s and Camelback East Specific [a] thousand dollar, twelve hundred square feet sixty year old homes on a quarter or half-acre that should contain a fourplex at [the] least. That would provide the density needed in a BIG City. Poor plan more failures to come, only bigger, more expensive, spreading urban [de]cay in its wake. Repeating Los Angeles' failures. Proper symbol, not a raising Phoenix Bird, Rather an erupting volcano, spreading urban [de]cay in its wake.

With no opportunity to contest the proposed Light Rail extension east and west beyond that voted by taxpayers, [it] includes a residen[tial] Unaccountable politicians picked future lines with the least potential. Two main sheets in towns that refuse to enter the [Re]gional Twentieth Century. Mesa's Main Street area is Heritage, low-density. To the east are large trailer parks, retirees and [it] is poor public pol[icy] "Snowbirds" populate the area. It seems deserted six months out of the year. The growth and industry there all south. North [to] Lets try to get it right next time. Leave politics out of the Public Transit decision process. These Errors wasted billions [of] lies the Salt River and Indian reservation. Downtown Glendale would not change; urban sprawl is miles to the south and west. [a] subterranean [de]mand to the city's [es]sential to the city's [of] its Scottsdale Fastun[g] life.

How Phoenix even got to this p[oint]



BAYROCK GRO[UP]

A five-story arch is a key design element in Donald Trump's proposed condo-hotel on Camelback Road in Phoenix. This is the west-side view of Trump International Hotel & Residences.

JOHN SEVERSON/THE ARIZONA REPUBLIC

Signs representing neighborhood reaction from both sides showed up on residential streets just south of Camelback Road.

garding Trump's project is a shameful reflection on its "planning" process.

Last Wednesday, the city's planning commission tackled this long-postponed project at 10 p.m. in what turned out to be a chaotic three-hour meeting. At 1 a.m., the commission gave Trump and associates its unanimous blessing, ignoring recommendations [from] the urban village planning committee [on] height limit.

[Su]pporters have [ha]d radio spots [by] attorneys for [their] councilman Councilman [Ma]yor Phil Gordon, [who] sent, from vot[ers] of interest. This is [the] East Specific [Plan] hundred's significant ca[ses] more than 5 mil[lion] includes a residen[tial] the plan for the [Ci]ty is poor public pol[icy]

[Th]e City Council to take [a] demonstrate that [es]sential to the city's [life].

Code	Issue	Response

Code	Comment Document

IS ARIZONA DESERVING OF BEING CALLED THE WORST PLACE IN THE NATION TO LIVE? ARIZONA COURTS DELIBERATELY KEPT A "SYSTEM IN CRISIS" TO PROMOTE BUSINESS FRIENDLY ARBITRATION AND MEDIATION, AVOID PEERS JUDGEMENT

ARIZONA ONE OF THE FEW STATES TO IMPOSE MANDATORY ARBITRATION RULED OPPRESSIVE SINCE 1862. Conscription of attorneys regardless of legislative intent approved. Mandatory attorney fees even if successful highest sanction in the nation.Arizona again in the minority,junk science admissible, Daubert and Kumho Tire Co.fair standard only in Federal Court.

Photo Radar barred as scam in several states and cities after investigations. Speed Reasonable and Prudent can mean arbitrary standard. Location of red light photo radar altered when income drops. One second increase in yellow light reduces violations 50%, Company claims foul.

Open Court provision deleted in favor of mandatory secrecy and sealed records. Trend to distribute judges work load reversed by eliminating commissioners in a system which has judges doing clerical tasks, mandatory sentences places discretion in the prosecutor rather than impartial judge, Distortion and manipulation by some lawyers to maximize hourly fees ignored .

November 30,2001 the national, not local news reported that Arizona was rated as," ONE OF THE WORST PLACES TO LIVE IN THE COUNTRY." The list to the right is only part of the reason and does not include the lack of access to courts or reasonable legal fees. Business interests and the local media have worked to require almost all civil cases to be submitted to arbitration or mediation where the average citizen is not able to get fair treatment. To make it impossible to get justice they now want to keep lawyers and the law out of the Justice Court and make justice available only in Superior Court, down town Phoenix. Although one of the most expensive legal systems it is not functioning to benefit the public; they are not represented , money is all that matters lobbyist make the rules in the legislature and the courts.

In 1972 having practiced law in New York and Ohio and spending a year reviewing cases at the Supreme Court I pointed out that there were judges doing clerks jobs and no intermediate court to process most disputes quickly and economically. Since then the population has doubled, number of Superior Court judges,tripled. Arbitration and mediation and secret proceeding almost exclusively in Maricopa County rather than comply with the Constitution.

Washington based attorneys,Sellers and Malveaux, in the Green Tree vs Randolph case that recognized that an arbitration agreement that would impose large costs on a party opposed to it or who lacks power to bargain over terms may be unenforceable and/or unconstitutional. Denying following rights ordinarily available to citizens of other states:

The provisions for a jury trial when seeking legal relief;
The provision for a public forum in which to litigate a controversy;
The right to a public forum,thereby avoiding large expense to gain access to a forum.
The provision for a written record of litigation.
The right to have the proceedings reviewed on appeal
The right to discovery and to present relevant evidence;
The right to bind the forum to the legal precedent prevailing.

ARIZONA'S RANKINGS

(All statistics from articles in the Arizona Republic many ar the direct result of that papers leadership)

3rd Worst State to Raise A Child

CRIME

4th highest in overall crime,highest in auto theft,highest i deaths by gun.In 2000, received a grade of D by Handgu Control Inc. in annual survey on how well states protec children from violence.One of 20 states that does not strictl regulate jail standards. Due to low salaries, one of th highest turnover rates for correctional officers

HEALTH

2nd worst to provide jobs with health insurance. Childre without health coverage is one of highest in the nation 10t highest infant mortality rate.Tied with Nevada for highest i the nation for teen suicide and divorce.Among seven state to provide the least adequate supervision of insurance companies

7th highest in nursing home residents who suffer untreatec pain.Lowest in funding mental health.Below the natior average in spending to battle effects of drug, alcohol and cigarette abuse. Very poor oversight for day-care centers because of 2,500 licensed facilities, there are only 2E inspectors

EDUCATION

One of the lowest for per-pupil funding in public education,In an Arizona poll, voters gave schools a grade o C minus.On average, teacher salaries are $5,000 lower than national median.3rd lowest in school counselor-student ratios.One of seven states to try and remove evolution from school science

Tied with Nevada for the lowest rate of high school graduation in the nation.Highest truancy rate in nation.

3rd highest teen pregnancy.Tops in nation for availability of charter schools, ease of home schooling, access to voucher and level of payment for private school expenses

ECONOMICS

2nd highest disparity in family income between most affluent and poorest. 4th worst poverty rate. 13%of Arizona households in need of food assistance, compared to 10% nationally.2 million Arizona residents pay over half of monthly income for housing. Arizona Salaries among the lowest in the nation

ENVIRONMENT

3rd highest in toxic releases into the atmosphere.'F' for ozone, among worst places in nation for summertime pollutant.Four Arizona national parks are among the nations' most dangerous:

Organ Pipe Cactus, Saguaro, Grand Canyon and Lake Mead

AUTO INSURANCE - SAFETY

Arizona crash rate 12% higher than national average,fatality 33% higher, 30% uninsured,insurance pool to level costs lacking, rebates increases auto glass replacement costs,

POLITICAL CONTRIBUTIONS AND ELECTIONS

3rd lowest in contributions to Democratic candidates, frequent elections, contests rare, seldom have two viable candidates,15 to 30% voter turnout common in local elections.

Code	Issue	Response

Code	Comment Document

ILLEGAL IMMIGRATION

July 2011

John Birch Society's new battle

Group's leader to discuss migrants' 'invasion' of U.S. during speech in Mesa

By Gary Nelson
THE ARIZONA REPUBLIC

After more than 50 years of battling communists, the John Birch Society is adding a second front to its ideological war: illegal immigration.

And it has allies among the "tea party" movement and others who believe illegal immigration is just one part of a vast conspiracy to destroy the United States as we know it.

The Birch Society, the East Valley Tea Party Patriots and others will join tonight in Mesa to hear the society's president, 75-year-old John McManus, expound on the perceived threat.

His topic: "Stealing the American Dream: How Illegal Immigration Affects You." The event is scheduled for 6:30 p.m. at Burke Basic School, 131 E. Southern Ave., Mesa; tickets are $7 at the door.

Bill Blewster of Mesa, a member of the Birch Society's national council, said his group is allied with the tea-party group, which

See IMMIGRATION Page B3

John Birch Society leader to speak

IMMIGRATION
Continued from B1

meets every Tuesday night at the school with about 75 to 100 participants. He said both organizations team with the National Center for Constitutional Studies, which was founded more than 40 years ago by conservative author and lecturer W. Cleon Skousen, a frequent visitor to Arizona and mentor of the late Arizona Gov. Evan Mecham.

Blewster said illegal immigration is an important issue to the Birch Society because it amounts to an "invasion" of the United States, which the nation is constitutionally authorized to repel.

"Mr. McManus has been on top of this issue for a long time," Blewster said.

He said illegal immigration is closely tied with efforts to forge stronger ties among Canada, the United States and Mexico, which the Birch Society believes are part of a campaign to create a North American union and destroy American sovereignty.

"That's where all this is leading to, a regional government," Blewster said. "That will totally do away with our Constitution, the Declaration of Independence, the Bill of Rights and the whole ball of wax."

Blewster said McManus is expected to outline the extent to which illegal immigration is harming the country and the Birch Society's proposed solutions, which consist of securing the border and enforcing existing laws, including Arizona's controversial Senate Bill 1070.

McManus himself is not without controversy stemming from his longtime membership in an ultraconservative religious group called the Slaves of the Immaculate Heart of Mary, which some consider to be anti-Semitic.

One former Birch staffer, William N. Grigg, claims on his blog that McManus "has spent decades promiscuously violating the JBS's standards and principles regarding anti-Jewish bigotry," citing McManus' involvement with a "deeply authoritarian para-Catholic cult founded by unabashed anti-Semite Leonard Feeney."

McManus has denied accusations of anti-Semitism, and Blewster said the Birch Society will not tolerate it, noting that some members are Jewish.

"We're certainly not an anti-Semitic group," Blewster said.

The Birch Society underwent an internal struggle in 2005 that resulted in a McManus ally being appointed executive director.

After that, former Birch members founded a new group called the Freedom First Society, which claims to adhere to the true teachings of Birch founder Robert Welch.

Code	Issue	Response

Code	Comment Document

Ariz. cities' economies fare poorly in report

By Betty Beard
The Arizona Republic

The economy in the Phoenix and Tucson areas ranked in the bottom fifth of the nation's top 100 metro areas in the first quarter, says a Brookings Institution report being released today.

That is based on four indicators: changes in the number of jobs, unemployment rate, economic output (gross metropolitan product) and housing prices. The time periods varied with each indicator and ranged from several months to several years.

After analyzing economies in the metro areas, Brookings concluded that the nation's recovery continues to be "uneven and unsure" with sluggish job growth, high unemployment rates, housing prices that hit new lows in all 100 metros and government layoffs that are making things worse.

The Phoenix area's rating, not surprisingly, was dragged down by its weak housing market. The Phoenix area, for example, ranked second to the Las Vegas area for having the most properties in or subject to foreclosure.

The rate is about 14.55 percent per 1,000 mortgageable proper-

AND WHAT IS THE THREE MAYORS ECONOMIC RECOVERY PLAN ?
20 MILL BUILDING FUND PARLAY IT FOR 50 MILL U S GRANTS
Most of our empty buildings are less than 40 years old many never occupied

WEDNESDAY, JUNE 22, 2011 | $1.00

Plan to ax clean-car program criticized

Activists to state: Keep strict rules on emissions

By Shaun McKinnon
The Arizona Republic

State officials posted the Valley's eighth ozone pollution advisory of the season Tuesday, a fact clean-air activists noted repeatedly as they argued against a plan to repeal Arizona's vehicle-emissions rules barely six months after they took effect.

Citing enforcement costs and a legislative mandate, the Arizona Department of Environmental Quality wants to scrap the rules, also known as the Clean Cars program, and make Arizona subject to federal standards administered by the U.S. Environmental Protection Agency.

Arizona adopted Clean Cars in 2008 as part of then-Gov. Janet Napolitano's climate-change plan. The rules, based entirely on California's more-stringent emissions program, took effect in January for cars and trucks produced for the 2012 model year.

Under the Clean Air Act, California

Experts offer varied housing outlooks

Real Estate
CATHERINE REAGOR

Housing-market watchers are searching for signs Phoenix's five-year housing crash is near an end.

There's lot of real-estate information out there with different forecasts. Several reports show the market improving, and prices inching up this year. But there's also research implying the crash isn't over.

Data from Phoenix groups the Cromford Report and the Information Market:

» Home sales were up 3.5 percent in May over April.

» Pending sales were almost flat in May from April, signaling June could be another good month.

» Listings continue to fall and are down almost 10 percent from May.

» Both pre-foreclosures and foreclosures are down.

The news isn't as good for the new-home market, which must still compete with foreclosures.

RL Brown and Greg Burger's latest "Phoenix Housing Market Letter" tracked nearly 600 new-home permits in the Phoenix area, which is this year's norm for the market.

The report states the home-building industry, which was once the driver of Phoenix's economy, won't be healthy again until the economy adds 300,000 jobs.

The less-upbeat forecast comes from the Arizona Regional Multiple Listing Services Price Index. The data, based on pending sales, show metro Phoenix's median home price could fall to $106,000 in July and $97,000 in August.

If you read this column last week, you will know that the region's median price has been holding steady at about $115,000 for the past six months.

Meanwhile, former vice-presidential candidate Sarah Palin's recent $1.7 million Scottsdale home purchase is drawing more attention.

A Massachusetts official and mortgage-fraud investigator believes a "robosigner" was involved in Palin's deal.

Several Arizona real-estate experts believe Palin's title is clear and legal and say they need more evidence of any illegal signing.

Code	Issue	Response

Code	Comment Document

Mesa Tribune
Letter To The Editor (480) 898-6362 January 21,2007
Dear Editor:

At this time while others are paying the price for comfortable summers, contending with snow and ice, we should be planning how to reduce the price we pay to escape that frigid weather. Such as the ever increasing cost of fuel, high pollution, power shortages,threatening rolling black-outs,even isolation. Much of that can be reduced with something as simple as using the cooler daylight hours. Around 4 and 5 a m is our best time of the day, May to October. Arizona is the only place left on the U.S. mainland that fails to take into consideration the earth's rotation. That is nothing to be proud of,it is a handicap. For example, most local sports events broadcast nationally end after midnight eastern time. That effects ratings and revenue.

A young Benjamin Franklin while in France measured the lamp oil saved when people arose and retired one hour earlier in the season. His experiment has been accepted in most of the industrial world as a method of conserving fuel. The concept has been adopted by out door workers, the construction industry. Home and travel energy use is reduced by many who voluntarily alter work hours. Any opportunity to avoid using the air conditioners saves fuel,reduces pollution. Ever notice when activated the auto air conditioner compressor acts as if a trailer was attached to the vehicle: Even stalled in traffic,common today, its off / on load on the motor is detectable. That is more fuel and residue exiting the tailpipe.

Arising an hour earlier most people could drive to work with car windows open, reduce home power demands. It would accommodate the construction worker as well as those communicating with offices that close three hours earlier in the east. Most important, as I pointed out,we waste the most pleasant time, before 6:00 a m.. Most Arizonans are asleep, they watched late news and went to bed an hour later than the rest of the country.

Its nice in the earlier morning, to get up and take a walk around the block, say Hi to your neighbor. There are benefits to adjusting to nature, and there are clocks that adjust to day light savings time automatically for those challenged by the task. Richard T. Tracy,Sr. (480)-839-1153

Code	Issue	Response

4-27-13

Environmental study touts freeway

ADOT: S. Mountain leg would ease congestion, aid air quality

By Sean Holstege
The Republic | azcentral.com

Build the South Mountain Freeway and the Valley's traffic moves more smoothly and the air gets cleaner than if the region builds nothing at all, according to a long-awaited environmental impact statement for the $2 billion project released Friday.

After 12 years and $21 million, the study answered some technical questions about the proposed 22-mile reliever for Interstate 10 but didn't seem to change any minds on the plan.

The extension of Loop 202 has been controversial since regional traffic planners penciled it on the map 30 years ago.

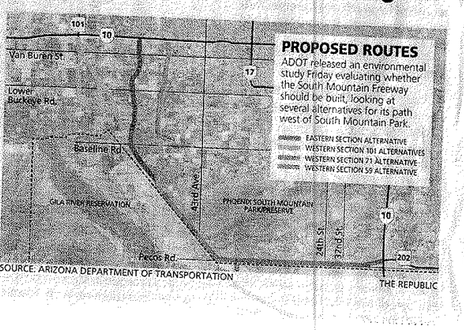
Friday's environmental study is among the most complex in Arizona Department of Transportation history.

Its release moves the project into the final planning phases, but it ramps up the divisive politics of the route on and off the neighboring Gila River Reservation.

The study compared building an eight-lane highway between Laveen and Chandler, which is projected to carry about 140,000 cars a day, with doing nothing.

Federal environmental law requires planners to compare

See FREEWAY, Page A4



Code	Comment Document

SUNDAY, JANUARY 31, 2010

Ties to land hound DiCiccio

Critics say councilman's advocacy on freeway extension represents a conflict

By Sean Holstege and Scott Wong
THE ARIZONA REPUBLIC

The proposed South Mountain Freeway has defined Sal DiCiccio's return to politics.

A year ago, the Phoenix real-estate broker filed a vacancy on the City Council, reclaiming the seat he held a decade earlier. Ever since, he's championed moving the planned Loop 202 south from Ahwatukee Foothills to the Gila River Reservation.

To supporters, DiCiccio is working to find the best outcome for his Phoenix constituents. Opponents say his development deals along the freeway blur personal and public matters and represent a conflict of interest.

The Arizona Republic took a closer look at DiCiccio's possible stake in the planned 22-mile freeway, examining city financial forms and court records, plus letters, e-mails and other documents obtained under a public-records request. The picture that emerged shows that DiCiccio:

» Benefited financially from a business partner's purchase of land that was resold to the state for the proposed South Mountain Freeway. The purchase, which *The Republic* uncovered in records, allowed the business returned to city politics last year.

Sal DiCiccio

See DICICCIO Page B7

OPINIONS

MESA REPUBLIC

VP/ Mic

VIS

Transit specifics needed

Tempe Mayor Hugh Hallman's proposal to build commuter rail before widening the Broadway Curve on Interstate 10 has prompted a healthy response from readers. Since his proposal ran Jan. 20 on these pages, we have received 14 letters, most of them positive and pleading for action on the idea.

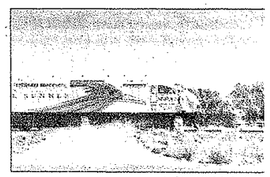
OUR VIEW

That's far more letters than we have received during that time on any other subject.

Granted, 14 letters hardly is a representative sample of the population. But Hallman's proposal clearly has touched a nerve with readers who feel that commuter rail is long overdue.

Whether you agree with Hallman's idea or not, at least his proposal was specific, not just lip service. We challenge other elected leaders to either join Hallman on his idea or express their own specific plans to speed transit improvements.

Given how little cash there is, and how great the need is to improve traffic flow without spewing more pollution, residents should have several creative ideas to debate.



JACK KURTZ/THE RE

New Mexico's Rail Runner, which runs fr Belen to Bernalillo, went from idea to inception in less than four years.

What do you think?

Want more elected leaders to get specif about transit? Tell them!

E-mail Mesa's mayor and council at **council@mesaaz.gov**. Find your legislator **azleg.gov**. And copy us on your message, **se.letters@arizonarepublic.com.**

Curve's design is problem

Reading the debate about the dreaded Broadway Curve: Is it just traffic volume, or does the horrendous design of the Broadway Curve enter into the problem just as much if not more so?

YOUR VIEWS

Nearing the Broadway Curve, you have the steady lane of traffic from Arizona 143 entering the freeway, followed immediately by Broadway Road on-ramp traffic and then by the Superstition Freeway off-ramps.

Do we really need 12 lanes of traffic, or do we just need a way to funnel those cars entering at the 143 and Broadway Road to get onto I-10 after the Superstition interchange?

It's a mess right now, and though I favor commuter rail, I don't know if that will have much impact on reducing the traffic as it currently stands.

— **Paul Nicholson**, *Tempe*

Rail system must be extensive

I agree with Tempe Mayor Hugh Hallman that a rail system should be built before widening the Broadway Curve. The is traffic gridlock is to take more cars o road.

Building more freeways will onl cars and pollution. The train would n be an extensive network, though, to ge ple to all parts of the Valley in order to fective.

— **Pam Smyth,**

Code	Issue	Response

Code	Comment Document

LEGAL BUSINESS HAS BEEN DOWNTOWN PHOENIX'S MAJOR INDUSTRY
POWERS TO BE RESIST SPREADING YOUR COURTS AROUND THE COUNTY
ALTHOUGH THEY WOULD BE LESS EXPENSIVE AND MORE EFFECTIVE

(Copy of prior proposed Constitutional Amendment to lower standards in both J.P. and City Courts and require approval of one committee to certify who can be appointed or run rather than a local open selection process. Same group has blocked efforts to establish permanent assignment to specialized divisions such as family or probate court so that the judge would be an expert in the field and reduce the confusion and expenses in those areas of law. That would also reduce the volume of litigation, appeals and legal fees by speeding up processing because the Judge is informed,not easily mislead and fewer errors and appeals. Consistency makes results predictable that reduces cases or defenses with out merit from being filed or asserted)

Arizona Constitution Article 6§22 ·

such other jurisdiction as may be provided by law.
Superior and other courts; qualifications of judges

Section 22. A. Judges of the superior court.— AND intermediate appellate courts ~~or courts inferior to the superior court having jurisdiction in civil cases of one thousand dollars or more, exclusive of interest and costs,~~ established by law under the provisions of section 1 of this article.— shall be at least thirty years of age, of good moral character and admitted to the practice of law in and a resident of the state for AT LEAST five years next preceding their taking office.

B. AT A MINIMUM, AT THE TIME A STATE TRIAL COURT JUDGE IS ELECTED OR APPOINTED TO OFFICE THE STATE TRIAL COURT JUDGE SHALL BE AT LEAST THIRTY YEARS OF AGE, BE OF GOOD MORAL CHARACTER, HOLD A BACHELOR'S DEGREE FROM AN ACCREDITED COLLEGE OR UNIVERSITY APPROVED BY THE SUPREME COURT AND NOT HAVE BEEN CONVICTED OF A FELONY OR HAVE ANY CRIMINAL WARRANTS IN ANY JURISDICTION. BEFORE BEING ELIGIBLE FOR APPOINTMENT OR PLACEMENT ON THE BALLOT FOR AN ELECTION, A STATE TRIAL COURT JUDGE SHALL PASS A LEGAL COMPETENCY TEST AS PROVIDED BY LAW. THIS SECTION DOES NOT APPLY TO AN INCUMBENT JUSTICE OF THE [illegible] WHO IS RUNNING FOR REELECTION OR [illegible] COURT JUDGE

state trial
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Closer look at Justice Courts

There has been considerable effort by the local press to convey the impression that the Justice of the Peace Courts are "the people's court" where one can go without an attorney and the judicial officer need not be an attorney. The opposing parties may not be so inclined. They are entitled to be represented and it is possible that one could be required to pay his attorney fee in an amount greater than that in dispute.

The Justice Courts in Maricopa County are overburdened. Though the population has doubled, only two additional courts were created.

The power to vest civil jurisdiction in municipal courts has existed since 1960. Their judges are attorneys accountable to local governing body review and comply with the Constitution, which requires a judicial officer with authority to award over $1,000 to be an attorney in good standing and a resident of the state for five years.

Recently, state lawmaker Marilyn Jarrett of Mesa said she would introduce legislation so that the justice would be able to "understand and think through the problems." She did so primarily because of the inappropriate behavior of several elected to the office of JP.

Of more concern should be inappropriate decisions and arbitrary treatment. In the old days, the JP conducted hearings at night at his home in his bathrobe for a traveler. Only that the correct law was applied was important.

Times have changed. JP courts have been abolished elsewhere because of the complexity of the law, commerce, technology in an effort to give true meaning to the phrase over the entrance of the U.S. Supreme Court, "Equal Justice Under The Law."

To change the standard for JP would require a state constitutional amendment. To substitute a county and municipal court with the same jurisdiction in Maricopa and Pima counties requires only a legislative enactment by the Legislature and county supervisors.

Since 1963, certain matters which come before the JP require that the defendant be represented by an attorney, the state is represented by an attorney. Should not the judge be their equal to truly understand the problems?

Richard T. Tracy Sr.
Mesa

RICHARD T. TRACY, SR.
2238 S. COTTONWOOD ST.
MESA, AZ 85202

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/14/13	INCOMING CALL TIME: 1:50 PM
CALLER: NANCY TRAINER	CALLER ADDRESS: P.O. BOX 5575, GOODYEAR, ARIZONA 85338
PHONE: 623-399-6218	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I do support the freeway. The South Mountain freeway, but you need to stop playing politics with it and build it. But you need to build it where you will disrupt the least amount of people. Also, I take exception with having to listen to this message in Spanish. If you are a voter you need to be able to read and write in English. Thank you.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Jennifer Tran Document Created: 5/21/2013 2:34:51 PM by Web Comment Form I live in Avondale and commute to work every day on the 10E to Tempe, AZ. Traffic in the morning is typically really bad once I approach around 43rd Ave. In the past 8 years, I've noticed that accidents tend to occur before, in or after the downtown tunnel. One of factir that I believe contributes to these increase in accidents in this area is the short amount of distance after you exit the tunnel to either enter the 202 0r the 51. I believe that with the proposed loop 202 in the west side will definitely decongest traffic going into the tunnel and hence, reduce accidents.

Code	Issue	Response
1	**Design**	Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 12:57 PM
CALLER: THE TRAVILLIONS	CALLER ADDRESS: 2608 SOUTH WETSTONE PLACE, CHANDLER, ARIZONA 85286
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
Hi we're in favor of the South Mountain and the 202 freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

5043

MS. TRAVIS: Janet Travis and my address is 44177 West Palmen Drive in Maricopa and 85138. I think the first comment I have is in this report there is absolutely no information on the tonnage. And this is a point that we repeatedly asked, I'm sure it was ADOT, MAG, all these representatives that were there, the bigwigs here, decisionmakers on this. Repeatedly asked them for that information, and they did tell us, "Yes, yes, we will have that information." That's very, very basic information regarding freeway and employees.

And not just a public meeting, you know, something like this, but departmental meetings, air quality program with decisionmakers at Gila River, transportation meetings, a number of meetings over the years. We were told we would have that information. It's not in there. And that it's a basic, basic piece of information that is included in normal environmental impact statements.

As an example, the amount of vehicle miles traveled, or the amount of cars per day on that 18-mile stretch on the community, Interstate 10, there's 17,000 tons of carbon monoxide emitted annually. This needs to have tonnage and it's just not there.

1

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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The total tonnage of emissions by pollutant is not presented because the regulations require that the analysis be compared to the National Ambient Air Quality Standards, which are not based on tonnage. However, tonnage (total emissions) was reported for mobile source air toxics because there are no standards.

Code	Comment Document

2

3

2

1

4

Okay. Another point is, there is absolutely nothing about health impacts on this. And I know not all environmental impact statements have that included, but many do. And in this case, it should be included because this freeway, unlike all the others in the Valley, is located between two mountain ranges during periods of inversion layers, stagnant air. That's going to sit right there between the mountains.

And the level of health problems out here, especially with kids with asthma, it's going to skyrocket. And right now, there's kids playing football outside. And pollutants have been proven to have a strong impact on the population within a mile and a half of a freeway. So there's schools, of course, residents and they're going to be sitting in that smog.

We need numbers, tonnage on carbon monoxide, ozone, volatile organic compounds. Just all of the things, particulate matter. And one thing they did not address, they did mention particulate matter and 10 -- PM 10, but they do not address PM 2.5, smaller particulates, and those are especially the problem with diesel trucks, PM 2.5.

And the community has an air quality

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Code	Issue	Response
2	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
4	**Air Quality**	A particulate matter ($PM_{2.5}$) analysis is not required since the area is in attainment for the particulate matter ($PM_{2.5}$) National Ambient Air Quality Standard.

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monitoring site. You could almost see it it's so close. And we have baseline levels and it will be interesting to see what those levels increase to once the freeway is put in. And we did our 2.5 measurements, PM 2.5. We did what is called speciation on that particular type of pollutant, and that picks up the hazardous air pollutants. So this does not address that. It does not really address air toxins.

1

From what I can understand, this is pretty complex. They did two, have monitoring criteria from the point in Chandler where the freeway -- where 202 will meet I-10 and around on the other side. Those end points, they have carbon monoxide monitoring numbers. Although it is not in tons, it is just saying they meet the standard and that's not enough information. And then they have no monitoring or estimated numbers for all along the community, and that information is actually easy to gather.

All you have to do, if you estimate vehicle miles traveled and put these particulate types of pollutants into a modeling program and it comes up with tonnage. So I know they have the information. They just did not express it in the way that they should have. This is very, very basic

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information because it affects public health on a level that is unimaginable.

I know Maricopa County, City of Phoenix, they have met a number of EPA standards. They have made some progress, but there's a few that they haven't met, and I do need to gather more information on that. But it seems like Phoenix pretty much does the minimal amount to meet those standards. They could do more. It's not easy, but it's based on health standards, federal health standards, and it seems like they never go beyond the minimum.

And I know they've been threatened with sanctions, and it seems like that's the only time they move forward. And to me that indicates more of an economic concern rather than a health concern, so.

And as far as where they discussed benefits, impacts, social economic environmental impacts, that was all done for the other side, not for the Gila River side. Especially what really upsets me is no mention of health impacts. I mean, in a way, they are addressed because those standards of pollutants are based on federal numbers, measurements, and anything beyond certain levels has these impacts spelled out.

2

Well, we don't know the tonnage, so we

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can't estimate what those health impacts might be. And that's kind of a simplified way to say it, but I've been out of the loop for a while, but there are some basics that I do know. And after being told they would be addressed and to not have it in there I think is really disrespectful and a slap in the face to Gila River, and this is why one reason this is so controversial.

And I know this is going to be built. I've known from the beginning, but I just thought it would be done in a way where the information would be out there for residents of Phoenix, but the residents of Gila River, I just don't understand why we are not allowed the same information that is provided to all the other freeway environmental impact studies that have been done in the past.

So I know a lot of people view the City of Phoenix as the 2,000 pound gorilla, you know, when it comes to economic development and a lot of things. And this kind of supports that, as much as I hate to say it, but...

And then as far as cultural, I will let a lot of these other people address that because I think they are more knowledgeable than I am, so I don't need to go into that. And as far as direct

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impact on water quality, on wildlife, that is also information that will be addressed more in-depth from one of the departments in Gila River.

So our comments as a whole different environmental program have been submitted, and they will be reviewed by the higher-ups before they are released as official statements. In the meantime, I think it would have been good to have a lot of this information out so people would know the right questions to ask so that they would insist upon answers.

And my familiarity with public hearings where you actually have to do the legal requirements, which you guys are doing right here, and the fact that there's no question-and-answer, you know, I realized that's how it was going to be. I was kind of hoping they might tweak that a little bit, but, I mean, I'm kind of at a loss for words just because I was so surprised at what I read -- or I should say what I didn't read, what should have been there.

Actually, when I did park here and I saw those kids out there, I was just thinking in the future how they will be impacted by this. I know one of the benefits for the freeway is like transportation of emergency vehicles and stuff like

5

Code	Issue	Response
5	**Public Involvement**	At the public hearing, in addition to the public hearing room (Ballroom 3), and the project video (Ballroom 1), information, resources, and staff were set up in an open house style format in Ballroom 2. Several copies of the Draft Environmental Impact Statement document were available for review; 63 banners explaining the participation process, the Draft Environmental Impact Statement, and the next steps were displayed; approximately 25 staff members were available to answer questions; computer stations were set up to accommodate online comments; comment cards were provided at tables for written comments; and court reporters were available to record verbal comments.

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that. I know they're going to have, oh, what do you call that, the roads on either side of the freeway? Service roads. And that will, you know, be part of the benefit, but then it also came to mind that, okay, you're making it easier for emergency vehicles, which is a good thing because you're probably going to be out here a lot picking up little kids that have asthma attacks in reality.

The rate of diabetes, which pollution does affect, the rate of asthma of course is extremely high out here. A lot of people know that. So they kind of get lost in the big picture when it comes to that. And that's -- they should have the priority, the little kids, of impacts to them.

And I think another issue is, there's a lot of people around right now, community members that remember when Interstate 10 was built. And I've always heard that they weren't paid fair market value for some of the land. I don't know if that's true. At one particular meeting, ADOT was asked to provide numbers of how much were they paid back in the early '60s, and they had a number, but then you hear different people say, no, we only got this or that.

So that's really not something I can make a comment on because I just don't know. But one

Code	Issue	Response
6	**Design**	The proposed freeway would have eight travel lanes, but would not have frontage roads in the area along the Gila River Indian Community land (see Figure 3-14 in the Final Environmental Impact Statement).

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thing is the people that do have the memory of that, and I was surprised to hear this, we were promised frontage roads. We were promised more exits when that was built. We're still waiting for the frontage roads. People remember that because they've been here for generations. And that information, you know, it's passed down and it pisses people off. They remember because the people here live here for years and their children and their children.

And a lot of these people here, they didn't grow up here. Their parents still live here. Their grandparents live here and great, great grandparents live here, and that's why it's become so personal, and I think that's something that a lot of people don't realize and they don't see it this way.

Well, maybe five, ten years, you know, maybe you'll move to wherever. Maybe I will too, but most of the people here don't. They stay and they remember. I'm going to make some silly sarcastic comments, but I better not. This is official.

But anyway, I think those are my main points, just to include the basic information. And I really would like to ask directly the people that, the engineers monitoring, overseers, whatever, are they going to have that in the final draft? I know

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they're not. I just know they're not. But I just want them to know we were told they were, and that is one reason that people are weary of things, one of many reasons.

And then it does go into how this will benefit the Phoenix area. Sure it's going to relieve congestion, it's going to reduce air pollution. Well that's great if you're on the other side of the mountain, that's really great, but here we're not.

And whenever you talk about this kind of thing, casinos always come up into the mix, so I don't know. It seems like, well, you guys have those casinos. Like we're not allowed to complain about anything because we have casinos. That gets kind of old.

There's a number of people out here, whether you want to call them activists or just concerned people. I consider myself a concerned resident, not really an activist because I'm kind of too lazy, but they're getting a lot of the kids involved. And I think I would like to see more of the other side, you know, not just the emotional so those kids can actually have scientific background to back up what they're so passionate about. So maybe in the future we'll have more of that, but right now

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Code	Issue	Response
7	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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just to see the kids expressing themselves, having a voice, that's really great.

I think something that's kind of scary about all of this and the controversy that comes with it for a lot of tribal members out here, this is like the last straw. So I don't know how that's going to affect things in the future, but just wanted to get that out there. I'm not saying it's the last straw. You're not going to see me laying in the freeway or laying in front of a bulldozer that's trying to, you know, but no promises there won't be other people doing it.

And actually, the model that they used, this Mobile 6 model where they figure out no pollutants, you know, measurements like that and vehicle miles traveled, blah, blah, blah, we used that same model to do our emissions inventory for the Interstate 10. And specifically I didn't do it, but it's been done. And it wasn't contracted out, air quality personnel did it themselves, and they happen to have a lot of experience with other jurisdictions outside, so they pretty much know what they're doing as far as technical and policy issues because they go hand-in-hand, you know.

Don't even get me started on Arizona's

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politics. I won't mention Jan Brewer's name, but you know what I mean. So air quality here does have familiarity with the type of technology used when figuring emissions. And I do know that these calculations are also done on projected situations like better quality gas, better mileage for vehicles, you know, that kind of thing. And that is technically, yeah, you do want to include that information, but the way it is right now, I think that's all people see. They're not going to sit back, well, 35 years from now, things will be better, you know. You can't do that. Nobody really wants to do that.

I mean, it just in many ways, it doesn't make sense, but I do know that is information you have to include when you're figuring these things out. So I do understand that's part of it, but the assessment does make those assumptions, but they are assumptions and not based on the way things are now.

And people are also curious, I am too, about what classification on air quality that this Gila River -- okay, I know I'm rambling here, but we currently have what's considered clean air based on three years of monitoring data which is a federal requirement. How is that going to impact it? Are we

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now going to be considered nonattainment dirty air area? How will that affect economic development? There is a direct relationship that really affects that, and Phoenix has had the upper hand on that for years. Finally got that changed. I could go into a lot of other things, but it gives me a headache, so...

And currently we don't do emissions testing based on the fact that the air is considered clean out here, and I do believe all that will change. Even where Phoenix might have monitors for different pollutants that do meet the standard, once that air is trapped between the mountains, that's going to change. I don't care what anyone says, that is going to change. So that is another thing that residents of the community, I'm sure they will be required to do emissions testing because right now they don't.

One thing I would like to mention is that Gila River Environmental Department, we've always had a good relationship with the state and the county and federal PA people. We've had a good relationship, and that has helped a lot because many, many tribes do not have a good relationship with the state, where we actually did play well together and we have worked

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together on different projects. So it is not something personal, you know. It is all about policy and my opinion of what is fair.

Another thing I want to mention, as far as environmental issues or conditions that were out here at one time, a lot of the elders remember when the rivers were around, Gila River and Salt River. They remember the wildlife. They remember all of the fields that were growing. They remember all of that. And in a very short period of time, it's gone. And, you know, I understand that Phoenix is a city. It's growing, but to be honest, I had no idea this would happen because I always thought it's so hot there. Who would want to move to Phoenix? And what am I doing, I'm back in the Valley.

But I guess my main point is, even myself just in talking to my mother, she lives in District 7 right near where the Salt River once was, and she tells stories about swimming there every single day and hauling watermelons on the horse so they'd have something to eat. I mean, just these amazing scenarios that I can't even imagine.

And the elders, there's less and less of them. So many of us have no clue of what it was like on a personal level. We see old pictures, we hear

Code	Issue	Response
8	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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stories, but it's gone and that's in a very short period of time. And a lot of natural resources that are now gone were directly tied to cultural elements. And I think that's another thing that people don't understand is how many ceremonial cultural things still take place here. I think many of them don't believe it because to be honest, people more or less remember the negative, the native people that they see wherever in the city. It's not always pretty. That's what they know. And they have no idea that so many ceremonial cultural events still happen and they're still important. People just have no clue.

And I would go into some of those, but I really don't think this is the place to do that as far as public comments, but I just want people to realize it's there. They're probably never going to see it, but they need to know these are there. After this is over and you have all of these comments, and you're going to have a lot of them, not just here but from Ahwatukee, Phoenix, environmental clubs, industry, whatever, the process I think people know they are aware they may feel that what I'm saying right now isn't going to make a damn bit of difference. That state environmental impact statement is not going to be realized based on what

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Code	Issue	Response
9	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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one person is saying, and that's a little bit
upsetting because you feel you have all of this
passion about something, but deep down you realize
nothing's going to change and that's upsetting, so...

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Against the South Mountain Freeway
Date: Monday, May 20, 2013 8:45:54 AM

-----Original Message-----
From: Mike Treacy [mailto:treacy@asu.edu]
Sent: Friday, May 17, 2013 5:04 PM
To: Projects
Subject: Against the South Mountain Freeway

Dear ADOT,

I do not support the proposed South Mountain Freeway.

1 (1) That valley is beautiful and scenic at present. I like it unspoiled.

2 (2) Making it even easier to access Phoenix by car can only worsen the traffic density downtown.

3 4 (3) Smog in winter in the valley is already unhealthy. There are certain days when the kids in my daughter's school (Awakening See in South Phoenix) were not allowed to play outside because of poor air quality

5 6 (4) I would prefer you to focus more on ways to reduce the number of single-passenger cars. I like the new downtown tram system. I would prefer you to put your resources into that project, which potentially serves more people.

7 You do a great job designing and maintaining the roads in the valley. I am impressed. I am not persuaded that another artery into Phoenix is needed. I sense that this movement is driven by residents of West Ahwatukee who do not like having to travel East to the I10 in order to get around South Mountain. The freeway will reduce their commute time, but the rest of the Valley will not be served so well.

Sincerely

Mike Treacy
Resident of South Tempe.

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Code	Issue	Response
1	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Health Effects**	
5	**Alternatives, Nonfreeway Alternatives**	
6	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
7	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The proposed freeway is not an arterial road into Phoenix. The proposed freeway is needed to serve projected growth in population and accompanying transportation demand and to correct existing and projected transportation system deficiencies. See Chapter 1, *Purpose and Need*, in the Final Environmental Impact Statement.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:46:48 AM

-----Original Message-----
From: aptrejo_2@juno.com [mailto:aptrejo_2@juno.com]
Sent: Friday, May 10, 2013 4:24 PM
To: Projects
Subject: Build the South Mountain Freeway

1

We support the South Mtn Frwy project.
Al & Pat Trejo
4726 E. Florian Circle
Mesa, Az. 85206

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Let us to the 202!htttgt
Date: Wednesday, May 15, 2013 3:41:50 PM

-----Original Message-----
From: Leo Trinidad [mailto:ltrini@aol.com]
Sent: Wednesday, May 15, 2013 3:34 PM
To: Projects
Subject: Let us to the 202!htttgt

1

BUILD THE 202 FREEWAY NOW...
After moving and making the Phoenix area as my family's permanent residence Since 1987 We have witnessed the transformation of Phoenix from a small city to a major city that requires Big city infrastructure facilities..

The smoothly functioning I-17 is a product of proper transportation planning and execution of long term transportation planning. MAG and ADOT have proven it in the past, the 202 freeway will be another good news from ADOT in the future.

Therefore let us build the 202 freeway NOW!

I-17 freeway was slowly

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 12:14 PM
CALLER: LEE TURNER	CALLER ADDRESS: 838 EAST DAVA DRIVE, TEMPE, AZ 85283
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am calling in support of the South Mountain Freeway construction. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comment on the proposed Loop 202 extension
Date: Tuesday, June 18, 2013 11:42:29 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Tuszynski, Ron S [mailto:ron.s.tuszynski@intel.com]
Sent: Tuesday, June 18, 2013 10:59 AM
To: Projects
Subject: Comment on the proposed Loop 202 extension

AZ DOT,

1 2 3 4 5 6 7

I live in the Ahwautkee Foothills and am one of many that oppose the build out of the Loop 202. I do not believe the environmental impact study is complete and I do not think this benefits the residents of Ahwatukee at all. I am very concerned about the air pollution, noise pollution and the drop in property values that this extension will produce. There are multiple schools that will be impacted by the noise/air pollution. I urge you to reconsider building out the extension at all when it will only benefit truckers who will detour out of the city to connect to I-10 on the east side. We do not need it and cannot afford it!

Respectfully,
Ron Tuszynski

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Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	
4	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
5	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Purpose and Need, Truck Bypass**	
7	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 3:52 PM
CALLER: WILLIAM ULLOA	CALLER ADDRESS: 3323 E. MALAPAI DRIVE, PHOENIX, ARIZONA 85028
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, I do support the new freeway along Pecos Boulevard. I happen to be in the transit area of the 51 going north. And even though I am close, I think it's for the betterment of entire city and county that the freeway goes through as soon as possible. It has been on the drawing board for a long time. I feel bad for those people but no one felt bad for me up here at 32nd and Shay and it hasn't really hurt that much. Thank you. Goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Robert Upham Document Created: 5/21/2013 3:15:21 PM by Web Comment Form I would like to see the bridge at 32nd Street eliminated. Without a Traffic Interchange there and no access to the freeway, I would prefer to see 32nd street just dead end. I have experienced enough crime that can enter our neighborhoods from the reservation (from other connections and personal experience into the City). I don't want future access to the reservation from my neighborhood. having future access from 40th street and 24th street is enough.

Code	Issue	Response
1	**Design**	The bridge at 32nd Street is included to allow potential access to land south of the freeway.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:46:48 AM

-----Original Message-----
From: Frank [mailto:frankcarol2001@cox.net]
Sent: Friday, May 10, 2013 1:19 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I am a retired Maricopa County public works street maint. Superintendent and agree this freeway is way overdue in being built and should get started right away. I would enjoy being part of a discussion or focus group to start discussions with Indian tribe and its leaders to start this project and get the ball rolling. Thank You. Frank Urquiza

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Frank Urquiza Document Created: 5/21/2013 12:57:22 PM by Web Comment Form I feel this 202 freeway is long overdue, and should be built..I was born and raised in the west valley and have seen the growth thoughout the valley with most of it on the north and east side of the valley and very little done on the west side of Maricopa County...As we go into the future traffic will continulally get worse on the freway and this 202 freeway will allow traffic to continuous flow elimanting traffic problem, accidents, pollution,,etc..thanks you..

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Gary Usinger
To: Projects
Subject: 202 extension
Date: Thursday, June 20, 2013 9:18:05 PM

1

I am for the extension....it will help with the current flow of traffic and give people alternate routes to get out of this funnel called ahwatukee

Gary usinger

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 3:35 PM
CALLER: KEMP USRY	CALLER ADDRESS: 5503 CAYA DE SANTO RIOS, PHOENIX, AZ 85018
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in support of the new freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4270

THE FACILITATOR: Thank you. Jim Vaaler.

MR. VAALER: Yeah, thank you for the opportunity to speak, just got basically two words for you, no-build. I think the purpose and need for this freeway is outdated. I think you could improve existing infrastructure and use mass transit in place of this freeway.

My other concern is the intrusion this potential freeway would have on South Mountain Park. I think you set a very bad precedent by proposing to build it in the park. Any deletion from the park, I mean, 30 acres is unacceptable. Those are the two points I'd like to make.

Thank you.

THE FACILITATOR: Thank you.

Anybody who would like to speak, please go out and register at the registration table. We'd be happy to hear you.

Larry Weeks. Larry, could I ask you to go to this microphone, please. Trying to do it equally for the court reporter.

MR. WEEKS: Good afternoon, my name is Larry Weeks. I'm in the 85048 zip code, specifically in the Lakewood and Ahwatukee area. And my concerns are the increase in noise and increase in pollutants

Page 100

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Old Plan or Use of Old Data**	
3	**Purpose and Need**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Draft Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
4	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Section 4(f) and Section 6(f)**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the 202 South Mountain Freeway.
Date: Monday, May 20, 2013 10:51:25 AM

From: Vachon, Patricia (AZ75) [mailto:Patricia.Vachon@honeywell.com]
Sent: Monday, May 20, 2013 10:03 AM
To: Projects
Subject: Build the 202 South Mountain Freeway.

1

Please build this freeway. The metropolitan area need it desparately.

Patricia Vachon
Honeywell International
HPS Technical Assistance Center Manager
Desk: 602-293-1720
Cell: 602-300-5451

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202
Date: Thursday, May 16, 2013 8:14:12 AM

From: Mary Ann [mailto:maryannvail@aol.com]
Sent: Thursday, May 16, 2013 7:26 AM
To: Projects
Subject: Loop 202

1

I feel very strongly that the South Mountain Freeway needs to be built.

Thank you for your consideration.

Mary Ann Vail
8934 East Calle Buena Vista
Scottsdale, AZ 85255

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Antonio Valdovinos Document Created: 5/21/2013 1:51:45 PM by Web Comment Form i support the 202 because we need a hospital in our laveen are, lets save lifes in the long run

Code	Issue	Response
1		Comment noted.

Code	Comment Document

5051

1 MS. VALENCIA: I would like to say that this
2 freeway would affect my civil rights as not only an indigenous
3 person, but as a woman, a parent, a descendant, and a future
4 ancestor of my future generations. My connection to this
5 mountain was during a spiritual run called the Peace and
6 Dignity Run, a spiritual run called the Peace and Dignity
7 Journeys, which unites the indigenous people from South
8 America, Mexico, the United States, Canada, and Alaska.
9 We are -- We are all people who run, and we pray
10 together to bring strength to our -- to our people across the
11 world. And this run happens only every four years. And my
12 connection with South Mountain was the prayers and the
13 spiritual connection that I had while running, for over
14 eight miles, and how it's sacred to our people.
15 If the sacred site is destroyed, it will affect
16 anyone, not only just the southern people in Arizona, but also
17 our relatives from other continents.
18 And I would just like to ask -- like, say: Why
19 should we have to fight to defend our sacred rights -- I mean,
20 our sacred lands if they're protected by the U.S. Government?
21 And I'd just like to clarify how it will violate my
22 freedom of religion, not only, like, as an indigenous person.
23 But I feel like I'm -- we have been discriminated against,
24 because, like, I mean, I live, like, in Gilbert. And I read
25 the newspapers, that they have, in that Gilbert area, and they

Page 41

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Code	Issue	Response
1	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

had a meeting for the, you know, Loop 202 in Phoenix.

And there was a lot of people that I know from the reservation who went and attended that, who were opposing against it, outside with signs and banners.

And, in the article that I read, it had nothing to do with Gila River and how it will affect the people who were there protesting against it. And it had no -- Like, it sort of makes it sound like it's something good, like it's a positive thing.

And there's nothing -- There's nothing in the -- you know, in the visual aid and in the research, that they haven't put who -- like, the air quality, like, what scientists and, like, who proved that. And, like, it just doesn't really seem like reliable information that they would put out. So I don't know.

3

But, again, I would just like to say that this freeway would violate my civil rights as a person. And that's it.

1

Code	Issue	Response

Code	Comment Document

5057

1 ***
2 THE REPORTER: Please state your name.
3 MS. VALENCIA: Claudelle Valencia.
4 I have it written down. The expansion of
5 the Loop 202 is a complete violation of my rights as
6 an indigenous woman under the 1964 Civil Rights Act.
7 No matter where you go in O'odham territory, Tohono
8 O'odham, Ak-Chin, Akimel O'odham, you will hear the
9 stories of the significance of South Mountain to our
10 people as indigenous people. We are put on this
11 earth to take care of this land. We should not have
12 our civil rights violated trying to protect our
13 sacred sites. No matter what, we will defend what is
14 ours.
15 THE REPORTER: Thank you so much.
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Page 18

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Code	Issue	Response
1	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the Responses to Frequently Submitted Public Comments beginning on page B733 of this appendix.

Code	Comment Document

Tiffany Van Cleave

Document Created: 5/17/2013 3:25:15 PM by Web Comment Form

The Loop 202 (South Mountain Freeway) project will create 30,000 jobs during the five to six year construction period and result in a $2 billion investment in the Phoenix-area economy. Not only will the project create numerous jobs and become and investment to the Phoenix area, the money to build the freeway is in the budget.

1 I believe it is time to build the Loop 202 (South Mountain Freeway). Valley commuters have waited long enough.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO LOOP 202
Date: Wednesday, July 24, 2013 11:19:13 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT
Communications

From: joelvandesande@gmail.com [mailto:joelvandesande@gmail.com] **On Behalf Of** Joel van de Sande
Sent: Wednesday, July 24, 2013 11:15 AM
To: Projects
Subject: NO LOOP 202

1 2 3 4 5 6 3

In Arizona, we have an urban-sprawl problem and we are also in an economic depression. Yet you along with MAG, the Federal Highway Administration, corporate & developmental interests want to build an unneeded, polluting, and destructive freeway extension through the sacred mountain: Muhadag Do'ag (South Mountain).

There are many issues with the Draft Environmental Impact Statement (DEIS), which has taken too long to produce in the first place. Plus, this project is an incredible wa$te of money.

Joel van de Sande

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Code	Issue	Response
1	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Purpose and Need**	The worldwide recession that began in late 2007 generated a substantial downturn in growth rates for new housing and employment across the United States. Arizona particularly suffered the effects of this recession because, beginning in the early 2000s, Arizona in general and Maricopa County specifically experienced some of the fastest population, housing, and employment growth rates in the country. Because the need for the proposed freeway is predicated in part on projected growth, one might conclude the recession reduced that need. An economic downturn associated with a given recession is, however, generally considered a short-term phenomenon with respect to the longer-term planning horizon established for the proposed freeway. Socioeconomic indicators have steadily and consistently increased in the region since the early 1900s. The critical factors underlying these indicators remain unchanged. (See the sidebar on Final Environmental Impact Statement page 1-11.)
3	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	
5	**Section 4(f) and Section 6(f)**	
6	**Cultural Resources**	

Code	Comment Document

Document Created: 5/20/2013 7:26:04 AM by Web Comment Form

Rory Van Den Berg

•It is time to build the South Mountain Freeway. Valley commuters have waited in traffic jams long enough. Based on the traffic studies in the Draft EIS, this will greatly help commute times in a busy area of roads.

•The freeway will cut traffic congestion across the metro area, reduce air pollution, and save drivers time and money.

•64.3% of likely voters in Maricopa County support construction of the freeway according to the results of a new poll commissioned by We Build Arizona. Just 19.6 percent said they were either opposed or likely to oppose the project.

•In a separate survey, also commissioned by We Build Arizona, 59 percent of likely voters living in Ahwatukee and Laveen support the freeway as well.

•If we don't build the South Mountain freeway, traffic in the region will get much worse over the next two decades. According to ADOT's own study:

•Traffic on I-10 between Ahwatukee and Goodyear will grow 28%
•Another 103,000 cars will use the Broadway Curve each day
•Another 38,000 cars will jam the Tunnel every day
•Morning and evening commute times will increase 39% to 82%
•Traffic congestion on city streets will increase 46%

•The same report indicates the project also will reduce air pollution by reducing the time vehicles spend stuck in traffic.

•The project will create 30,000 jobs during the five to six year construction period and result in a $2 billion investment in the Phoenix-area economy.

•The money to build the freeway is in the budget. It was approved by voters twice, first in 1985 and again in 2004.

1 •There is no more important project to the area's commuters and workers than the South Mountain Freeway project. We must build it now.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway Draft EIS.
Date: Monday, May 20, 2013 8:22:22 AM

From: Rory.VanDenBerg@kiewit.com [mailto:Rory.VanDenBerg@kiewit.com]
Sent: Monday, May 20, 2013 5:34 AM
To: Projects
Subject: Loop 202 South Mountain Freeway Draft EIS.

Dear Sir or Madame,

The proposed completion of Loop 202 South Mountain Freeway has been part of the planned freeway system in Phoenix for over 30 years, and there is no better time to build it than now, so we can take care of traffic issues before they become bigger problems. I have read through the Draft EIS, and seeing the numerical data further reinforces my thoughts on completing Loop 202 . Below are some key points to consider.

- It is time to build the South Mountain Freeway. Valley commuters have waited in traffic jams long enough.
- The freeway will cut traffic congestion across the metro area, reduce air pollution, and save drivers time and money.
- 64.3% of likely voters in Maricopa County support construction of the freeway according to the results of a new poll commissioned by We Build Arizona. Just 19.6 percent said they were either opposed or likely to oppose the project.
- In a separate survey, also commissioned by We Build Arizona, 59 percent of likely voters living in Ahwatukee and Laveen support the freeway as well.
- If we don't build the South Mountain freeway, traffic in the region will get much worse over the next two decades. According to ADOT's own study:
  - Traffic on I-10 between Ahwatukee and Goodyear will grow 28%
  - Another 103,000 cars will use the Broadway Curve each day
  - Another 38,000 cars will jam the Tunnel every day
  - Morning and evening commute times will increase 39% to 82%
  - Traffic congestion on city streets will increase 46%
- The same report indicates the project also will reduce air pollution by reducing the time vehicles spend stuck in traffic.
- The project will create 30,000 jobs during the five to six year construction period and result in a $2 billion investment in the Phoenix-area economy.

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document
1	• The money to build the freeway is in the budget. It was approved by voters twice, first in 1985 and again in 2004. • There is no more important project to the area's commuters and workers than the South Mountain Freeway project. We must build it now. Thank you for your attention to this vital project to the Phoenix area, Rory van den Berg Citizen and construction employee in Phoenix Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Proposed South Mountain Freeway Routes
Date: Tuesday, July 23, 2013 10:38:41 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT
Communications

From: Jill Van Dierendonck [mailto:jill.vandierendonck@gmail.com]
Sent: Tuesday, July 23, 2013 10:10 AM
To: Projects
Subject: Proposed South Mountain Freeway Routes

(1) (2) (3) (4) (5) (6) (7)

I am completely opposed to the E1 Alternative route for the proposed South Mountain Freeway. I have lived in Ahwatukee for more than 12 years, and have listened and watched the debate over this freeway extension project the entire time. This road path may have made sense when planners looked at an aerial map of the Valley in the early 1980s…but it certainly is a bad idea today. It is inconceivable to me that responsible area leaders hope to displace homeowners, schools, churches, an efficient local travel road…and destroy a beautiful and scared mountain range…to enable interstate truck traffic to bypass downtown Phoenix. I know…the "pro" arguments also say this freeway is needed so people can travel from the far East Valley to the West Valley and vice versa. Really? Both the U.S. 60 and the existing 202/I-10 routes seem to work pretty well for this. Transportation planners really need to STOP negatively impacting our air quality and natural resources with highway/freeway designs like this.

(8) (1) (4) (5) (3) (9)

NO on the 202.
NO on the Pecos Road alignment.
NO on ANY destruction of South Mountain.
NO to increased interstate truck traffic in my neighborhood.
NO to destroying homes, churches, and schools.
NO to harming and destroying wildlife habitat.

Jill Van Dierendonck
16821 S. 11th Way

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Old Plan or Use of Old Data**	
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Section 4(f) and Section 6(f)**	
6	**Purpose and Need, Lack of Support**	
7	**Air Quality**	
8	**Alternatives, No-Action (No-Build) Alternative**	
9	**Biology, Plants, and Wildlife**	

Code	Comment Document

Phoenix, AZ 85048
480-213-8844

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Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 loop
Date: Tuesday, May 14, 2013 9:38:03 AM

From: psn0ball@aol.com [mailto:psn0ball@aol.com]
Sent: Sunday, May 12, 2013 7:34 AM
To: Projects; "<projects"@azdot.gov
Subject: 202 loop

1
2
3

I feel that the proposed route to I 10 and 59th Ave hook up is a bad idea as it will add to traffic jams on I 10 at that point.
I advise that the loop take the W101 alternative and be a straight shot north. I realize that pressure is attached to the 59th as people want to be closer to downtown in their commute, however, that can be obtained by adding a expressway up 59 th ave to I 10 with limited access at every mile. A mini freeway.
But until all this stuff is delt with maybe make a deal withthe Reservation about a toll road connecting the pecos and 51st. going past the casino. A 2 lane short cut other than the long round about one travels now to the South.
Phoil Van Dyke

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	According to 23 Code of Federal Regulations §771.111(f)," the action evaluated in the environmental impact statement must connect logical termini and be of sufficient length to address environmental matters on a broad scope...". The proposed action should satisfy the project need and should be considered in the context of the local area socioeconomics and topography, the future travel demand, and other infrastructure improvements in the area. A partial freeway from Interstate 10 (Papago Freeway) to Laveen Village is not feasible because it would not meet the proposed freeway's identified purpose and need.
3	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4294

MR. VAN DYKE: I'm all for a loop. I'm all for a loop, okay? But as long as it is -- that it is a loop. And -- and the 51st and fifty -- I mean the 59th and the 71st alternatives are not a loop. They -- they desecrate the idea of having a loop by -- by cutting it short, which will make -- make for congestion on I-10 considerable at those points.

Where traffic is going to come in and then it's going to go east or west on I-10, they're not going to widen I-10, so you're going to have a mess. And anybody that lives out west and uses the 10 to come into town is going to be very upset, you know, because they're going to have to wait a lot more time in traffic, you know, and burn a lot more gas.

Whereas, I hear now that the reason why they don't want to use the 101 -- I guess it's the 101 alternative, whatever the wide one is, the wide one here, yeah, the W-101 -- is that it would cut Tolleson in half and then they'd have to take out 1300 homes, versus 59th Avenue, which is only, like, 53 homes, 53 houses or something like that, which would save them a lot of money.

But it's -- But it's going to increase congestion on I-10 considerably. If you've been to California, you know that any time two freeways meet, what the congestion is like, you know, any time of day. Okay? The -- So I say that, you know, they have to somehow keep the -- keep the Loop 202 being a loop. That's why we designed a loop, is to keep the traffic

Page 2

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www.drivernix.com

1

1

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

from getting inside of town and congesting the town.

Any traffic going east or west, in other words, if you have a semi truck or something like that going east and west, you don't want to go through town because it's going to slow you down. And if you go -- If you use the 59th -- If you're going to use the 59th Corridor that they have planned, you're going to have to get back on the I-10 in the middle of town again, you know. And it's going to be -- There's going to be even more congestion there than if it was down at the 101, where a lot of traffic could either go north and then -- and also west.

And all I know is that the 59th Avenue and 71st Avenue are -- are bad plans because it's not part of the loop.

And I do say that we need to make 59th Avenue an expressway, where, like, if you live north of town here, you go up 51st Avenue, it gets to three lanes. But you have every -- every street comes in on it. Well, you need to not do that on an expressway. You -- Only like on Dobbins and Elliott and the major roads, you know, that are one mile apart would be the access to the expressway, so there wouldn't be congestion slowing down traffic between the lights.

And, that way, the Ahwatukee people, that want to go around the mountain that way, can get downtown faster. But we still need to keep the loop a loop.

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www.drivernix.com

Code	Issue	Response

Code	Comment Document

2

I even made a comment, over there with the reservation people, is that the reservation needs to continue their -- their -- their four-lane road that goes past their casino there, the Vee Quiva or whatever it is, and take it down to Pecos Road, for now, because this is going to take years and years to build, and make it a toll road. That way, you know, a person can pay $2 to shortcut, to get from 51st Avenue to Pecos and get into Tempe for $2, versus having to go all the way through their town, which is 35 miles an hour, go all the way down to the -- go all the way down to the road that goes to Maricopa, and then come back into town that way, which would save a lot of gas and time.

The reservation would make a lot of money and -- and drive right past their casino, for a refreshment break. I don't know.

It's -- it's -- I think there's a lot of money that needs to be spent on this, and it needs to be spent wisely, not -- not just -- The cheapest route is not the best route, you know?

And in fifty years from now, it -- it'll remain the same. Gas will be a lot more expensive, and we'll have the same problems. And people are not going to want to spend money and gas, sitting in a car waiting for traffic, because we did it wrong now. So that's all.

MR. HAYES: Robert Hayes. I have my little notes,

Page 4

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Code	Issue	Response
2	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic—including truck traffic—to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The alternative proposed by the commenter is similar to the Riggs Road Alternative evaluated for the proposed project. The reasons this alternative was eliminated from further study are presented on page 3-9 of the Final Environmental Impact Statement. Further, the Gila River Indian Community opposes any concept that doesn't limit truck and commuter traffic through its land (see page 2-8 of the Final Environmental Impact Statement).

Code	Comment Document

From: craig.vanengen
To: Projects
Subject: I support the 202 loop project
Date: Sunday, May 26, 2013 1:06:06 PM

1

I live in Laveen and I would like to show my support for the loop 202 project. It will help our city and our state.

Thank you
Craig Van Engen
Laveen resident

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 support
Date: Wednesday, May 22, 2013 10:51:42 AM

From: John Van Leuken [mailto:javanleuken@yahoo.com]
Sent: Tuesday, May 21, 2013 12:50 PM
To: Projects
Subject: 202 support

1

This e-mail is to express my feelings that either the Gila River tribe or ADOT get off the pot and build the freeway

John & Audrey

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/15/13	INCOMING CALL TIME: 9:09 AM
CALLER: DENISE VANCE	CALLER ADDRESS: 1101 E. WARNER ROAD, #134, TEMPE, AZ 85284
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 12:36 PM
CALLER: JAN VANDER ARC	CALLER ADDRESS: 2303 NORTH BULLMOOSE DRIVE, CHANDLER, ARIZONA
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I approve of the proposed routing of the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Greg Vannoni

Document Created: 5/26/2013 4:32:38 PM by Web Comment Form

I love the layout for the loop 202 expansion to support the greater Laveen area. It is obvious that, over the past decade, much work has been done to align the freeway to satisfy the the communities that will gain the most benefit from this expansion.

I know that a 202 expansion would help all commuters get between both east and west valley with less fuel and time consumption.

1 PLEASE BUILD THE FREEWAY!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support the 202 South Mountain Freeway
Date: Monday, May 20, 2013 8:48:25 AM

From: Melinda Vasquez [mailto:MeVasquez@cenpatico.com]
Sent: Friday, May 17, 2013 4:00 PM
To: Projects
Subject: Support the 202 South Mountain Freeway

1

Please push this project through! We are bottle necking from Chandler and Ahwatukee to get in through the I-10 and with the 202, we could bypass that piece and cut down the traffic for both directions!

Melinda Vasquez
Chief Officer
Cultural & Community Affairs

Cenpatico
1501 W Fountainhead Parkway, Suite 360
Tempe, AZ 85282

866-495-6738 x26105 office I mevasquez@cenpatico.com
480-317-6505 direct line

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

4326

how to protect their land, so I will stand on the side of protecting in any way that we can.

I'm with codepink.org. It's a national group. Okay. No build is the only option to conclude.

MR. VASQUEZ: My name is Roy Vasquez. I've been a resident of the Phoenix metropolitan area since 1978. I've experienced the massive infrastructure improvement of the highways during that period of time up until today and really see a need for -- for this project to go forward. More currently, I'm a resident of Laveen and will really feel the impact of this project to my family life and to the community that I live in.

One of the things that I'm in favor of is what it will do for the arterial roads improvement, the projected business improvement environment, also a much needed hospital project. That impacted me because several years ago, I had an appendix attack and I had to go way to Avondale to get that taken care of. So it will be more of a -- that was a personal view point.

I think the routing from Pecos west through the South Mountain area is important. It will give a nice viewpoint for travelers. It will

Code	Issue	Response
1		Comment noted.

Code	Comment Document

make -- relieve all the traffic congestion that goes through Interstate 10 through downtown. Having experienced that traffic jam, this will really be an improvement. Thank you very much.

MRS. HUGHES: Ray and Karen Hughes. Well, we were just curious because of the wall is probably going to be in our -- I mean, right -- we're going to be right up against the wall, so we were just curious how high it would be and, you know, is it going to take the place of our -- our property wall that's in the back or what the -- you know, how loud is it going to be with it being right there, you know.

MR. HUGHES: So right now, we see that the alignment is -- they have the right-of-way line is literally on our back property wall. And so we were talking to the noise folks down here, and they explained to us what they -- the study that they've run and that it can be anywhere from 6 to 20 feet tall. And we're just curious when those designs will be finalized and how tall the wall will be and then also how close it would be to a property wall. That's all.

And then the other thing that we're very interested in knowing is when will the decision be

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www.drivernix.com

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/15/13	INCOMING CALL TIME: 9:30 AM
CALLER: LINDA VEGA	CALLER ADDRESS: 1729 W. LARSON DRIVE, CHANDLER, AZ 85226
PHONE: 602-899-8363	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I would like to inform you that I approve of the South Mountain Freeway. God bless you. Have a beautiful day. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 9:54 AM
CALLER: LILAH VEGA	CALLER ADDRESS: 1136 W. LYNNE LANE, PHOENIX, AZ 85041
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am a registered voter who supports the plans for the Loop 202 South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

and car ownership by young adults. Why, then, assume that patterns that held prior to 2005 will inevitably be repeated over the next few decades? Why not reinforce this positive trend toward diminished driving by enhancing transit, rather than building a freeway that may counteract the positive trend with an inducement to drive more?

Please don't destroy part of South Mountain on the basis of insufficient justification. I urge you to rethink this report and the freeway it recommends.

THE FACILITATOR: Thank you, Mr. Bickford.

Shana Velasquez.

MS. VELASQUEZ: Hi, thank you. I may not be as eloquent of a speaker as my speakers before me, but I'm here today as a mother that lives in Laveen. And we moved there originally four years ago because we were told there's going to be a lot more things that were going to be built, and so far that has not happened because we do not have the access to the 202. We can't have a hospital, we don't have a rec center, I have to drive my children 30 minutes just to, you know, take them to dance classes.

I personally work in Tempe, I used to work in North Scottsdale when I originally moved to Laveen and that takes me the same amount of time to get to Tempe as

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 it took me to get all the way up to the Desert Ridge
2 area, so I know that we need this 202. We need a
3 hospital. When I gave birth to my son, it took me 40
4 minutes to get to the hospital just to be able to give
5 birth.
6 I mean, I understand about South Mountain, I
7 love hiking, I'm a biker. I mean, when you do build the
8 202, we definitely want the bike route along it so we can
9 have that access. We want sound-proof barriers, we want
10 it to be pretty, we don't necessarily want to destroy
11 South Mountain, but we also need to make some sacrifices
12 in order to, you know, take into account all of the extra
13 building that's going to be happening in Laveen shortly.
14 We can't overlook the fact that all the growth
15 is still going to be continuing within the next ten
16 years, and now is our opportunity to be able to handle
17 all the extra traffic, especially with the casino that
18 will be opening in July. Thank you.
19 THE FACILITATOR: Thank you.
20 David Gironda. Did I pronounce that properly?
21 MR. GIRONDA: Gironda. I do have a written
22 statement which I can give to the court reporter.
23 THE FACILITATOR: Thank you, Mr. Gironda.
24 Prem Goyal. Did I pronounce that name
25 correctly? Is Prem Goyal in the auditorium?

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Ramon Velasquez

Document Created: 7/24/2013 3:54:49 PM by Web Comment Form

1 2 3 4 5 6 7 8

The effort to keep traffic moving has another option. Begin farther south away from the City connect to the 1-10 west of the town Buckeye. We live in a valley, all the air pollution stays down in the valley. View this from Sunset Point coming south. People and commercial traffic needing to the I-10 only can avoid city traffic by beginning father south and ending farther west. Cutting thru South Mountain is just ridiculous. Education and common sense HAS to meet somewhere is this project. Do you want a freeway next to your house? Or tear down a neighborhood unnecessary? Put the business and travel loop away from the city. Manifold the freeways away from residential areas and reduce the downtown traffic and air pollution. People who have a money interest will fight you all the way. Remember who bought property along the CAP canal before it was built he advised his family to purchase land there. This Senator is now retired. You and I wont make the decision, its the people higher up who's strings are being pulled by special interest/investors. Air and traffic pollution don't mean a thing to them, they don't live here. All it takes is one hazardous cargo truck rolling over close to town to create a panic. A problem that could be avoided by directing that traffic away from town. Its called PREVENTION thinking and planning. Thank You.

Code	Issue	Response
1	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Draft Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
2	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
5	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
7	**Purpose and Need**	The Proposed freeway is not a business or travel loop. The proposed freeway is needed to serve projected growth in population and accompanying transportation demand and to correct existing and projected transportation system deficiencies. See Chapter 1, *Purpose and Need*, in the Final Environmental Impact Statement.
8	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. We do not believe that the Pecos E1 Alternative should be the preferred Route for the proposed Loop 202 South Mountain Freeway. (1)

1) The wildlife natural habitats on the preserves will be disturbed. (2)

2) There is an extra ordinary amount of people, homes, schools, church that will be affected & displaced. (3)

3) This will bring much more pollution to residents. (4)

4) This will bring much more Noise to residents. (5)

5) Who does this benefit? This does nothing to help the commuters get to Downtown. It would put the commuters at 59th Ave. This is quite an overshot of the Downtown area. (6)

6) It seems to benefit only trucks & puts their Dangerous loads into our back yards. (7) (8)

Over

Optional

Name: Alize Atlas Venezia, Steve Venezia, Allison Venezia, Jonna Venezia

Email: AJ Venezia460@aol.com

Address: 1915 E. Salt Sage Dr.

City: Phx State: AZ Zip: 85048

Phone: _____ Fax: _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT · U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Biology, Plants, and Wildlife**	
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Noise**	
6	**Alternatives, W59 Alternative Versus W101 Alternative**	
7	**Purpose and Need, Truck Bypass**	
8	**Hazardous Materials**	

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

9 1) There are other viable alternatives:
(A) Link I-8 SANDiego highway to 59th Ave
10 (B) Link Maricopa
(C) Link Riggs
11 (D) Go thru the Reservation. There are 2 casinos already built waiting
12 to be linked to highways
13 2) If this is truly a proposal why aren't we being heard?
There are already signs at the end of my street stating FUTURE FREEWAY ENTRANCE.
It sounds like this is a done deal.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
9	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Draft Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
10	**Alternatives**	The study includes an evaluation of the alternatives noted in "a," "b," and "c." The assessment and outcome are described on page 3-9 of the Draft Environmental Impact Statement. The study also considered an alignment on Gila River Indian Community land (see page 3-24 of the Draft Environmental Impact Statement), but ultimately, the Gila River Indian Community voted against the alignment and it was not carried forward for further study.
11	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). Nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study.
12	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
13	**Public Involvement**	Public comments are a vital component in the decision-making process. Public comments have been solicited from project inception and through key milestones in the environmental impact statement process. The interests and needs of the public, along with all other social, economic, and environmental issues and impacts, must be fully analyzed and included in the Draft and Final Environmental Impact Statements. Comments made during development of the Draft Environmental Impact Statement have been used to adjust plans, explore new questions, or make changes—all within the scope of the National Environmental Policy Act. Public comments received on the Draft Environmental Impact Statement was reviewed and addressed in the Final Environmental Impact Statement. Public comments received on the Final Environmental Impact Statement will also be considered and addressed as appropriate. More information about the entire public involvement process up to publication of the Draft Environmental Impact Statement is available in Chapter 6, *Comments and Coordination*, of the Draft Environmental Impact Statement.

Code	Comment Document

From: bethver@aol.com
To: Projects
Subject: 202 South Mountain Freeway
Date: Wednesday, June 12, 2013 5:31:52 PM

1 2 3 4

I am adamantly opposed to building the freeway on the Pecos Road route in Ahwatukee. It will substantially increase the air pollution and noise throughout the Ahwatukee area. You should do everything within your power to have the freeway relocated further south on the Gila Indian reservation,

Thank you.

Wanda Vermeer
Resident of Ahwatukee

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	
4	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

From: Dawn M. Vetter
To: Projects
Subject: I am opposed to the South Mountain Freeway
Date: Wednesday, July 24, 2013 1:08:37 PM

1 2 3 4 5 6

The South Mountain Freeway would cut through a portion of South Mountain Park, exacerbate air quality problems, destroy wildlife habitat and cut off wildlife movement corridors, endanger public health, and more. It would also continue the Arizona Department of Transportation's (ADOT) short-sighted focus rather than looking toward long-term transportation solutions such as better mass transit.

I kindly ask that you please select the No Build Alternative in order to protect our environment and our communities.

Sincerely,

Dawn Vetter

Dawn Vetter , Receptionist
Jaburg Wilk, PC
3200 N. Central Ave.
Suite 2000
Phoenix, AZ 85012
602-248-1000
www.jaburgwilk.com

"Until one has loved an animal, part of their soul remains unawakened."

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Biology, Plants, and Wildlife**	
4	**Health Effects**	
5	**Alternatives, Nonfreeway Alternatives**	
6	**Alternatives, No-Action (No-Build) Alternative**	

Code	Comment Document
1	Anderson Vieira Document Created: 5/21/2013 2:31:20 PM by Web Comment Form I think the Loop 202 will help in improving the traffic of the east valley, mainly in the I-10 westbound and 101 north portions. This will certainly contribute to improve quality of life of people in the great Phoenix area. I am looking foward to seeing the loop 202 constructed.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Nathan Vigness Document Created: 5/21/2013 3:53:18 PM by Web Comment Form I am in favor of building the South Mountain Freeway. As a resident of Laveen I am excited about the prospect of getting new business to move into the area and create a better way of life for Laveen residents. I also see a great benefit of a bybass for those who would not like to sit idol in traffic through Phoenix to head south on I10. I see a great economic impact as well as enviromental impact that we can not get wrong. Please move forward with this project!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: The 202
Date: Wednesday, May 22, 2013 10:50:02 AM

From: Genny Villa [mailto:genny.villa29@gmail.com]
Sent: Tuesday, May 21, 2013 3:02 PM
To: Projects
Subject: The 202

To Whom It May Concern,

1 Although my husband and I will not be able to attend the public hearing today we want to let you know that as residents of Laveen for almost eight years, we are very much in favor of this freeway being built. We have heard about it since we moved here and hopefully it will become a reality before too much longer.

Respectfully Submitted,

Genny and Vincent Villa
(602) 237-7478
genny.villa29@gmail.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

DRAFT 6-4-13

SUBJECT: ALTERNATIVE TO PROPOSED LOOP 202 EXTENSION

SUMMARY: Reroute I-10 interstate thru traffic between I-10 exits 112 and 199 using I-8 to Gila Bend and existing state 85 ROW (RIGHT-OF-WAY) to Buckeye FOR NEW I-10 CONSTRUCTION. Result= less traffic and pollution in the metropolitan Phoenix area. see sketch "A".

1

INFORMATION NEEDED TO EVALUATE ALTERNATIVE Vs 202:

1. % I-10 existing local traffic and % thru traffic.
2. Same as 1 in 10 years. estimate
3. Same as 2 but include NAFTA (North American Free Trade Agreement) North-South traffic.
4. Same traffic as 1, 2 and 3 but with respect to air pollution.
5. Estimated cost comparisions – see sketch "B" work sheet
6. Financial impact on business and home owners between Laveen and I-10

CONCLUSION: If cost and environmental concerns favor the alternative route, then build it ASAP. Wait 10 years to see how traffic and the effect of more public transportations develop.

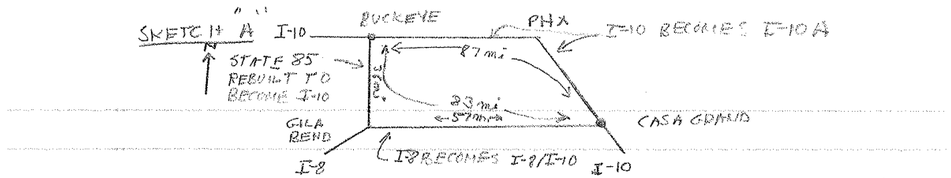
2

Then, maybe a less costly extension may suffice connecting to I-10 further west. Also include ROW for a high speed rail link for East valley to West Valley public transportation.

3

Code	Issue	Response
1	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
2	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives, W59 Alternative Versus W101 Alternative**	

Code	Comment Document



SKETCH "B" ESTIMATED COSTS

LOOP 202 EXTENTION

ROW I-10 @ AWATUKEE TO LAVEEN

CONSTRUCTION " " "

ROW LAVEEN TO I-10

CONSTRUCTION TO I-10

OVER PASSES

202 - I10 INTERCHANGE

OVER HEAD

ALTERNATE

CONVERTING I-8 TO I-8/I-10 BETWEEN CASA GRAND AND GILA BEND - SIGNS, ETC.

GILA BEND INTERCHANGE

WIDEN STATE 85 ROW FOR I-10 CONSTRUCTION

NEW I-10 CONSTRUCTION

BUCKEYE INTERCHANGE

10 ESTIMATED OVERPASSES

OTHER

LOOP 202 EXTENSION — *

ALTERNATE — *

SUBTOTAL #1.9 BILION

INTEREST FOR FINANCING PROJECT

TOTAL

* NEED ESTIMATED COSTS FOR COMPARISON

Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:
- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1. A LOW COST ALTERNATIVE TO THE LOOP 202 EXTENTION FOR REDUCING I-10 THROUGH TRAFFIC IN PHOENIX IS AVAILABLE. DIVERT THROUGH TRAFFIC ON TO I-8 AT CASA GRANDE to GILA BEND. THEN GO NORTH TO I-10 AT BUCKEYE USING STATE ROUTE 85.

2. LOOP 202 EXTENSION COMMENTS ARE CONTAINED IN ENCLOSURE A.

3. HOW DOES ADOT AND VALLEY METRO COORDINATE THEIR "PEOPLE MOVING" PLANNING. ADOT BUILDS FREEWAYS, VALLEY METRO BUILDS PUBLIC TRANSPORTATION e.g. BUS ROUTES & STREET LEVEL LIGHT RAIL. TOGETHER LIGHT RAIL CAN BE INCLUDED IN FREEWAY CONTRUCTION. ENCLOSURE "B" IS A PLANNING TOOL FOR DETERMINING COMMUTER HOME/WORK DENSITIES. ENCLOSURE "C" SAMPLE TRANSPORTATION PLAN THAT WOULD REDUCE COMMUTER GRIDLOCK IF 30% OF COMMUTERS USE IT

4. I AGREE WITH PARC, PROTECTING ARIZONA'S RESOURCES AND CHILDREN, ASSESMENT ON INCREASED AIR POLLUTION. SEE ENCLOSURE D.

Optional

Name DAVID C VILLEGAS Email

Address 3630 W. SHAUMEE DR.

City LAVEEN State AZ Zip 85339

Phone 602-237-3639 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives**	The proposed freeway is part of a transportation system developed to improve mobility in the region by increasing capacity and providing alternatives to allow traffic to bypass already congested routes (see Final Environmental Impact Statement pages 1-21, 1-22, 3-1, and 3-3). Like other "loop" freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would be a commuter corridor, helping to move local traffic between the eastern and western portions of Maricopa County. The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Final Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
2	**Planning**	The proposed freeway is part of the multimodal *Regional Transportation Plan* (see Draft Environmental Impact Statement page 1-5 for more information regarding the *Regional Transportation Plan*). The *Regional Transportation Plan* addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region. The Maricopa Association of Governments, as the region's metropolitan planning organization, has the responsibility to perform regional multimodal planning. The Arizona Department of Transportation is charged with implementation of the freeway program (of which the proposed freeway is a part) within the *Regional Transportation Plan*. Similarly, Valley Metro is charged with implementing the transit program within the *Regional Transportation Plan*.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

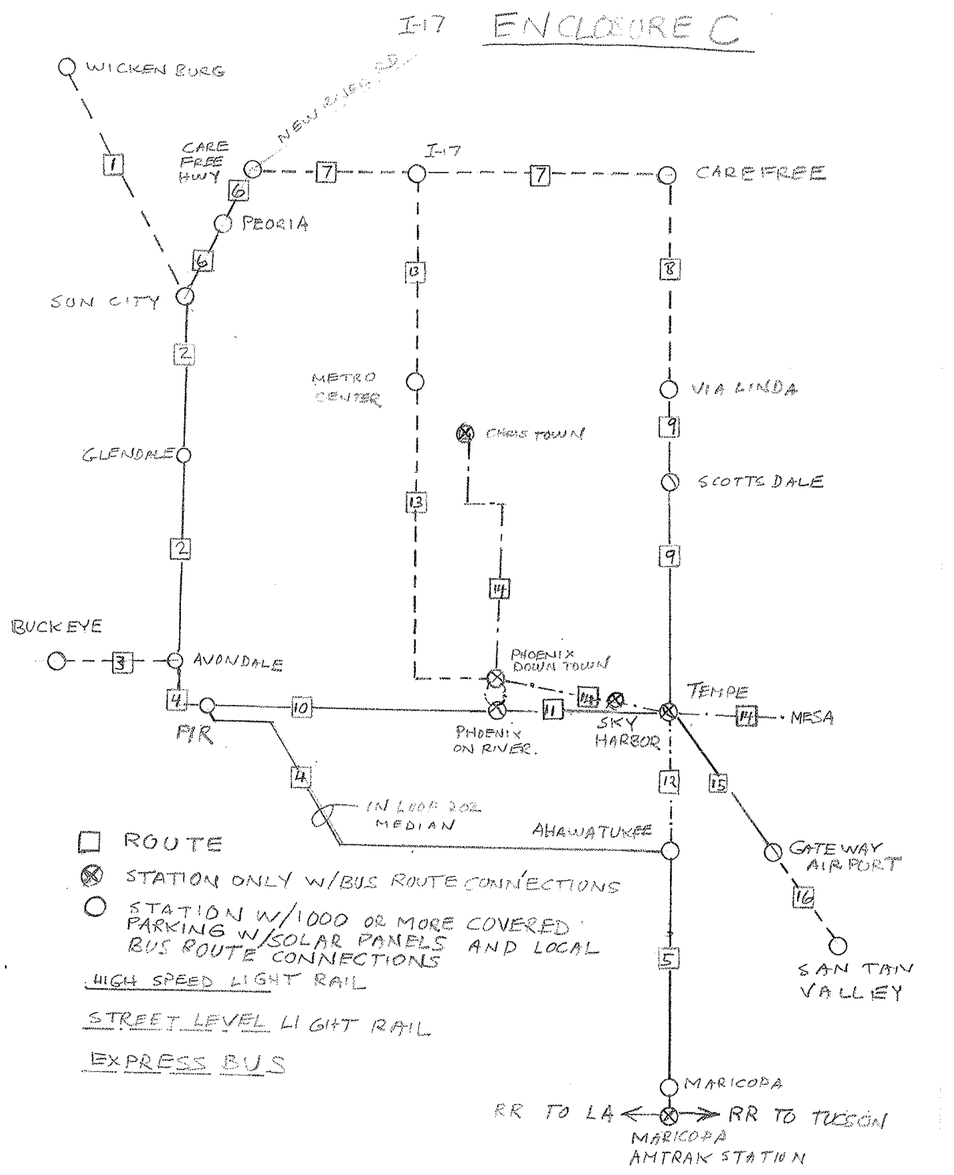
Code	Comment Document
4	ENCLOSURE A – LOOP 202 EXTENSION COMMENTS EASTERN SECTION 1. DELETE THE 17TH AVE INTERCHANGE. IT ONLY SERVES ABOUT 1500 HOUSE HOLDS (BY COUNTING ROOFS ON GOOGLE MAPS). A 2-LANE ACCESS ROAD ON THE 202 EXTENSION NORTH EDGE FROM SOUTH CHANDLER BLVD, NEAR 27TH AVE TO THE DESERT FOOT HILLS INTERCHANGE WOULD BE ENOUGH. 2. DELETE THE 24TH ST INTERCHANGE FOR THE SAME REASONS AND CONTINUE THE ACCESS ROAD BETWEEN DESERT FOOTHILLS AND THE 24 ST INTERCHANGES. 3. NOTE THAT THE AREA HAS LITTLE ROOM FOR POPULATION GROWTH BEING SANWICHED BETWEEN SOUTH MOUNTAIN PARK AND THE GILA RIVER INDIAN LAND. WESTERN SECTION 1. DELETE THE ELLIOT ROAD, DOBBINS ROAD AND SOUTHERN AVE INTERCHANGES. BECAUSE: a. THE LAVEEN VILLAGE IS BASICALLY AN ENCLAVE BOADERED BY THE SALT RIVER, SOUTH MOUNTAIN PARK AND THE GILA RIVER INDIAN LAND b. BASE LINE ROAD AND SOUTHERN AVE ARE ADEQUATELY HANDLING MOST EAST-WEST COMMUTER TRAFFIC c. THE BASE LINE ROAD INTERCHANGE IS MORE THAN ADEQUATE FOR EXISTING AND FUTURE LAVEEN AREA NEEDS. BOTH SECTIONS – REGARDING INTERCHANGES "WHY SPEND SO MUCH FOR SOO FEW"

Code	Issue	Response
4	**Design**	The locations of the planned interchanges were determined in coordination with the City of Phoenix. The current plan balances the need to minimize impacts on the adjacent community with the need to provide acceptable access to the region's transportation system.

Code	Comment Document
5	ENCLOSURE B COMMUTER DESTINATION PLANNING ZIP CODES ARE A USEFUL TOOL FOR PLANNING COMMUTER TRAFFIC PATTERNS. THE SOCIAL SECURITY DATA BASE FICA, FEDERAL INCURANCE CONTRIBUTION ACT, PROVIDES NEEDED DATA FOR PLANNING: 1. EMPLOYER ZIP CODE. 2. NUMBER OF EMPLOYEES 3. NUMBER OF EMPLOYEES SHARING THE SAME ZIP CODE EXAMPLE: 85 XXX 500 EMPLOYEE 85 XX1 50 " 85 XX2 100 " 85 XX3 150 " 85 XXH 200 " THEN 4. IN EACH ZIP CODE TOTAL ALL EMPLOYEES AND ALL EMPLOYEES THAT SHARE THE SAME ZIP CODE IN ZIP CODE 85XX1 THERE IS A TOTAL OF 10,000 EMPLOYEES. OF WHICH 1000 LIVE IN 85XX2 4000 " " 85XX3 5000 " " 85XXH 5 LIST THE TOTAL AMOUNTS IN DESCENDING ORDER. 6. THE TOP OF THE LIST IS WHERE TRAFFIC PROBLEMS MAY OCCUR. IF THE SOCIAL SECURITY ADMINISTRATION DID THE WORK THEN THE MAN-HOURS (MORE CORRECTLY STATED, PERSON-HOURS) CAN BE BILLED TO THE FEDERAL DOT WHO IN TURN CAN DEDUCT THE AMOUNT FROM THE STATE'S DOT ALLOTMENT. NOW THERE EXICTS A CONSTANT TOOL THAT ANY CITY CAN ACCESS SHOWING HIGH VOLUME TRAFFIC AREAS FOR PLANNING. THIS BEATS THE CURRENT PROCESS OF "HERE A FREEWAY, THERE A FREEWAY, EVERY WHERE A FREE WAY" THE PLANNING PROCESS WILL BE FACILITATED IF MUNICIPALITIES. WOULD COORDINATE AND AGREE ON AREAS FOR FUTURE LARGE EMPLOYEE DEVELOPEMENT.

Code	Issue	Response
5	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document



Code	Issue	Response

Code	Comment Document

	ROUTE	HIGH SPEED LIGHT RAIL	STREETCAR LIGHT RAIL	EXPRESS BUS	COMMENTS
1	WICKENBURG – SUN CITY			37	US-60
2	SUN CITY – AVONDALE	13			AGUA-FRIA RIVER BED ROW
3	BUCKEYE – AVONDALE			13	AZ-85
4	AVONDALE – AHAUATUKEE	24			USE LOOP 202 EXTENSION MEDIAN FOR ROW
5	AHAUATUKEE – MARICOPA	20			USE OLD FORNER MARICOPA-TEMPE RR ROW
6	SUN CITY – CAREFREE HWY			13	AGUA FRIA RIVER BED ROW
7	CAREFREE HWY. AGUA FRIA – CAREFREE			16	CARE FREE HIGHWAY
8	CARE FREE – VIA LINDA			17	PIMA RD
9	VIA LINDA – TEMPE	9			SALT RIVER INDIAN LAND ROW
10	PIR – PHOENIX	15			SALT RIVER BED ROW
11	PHOENIX – TEMPE	9			SALT RIVER BED ROW
12	AHAWATUKEE – TEMPE		13		ADD NEW ROW PARALLEL TO EXISTING RR ROW
13	CARE FREE HWY – PHOENIX			28	I-17
14	EXISTING/PLANNED		?		EXISTING – SEE VALLEY METRO TRANSIT BOOK. FUTURE?
15	TEMPE – GATEWAY	17			ADD NEW ROW PARALLEL TO EXISTIN RR ROW.
16	GATEWAY – SAN TAN VALLEY			9	RITTENHOUSE RD
	APPROX. TOTALS MILES	107	?	133	

Code	Issue	Response

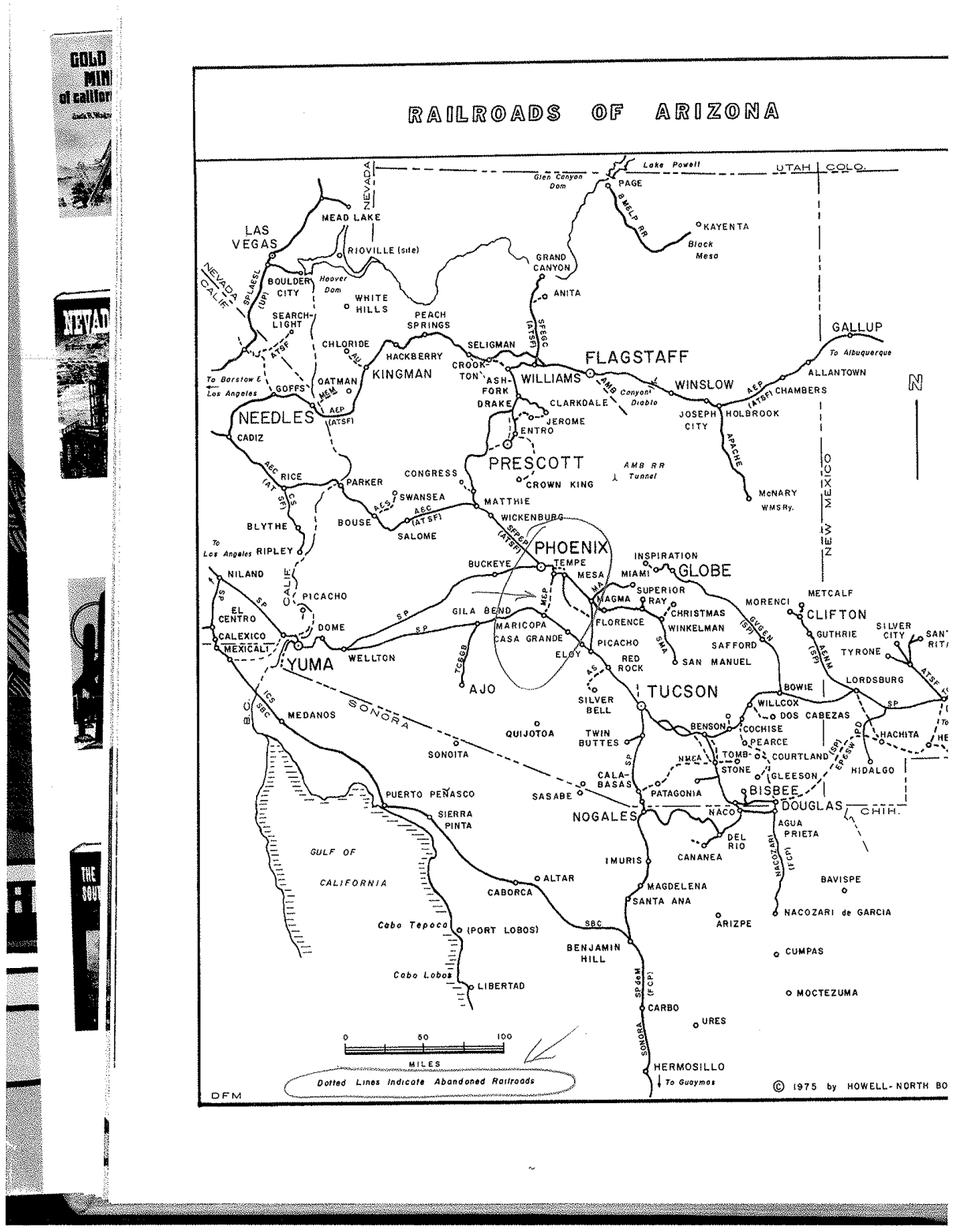
Code	Comment Document

NOTES.

1. PHOENIX ON RIVER STATION - THE AREA BETWEEN S. 5TH AVE AND CENTRAL WHICH MAY BE AN OLD LAND FILL SITE BETWEEN WATKIN ST AND THE SALT RIVER BED APPEARS TO BE AN IDEAL LOCATION
2. THE AHAVIATUVEE STATION SHOULD BE LOCATED ON THE GILA RIVER INDIAN LAND BECAUSE IT MAKES THEIR ENTERPRISES, WILD HOURSE PASS, ETC. MORE ACCESSIBLE VIA PUBLIC TRANSPORTATION AND BE A TERMINAL POINT INTERCONNECTING LIGHT RAIL & BUS SYSTEMS.
3. RESEARCH THE OWNERSHIP OF ABANDONED MARICOPA TO TEMPE OR PHOENIX RAIL ROAD. SEE ATTACHED DRAWING
4. ROUTE 2, SUN CITY - AVONDALE, LIGHT RAIL CONSTRUCTION SHOULD UTILIZE EITHER A LOW EMBANKMENT OR TRESTLE. WADEL DAM PROTECTS THE AGUA FRIA RIVER FROM FLOODING.
5. ROUTES 10 & 11, PR TO TEMPE, LIGHT RAIL CONSTRUCTION SHOULD BE BASED UPON THE FLOW RATES AND WATER LEVELS THAT OCCURRED DURING BACK-TO-BACK, 100 YEAR FLOOD LEVELS IN THE 1970's.
6. ALL FUTURE FREEWAYS SHOULD BE DESIGNED TO INCLUDE LIGHT RAIL CONSTRUCTION IN THE MEDIANS OR OF EDGE OF RIGHT-OF-WAY.
7. ALL FUTURE FREEWAYS SHOULD INCLUDE SPARE CONDUITS FOR FUTURE COMMUNICATION NEEDS INSTEAD OF DIGGING UP EXICTING STREETS.
8. WITH A PHOENIX-MARICOPA LIGHT RAIL IN SERVICE WOULD A PHOENIX-TUCSON RAILROAD LINK BE NEEDED. SEE ARIZONA REPUBLIC ARTICLE ON 7-11-13. A "BUDD RAIL DIESEL CAR" (SEE WIKIPEDIA ARTICLE OR SOMETHING SIMILAR COULD ACCOMPLISH THE SAME RESULT AT MUCH LESS COST.

Code	Issue	Response

Code	Comment Document



Code	Issue	Response

Code	Comment Document

ENCLOSURE D
AIR POLLUTION

6 3

THE 202 EXTENTION ALIGNMENT IS GENERALLY CLOSE TO THE GILA RIVER BED, THE LOWEST POINT IN THE VALLEY. THE VALLEY'S GENERAL WEATHER PATTERN IS WEST TO EAST. THE VALLEY SITS IN A BOWEL WITH HIGH EDGES ON THE NORTH, EAST AND SOUTH. THE SMOG BUILDS DUE TO TRAFFIC POLLUTION ESPECIALLY DURING THE WINTER. STRONG WEST TO EAST WEATHER AND RAIN TEMPORARILY DISSIPATE THE SMOG.

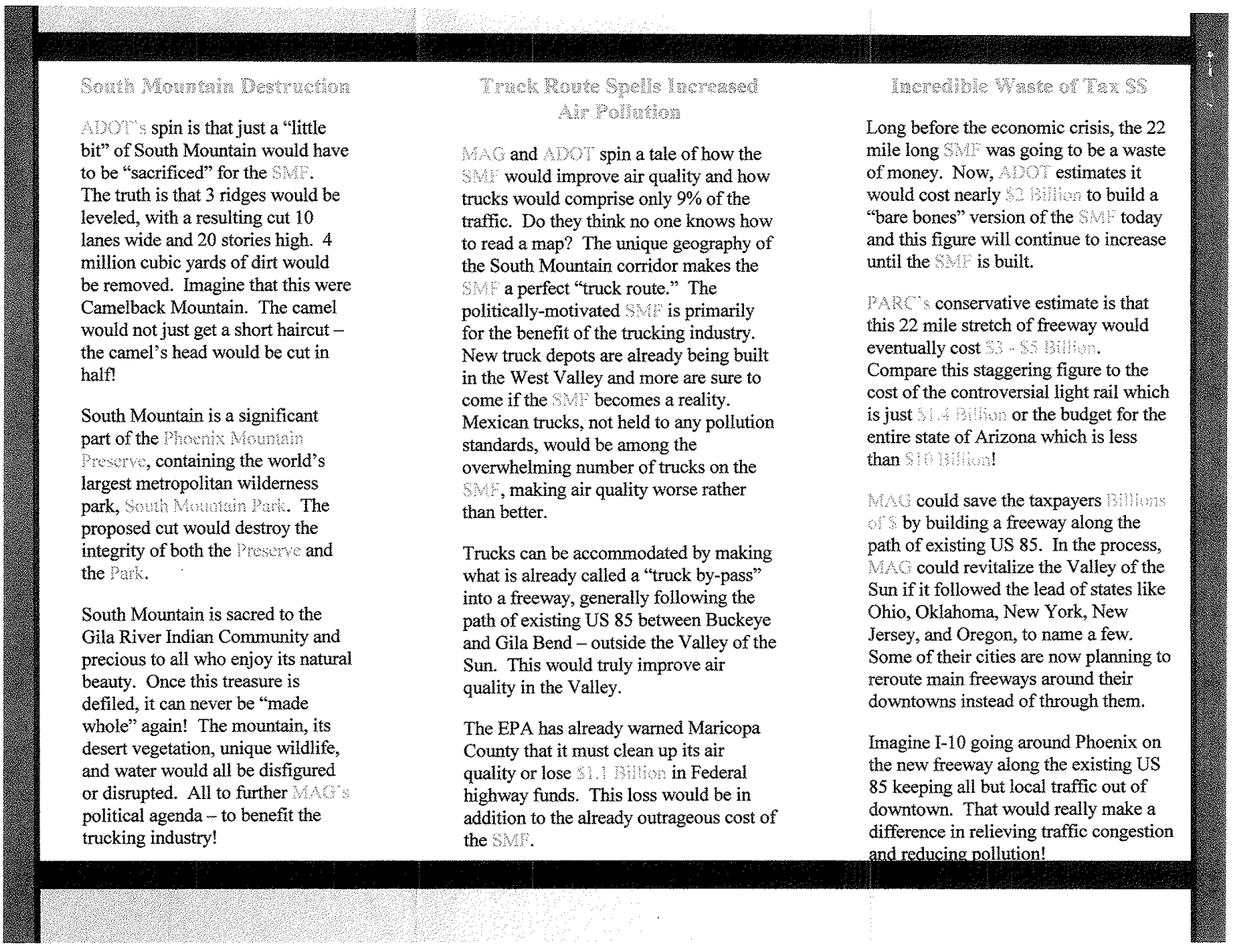
THE ELEVATIONS ABOVE SEA LEVEL, SHOWN ON THE ATTACHED MARKED DRAWING, ILLUSTRATE THE BOWEL EFFECT.

ALSO ATTACHED IS A PORTION OF PARC'S PAMPHLET ENTITLED "TRUCK ROUTE SPELLS INCREASED AIR POLLUTION" WHICH DECRIBES THE PROBLEM BETTER THAN I CAN.

Code	Issue	Response
6	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

Code	Comment Document

Code	Issue	Response



South Mountain Destruction

ADOT's spin is that just a "little bit" of South Mountain would have to be "sacrificed" for the SMF. The truth is that 3 ridges would be leveled, with a resulting cut 10 lanes wide and 20 stories high. 4 million cubic yards of dirt would be removed. Imagine that this were Camelback Mountain. The camel would not just get a short haircut – the camel's head would be cut in half!

South Mountain is a significant part of the Phoenix Mountain Preserve, containing the world's largest metropolitan wilderness park, South Mountain Park. The proposed cut would destroy the integrity of both the Preserve and the Park.

South Mountain is sacred to the Gila River Indian Community and precious to all who enjoy its natural beauty. Once this treasure is defiled, it can never be "made whole" again! The mountain, its desert vegetation, unique wildlife, and water would all be disfigured or disrupted. All to further MAG's political agenda – to benefit the trucking industry!

Truck Route Spells Increased Air Pollution

MAG and ADOT spin a tale of how the SMF would improve air quality and how trucks would comprise only 9% of the traffic. Do they think no one knows how to read a map? The unique geography of the South Mountain corridor makes the SMF a perfect "truck route." The politically-motivated SMF is primarily for the benefit of the trucking industry. New truck depots are already being built in the West Valley and more are sure to come if the SMF becomes a reality. Mexican trucks, not held to any pollution standards, would be among the overwhelming number of trucks on the SMF, making air quality worse rather than better.

Trucks can be accommodated by making what is already called a "truck by-pass" into a freeway, generally following the path of existing US 85 between Buckeye and Gila Bend – outside the Valley of the Sun. This would truly improve air quality in the Valley.

The EPA has already warned Maricopa County that it must clean up its air quality or lose $1.1 Billion in Federal highway funds. This loss would be in addition to the already outrageous cost of the SMF.

Incredible Waste of Tax $$

Long before the economic crisis, the 22 mile long SMF was going to be a waste of money. Now, ADOT estimates it would cost nearly $2 Billion to build a "bare bones" version of the SMF today and this figure will continue to increase until the SMF is built.

PARC's conservative estimate is that this 22 mile stretch of freeway would eventually cost $3 - $5 Billion. Compare this staggering figure to the cost of the controversial light rail which is just $1.4 Billion or the budget for the entire state of Arizona which is less than $10 Billion!

MAG could save the taxpayers Billions of $ by building a freeway along the path of existing US 85. In the process, MAG could revitalize the Valley of the Sun if it followed the lead of states like Ohio, Oklahoma, New York, New Jersey, and Oregon, to name a few. Some of their cities are now planning to reroute main freeways around their downtowns instead of through them.

Imagine I-10 going around Phoenix on the new freeway along the existing US 85 keeping all but local traffic out of downtown. That would really make a difference in relieving traffic congestion and reducing pollution!

Code	Comment Document

From: Greg Vogel
To: Projects
Subject: BUILD NOW - Loop 202 - South Mountain Freeway
Date: Wednesday, July 24, 2013 6:06:29 AM

To Whom it May Concern

1 I am writing this letter in support of getting the Loop 202 South Mountain Freeway moving forward. We represent land and business owners that will benefit from building this stalled freeway. While they will directly benefit, I cannot overstate the importance of building this freeway now and its importance to all citizens of our State.

- relief of existing and coming massive congestion along Interstate 10 at I-17
- Jobs that will be created by the construction of the freeway
-tax base in property, income, sales all increasing and benefiting the entire State
-environmental benefits of relief of congestion

This freeway has been on the books for almost 30 years. It is time for the State, City and local governing bodies to step up and lead and build this massive missing link to our transportation network.

We look forward to seeing this Freeway completed this decade.

Greg J. Vogel
Chief Executive Officer, Land Advisors Organization
4900 North Scottsdale Road, Suite 3000, Scottsdale, Arizona 85251
480.483.8100 fax | 480.483.8000 web | www.landadvisors.com

Please consider the environment before printing this e-mail.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Monday, May 20, 2013 8:24:52 AM

From: Dave Von Tersch [mailto:djvontersch@q.com]
Sent: Sunday, May 19, 2013 9:40 AM
To: Projects
Subject: Loop 202 South Mountain Freeway

1

Dear Sir / Madam,
Several months ago, I suggested that Loop 202 South Mountain Freeway consider (if feasible) a "double deck" design, similar to I-70 Colorado's double decker through Glenwood Canyon. At that time, the answer I received was **NOT** adequate.
Please provide detailed information as to why this "double deck" suggestion is not a viable solution.

Dave & Jeannie Von Tersch
12007 S. Crow Ct.
Phoenix, AZ. 85044
480-753-4166
djvontersch@q.com

Please consider your environmental responsibility before printing this e-mail

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1	**Alternatives**	The double-deck option suggested in the comment would have similar benefits and impacts as the Bridge Alternatives evaluated in the Draft Environmental Impact Statement (see pages 3-13 and 5-20). Options to build a bridge through or over the South Mountains were eliminated from further study because of incident management, constructibility and maintenance issues, future expansion limitations, substantially higher estimated construction costs, and undesirable intrusion-related impacts.

Code	Comment Document

4367

I came here primarily because I understood that the freeway was going to make a loop and enter our reservation at Pecos Road, and my niece just told me that I was mistaken, that it's not going to, that it is going to stay on Pecos Road, so my presentation is really ineffective and has no balance as to -- like I said, my whole thought is to not put anything on the reservation, because we cannot lose any more land, and I congratulate you on the wise decision not to put it on the Ahwatukee side, and I think that'll be best for everybody and speed up the process of the freeway and so forth. And I thank you very much, and that's all I have to say. Thank you.

THE FACILITATOR: Thank you.

Do we have another name up there? There it is.

Dave Von Tersch. Did I pronounce that right? Dave Von Tersch.

As a reminder, anyone in the auditorium, if you would like to speak just register at the front desk, your name will appear on the screen, and we will call you up.

Ken Lapierre.

Dave Von Tersch, is that you, sir?

MR. VON TERSCH: Hi, my name is Dave Von Tersch, I live in Ahwatukee. I'd like to suggest, as long as there's no ordinance against it or law against it, that the committee 202 project team might consider a

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

double-deck approach to the proposed freeway. Thank you.

THE FACILITATOR: Thank you.

Ken Lapierre.

MR. LAPIERRE: Hello, my name is Ken Lapierre, I live in Ahwatukee Foothills Reserve, and my initial comments here about the EPA draft study is I feel it's deficient on a couple of points. One is it's really not up to date. I'm not sure what data set was used, but if you look at, in particular, the violation of the EPA standards we have at the 43rd Avenue EPA sensor, it doesn't really look like we've acknowledged that that would get worse. My concern is that we will have a loss of federal highway funding if we violated 13 times on 43rd Avenue already and we're going to build a highway that's going to be a mile away, that's going to impact that sensor. Then we'll have more violations.

The other thing that I'm very concerned with is benzene in the air. I don't really know if you've studied the benzene levels in the Gila Indian Community, where I live in a community that borders that. I don't know if that's allowed or part of the study, but it's very toxic, people have health hazards. I work in a health advocacy group in Phoenix, and children are already experiencing asthma symptoms from the smog and the soot and the dust particulates from that area

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
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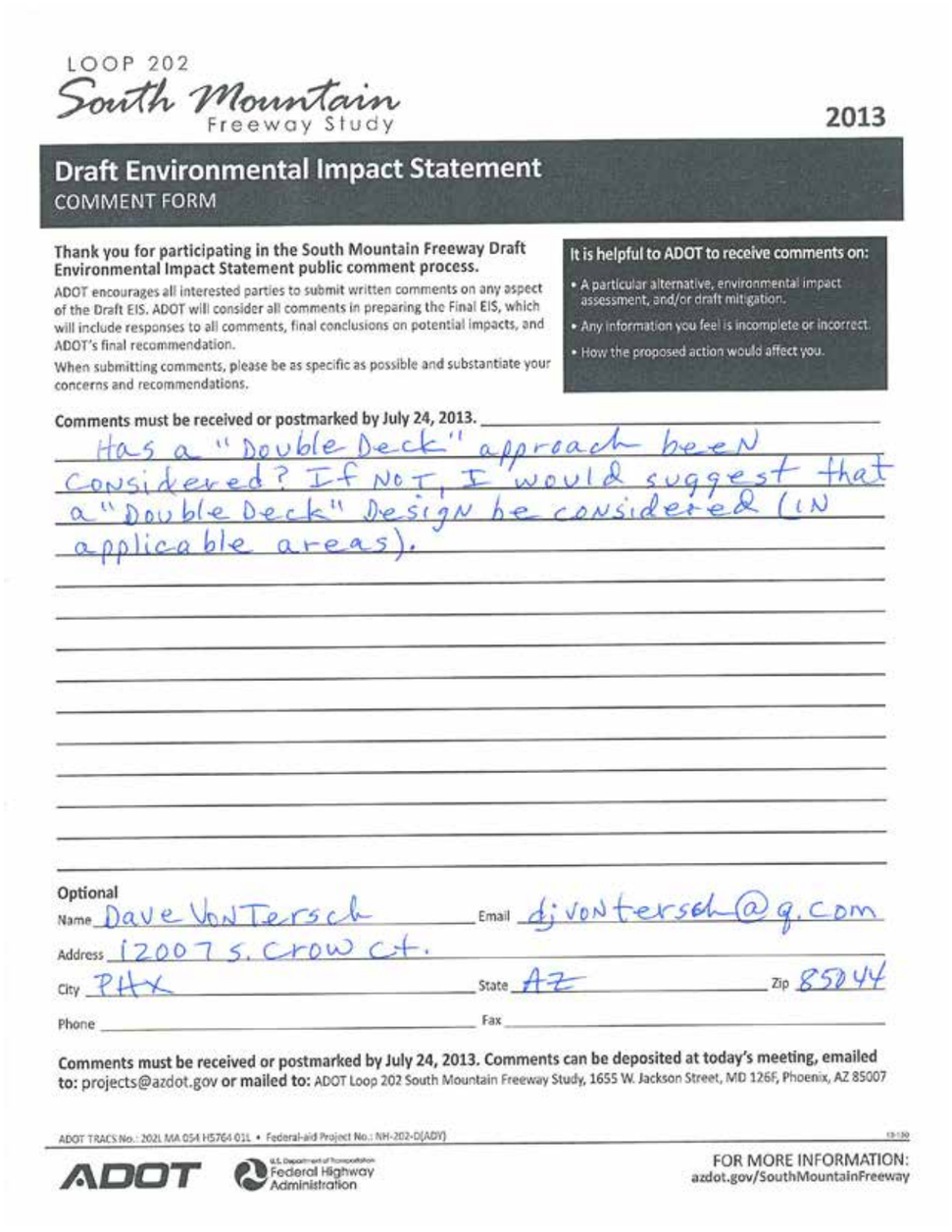
Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

Has a "Double Deck" approach been considered? If not, I would suggest that a "Double Deck" design be considered (in applicable areas).

Optional

Name Dave VonTersch Email djvontersch@q.com

Address 12007 S. Crow Ct.

City PHX State AZ Zip 85044

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

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Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 4:56 PM
CALLER: DONNA VOTE-BRACY	CALLER ADDRESS: 107 W. GENEVA CIRCLE, TEMPE, AZ 85282
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 We are in support of the new Loop 202 Freeway, south of the South Mountain for better traffic control and easing of the congestion on the existing freeways running north of South Mountain.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: DJENTRIFICATION ,PHX
To: Projects
Subject: Phoenix Native against a 202 freeway South Mountain Option
Date: Wednesday, July 24, 2013 3:52:45 PM

1
2

Hello and thanks for possibly taking my input!
My name's Alex Votichenko,born and raised here in the valley and I just want to urge you to please consider a No Build Option for the the 202 extension through part of the South Mountain preserve-it's really a cherished landmark and point of pride here in the valley,all of the preserve really.
I bring out of town visitors to the park frequently and it's important to so so many valley residents.
Thank You !
Alex Votichenko

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Please don"t build the freeway
Date: Monday, June 24, 2013 9:04:24 AM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Judy Wade [mailto:wadewords@cox.net]
Sent: Saturday, June 22, 2013 12:20 PM
To: Projects
Subject: Please don't build the freeway

1 2 3 4 5

We are against building the freeway as it is presently proposed. If the Gila River Indian Community is willing to have it build on their land, this would be acceptable. But to tear down homes, wreck parts of South Mountain, create a huge noise factor near thousands of homes, and invite crime into our neighborhoods is unacceptable.

Judy Wade and Bill Baker
Ahwatukee

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Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	
5	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

From: Phil Wagoner
To: Projects
Subject: "No Build" yields to more traffic on Beltway Road.
Date: Wednesday, July 24, 2013 4:13:27 PM

> Regarding opposition to building AZ Loop 202 South Mountain Freeway, some members of the Gila River Indian Community (GRIC) don't want the pollution on their land, while some members of the Ahwatukee Foothills
> Community (AFC) don't want pollution on their land, uniting the two groups behind a No-Build "solution". But
> the number of commuters from the Southeast Valley to the West Valley continues to increase. One can find many of them adding to the fun on the I-10.

> However, a few of them are using the Beltway Road across GRIC land leading from Riggs Road to 51st Avenue and I-10. It's smooth cruising until they reach 51st Av, where it
> slows for the final few miles.

> Now, ADOT could improve the flow along 51st Av. That would be much
> cheaper than building the 202. It moves pollution well away from the AFC and the GRIC northern boundary.
> It's GRIC's choice: Pollution from stop-and-start on the
> Beltway? Or, from smoothly flowing traffic downwind on an
> economic boon 202? Or tear the heart out of Sacred
> Mountain?

Phillip Wagoner
mobile: 480-220-0606

1
2
3

Code	Issue	Response
1	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). Nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Cultural Resources**	

Code	Comment Document

From: Phil Wagoner
To: Projects
Subject: Fwd: "No Build" yields to more traffic on Beltway Road.
Date: Wednesday, July 24, 2013 4:48:21 PM

>> Regarding opposition to building AZ Loop 202 South Mountain Freeway, some members of the Gila River Indian Community (GRIC) don't want the pollution on their land, while some members of the Ahwatukee Foothills Community (AFC) don't want pollution on their land, uniting the two groups behind a No-Build "solution".

>> But the number of commuters from the Southeast Valley to the West Valley continues to increase. One can find many of them adding to the mix on the I-10.
>
>> However, a few of them are using the Beltway Road across GRIC land leading from Riggs Road to 51st Avenue and I-10. It's smooth cruising until they reach 51st Av, where it
>> slows for the final few miles.
>
>> Now, if ADOT improved the flow along 51st Av., it would be much
>> cheaper than completing the 202 and it would move pollution well away from the AFC southern and the GRIC northern boundaries.

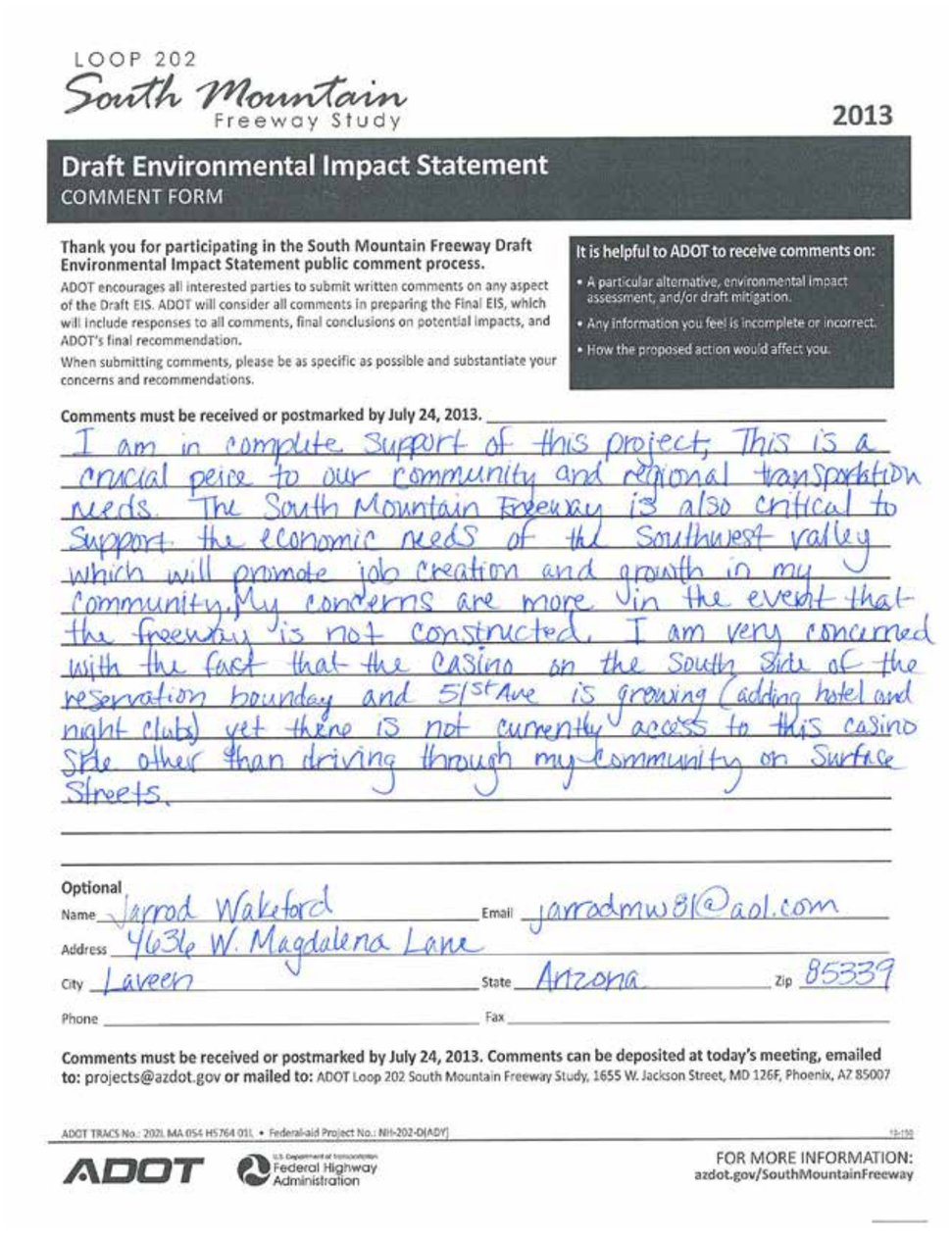
1 >> GRIC has a chance to make an important decision: Pollution from stop-and-start traffic through the heart of the GRIC on Beltway Road? (It will only get worse.)

2 >> Or, from smoothly flowing traffic downwind on the economic bonanza Loop 202, built upon GRIC-controlled land?

3 >> Or tear the heart out of Sacred Mountain?

AFC: GRIC; "No-Build" means no control and is a very bad solution.
>
> Phillip Wagoner
> mobile: 480-220-0606

Code	Issue	Response
1	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). Nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Cultural Resources**	

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I am in complete support of this project; This is a crucial piece to our community and regional transportation needs. The South Mountain Freeway is also critical to support the economic needs of the Southwest valley which will promote job creation and growth in my community. My concerns are more in the event that the freeway is not constructed. I am very concerned with the fact that the casino on the South Side of the reservation boundary and 51st Ave is growing (adding hotel and night clubs) yet there is not currently access to this casino site other than driving through my community on surface streets.

Optional

Name Jarrod Wakeford Email jarrodmw81@aol.com

Address 4636 W. Magdalena Lane

City Laveen State Arizona Zip 85339

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 12-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Opposition to the South Mountain 202
Date: Monday, May 20, 2013 8:49:49 AM

From: Walker, Gregory [mailto:gwalker@Huitt-Zollars.com]
Sent: Friday, May 17, 2013 2:24 PM
To: Projects
Subject: Opposition to the South Mountain 202

1

As a South Mountain resident, I am VERY opposed to construction of the South Mountain 202 loop. It is an extremely destructive project and totally unneeded. Do not build this waste of time, money and the environment.

- Greg

HUITT-ZOLLARS
Gregory A. Walker, AICP
Vice President | Transit/Transportation Planning
425.877.0385 Mobile | 602.952.9123 Desk | www.huitt-zollars.com

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Code	Issue	Response
1	**Purpose and Need**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Input to proposed 202 South Mountain Loop
Date: Friday, June 28, 2013 10:23:32 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Houle, Sabina J [mailto:sabina.j.houle@intel.com]
Sent: Friday, June 28, 2013 10:21 AM
To: 'projects@azdot.gov'
Subject: Input to proposed 202 South Mountain Loop

1 2 3 4 5

I am a resident of the ahwatukee foothills and am opposed the long standing alignment of the 202 south mountain loop. I was told the mountain behind my house was preserve and would remain if the 202 south mountain loop was constructed. The latest alignment shows the mountain removed and my fence as the wall of the freeway This design and proximity to our community will have multiple impacts in noise and air pollution. Additionally, the freeway is exceptionally close to 2 grades schools, a middle school and high school. This is not a healthy environment for our children. I am fully supportive of exploring options that would move the freeway further away from the population centers and eliminate the need to destroy portions of south mountain. As stewards of the land and our future generations I believe we should aggressively pursue options that will be mutually beneficial to the impacted community, as well as, the greater metropolitan area.

Rgds,

Maria Walker

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Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	
4	**Air Quality**	
5	**Health Effects**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Input to proposed 202 South Mountain Loop
Date: Friday, June 28, 2013 10:00:08 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Walker, Maria F [mailto:maria.f.walker@intel.com]
Sent: Friday, June 28, 2013 9:50 AM
To: Projects
Subject: Input to proposed 202 South Mountain Loop

I am a resident of the ahwatukee foothills and am opposed the long standing alignment of the 202 south mountain loop. As I understand it, key intersections will be elevated and the freeway does not have funding for sound barriers. This design and proximity to our community will have multiple impacts in noise and air pollution. Additionally, the freeway is exceptionally close to 2 grades schools, a middle school and high school. This is not a healthy environment for our children. I am fully supportive of exploring options that would move the freeway further away from the population centers and eliminate the need to destroy portions of south mountain. As stewards of the land and our future generations I believe we should aggressively pursue options that will be mutually beneficial to the impacted community, as well as, the greater metropolitan area.

1
2 3
4 5

Rgds,

Maria Walker

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Code	Issue	Response
1	**Noise**	Noise mitigation, such as sound barriers, is included in the proposed project (see Final Environmental Impact Statement page 4-91).
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Health Effects**	
5	**Section 4(f) and Section 6(f)**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 1:46 PM
CALLER: GEORGE WALKER	CALLER ADDRESS:
PHONE: 602-971-6447	EMAIL:
CALLER REMARKS/QUESTIONS: And build the freeway but No toll roads in Arizona. Bye.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Draft EIS Comments
Date: Monday, July 15, 2013 8:04:48 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Gary Walker [mailto:ga.mf.walker@gmail.com]
Sent: Saturday, July 13, 2013 9:13 PM
To: Projects
Subject: Draft EIS Comments

Hi,

I am responding with comments on Draft EIS.

(1) I live in Ahwatukee. The new freeway will be going by four schools around where I live (Pecos and 24th street). I do not think that is acceptable.

(2) (3) (4) In addition, I think the freeway will bring much more crime, pollution and noise to this area. I plan on moving if the freeway goes in.

If you have any questions, please contact me at 480-227-6262.

Gary Walker
2513 E Glenhaven Dr
Phoenix, AZ 85048

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Code	Issue	Response
1	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Noise**	

Code	Comment Document

From: Cosmic Rat
To: Projects
Subject: Proposed 202 Freeway extension
Date: Wednesday, July 24, 2013 4:18:34 AM

To whom it may concern:

1 2 3 4 This extension should absolutely NOT be built. Not only will the freeway itself bring more air, noise, and visual pollution into the area of its route, but, even worse, it will encourage commercial and real estate development, further despoiling the area.

5 We should respect the wishes of the native tribes who consider South Mountain sacred. Too often we have callously disregarded their respect for nature to our own detriment, needlessly offending their spiritual beliefs because of greed.

6 Let us instead use the funds to improve and maintain the highways we already have.

Michael Walker, 5315 W. State Ave., Glendale AZ 85301.

~~Cosmic Rat

Peace, Freedom, and Equal Justice for All
http://www.cosmicrat.com
http://www.myfriendlyuniverse.com
twitter ID @cosmicrat

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
4	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
5	**Cultural Resources**	Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
6	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 11:13 AM
CALLER: GLENDA WALKER	CALLER ADDRESS: 2323 NORTH CENTRAL AVENUE, APT. #201, PHOENIX, ARIZONA 85004
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, I do support the South Mountain freeway. I hope that gets built soon. It's been around too long. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	David Wallak Document Created: 5/12/2013 3:45:05 PM by Web Comment Form For the W59 alternative where the proposed Highway would cross over Lower Buckeye Road between S. 59th Ave and S. 63rd Ave the construction should include funds to widen lower buckeye road between S.59th Ave and S. 63rd Ave. This stretch of road is now occupied by farmland oneither side and goes from one lane to two lanes, going West at S.6rd Ave. This should be remedied with the W 59 Alternative. Thank you.

Code	Issue	Response
1	**Traffic**	Traffic interchanges (on- and off-ramps) would be located at Van Buren Street, Buckeye Road, Lower Buckeye Road, Broadway Road, Southern Avenue, Baseline Road, Dobbins Road, Elliot Road, 51st Avenue, 17th Avenue, Desert Foothills Parkway, 24th Street, and 40th Street. In the immediate area of the interchanges, the crossroads would be widened to their ultimate lane configuration based on the City of Phoenix General Plan. Adjacent improvements such as signals and road widening would be the responsibility of the City of Phoenix.

Code	Comment Document
1	Document Created: 6/30/2013 2:48:03 AM by Web Comment Form Where the proposed highway intersect W. Lower Buckeye Rd between S. 63rd Ave. And S. 59Th Ave., that portion of W. Lower Buckeye Rd needs to be widened, once the canals on each side of the road are filled. This area currently is a very dangerous section, with 18 wheeler Fed Ex trucks, clog the intersections and run over fire hydrants on the corner of W. Lower Buckeye Rd an S. 59Th Ave. Thank you, David Wallak 2205 S 63rd Dr Phoenix, AZ 85043

Code	Issue	Response
1	**Traffic**	Traffic interchanges (on- and off-ramps) would be located at Van Buren Street, Buckeye Road, Lower Buckeye Road, Broadway Road, Southern Avenue, Baseline Road, Dobbins Road, Elliot Road, 51st Avenue, 17th Avenue, Desert Foothills Parkway, 24th Street, and 40th Street. In the immediate area of the interchanges, the crossroads would be widened to their ultimate lane configuration based on the City of Phoenix General Plan. Adjacent improvements such as signals and road widening would be the responsibility of the City of Phoenix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Widen Lower Buckeye Rd. Between 59 & 63 Ave.
Date: Monday, July 01, 2013 8:45:21 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: David Wallak [mailto:dwallak@cox.net]
Sent: Sunday, June 30, 2013 12:56 AM
To: Projects
Subject: Widen Lower Buckeye Rd. Between 59 & 63 Ave.

1

Please widen road between 59 and 63 Ave's. On Lower Buckeye Rd, where the 202 will cross over. This road goes from one lane to two lanes at 63rd Ave and has caused many accidents. Please re-Design. Thank you,
David Wallak
2205 S 63rd Dr
Phoenix, AZ 85043
623-297-0600
--
Sent from my Android phone with K-9 Mail. Please excuse my brevity.

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Code	Issue	Response
1	**Traffic**	Traffic interchanges (on- and off-ramps) would be located at Van Buren Street, Buckeye Road, Lower Buckeye Road, Broadway Road, Southern Avenue, Baseline Road, Dobbins Road, Elliot Road, 51st Avenue, 17th Avenue, Desert Foothills Parkway, 24th Street, and 40th Street. In the immediate area of the interchanges, the crossroads would be widened to their ultimate lane configuration based on the City of Phoenix General Plan. Adjacent improvements such as signals and road widening would be the responsibility of the City of Phoenix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. In the early planning of Loop 202, ADOT discussed the need to get trucks out of Central Phoenix. The regional Plan should be modified to re-route trucks out to US. 85.

(1)

I have lived in two Phoenix neighborhoods where freeways (the 10 and 51) were built. Noise and pollution are inevitable, along with the inherent medical problems and crime that follow — and deteriorating neighborhoods.

(2) (3) (4) (5) (6)

South Mountain needs to be protected from a Wilderness and Cultural Standpoint for everyone.

(7) (8)

Optional

Name PATRICIA WALSH Email

Address 14828 S. 44th Way

City Phoenix State AZ Zip 85044

Phone (480) 961-0130 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Draft Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and inter-regional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, it was eliminated from further consideration.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Health Effects**	
5	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
6	**Economics, Socioeconomics**	There is no evidence that the proposed facility would cause people to leave the area. The regions' benefits would remain, and improved access to residences and businesses would make them more desirable.
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Cultural Resources**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202
Date: Monday, May 20, 2013 8:45:14 AM

-----Original Message-----
From: kward Ward [mailto:ksherer15@hotmail.com]
Sent: Friday, May 17, 2013 5:37 PM
To: Projects
Subject: Loop 202

1

Please begin construction on the south mountain loop 202. We need this freeway to cut down on congestion and bring jobs and business to the Laveen area. One of our elementary schools was the #1 elementary school in the state last year. We need this with the growth of our community.

Thank you for your time.

Kathleen Ward

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Loop
Date: Wednesday, May 22, 2013 3:35:16 PM

From: Roadarmel E W (Ward) [mailto:Ward.Roadarmel@srpnet.com]
Sent: Wednesday, May 22, 2013 3:11 PM
To: Projects
Subject: South Mountain Loop

1 Get it built! Why allow a small group of home owners to hold this up any longer? Why keep sending all the big rig traffic through the center of town and have this un-necessary traffic contributing to the congestion and pollution? It was approved by the majority years and years ago, any one moving into the south loop area was aware of its impending existence. Get over it and let's get it built!

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 SanTan extension. . . . .
Date: Wednesday, May 22, 2013 10:50:49 AM

From: Ken Ward [mailto:recvken@yahoo.com]
Sent: Tuesday, May 21, 2013 12:50 PM
To: Projects
Subject: 202 SanTan extension. . . . .

Good Afternoon,
My wife originally puchased the home we reside in back in 1987, making her an original owner in the Mountainside subdivision. In 1985 as I recall, we supported for and subsequently voted for the plan to build the loop freeway system circumnavigating the valley while we were living in another neighborhood.To date the only portion of that freeway not built, much to our dismay, is the portion that now ultimately affects us the most. I feel that it is high time that that last section of the 202 SanTan freeway around the back side of South Mountain be built without delay. The people spoke on this issue long ago, and it is unconscionable that all of our votes be ignored , regardless of how long ago it was. We tire of having to deal with living in what has become known as "The World's Largest Cul-De-Sac". I would further suggest that it not be built on reservation land as many have suggested. The fewer entanglements we engage in with that delightful "Sovereign Nation" the better off we will be. When Greg Stanton was a city council member representing the area he stated that this section of the freeway "Would never be built on HIS watch" ! I never voted for him because of that statement, and it is unfortunate that he is now our Mayor, because he won't support what needs to be done. FINISH THE FREEWAY PLEASE !
Sincerely,
Ken Ward

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Monday, May 20, 2013 8:47:10 AM

From: Betty Ware [mailto:bettya_ware@yahoo.com]
Sent: Friday, May 17, 2013 5:25 PM
To: Projects
Subject:

1

We need the 202 freeway to be build, population in the South Mtn area has increased at a large rate our MAIN STREETS ARE FULL.

Thank You
Betty Ware

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:30 PM
CALLER: CAROLYN WARNARD PHONE:	CALLER ADDRESS: 1719 E. GELDING DRIVE, PHOENIX, AZ 85022 EMAIL:
CALLER REMARKS/QUESTIONS: I am in support of that freeway construction. I strongly support construction of this freeway it is greatly needed.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

From: Rich Warren
To: Projects
Cc: Rich Warren
Subject: South Mountain Freeway
Date: Tuesday, June 04, 2013 1:50:05 PM

COMMENT RE: SOUTH MOUNTAIN FREEWAY

I would like to urge that there be a stipulation that commercial billboards (including electronic) are not allowed anywhere along the entire length of the proposed South Mountain Freeway. We live in a beautiful state where magnificent scenery surrounds our roadways; the South Mountain Freeway will be no exception. These same roadways shouldn't subject us to the seemingly endless stream of advertising that pervades the rest of our lives. An Arizona Court of Appeals decision found that billboards (including electronic) were illegal in relation to the Arizona Highways Beautification Act.

Visitors provide vital economic activity for Arizona and an unmarred landscape helps promote tourism. We are blessed to live in the gorgeous State of Arizona where it's not unlikely to be rewarded with a scenic view at every turn. Let's take action to make sure it stays that way.

Rich Warren
6723 E. Paradise Lane
Scottsdale, AZ 85254
(480) 678-7071
richwarren13@yahoo.com

Code	Issue	Response
1	**Visual Resources**	The State of Arizona (through the Arizona Department of Transportation) administers an Outdoor Advertising Program as mandated by the Federal Highway Beautification Act. Arizona's program provides regulations for the permitting, placement, and maintenance of outdoor advertising signs along Interstate highways as well as State highways within Arizona. The State statutes (Arizona Revised Statutes §§ 28-7901 through 28-7915) and the State rules (R17-3-701 and R17-3-701.01) provide that the Arizona Department of Transportation must regulate any sign that is within view of, directed at, and intended to be read from the main traveled way of a controlled highway. (A controlled highway is any highway that is part of the National Highway System along with specific State routes. The South Mountain Freeway would be both a State route and part of the National Highway System.) While the Arizona Court of Appeals did decide in November 2011 that electronic billboards violate the 1970 Arizona Highway Beautification Act, a new law was passed by the State Legislature that banned such billboards in much of the state but allowed them in most of Maricopa County and parts of Pinal, Yuma, and La Paz counties. Weeks later, the Phoenix City Council created a zoning ordinance to regulate such billboards on city streets and highways. Chapter 7, Section 705, of the Zoning Ordinance of the City of Phoenix does not permit billboards to occupy public property or to extend across a property line where such property line borders a public highway. Electronic messages are permitted only on land zoned as commercial or industrial or zoned as a nonresidential use in Residential Districts. Under current zoning, this eliminates most, if not all, of the land along the E1 Alternative. Such signs might be permissible along portions of the W59 Alternative. Such signs may not be illuminated between 11 p.m. and sunrise "when (1) located within one hundred fifty (150) feet of Single Family Residential zoned property and (2) visible from such development or property." Erection and operation of any billboards on Gila River Indian Community land would be subject to regulation by the Gila River Indian Community.

Code	Comment Document

From: Sierra Club on behalf of Craig Warren
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 12:45:09 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 3 The proposed freeway would cause more problems than it would solve and would provide only short-term congestion relief. ADOT needs to focus instead on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 5 The freeway would have very detrimental effects on our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, and valuable public spaces will be lost. The freeway would set a terrible precedent by demolishing what should remain a protected area.

6 The freeway would also exacerbate urban sprawl forcing Valley residents to remain vehicle-dependent, and increase residents tax burden in order to support infrastructure so that others can live farther and farther from a city center.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Craig Warren
7857 W Crocus Dr
Peoria, AZ 85381-8526
(623) 878-3189

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
6	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 3:43 PM
CALLER: ROSE MARIE WARREN	CALLER ADDRESS: 4037 WEST BLUEFIELD AVENUE, GLENDALE, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am for the expansion of the South Mountain freeway. We need the relief from the traffic congestion and we also need the jobs that that type of construction will bring to the valley. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: swaters5@cox.net
To: Projects
Subject: Public input regarding Loop 202 South Mountain Freeway
Date: Tuesday, July 23, 2013 5:32:19 PM

1 2 3

I am writing to express my opposition to the Loop 202 South Mountain Freeway. My home will be very close to the freeway and my biggest concern is the increase in air pollution that will result from the freeway traffic. I also believe it is wrong to cut roadways through the ridges of South Mountain Park/Preserve. I understand the need for new freeways but I do not think we should destroy any part of the South Mountain Park/Preserve in order to build a freeway. South Mountain Park is a natural treasure and should be protected from this kind destruction.

Thank you,

Susan Waters
Ahwatukee Resident

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Section 4(f) and Section 6(f)**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 2:10 PM
CALLER: WYNONA WATKINS	CALLER ADDRESS: 11417 N. 20TH AVENUE, PHOENIX, AZ
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Yes, and I support the South Mountain Freeway. Bye.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support
Date: Monday, May 20, 2013 8:36:26 AM

-----Original Message-----
From: Sheila Watowa [mailto:osheilafreedom2010@me.com]
Sent: Friday, May 17, 2013 8:55 PM
To: Projects
Subject: Support

1

Yes

OSheila Watowa@ gmail.com

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Ravi Watts
To: Projects
Subject: Not too late to comment on the South Mountain DEIS I hope
Date: Wednesday, July 24, 2013 4:37:36 PM

Good afternoon,

I would just like to say that a 900+ page study is not really public friendly, and this is coming from someone who is familiar with reading research publications on the daily. My name is Ravi Raj Watts, and I live in Laveen. Having switched my standpoint from 2002 (pro-202) to where I am now, currently in opposition, I feel like there is not enough justification for this proposed freeway through the preservation/reservation. Sure, projected growth by 2035 is estimated to be large, and with it comes more roadway congestion, but I think the greater issue is an inappropriate amount of vehicles/motorists.

1

Why does every single commuter require their own vehicle in Phoenix? Surely there are some families and carpools from neighborhoods to workplaces, but the majority of traffic and congestion could be easily avoided if the public took mass transportation more seriously. Rather than destroy a natural habitat that is the south mountain preserve with an immense freeway, we should implement better public transportation.

2

That is my brief comment
Sincerely,
Ravi Raj Watts

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Highway
Date: Monday, May 20, 2013 8:32:12 AM

From: Weatherford,Crystal [mailto:Crystal.Weatherford@SRPMIC-nsn.gov]
Sent: Saturday, May 18, 2013 7:47 AM
To: Projects
Subject: 202 Highway

1

I support the building of the South Mountain 202 Highway. The traffic is too congested in Phoenix. This would be a way to get the traffic away from down town. Thank You

Crystal Weatherford
Sun City, Arizona

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

From: Rusty Crerand
To: ADOT
Subject: Loop 202 comment S. Mt. #1315562770
Date: Wednesday, June 05, 2013 7:28:58 AM
Attachments: image001.png

6/4/2013 5:22:53 PM
Just wanted to put my two-cents in that I'm appalled at this horrible undertaking and how bad it will affect the environment!! PLEASE STOP this!!

Melissa Weaver
mlsswvr@aol.com

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the Responses to Frequently Submitted Public Comments beginning on page B733 of this appendix.

Code	Comment Document
1	**From:** webmaster@azmag.gov [mailto:webmaster@azmag.gov] **Sent:** Tuesday, June 04, 2013 5:25 PM **To:** MAG General Mailbox **Subject:** South Mountain **Subject:** South Mountain **To:** Maricopa Association of Governments **Name of Sender:** Melissa Weaver **Email Address:** mlsswvr@aol.com **Organization:** Self **City/State:** phoenix, AZ **Phone:** 6029430180 **Sent:** 6/4/2013 5:25:01 PM PLEASE DON'T do this freeway "fiasco" - it will do so much harm and it's a waste of $'s!!! This email has been sent to you from the MAG Website.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the Responses to Frequently Submitted Public Comments beginning on page B733 of this appendix.

Code	Comment Document

THE FACILITATOR: Thank you. Jim Vaaler.

MR. VAALER: Yeah, thank you for the opportunity to speak, just got basically two words for you, no-build. I think the purpose and need for this freeway is outdated. I think you could improve existing infrastructure and use mass transit in place of this freeway.

My other concern is the intrusion this potential freeway would have on South Mountain Park. I think you set a very bad precedent by proposing to build it in the park. Any deletion from the park, I mean, 30 acres is unacceptable. Those are the two points I'd like to make.

Thank you.

THE FACILITATOR: Thank you.

Anybody who would like to speak, please go out and register at the registration table. We'd be happy to hear you.

Larry Weeks. Larry, could I ask you to go to this microphone, please. Trying to do it equally for the court reporter.

MR. WEEKS: Good afternoon, my name is Larry Weeks. I'm in the 85048 zip code, specifically in the Lakewood and Ahwatukee area. And my concerns are the increase in noise and increase in pollutants

1 2

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	

Code	Comment Document

3

that are expected by vehicles that will traverse in that area. Also, as a resident of the Lakewood area I'm concerned about the elementary school in the Lakewood area, and the high school in that area, although we've capped at 32nd Street. What will happen, then, is the folks from 24th Street through 40th Street will head east to 40th down Chandler Boulevard, increasing traffic flow.

Also, the parents that drop off at Desert Vista will begin to use the Lakewood community more frequently to short-cut their way past the elementary school to 40th Street, so I project a bottleneck happening at 40th Street and Chandler Boulevard. I see an increase in traffic, local traffic, coming from the 24th Street, 32nd Street areas up to 40th Street backing up to Chandler Boulevard. And Chandler Boulevard, the morning commute is backed up now, and as folks make decisions whether or not to take the 48th Street arterial routes or try to make their way to the 10. So if the 202 is an alternative for the folks going downtown, I don't really see them, you know, they're going to have to make some decisions as to whether or not to go all the way down to 59th or 51st, and then cut back to downtown. so -- but my main concern is the increased traffic in

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www.drivernix.com

Code	Issue	Response
3	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix. The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. At the same time, the City conducted a traffic circulation study to evaluate the impacts of the freeway (and the removal of an access point at 32nd Street) on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

Code	Comment Document

the Lakewood community area.
That's it.
THE FACILITATOR: Thank you.
Patricia Weeks.
MS. WEEKS: All right. Actually, I just wanted to expound upon what my husband said. And my concern is the fact that you're closing off 32nd Street off of Pecos, off the 202. The concern, just to elaborate a little further, is specifically off of Fry Road and Liberty, and the amount of traffic that will be going through that Lakewood area. Right now we have concerns where there is an elementary school in that area, and there is police officers there to try and slow down traffic.
And the quantity of traffic is what my concern is, because it's just a complete loop in that Lakewood area. Like to just kind of make sure that maybe there's some type of provisions that are made, maybe, to eliminate some of that traffic. Please consider that. Thank you.
THE FACILITATOR: Thank you.
If anybody out here would like to speak, please go out and register at the front desk here and then come on back in.
Your attention, please. This is the first

Code	Issue	Response

Code	Comment Document

4272

the Lakewood community area.

That's it.

THE FACILITATOR: Thank you.

Patricia Weeks.

MS. WEEKS: All right. Actually, I just wanted to expound upon what my husband said. And my concern is the fact that you're closing off 32nd Street off of Pecos, off the 202. The concern, just to elaborate a little further, is specifically off of Fry Road and Liberty, and the amount of traffic that will be going through that Lakewood area. Right now we have concerns where there is an elementary school in that area, and there is police officers there to try and slow down traffic.

And the quantity of traffic is what my concern is, because it's just a complete loop in that Lakewood area. Like to just kind of make sure that maybe there's some type of provisions that are made, maybe, to eliminate some of that traffic. Please consider that. Thank you.

THE FACILITATOR: Thank you.

If anybody out here would like to speak, please go out and register at the front desk here and then come on back in.

Your attention, please. This is the first

Page 102

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www.drivernix.com

Code	Issue	Response
1	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix. The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. At the same time, the City conducted a traffic circulation study to evaluate the impacts of the freeway (and the removal of an access point at 32nd Street) on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

Code	Comment Document

4293

better because you already have connections.

The 59 gives the Laveen community a way to get to the main freeway so they can go to downtown Phoenix or to the west regardless of where they live in Phoenix. So 59 is more involved for the living community to connect to downtown and the rest of the city.

On top of that, to me it feels like there is no freeway connecting Laveen into any of the city. So I think this might allow us to connect to the city a lot better, to let us bring our ideas to the city, commute back and forth.

I guess that's all I have.

***

PATRICIA WEEKS: Our concerns are once they close off 32nd Street off of Pecos and 32nd Street, the road that goes from Frye off of 32nd Street into the Lakewood subdivision and out through --

LARRY WEEKS: -- will be used to bypass Chandler Boulevard getting to 40th Street to get to the freeway on the 202 and the Briarwood exit.

PATRICIA WEEKS: That's one of the concerns.

LARRY WEEKS: The other concern is there is

1

Page 6

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Code	Issue	Response
1	**Design**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix. Construction of the interchange would have resulted in the displacement of over 100 homes and the interchange would have been located near an existing high school. Access to 32nd Street is to remain available from Chandler Boulevard and other east–west local streets. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway (and the removal of an access point at 32nd Street) on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The traffic projections for Chandler Boulevard (see Figure 3-12, on page 3-29 of the Final Environmental Impact Statement) show a reduction with the proposed freeway when compared with conditions without the proposed freeway.

Code	Comment Document

an elementary school in the Lakewood subdivision and we will see an increase in traffic.

PATRICIA WEEKS: And currently there are police officers there to make sure people are slowing down just with the roads open right now.

LARRY WEEKS: So there's already things going on in the Lakewood area that is going to increase with this capping of the on-ramp at 32nd Street.

The other thing is we'd like to know what the projected increased volume of vehicles will be on 40th Street and Chandler Boulevard once the project is complete. So moving east on Chandler and south on 40th Street as they make their way down the ramp to the new 202.

And then I don't know if we pose it as a question, but what provisions have they made as far as to eliminate the traffic that may go through the subdivision, which is the Lakewood subdivision, once they close off 32nd.

It would be nice to close Frye Road too.

* * * *

(The proceedings concluded at 8:00 p.m.)

Code	Issue	Response

Code	Comment Document

4412

Mike Franklin, I live in South Tempe. South Mountain is the place I go hiking most, because it takes less gasoline for me to get there. There are parts of South Mountain that kind of take you out of the city, and there aren't too many places you can go to around here like that. It's always interesting to find new discoveries, there's lots of petroglyphs, it's unique. It won't be unique if the west end is chopped off with eight lanes of traffic, polluting the air, making it noisy, totally destroying the natural experience of being up in the mountains. To do this, to take about five percent of the traffic or whatever it is off of the interstate just doesn't seem worth it to me.

I think once you've -- the oil production gets down we're going to have to find better ways of transportation or we're going to get stuck with this expanse of asphalt there forever, at least during my life. And I vociferously disagree with that tact of moving traffic, it's kind of a 20th-century solution to a 21st-century problem. That's what I have to say.

THE FACILITATOR: Thank you.

Patricia Weeks.

MS. WEEKS: Hello. Actually, I just want to expound upon what my husband said. Can you guys hear me? Can you hear me?

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Ruth Claire Weintraub Document Created: 7/17/2013 8:47:12 AM by Web Comment Form

1 2

Arizona - Phoenix, in fact all the USA - needs sustainable transit, not more accommodation for cars and trucks. I would like to see the country come to grips with reality. When can that come to pass, please?

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	

Code	Comment Document

From: Steve Weiss
To: Projects
Subject: I oppose Loop 202 extension
Date: Wednesday, July 24, 2013 12:10:12 PM

To whom it may concern,

I want to be put on record as being opposed to the Loop 202 extension as currently proposed.

1 2 3

If we can learn anything from the Great Recession, it's that pursuing policy that extends urban sprawl is reckless and short-sighted. Adding more freeways and extensions only exacerbates the current situation, it will not improve it, and it is potentially harmful to both the Gila River Community and South Mountain Park.

Steve Weiss
2938 North 15th Drive
Phoenix AZ 85015

--
Steve Weiss
Candid Landscapes
Photography-Arizona and the Southwest
602-265-9524 http://www.candidlandscapes.com
Fine Art Portfolio http://www.candidlandscapes.carbonmade.com

Code	Issue	Response
1	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Section 4(f) and Section 6(f)**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: NO on Loop 202 Extension
Date: Monday, July 22, 2013 8:51:42 AM

-----Original Message-----
From: Van Welborn [mailto:vwelborn@gmail.com]
Sent: Sunday, July 21, 2013 10:32 PM
To: Projects
Subject: NO on Loop 202 Extension

1 2

Hello. I would like to give my input on the Loop 202 extension. Either it needs to be farther South so as not to encroach on the existing developments, or it needs to be scrapped! The money spent on buying the homes in the path could be used to facilitate a deal with the Tribe to use their land.

Thank you!

Van Welborn
HomeSmart
623.363.6731
Sent from my iPad

_____

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community Alignment**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:23:51 AM

From: Brittany Welch [mailto:brittany.welch24@gmail.com]
Sent: Sunday, May 19, 2013 1:45 PM
To: Projects
Subject: 202

1

NO they should not build on to the 202 South Mountain there is enough freeways where people can commute or just take the streets.... people are always complaining that we are in debt so why waste money on a freeway that's not needed.

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Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 9:45 AM
CALLER: CARL WELKS	CALLER ADDRESS: 8447 WEST MINNESOTA, PHOENIX, ARIZONA 85037
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Mary Wellington
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 7:35:53 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 What is this madness in our state to create ever more and ever wider roadways for cars? STOP!

3 We need to put transportation dollars into rail, bus, bicycle parkways and pedestrian paths.

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mrs. Mary Wellington
8682 N Morning View Dr
Tucson, AZ 85704-4726

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
3	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: DEIS South Mountain Freeway
Date: Wednesday, May 22, 2013 10:52:19 AM
Attachments: South Mountain 202.doc

From: Yahoo!! [mailto:welshfj@yahoo.com]
Sent: Tuesday, May 21, 2013 12:18 PM
To: Projects
Subject: DEIS South Mountain Freeway

Attached are my comments regarding the public hearing May 21, 2012. I sent comments earlier, but these are my corrected comments. Please ignor the earlier message.

Frank Welsh, PE JD
7654 S. 41st Place
Phoenix, AZ 85042

602-595-5088

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

It's hard to believe that we are still attempting to build freeways based on the old Wilbur Smith Report of 30 years ago. I thought the Paradise Freeway, which was stopped by Governor Symington, would be the final chapter of that report.

2 3

All the alternatives presented here result in the loss of some of the South Mountain Preserve. No alternatives have been explored that don't have this result. This concerns me. The so called "alternatives" W101, W71, or the Recommended Alternative, are not very relevant. All alternatives leave 140,000 vehicles a day on our crowded, polluted freeways.

4

5

Some of ADOT's other studies are more helpful. May I refer you to the ADOT Passenger Rail Corridor Study of December 2012. This provides some REAL alternatives. The study concepts of the red and green routes connecting all the way from Avondale to LA could the beginning of something big – a high speed rail line connecting our two largest cities and the jump-start of a high speed connection from Avondale to Los Angeles. All we need is more money!

6

The billions that would be spent on more freeways might be better spent on mass transit. Mass transit will take more cars off the freeways, and will be the wave of the future.

Frank Welsh
Phoenix .AZ

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Alternatives, E1 Alternative**	
4	**Alternatives**	Many alternatives were considered to avoid having to alter the South Mountains. These are discussed in the Final Environmental Impact Statement in Chapters 3 and 5. South Mountains Avoidance Options is the subheading on page 3-13 where these discussions begin. Table 3-5, on page 3-12, summarizes alternatives such as using Ray Road, extending U.S. Route 60, tunneling through the South Mountains, and bridging the South Mountains. The latter two are described on pages 3-16 and 3-17 and in text that begins on pages 3-13 and 5-20. The reasons these alternatives were eliminated are made clear.
5	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
6	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	Juanita Welsh Document Created: 7/16/2013 12:28:34 PM by Web Comment Form I have been studying the South Mountain Freeway Alternatives for years now. I voiced my opinions when the first public meetings took place. I do not understand why developers would want to merge the SMF at the 59th Ave junction. The grid lock now at rush hours traveling West is a mess. It makes no sense to add to this by merging the SMF at this point. The most logical option is the W101 Alternative Central Option. AT this juncture traffic can go North, East or West. At the 59th juncture the options are only West or East.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Estudio de la Autopista
South Mountain
LOOP 202

2013

Reporte Del Impacto Ambiental
FORMULARIO DE COMENTARIOS

Comentarios Adicionales: I WOULD APPRECIATE YOUR RECONSIDERATION OF THE PLAN TO BUILD THE SOUTH MOUNTAIN FREEWAY. WE HAVE SPECIFICALLY CHOSEN TO LIVE IN AHWATUKEE BECAUSE OF ITS RELATIVE REMOTENESS AND QUIET LIFESTYLE. I FEAR THAT THE PROPOSED FREEWAY WILL DO MORE HARM THAN GOOD OVERALL. (1)

- ENVIRONMENTAL HARM: THE NOISE AND DESTRUCTION OF A PORTION OF SOUTH MOUNTAIN PARK, THE DISPLACEMENT OF WILDLIFE, AND THE ADDED POLUTION ARE ALL TERRIBLE EFFECTS OF THIS PLAN. (2) (3) (4) (5)

- SAFETY HARM: THE PLACEMENT OF THE FREEWAY IS CLOSE TO EXISTING HOMES AS WELL AS THE KEYSTONE MONTESSORI SCHOOL. THE USE OF TRUCKS (WHICH WILL UNDOUBTEDLY OCCUR) ALONG THIS ROUTE TO BYPASS I-10 POSES ANOTHER GRAVE DANGER CONSIDERING MANY OF THOSE TRUCKS CARRY HAZARDOUS MATERIALS. (6) (7)

QUALITY OF LIFE HARM: MANY PEOPLE SPECIFICALLY MOVE TO AHWATUKEE TO LIVE APART FROM THE HURRIED AND CROWDED ATMOSPHERE OF THE CITY AND NEARBY INDUSTRIAL AREAS. THE NOISE POLLUTION FROM GREATLY INCREASED TRAFFIC, THE VISUAL POLLUTION FROM THE UNSIGHTLINESS OF A FREEWAY (CLEARLY VISIBLE FROM THE BEAUTIFUL SOUTH MOUNTAIN TRAILS), AND THE CONCENTRATION OF EXHAUST POLLUTION WILL ALL HAVE DELETERIOUS EFFECTS ON THE OVERALL QUALITY OF LIFE IN THE AREA. (1) (8) (5)

I URGE YOU TO NOT BUILD THE SOUTH MOUNTAIN FREEWAY. THIS ACT WILL RUIN THE QUALITY OF LIFE WE HAVE ALL SOUGHT OUT IN THIS COMMUNITY. (9) (1)

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 10-150

ADOT U.S. Department of Transportation Federal Highway Administration

PARA MÁS INFORMACÓN:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Section 4(f) and Section 6(f)**	
4	**Biology, Plants, and Wildlife**	
5	**Air Quality**	
6	**Purpose and Need, Truck Bypass**	
7	**Hazardous Materials**	
8	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
9	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Estudio de la Autopista
South Mountain
LOOP 202

2013

Reporte Del Impacto Ambiental
FORMULARIO DE COMENTARIOS

Gracias por participar en el proceso de recopilación de comentarios sobre el Reporte del Impacto Ambiental del proyecto de la autopista South Mountain.

ADOT alienta a todos los interesados, a presentar sus comentarios por escrito sobre cualquier aspecto del Reporte del Impacto Ambiental. ADOT considerará todos los comentarios en la preparación final de este reporte e incluirá las respuestas a todos los comentarios, conclusiones finales sobre impactos potenciales, y la recomendación final de ADOT.

Para ADOT es muy útil recibir comentarios sobre:

- Alguna alternativa en particular, cúal sería su impacto ambiental y las medidas propuestas para reducir dicho impacto.
- Cualquier información que usted sienta que está incompleta o incorrecta.
- Cómo le afectará a usted la acción propuesta.

Los comentarios deben ser recibidos o tener el sello postal con fecha límite del 24 de julio de 2013.

COMMENTS ON OTHER SIDE →

Opcional

Nombre DAVID WENGER Correo Electrónico dwenger01@gmail.com

Dirección 730 E. MOUNTAIN SAGE DRIVE

Ciudad PHOENIX Estado AZ Código Postal 85048

Teléfono _____ Fax _____

Los comentarios deben ser recibidos o tener el sello postal con fecha límite de Julio 24,2013. Los comentarios pueden ser depositados en la reunión de hoy, enviados por correo electrónico a projects@azdot.gov **o por correo regular a :**
ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

PARA MÁS INFORMACÓN:
azdot.gov/SouthMountainFreeway

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Comments in opposition to South Mountain Freeway
Date: Wednesday, May 29, 2013 8:26:08 AM

-----Original Message-----
From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Sam Wercinski
Sent: Tuesday, May 28, 2013 5:00 PM
To: Projects
Subject: Comments in opposition to South Mountain Freeway

May 28, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

More commitments by politicians broken.

(2) (3) South Mountain Park is the largest city park in our nation and it was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(4) Taxpayers flip the bill for urban sprawl and developers' profits.

(5) This newest freeway will force residents to remain vehicle-dependent while we pay for roads that developers and home builders can use to gain more profit through more construction. Residents are pushed farther and farther from a city center.

(6) Building more roads is not the answer.

(7) ADOT needs to focus on planning for and investing in long-term transportation solutions, especially rail and other mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Use the tax dollars that would be spent on this project to expand light rail in the metro area and high speed rail between PHX and Tucson. Thank you.

Sincerely,

Mr. Sam Wercinski
5937 E Cheney Dr
Paradise Valley, AZ 85253-3575

_____

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Biology, Plants, and Wildlife**	
4	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
5	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway comments
Date: Friday, June 21, 2013 10:23:44 AM
Attachments: john.vcf

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: John H. Werner [mailto:john@kwinkmedia.com]
Sent: Friday, June 21, 2013 9:44 AM
To: Projects
Subject: South Mountain Freeway comments

Please add the following to the discussion:

1 2 3 4 5 6 7 8 9

1. We live near Desert Foothills Parkway (DFP) and I understand that this is where noise and air quality impacts would be worst, given the road's slope approaching the hill. What is to be done to mitigate this? Can the grade be reduced?
2. Has anyone considered how construction will, I'd guess, drive every snake and scorpion, of which we all have plenty already, right through our neighborhoods?
3. Will funding be provided to assist schools with improvements to air filtration systems?
4. Has growth inducement potential on the reservation and the secondary effects of that growth been fully considered?
5. Sorry for my ignorance, but how is DFP to be connected, via a bridge?

I am not opposed necessarily, and part of me likes the idea of *some* good commercial development on the reservation and our better integration into the metropolitan area, but, of course, I think a better alignment would be 1/2-1 mile south of Pecos, if that can be worked out.

John Werner

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Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. As discussed in the Noise Analysis Technical Report prepared for the Final Environmental Impact Statement, the proposed South Mountain Freeway was modeled in the latest version of the Traffic Noise Model (version 2.5). This is a three-dimensional model that factors in elements of the proposed freeway using x, y, and z coordinates. The model did account for the elevations of the freeway, nearby homes, which may be elevated above the roadway, and any recommended barriers between the homes and freeway. This is the same procedure and same model used for other freeway projects in the Valley and across the country.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
3	**Noise**	Noise walls would range in height from 8 feet to 20 feet tall in the Ahwatukee Foothills area. Noise barriers are designed to provide a substantial reduction in noise levels along freeways, but do not and cannot eliminate noise from passing into nearby neighborhoods. Just because noise can be heard does not mean that noise barriers are ineffective. Even at the levels considered "acceptable" by the Arizona Department of Transportation Noise Abatement Policy and Federal Highway Administration regulations, noise is still readily audible and can be heard for some distance from the freeway. Noise modeling is used to determine the most appropriate and effective location for noise barriers.
4	**Design**	The current level of engineering is used to determine the limits of environmental and construction impacts due to the proposed freeway. The location and profile of the freeway are evaluated to minimize potential changes to the freeway as the design level would progress. The current level of engineering is an accepted industry standard for determining impacts. (See Final Environmental Impact Statement sidebar on page 3-40 for more discussion.)

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
5	**Construction**	Issues with pests are not assessed in the Draft Environmental Impact Statement. Temporary construction impacts are discussed on Draft Environmental Impact Statement page 4-173.
6	**Air Quality**	At this time, the mitigation measures do not include funding to assist schools with improvements to air filtration systems.
7	**Secondary and Cumulative**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
8	**Design**	No bridges are proposed to connect the proposed freeway to Desert Foothills Parkway. Embankment material would be used to construct the on- and off-ramps at Desert Foothills Parkway.
9	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:14 PM
CALLER: MARY WEST	CALLER ADDRESS:
PHONE: 602-944-0010	EMAIL:
CALLER REMARKS/QUESTIONS: I am definitely for the freeway to be put in South Mountain. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 1:17 PM
CALLER: TEX WESTIN	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, hello - I really do support the South Mountain freeway. [UNCLEAR] like all those Mexicans congestion to I-10, so I do support the 202. This message was brought to you in part by (HIS NAME).

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:42 PM
CALLER: JEAN WHEELER	CALLER ADDRESS: 3573 S. SOVEREIGN LANE, CHANDLER, AZ 85286
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in support of putting the 202 South Mountain Freeway through to the west side. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Terry Whitaker
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 6:14:18 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit (e.g. expanding the rail). (3) The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, (5) more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, (7) wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Terry Whitaker
2678 E Lines Ln
Gilbert, AZ 85297-8136

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

Caleb Whitaker Document Created: 7/22/2013 10:34:55 AM by Web Comment Form

(1) I understand that the "carrot orange" coloring on the tail of the male Desert Chuckwalla (Sauromalus ater) is unique to South Mountain. Hasn't this been identified as a separate species or sub-species? Why was this not mentioned in the Draft EIS? The EIS made it sound as if the Chuckwallas found on South Mountain were the same as any others found in the Southwest. I do not believe this to the case. The Chuckwalla population found on South Mountain is unique and deserving of special protection. It cannot be found anywhere else, and the freeway will significantly disturb its habitat.

(2) I do not support the freeway for this and many other reasons. The freeway may have been a good idea thirty plus years ago, but in the meantime a large community has grown up in the proposed route. It would be a shame to ruin this fine community, especially when there is so much open land to the south. If the Gila River Indian Community will not allow the freeway on tribal land, then another route should be found even further to the south. The freeway should be directed away from people and homes, not right in backyard of tens of thousands of people. There are other and better options.

(3)

(4)

Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The coloring of the male common chuckwalla is unique to the South Mountains; however, it is one of two color patterns and is not a separate species or subspecies (see Arizona Game and Fish Department's abstract for the common chuckwalla). The color pattern for the common chuckwalla was not mentioned in the Draft Environmental Impact Statement because that was not relevant to the study.
2	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Alternatives even farther south have been considered, such as an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Draft Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the purpose and need fro the proposed action as part of a regional transportation network and, therefore, it was eliminated from further consideration.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 12:19 PM
CALLER: CARL WHITE	CALLER ADDRESS: 1723 SOUTH ROSEDA STREET, GILBERT, ARIZONA 85295
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I would like to express my support for the South Mountain freeway. Thank you very much.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

WESLEY & MEREDITH WHITELEY
1644. E. Briarwood Terr.
Phoenix, AZ 85048
480 460 0749
July 18, 2013

ADOT Loop 202, South Mountain Freeway Study
1655 W. Jackson Street MD 126F
Phoenix, AZ 85007

1

Please register our strong opposition to the Loop 202 plan along Pecos Rd. We are long-tiime citizens of the Valley, we are informed, and we vote. We have not joined PARC for the sole reason that we cannot give out our e-mail address, but we support their efforts. Do not cast aside this letter or our voice.

Sincerely,

Meredith Whiteley

Meredith Whiteley

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Comment
Date: Wednesday, July 24, 2013 10:14:22 AM

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT
Communications

From: Doug Whitfield [mailto:dougwhitfield@teamtechinc.net]
Sent: Wednesday, July 24, 2013 10:13 AM
To: Projects
Subject: South Mountain Freeway Comment

I have many questions pertaining to the proposed South Mountain Freeway.

1 One of the most important is that of the current level of pollution that is already being experienced along the proposed route. What, if anything, is going to make this current situation any better by adding thousands of vehicles passing through this area on a new route around the city?

2 On just about many given day when an inversion layer is present, you can see the brown air in the area with the mountains as a backdrop. How can anyone with any level of intelligence say that this situation will improve with a major highway added into the mix? This pollution tends to sit in the area until there is a strong enough air flow to push that dirty air out of the area, which takes weeks to happen in most cases.

3 No matter if above ground, at ground, or below ground, the same issue is present and needs to be addressed with a plan. With the use of alternative fuels by fleets on the rise, why couldn't the route be restricted to alternative fuel vehicles, much like the HOV lane is today on existing highways. This would have minimal impact on the environment along the existing route, take advantage of the current trends in alternative fuels, and allow for a speedy alternative for those vehicles qualifying to use such a route.

Thanks

Doug Whitfield
14602 S. 8th Street
Phoenix, AZ 85048

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
3	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

480-460-1845
© 480-263-0643
Dougwhitfield@teamtechinc.net
www.dentacareusa.com

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Code	Issue	Response

Code	Comment Document

5047

MR. WHITMAN: I'm just against it. I've been against it, and I just feel like a lot of people are. And I just don't want it to happen.

I mean, it's impacting our community a lot. And on the video, it just seems like they are more concerned about other historic places, in different towns and stuff, but little interest in ours and did whatever they wanted. So that's basically it. That's basically it.

1

Page 2

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The Preferred Alternative for the proposed freeway was designed to avoid historic buildings determined eligible for listing in the National Register of Historic Places; thus, none would be destroyed by the project. (See Draft Environmental Impact Statement page 4-132 [Table 4-47] and pages 3-25 and 3-26.)

Code	Comment Document

Cyndi Whitmore Document Created: 7/12/2013 2:47:14 PM by Web Comment Form

1 2 3 4

No, no, no. This freeway will not produce long term relief to traffic congestion and will only worsen air quality. More freeways are not the answer. Carving up more of our desert is not the answer.

Code	Issue	Response
1	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). By 2035, east- and westbound motorists on Interstate 10 between State Route 101L (Agua Fria Freeway) and State Route 202L (Santan Freeway) are expected to experience stop-and-go driving for over 3 hours every day. This is for a distance of nearly 30 miles. A new freeway in the Study Area would distribute commuters over an additional freeway facility. As a result, the duration of stop-and-go traffic on the region's freeways would be reduced.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 Expansion
Date: Tuesday, July 02, 2013 11:36:02 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Whyte, Colleen [mailto:Colleen_Whyte@FMI.com]
Sent: Tuesday, July 02, 2013 11:22 AM
To: Projects
Subject: 202 Expansion

1

As a resident of Laveen, I am glad to see that after "30 years" the 202 expansion will finally happen at some point in the future. Having viewed the material, it's disappointing that we may not have a true loop around the downtown area unlike other metropolitan areas in which I have lived. If long range planning had been in place – the build up around the Loop 101 could have been avoided. Many of our visitors are surprised that all traffic must travel through the downtown area. The preferred access from 59th Ave is obviously the cheapest and least intrusive but I fail to see how this alternative will relieve Interstate 10 of the congestion that builds everyday between 91st Ave and 7 Ave. In addition, this route does not provide much of an improvement for access to the west valley from the Laveen area where much of the anticipated growth will occur.

Obviously, my family would prefer that the 202 loop connect at the 101 and failing that, further out at the 71st interchange. 59th Avenue seems like a short-sited solution to the current problem.

Colleen M Whyte

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: John Wiegand
To: Projects
Subject: South Mountain Study Team - Loop 202 Extension
Date: Wednesday, June 05, 2013 1:34:42 PM

1

I support construction of the Loop 202 South Mountain Freeway as soon as possible. I believe the extension is vital for resolution of future transportation issues facing the Phoenix Metropolitan Area.

Thanks,

John Wiegand
9336 E Hobart St
Mesa AZ 85207

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 6:55 PM
CALLER: JERRY WILCOX	CALLER ADDRESS: 143 S. HOBSON, MESA, AZ 85204
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in favor of the South Mountain Freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build 202
Date: Wednesday, May 22, 2013 10:56:30 AM

From: Irene Wiley [mailto:wileyirene@yahoo.com]
Sent: Monday, May 20, 2013 7:41 PM
To: Projects
Subject: Build 202

1

We need the 202 built. Some of my family work in Awtookie (mspl), That would really help that part of town in many ways. Irene B. Wiley wileyirene@yahoo.com

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
5/17/13	4:51 PM
CALLER: STEVEN WILGERT	CALLER ADDRESS: 10635 N. 34TH PLACE, PHOENIX, AZ 850028
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway. Thank you. Please build the freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain 202
Date: Monday, May 20, 2013 8:22:56 AM

From: Clark Wilkerson [mailto:c_wilkerson@yahoo.com]
Sent: Sunday, May 19, 2013 6:21 PM
To: Projects
Subject: South Mountain 202

1

I am not sure of the cost but I think that building the South Mountain 202 is a great idea for Phoenix. The freeways help traffic and encourage business. Please move forward with this project at the rate you feel is prudent.

Clark Wilkerson

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

Cliff Wilkinson Document Created: 5/28/2013 6:18:58 AM by Web Comment Form

I support the "No Build" option.

1 2 3 4

The cost is just too high and Sierra club lists this as the worst project for transportation environmentally and essentially relocates Indigenous peoples and destroys their sacred sites.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Sierra Club Report**	The Arizona Department of Transportation and the Federal Highway Administration respectfully disagree with the referenced Sierra Club Report. As noted in the Final Environmental Impact Statement, when compared with the No-Action Alternative, the Preferred Alternative would result in less energy consumption (page 4-172), regional improvements to air quality (page 4-74) that would be expected to produce health benefits, and economic benefits of reducing regional traffic congestion (page 4-65), and would be consistent with local and regional long-range planning efforts (page 4-18).
3	**Acquisitions and Relocations**	No residences on Gila River Indian Community land would be acquired and no relocations of people living on Gila River Indian Community land would occur.
4	**Cultural Resources**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: No S. Mountain Freeway #1315503651
Date: Tuesday, June 04, 2013 8:04:16 AM
Attachments: image001.png

6/4/2013 12:46:09 AM
I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative. (1)

The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them. (2) (3)

South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases. (4) (5)

The freeway would also negatively affect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area. (6) (7)

The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center. (8)

Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you. (1)

Sincerely,
Cliff Wilkinson
cliff_jason_wilkinson@yahoo.com

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	ADOT Communications Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 3:29 PM
CALLER: MARK WILLEY	CALLER ADDRESS: 16397 W. PEARCE STREET, GOODYEAR, ARIZONA 85338
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: ADOT Loop 202 South Mountain Freeway
Date: Tuesday, May 14, 2013 9:48:43 AM

From: Christian M. Williams [mailto:ceemoaz@gmail.com]
Sent: Monday, May 06, 2013 1:49 PM
To: Projects
Subject: ADOT Loop 202 South Mountain Freeway

1

I am in favor of extending Loop 202 along the Pecos Road alignment as this has been planned since the 1980s. Let's not waste any additional money or time. Let's just finish what we have started. Pecos Road makes the most sense.

Thank you,

Christian Williams
10370 W Sands Dr
Peoria, AZ 85383

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 thru Laveen!
Date: Monday, May 20, 2013 8:30:07 AM

-----Original Message-----
From: Amy Williams [mailto:kennyandamy@q.com]
Sent: Saturday, May 18, 2013 10:22 AM
To: Projects
Subject: Loop 202 thru Laveen!

1

YES!!!! We are Laveen residents and want that freeway! Please speak for us in Laveen and make this happen!!!!
Thank you!!

Amy Williams

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Doug
To: Projects
Subject: South mountain freeway alternative
Date: Tuesday, June 04, 2013 6:20:10 PM

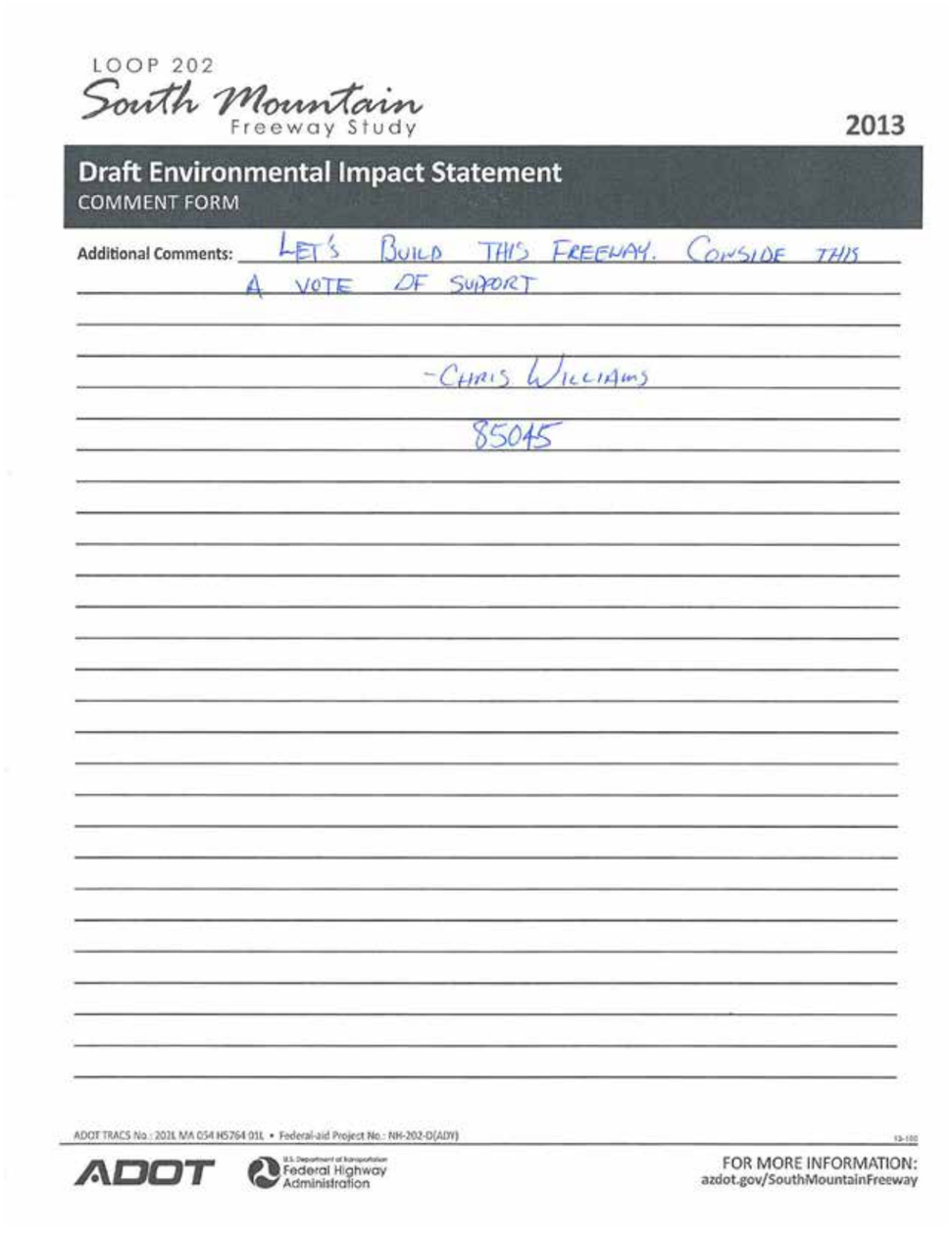
1

I am a resident of Ahwatukee area and would love to see our commuter trains expand to this area.
This would eliminate the need for more freeways and added pollution.
I voted for the trains years ago but they never came to our neighborhood.
I believe the train could be elevated above the interstate 10 with ease , like that of the Denver lines.
Why can't we utilize what we have more effectively and thus eliminate the need for more freeways that would only serve the community more. THE city of Phoenix should spend our tax dollars with the future in mind , let's campaign for alternatives which would make our city more livable.

LONGTIME RESIDENT
VICKIE WILLIAMS

Sent from my iPhone

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: LET'S BUILD THIS FREEWAY. CONSIDE THIS A VOTE OF SUPPORT

-CHRIS WILLIAMS

85015

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-100

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

I SUPPORT THE PROJECT. IT WILL GREATLY ASSIST REGIONAL TRAFFIC AND REDUCE CONGESTION THROUGH CENTRAL/METRO PHOENIX

Optional

Name ELIJAH WILLIAMS Email

Address

City MESA State AZ Zip

Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:31 PM
CALLER: CAROLEE WILLIAMS	CALLER ADDRESS: 5202 E. PARADISE LANE, SCOTTSDALE, ARIZONA 85254
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I do support the addition of the new freeway, South Mountain Freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4252

us up to all of the Valley, and also help us to stay and keep our dollars in Phoenix as well.

Thank you so much. And appreciate your time.

THE FACILITATOR: Thank you, Ms. Herring. Our next speaker is Ethel Williams. Welcome, Ms. Williams, you have three minutes.

MS. WILLIAMS: Thank you. Thank you for hearing me, and thank you for being here. Thank you for addressing our problems that we're having in the Laveen community. I know that these improvements will help the whole community and the surrounding communities.

Mainly, I moved to Laveen after my daughter, who just spoke, and my son, and her mother-in-law moved to Laveen, because everything looked promising, and we thought it would be a very good move to help improve some of the things that are going on in our surrounding areas in the City of Phoenix area.

But I think that this will bring a lot of help to us, as far as accidents are concerned, because, like she said, the traffic problems are horrendous during the rush hours. And for my

1

Page 73

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

family's safety, if for nothing else, I say yes, let's do it. And the 59th Avenue Freeway is the one that I would be concerned about.

Thank you very much.

THE FACILITATOR: Thank you, Ms. Williams.

We welcome our next speaker, Diane Barker. Welcome, Ms. Barker, you have three minutes.

MS. BARKER: Oh, thank you. And I imagine you're the ADOT board; is that who I'm addressing? Can I get you to respond? Okay. Now that you notice, I came in with my suitcase. I am a person that believes in [unintelligible]. I have just seen your video, and I've read the bulk of your EIS. And I would like to apologize up front if what I have to say offends anybody, but I believe it's the truth, certainly mine.

I favor a no-build. 40 CFR 15024 stipulates that the Environmental Impact Statement conducted by ADOT and all will be a rigorous exploration of alternatives to a real problem, need an action herein, of any possible growth in population with socioeconomic viability, as we are one of the USA's largest and fastest-growing counties, Maricopa.

Therefore, completion of the South 202 Loop

Code	Issue	Response

Code	Comment Document

I-10 plugs up, they all hit the surface streets, and the surface streets from South Phoenix to Laveen just get jammed up. A lot of accidents are starting to happen, more serious accidents than ever before.

So I am in favor of building the freeway. I have been in the path of the freeway since '85 when it was designed, and we voted for it in '86. And we are still waiting to see whether this is going to be built or not. But I would strongly suggest that the freeway be built.

Thank you very much.

ANONYMOUS: Well, we are for it, wish it would happen. I have been following it since 1985. Nothing has happened that we can see. And I live on 51st, off of 51st Avenue. And right now the traffic is horrendous. Two miles down south of where I live, the Vee Quiva will open its new phase in July with seven restaurants and a resort, which they don't have right now. So it already -- 51st Avenue will be a freeway. And that's our concern.

We want the freeway.

ETHEL WILLIAMS: The main thing I would like to do is say that my whole family -- not my whole family, but two-thirds of us, three-fourths of us, moved to Laveen because of all the things they promised

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 to do before we moved in there. One was to build a
2 bridge across 67th Avenue at the river.
3 And right after we moved in there, I remember
4 that bridge was closed by the river. We had no access
5 across the river for like -- it might have been four
6 months or five months; I can't remember. I got so used
7 to it that I wouldn't even think about going across.
8 But we do need that freeway, too, which would
9 be the W-59 route we are talking about.
10 We need a community center. When we first
11 moved in there, they had the -- we are seniors; my
12 husband and I, we're seniors. When we first moved in
13 there, they had the SilverSneakers program at the Cesar
14 Chavez High School that they closed down. And we have
15 never had any input about what facility we're going to
16 use for SilverSneakers since then.
17 What else? When I travel from my daughter's
18 house to my house, sometimes I take forever getting
19 across Baseline just to go -- like if I want to go to
20 Fry's. I do live to the right. Sometimes I exit her
21 house to go to Fry's or to go to the shopping center on
22 51st. And it takes forever. It takes a lot of time
23 just to make the turn to get out of that complex, out
24 of the complex where they live. And she lives in
25 Cottonfields, right there at 56th and Baseline.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

We do have a light at 67th, which makes it a lot better for us. We didn't have the light for a long time. But they did put a light in, I guess, about a year or year and a half ago. Which I knew if they did that at the place where we exit from her home, it would make it a lot better too. They don't have a light there. They have one four blocks down the street. And we can sit there forever trying to get out of there.

And I guess that's about it for now. That's all I can think about right now.

Oh, except for the infrastructure. They did promise us we were going to have shopping centers and other things to make it convenient for us to live in that area. And they have never materialized.

My comments are certainly my own, and they may not be many of the other people's.

DIANNE BARKER: I am a resident, citizen resident here in Phoenix and have lived in the Valley for over 25 years.

I was raised in Ohio, The Buckeye State. And I do want to thank you for this opportunity to be heard and believe I will be considered by ADOT.

I am favoring no-build scenario. 40 CFR 1502.4 -- that's federal regulations -- stipulates that the Environmental Impact Statement, this EIS, be

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:51 PM
CALLER: ELIZABETH WILLIAMS PHONE:	CALLER ADDRESS: 88 W. MYRTLE AVENUE, PHOENIX, AZ 85021 EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, calling to show my support of the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 9:21 AM
CALLER NAME: LELA WILLIAMS	CALLER ADDRESS: 3302 N. 87TH AVENUE, PHOENIX, AZ 85037
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 It is way past time to build that freeway around South Mountain. You need to stop wasting money on these bullshit studies and get to business. Thank you.

RESPONSE DATE:	RESPONSE TIME:	HDR STAFF INITIAL:

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
5/15/13	5:29 PM
CALLER: PATTY WILLIAMS	CALLER ADDRESS: 1306 W. 11TH STREET, TEMPE, AZ 85281
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 2 3 4

I do agree with running that freeway through, but I think you should go around that neighborhood out there and around the outskirts of South Mountain so that the sacred area with the Indians is not upset and those houses are not upset and we're not paying millions of dollars to people to move to a different location so we can destroy their homes.

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Cultural Resources**	

Code	Comment Document
1	Ethel Williams Document Created: 7/18/2013 2:13:05 AM by Web Comment Form Please build the Loop 202 W59 route. We bought our house in Laveen over 7yrs ago with the promise of the freeway and access to business infrastructure. We are growing too fast and need the access to the rest of the city and reduced traffic. This freeway is long overdue. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway Draft EIS and General Comment
Date: Monday, July 15, 2013 11:01:30 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Nathan Williams [mailto:natellwilliams@gmail.com]
Sent: Monday, July 15, 2013 11:01 AM
To: Projects
Subject: South Mountain Freeway Draft EIS and General Comment

As a resident of Ahwatukee, I am supportive of the proposed Loop 202 South Mountain Freeway expansion/ construction, in fact I would further request that we begin construction as soon as humanly possible with the proposed 59th Avenue alignment. As resident in the area for many years I have seen this project come and go, it is my suggestion that we simply make it work on our own land, whether we have to buy up houses, Churches etc. I just don't want to waste anymore time or money dealing with the Indian Community any longer. It would appear that they just want to bog the process down with potential options of construction on their land, and then pull out of the options later, so the project never gets constructed even though it would be a huge benefit for their community. If they don't have the foresight to see that, that's fine. Maybe it is difficult for them to see the benefit that the Loop 101 has provided for the Salt River Community. In any case I would think it best to just leave their land out of the equation and if they want future connections to the freeway then they should have to pay for it and it should not be a part of this budget. Let us please move forward with the project and build the freeway already, which is at least a decade overdue. Thank you for your time and consideration.

1

Sincerely,

Nathan Williams

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Code	Issue	Response
1	**Alternatives**	Federal law prohibits the denial of access to any community. Thus, traffic interchanges would be located along the freeway where it borders the Gila River Indian Community (see Draft Environmental Impact Statement page 3-51). Roadway connections on Gila River Indian Community land to the traffic interchanges would be the responsibility of the Gila River Indian Community, in coordination with appropriate jurisdictions.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 11:51 AM
CALLER: CASSANDRA WILLIAMS	CALLER ADDRESS: 2026 WEST LOBO CIRCLE, MESA, ARIZONA 85202
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Hi, I support the construction of the 202 freeway to alleviate some of the traffic. Thanks, bye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 3:19 PM
CALLER: NANCY WILLIAMS	CALLER ADDRESS: 513 EAST CAROL AVENUE, PHOENIX, ARIZONA 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yes, I support the South Mountain freeway being built. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:23 PM
CALLER: KAREN WILLIAMSON	CALLER ADDRESS: 27 [UNCLEAR] PHOENIX AZ
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Hi, yes I do support the new freeway expansion.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:33 PM
CALLER: LORETTA WILLIS	CALLER ADDRESS: 26307 S. TANGELO AVENUE, QUEEN CREEK, AZ 85142
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am definitely in support of the South Mountain Freeway and the sooner we get started the better off we will be here in the Valley and the safer those people will be as they come through that massive congestion there at the Tan conversion so let's get started now.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Monday, May 20, 2013 8:43:47 AM

From: Kenneth Wilson [mailto:bigpeach35@yahoo.com]
Sent: Friday, May 17, 2013 6:02 PM
To: Projects
Subject:

1

sure BUILD IT no more big truck accidents on the 10 downtown

Peace, love, and all that good stuff.
All we need is love.
Kenneth Russell Wilson

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Max Wilson Document Created: 5/21/2013 3:44:21 PM by Web Comment Form I believe that the proposed changes will dramatically improve conditions on already crowded freeways and surface streets. this is a great idea.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:23 PM
CALLER: ALICE WILSON	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Hi, I really don't understand why there would be negative thoughts about having this freeway if it's going to create jobs and reduce traffic around Phoenix, that would surely be a positive. So I say Yes, go ahead and build that freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Collette Wilson Please leave sacred land be! Document Created: 7/12/2013 12:51:04 AM by Web Comment Form

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. The alignment along Pecos road is unacceptable due to the following.

1 Our concerns are: Air Pollution!!
2 3 • Noise - major issue
• added community traffic
4 • negative visual impacts
- ugly noise walls impeding views
5 - commercial signage
6 - electronic billboards: hideous, glaring, visible flashing obnoxiously for miles
7 We need Pecos road for what it currently is. Easy access out of Club West and the Foothills communities. Limited traffic stops and easy access the Desert Vista High School without having to cross over a freeway or more lanes.
8 If there is damage during construction to adjacent properties such as windows or walls - what is the recourse.

Optional

Name Carol Wilson Email dcltwilson@aol.com
Address 1144 E. Thunderhill Pl.
City Phoenix State AZ Zip 85048
Phone 480-460-0680 Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	
4	**Traffic**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix. Construction of the interchange would have resulted in the displacement of over 100 homes and the interchange would have been located near an existing high school. Access to 32nd Street is to remain available from Chandler Boulevard and other east -west local streets. In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway (and the removal of an access point at 32nd Street) on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement). The traffic projections for Chandler Boulevard (see Figure 3-12, on page 3-29 of the Final Environmental Impact Statement) show a reduction with the proposed freeway when compared with conditions without the proposed freeway.
5	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
6	**Visual Resources**	Decorative or aesthetic treatments are sometimes applied to noise barriers and other freeway structures to help them blend into the surroundings and/or fit in with the tone of the community. The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation's standard applications. The Arizona Department of Transportation has expanded its selection of acceptable wall treatments to include thematic emblems or symbols and, in some cases, more than one color.

(Response 6 continues on next page)

Code	Comment Document

Code	Issue	Response
6 (cont.)		As an example, for State Route 101L (Pima Freeway) in Scottsdale, the City of Scottsdale chose to add public art to the noise barriers. The City's intent went above and beyond the Arizona Department of Transportation's guidelines of reasonable aesthetic treatment and, therefore, the Arizona Department of Transportation did not fund the aesthetic portion of the project. The Arizona Department of Transportation and the City of Scottsdale entered into an intergovernmental agreement for the purposes of allowing Scottsdale rights to design and construct artistic embellishment on the Arizona Department of Transportation-supplied noise barrier. The Arizona Department of Transportation provided the funds for construction of the noise barriers themselves, but the City of Scottsdale provided the funds to cover the aesthetic portion of the walls. Pages 4-158 and 4-159 in the Draft Environmental Impact Statement explain the process municipalities might take to achieve the desired aesthetic treatment for noise barriers or other structures.
7	**Visual Resources**	The State of Arizona (through the Arizona Department of Transportation) administers an Outdoor Advertising Program as mandated by the Federal Highway Beautification Act. Arizona's program provides regulations for the permitting, placement, and maintenance of outdoor advertising signs along Interstate highways as well as State highways within Arizona. The State statutes (Arizona Revised Statutes §§ 28-7901 through 28-7915) and the State rules (R17-3-701 and R17-3-701.01) provide that the Arizona Department of Transportation must regulate any sign that is within view of, directed at, and intended to be read from the main traveled way of a controlled highway. (A controlled highway is any highway that is part of the National Highway System along with specific State routes. The South Mountain Freeway would be both a State route and part of the National Highway System.) While the Arizona Court of Appeals did decide in November 2011 that electronic billboards violate the 1970 Arizona Highway Beautification Act, a new law was passed by the State Legislature that banned such billboards in much of the state but allowed them in most of Maricopa County and parts of Pinal, Yuma, and La Paz counties. Weeks later, the Phoenix City Council created a zoning ordinance to regulate such billboards on city streets and highways. Chapter 7, Section 705, of the Zoning Ordinance of the City of Phoenix does not permit billboards to occupy public property or to extend across a property line where such property line borders a public highway. Electronic messages are permitted only on land zoned as commercial or industrial or zoned as a nonresidential use in Residential Districts. Under current zoning, this eliminates most, if not all, of the land along the E1 Alternative. Such signs might be permissible along portions of the W59 Alternative. Such signs may not be illuminated between 11 p.m. and sunrise "when (1) located within one hundred fifty (150) feet of Single Family Residential zoned property and (2) visible from such development or property." Erection and operation of any billboards on Gila River Indian Community land would be subject to regulation by the Gila River Indian Community.
8	**Construction**	Provisions would be taken to ensure adjacent properties would not be damaged during construction.

Code	Comment Document

Mark Wilson Document Created: 7/20/2013 6:14:04 PM by Web Comment Form

1
2
3
4 5

Sirs - this entire project, smf202, is a joke. Your DEIS states 'improved polution characteristics' are likely. My 5th grader can easily prove this wrong. How many ozone alerts have we had annually the past 10 years? I missed that in the report. Ahwatukee suffers, kids cough, get displaced, and see church and schools close. Further, you intentionally say nothing of TRUCK traffic using this bypass to circumvent downtown traffic. This is ludicrous. And by the way, it's a 30 year old plan! You morons. I could go on, but what is the point. Your pr machine is unstoppable. And laveen needs more min wage wal mart and gas station jobs.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
3	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Purpose and Need, Old Plan or Use of Old Data**	
5	**Purpose and Need, Lack of Support**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Monday, July 15, 2013 10:47:25 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Wilson Thomas S (Tom) [mailto:Tom.Wilson@srpnet.com]
Sent: Monday, July 15, 2013 10:46 AM
To: Projects
Subject: Loop 202 South Mountain Freeway

When the portion of Loop 202 was constructed several years ago through the Lehi-area in Mesa, ADOT agreed to forego exits for several miles in order to preserve the lifestyle residents within Lehi were accustomed to. A similar approach for Loop 202 as it passes through Ahwatukee may make it more amiable for local residents while also reducing the cost to construct (fewer homes/businesses that would need to be acquired through eminent domain, etc.).

1

The 'existing' interchange at Pecos Road and 40th Street could remain with the Park and Ride facility nearby and perhaps one other exit (Desert Foothills Parkway?) where there are not many homes/businesses that would need to be removed to facilitate an interchange.

Traffic flows on this portion of the Loop 202 should benefit from having fewer points where vehicles are merging too.

Regards,

Tom Wilson

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Code	Issue	Response
1	**Design**	The locations of the planned traffic interchanges were determined in coordination with the City of Phoenix. The current plan balances the need to minimize impacts on the adjacent community with the need to provide acceptable access to the region's transportation system. The spacing of the interchanges would be approximately 1.5 to 2 miles, which would provide acceptable weaving conditions.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway
Date: Friday, July 19, 2013 9:19:50 AM

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov

-----Original Message-----
From: Dena Wiltsie [mailto:wiltsie@earthlink.net]
Sent: Friday, July 19, 2013 9:16 AM
To: Projects
Subject: Loop 202 South Mountain Freeway

First I will admit I am not happy with the W59 option because I live near (about 1/4) mile from where it will run but I was aware of the expansion and made the decision with eyes at least a little bit open.

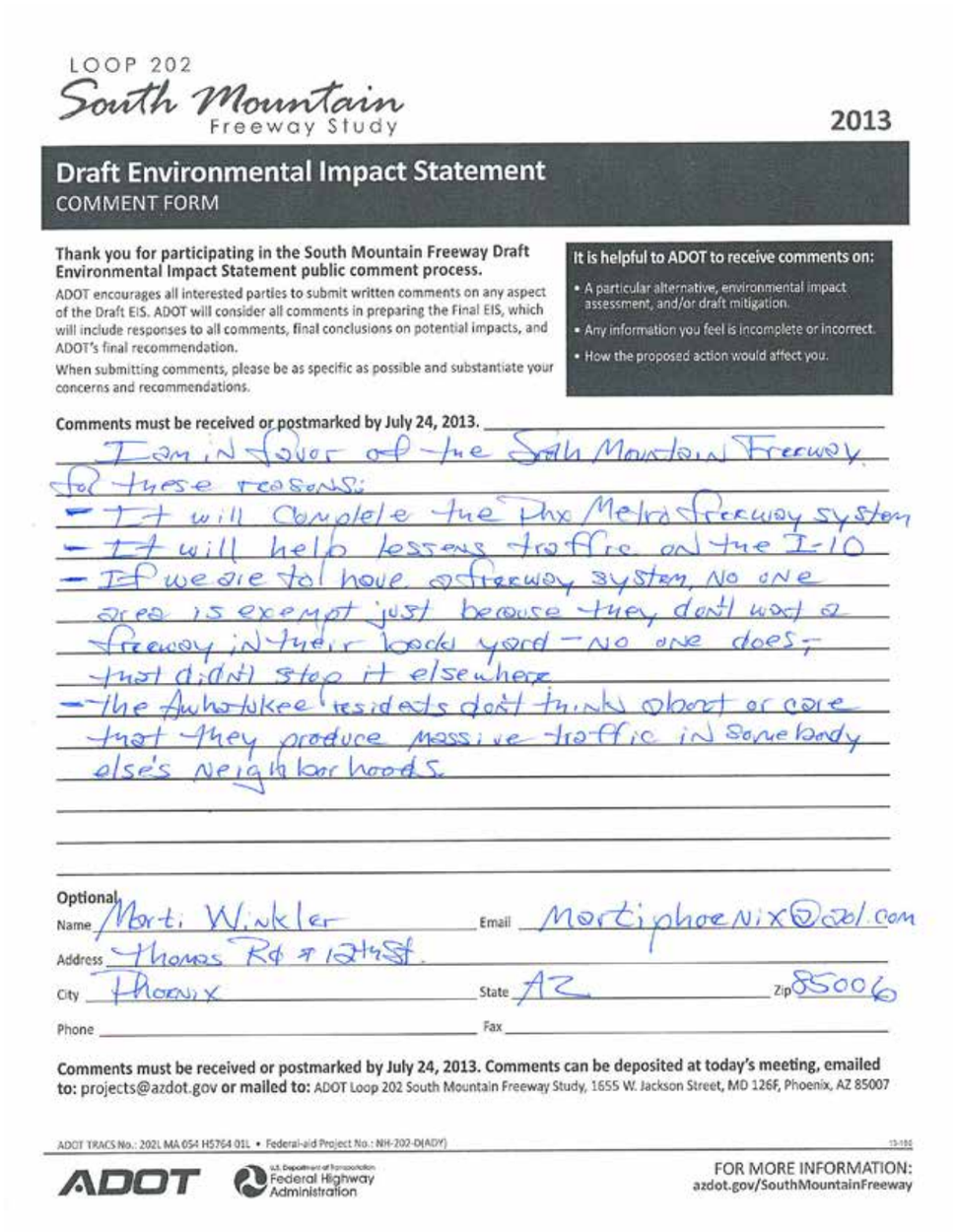
With that out of the way, I see a big problem with both the w71 and w59 approach that may in the future mark this expansion as a big mistake. The problem is both approaches share the I10 freeway and will place an additional load on the freeway which is already at times near it's limit. Additional cost will be added to the project at some point to expand the I10 and it will only solve part of the problem because when a blockage occurs, both I10 and loop 202 traffic will be stopped. The best way to keep the traffic moving will be to share the freeway as little as possible and go with the w101 approach. I know the w101 will require redesign of the 101/I10 interchange but I suspect the cost will be less that fixing the I10 freeway to handle the additional load.

1

One additional wrong though about the expansion is it will be needed to handle the additional traffic from the Laveen area. I think this is incorrect for two reasons. The first reason much of the traffic I see on baseline road has to be people who would use the w101 because they are skipping the freeway system or have come in from Riggs road and they are not locals. The second mistake is Laveen is backed up against park land and Indian Reservation. Little additional traffic will come from either area and while the existing farm land will be developed, I think the existing road surface streets will be able to handle the traffic with the w101 expansion.

My background in software design has shown me that sometimes a little fix is not the solution to the problem and you have to bite the bullet reworking a big chunk of code to fix the problem correctly. Any option other than the w101 will come back to cause many problems in the future.
Dena Wiltsie
5814 West Desert Drive
Laveen, AZ
602/237-2031

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I am in favor of the South Mountain Freeway for these reasons:
- It will Complete the Phx Metro freeway system
- It will help lessens traffic on the I-10
- If we die to! have a freeway system, NO ONE area is exempt just because they don't want a freeway in their back yard - NO one does; that didn't stop it elsewhere
- The Ahwatukee residents don't think about or care that they produce massive traffic in Somebody else's neighborhoods.

Optional
Name Marti Winkler Email Martiphoenix@aol.com
Address Thomas Rd & 12th St.
City Phoenix State AZ Zip 85006
Phone Fax

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4306

And the issue with Laveen is that it has always been planned as a lower-density overall area, which has grown significantly in population. And as we see these populations would need, moving in to Laveen and actually Ahwatukee, as well, we are ill-prepared to handle those social needs that come with that increase in population.

And it's not just the low-income populations, but it's others that also have that kind of need. So without the freeway, we're not going to have that concentration of resources or really much opportunity to develop that concentration of resources. So, like the hospital argument where we need to bridge the populations to give ample rooftop counts to support a hospital, the same is going to be true of any other social services and -- and other amenities or public resources that -- that are there to serve based on larger concentrations of population. That's all.

MS. WINKLER: I think I am in favor of this. I think this is a good idea. I live in the central city area, and I know that a lot of people in the Ahwatukee area may be in opposition to this.

But I particularly look at this as an issue of equality, that if the rest of the city all has to have freeways that border or come into their areas, that no one single area should be exempt. I think it will complete the grid system for the freeway if -- the freeway grid system.

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

And, actually, I -- I was talking to one of the -- one of the planners or engineers, and I think the best route would be to go through Tolleson and connect to the 101. But he was saying that there is a lot of issues regarding that. So he said it'll probably be 53rd Avenue or somewhere around there.

But I personally think that the logical route would be to connect to the 101 and, you know, that, that far-most route. So, no, but, overall, I just think it's a good idea. I think it's, like I said, a matter of equality, that no one area should be singled out that's not -- just because they don't want it coming into their neighbor -- around their neighborhoods.

And, although, I am not in favor of it prompting more people to move here. I was looking at the information, and it was saying that supposedly 3 million, close to 3 million more people, are going to be moving here within the next 20 to 30 years. And I certainly don't think -- believe we need 3 million more people in a land of finite resources.

But that's not for -- Yeah. I don't understand this constant push for more tourists, more households, more homes, more whatever. It's like no other city in this country is so -- more about pushing, pushing more and more and more and more people into an area as the Phoenix area. And I just don't -- I just don't get that because I think it's making the Phoenix metropolitan area just unlivable.

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

And that's why I was actually just talking with one of the planners and was saying about how, when it starts to get hot, that people just, all of us, starting to get -- start to get angry. Just all of a sudden. It's just within a couple of weeks. And -- And I said it's because people are -- You know, it's already congested. You know, now it's hot, on top of it.

And so, anyway, regarding this issue of making more freeways, so then we bring more people into the area; we don't need more people.

And, you know, and it's -- Unfortunately, I've worked for land developers and builders and land developers, and that type. And it's -- It's all about money, power, and greed, unfortunately. And that's what we'll never change about this town, because it's all about those three things.

So, but, as far as the freeway, I think it's a good thing. So thank you.

MR. ROYER: All right. Well, first off, I am strongly opposed to this for very simple reasons. First, I care about the environment, and I care about people. And I think, no matter how you look at this, it negatively affects environment, without a doubt. And it would negatively affect a lot of people, without a doubt.

Now, there's other reasons to oppose this. So I feel like a lot of this is of an elaborate, almost, scheme to justify more freeways.

Code	Issue	Response

Code	Comment Document

Steve Winn.

MR. WINN: Good morning. Thanks for your time, appreciate it. I don't have a lot to say, I just want to say that I approve the construction of the 202. I do use South Mountain Park a lot, I live in Laveen, I use it a lot, all the time, couple times a week. And although I would regret if we had to take a portion of that park away, you know, it seems to be the greater good at this point. I would look very much forward to, like the previous speaker said, having a hospital come in, the prospect of having some hospitals and some development come to Laveen, so I'm not spending a bunch of extra time driving very far to go to those services.

You know, in my personal life, you know, the environmental impact of not having that there would, you know, far surpass it, because I'm driving a lot more, a lot farther to these services that hopefully can potentially come into the town there. So I would also encourage some bypass along the route, especially access to South Mountain Park, things like that, and that's all I have. Thanks.

THE FACILITATOR: Thank you.

Sharon Finell -- no? Which one is it? Okay, thanks.

Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4187

everything going downhill, but what it's done is it's just made it even worse in that area because of no development, not only because of the economy, but there's just no roads, no highways. We're just kind of like very secluded.

This should have been done a long time ago. It needed to be done a long time ago. We've got to look at the big picture.

And I looked at the studies. It looks like it's been done very thoroughly. It looks like all interests have been taken into account. Now it's time to get going on it and quit playing.

MR. WINNER: I live at 47th Avenue and Baseline roughly. I support the freeway coming through. I have a three-year-old daughter and the first two years of her life she was chronically ill. I was in and out of the hospital. The closest children's pediatric urgent care is at Central and Baseline. The closest hospital is obviously in downtown. There's nothing -- west there's Thunderbird and there's another hospital, I believe it's on 5th Avenue, so I support it primarily for the expected hospital facility that they are going to be putting in.

That's it. Simple.

UNIDENTIFIED SPEAKER: The problem with I-10 is it turns into a bottleneck, and they are not

1

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: In support of 202 W59 Alternative
Date: Wednesday, May 22, 2013 10:48:01 AM

From: Amy and Scott Winter [mailto:aesw5277@msn.com]
Sent: Tuesday, May 21, 2013 7:22 PM
To: Projects
Subject: In support of 202 W59 Alternative

Greetings,

My name is Amy Winter, I reside at 2920 W Shumway Farm Rd in Phoenix.

1 I support the 202 going in near 59th Avenue. While no one wants a freeway in our back yard, the growth in this area (including the new enlarged casino) has created significant safety issues regarding traffic.

While I am in support of the 202 being completed in that location, I hope that the planners are mindful of wildlife habitat and safety, noise reduction for the residents, and safe options for pedestrians and bicyclists.

Warm Regards,
~Amy Winter

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 4:51 PM
CALLER: SANDRA WINTERS	CALLER ADDRESS: 750 E. NORTHERN AVENUE, UNIT 1040, PHOENIX, AZ 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Hi, I support the South Mountain Freeway. Get busy you guys.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Proposed South Mountain freeway, westen extension
Date: Monday, May 20, 2013 1:07:00 PM

From: Wirta, Morgan T. [mailto:Wirta.Morgan@mayo.edu]
Sent: Monday, May 20, 2013 12:47 PM
To: Projects
Subject: Proposed South Mountain freeway, westen extension

1

I support the Sierra Club's opposition to this proposal and for the reasons stated by the Sierra Club.
Thank you Morgan Wirta

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:55 PM
CALLER: SUSAN WISHEAR	CALLER ADDRESS: 1804 E. AUBURN DRIVE, TEMPE, AZ 85283
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Our family is very much in support of the new freeway and hope that it can be accomplished. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4429

is overlooked in the decision-making.

And that's all I want to say. Okay? We are definitely not in favor of it for so many reasons.

MR. WITHERS: My name is Thelbert Withers, T-h-e-l-b-e-r-t, last name Withers, W-i-t-h-e-r-s.

I'm in support of the freeway just for the simple fact that Laveen is a growing area now. We need more hospitals and more advanced things in this area and that community, not to mention that it's going to bring a lot more jobs and building the freeway and everything.

But I just want to put I'm in support of the freeway. I -- you know, let me think.

Just for entertainment purposes, you know, movies, you know, out -- evenings out, there's not really nothing too much in the Laveen area to choose from. I just think with this freeway, it will bring more of those type of -- restaurants, type of -- entertainment activities.

And like I said, more importantly, a freeway will bring a hospital, which is something that we really need in Laveen.

So I just want to put my support down for it. And if there's anything I can do to support it to get there, I'm on board with it.

So thank you. I appreciate your time.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 11:56 AM
CALLER: KEN WIXON	CALLER ADDRESS: 4556 WEST EL CAMINITO DRIVE, GLENDALE, ARIZONA 85302
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I support the South Mountain freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Patricia Talcott
To: ADOT
Cc: Patricia Talcott
Subject: ENVOY# 1314770758/South Mountain Freeway
Date: Tuesday, May 28, 2013 8:51:57 AM
Attachments: image001.png

The following was received on the ADOT ENVOY System:

SOUTH MOUNTAIN FREEWAY
5/27/2013 7:28:46 PM
ARE YOU GOING TO BUILD IT ON PECOS REALLY. DO WE REIMBURSEMENT FOR OUR PROPERTY LOSSES. oR WILL YOU BUY OUR HOUSE OUTRIGHT. DO WE HAVE ANY VOTE OR SAY WHILE YOU RUIN AHWATUKEE AND WATCH EVERYONE MOVE OUT.
Woelbel, Viictor - victorwoelbel@yahoo.com

1 2 3 4 5

Thank you.

Patricia A. Talcott
Program Project Specialist II
206 S. 17th Avenue, Room 101, MD118A
Phoenix, AZ 85007
602.712.7610
www.azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Agencies may acquire only those properties located entirely or partly within the project right-of-way limits (see Draft Environmental Impact Statement page 4-45).
3	**Public Involvement**	No public vote was held as part of the Draft Environmental Impact Statement review process. Members of the public were encouraged to participate and submit their comments on the Draft Environmental Impact Statement during the 90-day comment period. The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400.
4	**Public Involvement**	Public comments are a vital component in the decision-making process. Public comments have been solicited from project inception and through key milestones in the environmental impact statement process. The interests and needs of the public, along with all other social, economic, and environmental issues and impacts, must be fully analyzed and included in the Draft and Final Environmental Impact Statements. Comments made during development of the Draft Environmental Impact Statement have been used to adjust plans, explore new questions, or make changes—all within the scope of the National Environmental Policy Act. Public comments received on the Draft Environmental Impact Statement was reviewed and addressed in the Final Environmental Impact Statement. Public comments received on the Final Environmental Impact Statement will also be considered and addressed as appropriate. More information about the entire public involvement process up to publication of the Draft Environmental Impact Statement is available in Chapter 6, *Comments and Coordination*, of the Draft Environmental Impact Statement.
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). No evidence exists that many people would relocate because of the freeway. A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138-47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 4:23 PM
CALLER: DAVID WOKER	CALLER ADDRESS: 3232 W. STANFORD DRIVE, PARADISE VALLEY, ARIZONA
PHONE: 602-617-4631	EMAIL:
CALLER REMARKS/QUESTIONS: I am in support of the South Mountain Freeway. Thank you.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW:
Date: Thursday, May 16, 2013 8:10:24 AM

From: Mr woldew kibru [mailto:woldew@yahoo.com]
Sent: Wednesday, May 15, 2013 8:48 PM
To: Projects
Subject:

1

I am very exiting to see this projuct done soon. It will help and reduce our area trafice . Please allow this freeway to be build sooner than latter

Thank you.
wudma wolde

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Wednesday, May 22, 2013 2:06:58 PM

From: Wolde, Wudma Kibru [mailto:Wudma.Wolde@ehi.com]
Sent: Wednesday, May 22, 2013 2:06 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I support build the 202 free way that can reduce heavy traffic on rash hours and can reduce the area pollution as well.

Thank you for being top of this projects

Wudma wolde

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the 202!!!
Date: Monday, May 20, 2013 8:43:00 AM

-----Original Message-----
From: Elissa Wolf [mailto:elissawolf@yahoo.com]
Sent: Friday, May 17, 2013 6:22 PM
To: Projects
Subject: Build the 202!!!

1

Never in my life have I seen a state that takes such a ridiculous amount of time to build a freeway. Let's just get it done, already!

Sent from my iPad

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Moutain Freeway, Loop 202
Date: Monday, July 15, 2013 8:04:12 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: larabwolf@aol.com [mailto:larabwolf@aol.com]
Sent: Friday, July 12, 2013 5:23 PM
To: Projects
Subject: South Moutain Freeway, Loop 202

Hello,

1 2 3

My husband and I reside in the Ahwatukee Foothills community and have since 2005. We moved here from California and fell in love with the area, it was the deciding factor for us moving to Arizona. We love the remote, quiet location & community feel. We were looking for a place to live and settle our family down and due to the beautiful peaceful rural area of Ahwatukee we decided to make it home. We are extremely opposed to the loop 202 freeway expansion for this area due to noise, property value decreasing(I am a real estate agent and I know this would make it alot harder to sell our home in the future and definitely bring down the value), pollution and many other personal reasons.

4

My husband is an umpire for major league baseball and that is part of the reason we moved to Arizona, finding a community that was close to the airport but felt remote and removed from all the hustle bustle of every day life was key and extremely important to us as he travels alot and when he comes home peace and quiet is a priority. We do not feel we can maintain that remote, quiet, quaint community feel with the proposed frwy.

Thank you for taking our comments to oppose the frwy into consideration.

Lara and Jim Wolf

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Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:30 PM
CALLER: REGINA WOMPASS	CALLER ADDRESS: [UNCLEAR]
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 [Unclear] call they connected me to make a comment, [unclear] call yes I do support construction of the freeway. Um it needs to get done and I don't know if the tribe is ever gonna support it on their land, but the thing needs to get done, so I'm a registered voter in Phoenix Arizona. Thanks so much goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. _____

Optional

Name Victoria Wong Email windowscapes@yahoo.com

Address 16049 S. 10th Pl

City Phoenix State AZ Zip 85048

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

1 - Pecos alignment serves no useful purpose for most Ahwatukee residents. Little use for most residents to go to 59th Ave & to Hwy 10 on a daily basis

2

3 4 - Will have adverse effect on air quality since pollution will be trapped by South Mountain

- ADOT has not shown good faith effort to study more southern route for this alignment. How about Riggs Road? or the Hwy 85 to Hwy 8 alignment? All actions have been to shove this alignment down our throats.

5

6 7

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Information related to origins and destinations of motorists that would use the proposed freeway is presented in Figure 3-18 on page 3-36 of the Draft Environmental Impact Statement. The definition of freeway users considers only those motorists who travel through the South Mountains; so, motorists who begin their trips in Ahwatukee Foothills Village and travel east to Interstate 10 (Maricopa Freeway) or motorists who begin in Laveen Village and travel north to Interstate 10 (Papago Freeway) are not counted in the analysis. The analysis of origins and destinations shows that 73 percent of travelers would be involved in trips beginning or ending in the Study Area or areas immediately surrounding it. Seven percent of the trips would begin, end, or begin and end outside of the Maricopa Association of Governments region; ten percent would either begin or end in Pinal County.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
5	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
6	**Alternatives**	The study did evaluate the Riggs Road Alternative and the State Route 85/ Interstate 8 Alternative. A thorough evaluation using the multidisciplinary criteria outlined in the alternatives development and screening process was performed and, based on the results of this evaluation, the alternatives were eliminated from further study (see page 3-9 of the Final Environmental Impact Statement for more details). The Gila River Indian Community Council approved Resolution GR-164-11 authorizing a referendum of Community members to favor or oppose the construction of the proposed South Mountain Freeway on Community land or to support a no-build option. The coordinated referendum occurred in February 2012, and Community members voted in favor of the no-build option. This has meant and still means that, moving forward, an alignment(s) of the South Mountain Freeway cannot be located on the Gila River Indian Community (see Final Environmental Impact Statement page 3-25). Therefore, the Community Alignment was not carried forward for further study and the E1 Alternative was carried forward as the only action alternative in the Eastern Section.
7	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Draft Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:44 PM
CALLER: CATHY WOOD	CALLER ADDRESS: 5226 W. MALDONADO ROAD, LAVEEN, AZ 85339
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I am totally in favor of the South Mountain Freeway. I hope it goes through. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2 3 4	Abigail Wool-Biringer Document Created: 6/22/2013 6:05:14 PM by Web Comment Form Please don't build!! Our beloved South Mountain, the country's largest municipal park, will be irreparably ruined by this freeway. The proximity of the freeway to homes, schools, and churches is another major concern. This is NOT necessary and never has been. Ahwatukee doesn't want it.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document
1	Nate Woolfenden Document Created: 5/18/2013 6:29:54 PM by Web Comment Form Would like to see the South Mtn freeway built. It has been too long already. No more delays.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/13/13	INCOMING CALL TIME: 5:31 PM
CALLER JEANETTE WORKER	CALLER ADDRESS: 7342 W. GREER AVENUE
PHONE: 623-878-1910	EMAIL:

CALLER REMARKS/QUESTIONS:

1

My message is that I definitely think it's about time to put the 202 in. I definitely approve of the 202. Thank you. I guess I'm done. Ok, I'm done, bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: David Wright
To: Projects
Subject: Comment on Proposed Loop 202 (South Mountain Freeway)
Date: Wednesday, July 24, 2013 10:28:39 AM

1 2 Regarding the proposed Loop 202 Freeway extension south of Ahwatukee, I urge that this project not go forward. A massive freeway just south of Ahwatukee will have negative consequences for our community and for South Mountain Park.

3 4 Vehicle exhaust – including noxious diesel fumes – from a massive freeway would foul the air in our neighborhood and in the park. Any expectation that the project would reduce regional air pollution simply reflects spreading that pollution into Ahwatukee. We don't want it. This would reduce the attractiveness of Ahwatukee as a place to live. If Ahwatukee becomes as hazy as the rest of Phoenix, property values here will suffer.

5 Additional traffic on a major freeway to our south and west would inevitably increase traffic in our neighborhoods – quite simply, there would be more cars in the area if a freeway is wrapped around us. Traffic here is bad enough as it is. Cut-through drivers would be speeding down our streets when they realize that speed limits are not enforced in our residential neighborhoods.

6 7 The proposed project has many negatives for Ahwatukee and South Mountain, and precious few positives. The main positive results of this project would accrue to developers who would profit by increasing suburban sprawl, and to the firms that build the road. These profits would come at the expense of reduced quality of life in Ahwatukee.

2 3 8 Ahwatukee does not need or want increased air pollution and traffic. Yes, these will increase with time anyway, but they would increase to a greater degree (and sooner) with the 202 extension in our backyard. South Mountain Park would be degraded by having a major freeway truncating its western boundary. NO BUILD is the best option.

David Wright, PhD
Ahwatukee, Phoenix, AZ

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138-47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
5	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
6	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
8	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:39 PM
CALLER: JAMES WRZESIEN	CALLER ADDRESS: 6123 W. DUBLIN LANE, CHANDLER, AZ 85226
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Both my wife and I are in favor of the South Mountain Freeway. We currently live two miles off of Interstate 10 and Ray. If this freeway were built, the benefits of reduced truck traffic would provide a much safer driving environment to Downtown Phoenix. I am a retired highway planner from Chicago and a retired architect.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:37:20 AM

-----Original Message-----
From: jameswu009.az@gmail.com [mailto:jameswu009.az@gmail.com]
Sent: Sunday, May 12, 2013 7:46 PM
To: Projects
Cc: info@buildthe202.com; Jian Wu
Subject: Build the South Mountain Freeway

Voter' voice

1

I am a long time Phoenix resident. I strongly support to build the Southmountain 202 as soon as possible to reduce every day's traffic congestion, air pollution, time wasting and energy wasting. To build the Southmountain 202 is Arizona voters' decision. We have approved twice already. Please take actions without further delay!

Jian Wu

_____

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:55 PM
CALLER: RAYMOND WU	CALLER ADDRESS: 8817 S. 18TH WAY, PHOENIX, AZ 85042
PHONE: 602-288-8960	EMAIL: RAYKWU@GMAIL.COM
CALLER REMARKS/QUESTIONS: I support the Loop 202 South Mountain Freeway. Thanks.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support South Mountain Loop 202 Freeway
Date: Monday, May 20, 2013 8:47:08 AM
Attachments: EVPAZASSOC_535_South Mountain Freeway Study 5-2013.zip
EVPAZASSOC_536_South Mountain Freeway Talking Points 5-2013.doc

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From: Wurth, Philip [mailto:Philip.Wurth@colliers.com]
Sent: Friday, May 17, 2013 5:37 PM
To: Projects
Subject: Support South Mountain Loop 202 Freeway

1

To Whom It May Concern: I am in favor of the proposed freeway and believe it is in the best interest of the overall community to have it built.

Philip Wurth
Vice President | Office Properties
Direct 480 655 3310 | Mobile 602 369 9261
Main 480 596 9000 | Fax 480 948 0502
philip.wurth@colliers.com

Colliers International
14080 N. Northsight Blvd.
Scottsdale, AZ 85260 | United States
www.colliers.com

Learn more at www.colliersevoffices.com

From: Carol Schmitz on behalf of Roc Arnett [mailto:cschmitz@evp-az.org]
Sent: Friday, May 17, 2013 2:38 PM
To: Wurth, Philip
Subject: Support South Mountain Loop 202 Freeway

Dear Colleagues,

The South Mountain Loop 202 Freeway has been approved by Maricopa voters twice, first in 1985 and again in 2004. Funds are available to construct the project which consists of 22 miles south of Ahwatukee and the South Mountain and west to the Levine Area to connect to I-10 on the far west. Attached are talking points that have been gathered from a recent survey done by interested parties in moving forward the Freeway indicating public support, also

Code	Issue	Response
1		Comment noted.

Code	Comment Document

attached is a fact sheet from ADOT.

On Tuesday, May 21, the Arizona Department of Transportation will conduct a day-long hearing to gather comments from the public about the proposed South Mountain Freeway project in metro Phoenix. This is where we need your help:

We need you, your executives and employees to make plans to attend the hearing on Tuesday, May 21 at the Phoenix Convention Center North Ballroom, 100 N. 3rd Street, Downtown Phoenix. It will take place from 10 a.m. to 8 p.m. People are invited to attend at any time during the 10-hour hearing period. Parking will be validated.

Those who attend can make up to three minutes of comments before a study panel, or submit a written comment in support of the project at computers set up in the ballroom for the event.

A show of support is important. The FHWA and ADOT study group needs to see that many people want this project to happen. They need to see and hear from Valley residents who are tired of the traffic jams and the government delays over this project. They need to hear that you want the freeway built because it will create 30,000 jobs and pump $2 billion into our still-struggling economy.

If you or your employees cannot make it to the hearing in person, please submit your comments directly to ADOT at projects@azdot.gov. Be sure to put in your title "Support For South Mountain 202". For more information and facts about the importance of the South Mountain Freeway, please visit a website at www.buildthe202.com that is providing information and support.

Thanks for your help and participation.

Roc

Roc Arnett
President & CEO
East Valley Partnership
Office: 480-834-8335 Ext. 202
Cell: 602-999-3444

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Code	Issue	Response

Code	Comment Document

South Mountain Freeway Talking Points

- It is time to build the South Mountain Freeway. Valley commuters have waited in traffic jams long enough.
- The freeway will cut traffic congestion across the metro area, reduce air pollution, and save drivers time and money.
- 64.3% of likely voters in Maricopa County support construction of the freeway according to the results of a new poll commissioned by We Build Arizona. Just 19.6 percent said they were either opposed or likely to oppose the project.
- In a separate survey, also commissioned by We Build Arizona, 59 percent of likely voters living in Ahwatukee and Laveen support the freeway as well.
- If we don't build the South Mountain freeway, traffic in the region will get much worse over the next two decades. According to ADOT's own study:
  - Traffic on I-10 between Ahwatukee and Goodyear will grow 28%
  - Another 103,000 cars will use the Broadway Curve each day
  - Another 38,000 cars will jam the Tunnel every day
  - Morning and evening commute times will increase 39% to 82%
  - Traffic congestion on city streets will increase 46%
- The same report indicates the project also will reduce air pollution by reducing the time vehicles spend stuck in traffic.
- The project will create 30,000 jobs during the five to six year construction period and result in a $2 billion investment in the Phoenix-area economy.
- The money to build the freeway is in the budget. It was approved by voters twice, first in 1985 and again in 2004.
- There is no more important project to the area's commuters and workers than the South Mountain Freeway project. We must build it now.

Code	Issue	Response

Code	Comment Document

Fact Sheet

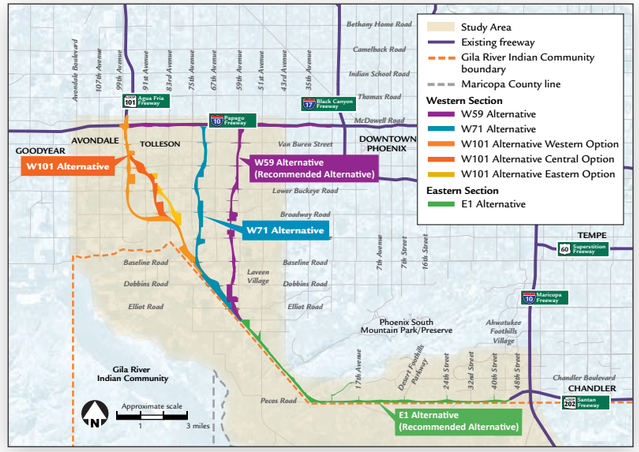
LOOP 202 South Mountain Freeway Study

Introduction

The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' (MAG) Regional Freeway Program since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400. The proposed freeway is a key component of the region's adopted multimodal transportation plan and the Regional Freeway and Highway System and is the last piece to complete the Loop 202 system.

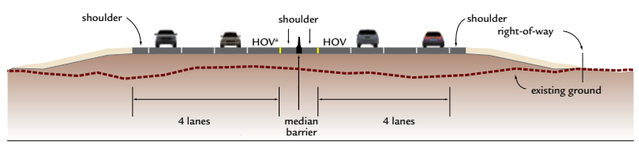
Additionally, the Loop 202 South Mountain Freeway provides an important link between the southeast and southwest areas of the Valley and an alternative route to Interstate 10. Traffic volumes for the proposed freeway are expected to be in the range of 137,000 to 142,000 vehicles per day by 2030, which is comparable to current use on the Loop 101 and existing segments of Loop 202. The analysis of travel patterns shows the demand for the freeway consists of mostly regional traffic, not traffic moving through metro Phoenix.

Alternatives studied in the Draft Environmental Impact Statement



Where will the Freeway be Located?

The proposed freeway is broken up into two segments, an eastern section and a western section. The eastern section connects to I-10 adjacent to the current Loop 202 Santan Freeway, and the western section veers north to connect the freeway loop to I-10. For the eastern section, the proposed alignment follows Pecos Road. This alignment was first proposed in 1985 and affirmed in the 1988 Environmental Assessment. For the western section, the proposed freeway alignment is called the "W59 Alternative," which provides a north-south connection of the South Mountain to I-10 near 59th Avenue. A "no build" option also is being evaluated, as required by federal law.



The configuration of the freeway is anticipated to be eight lanes (three general-purpose lanes and one high occupancy vehicle lane in each direction).

ADOT TRACS No.: 202L MA 054 H5764 01L | Federal-aid Project No.: NH-202-D(ADY)
azdot.gov/SouthMountainFreeway
ADOT U.S. Department of Transportation Federal Highway Administration ON THE MOVE
April 2013

Code	Issue	Response

Code	Comment Document

Fact Sheet

What is the Current Status?

The Arizona Department of Transportation and the Federal Highway Administration have finalized a detailed evaluation of the proposed Loop 202 South Mountain Freeway through the preparation of a Draft Environmental Impact Statement, or "Draft EIS." Under federal law, the Draft EIS must address 26 factors outlined in the National Environmental Policy Act of 1969. These factors cover the entire range of environmental study, including impacts on South Mountain, wildlife, air quality, storm-water drainage, and neighborhoods.

How can the Public be Involved?

The Draft EIS is available for a 90-day public review and comment period, starting **April 26, 2013**, and ending on **July 24, 2013**. During this review and comment period, the document is available online (**azdot.gov/SouthMountainFreeway**) and at public locations such as public libraries and community locations. A full listing of these locations is available on the study website.

PUBLIC HEARING

Tuesday, May 21, 2013
10:00 a.m. – 8:00 p.m.
Phoenix Convention Center, North Ballroom
100 N. 3rd St., Phoenix, AZ 85004
Validated parking and transit vouchers will be provided.

Members of the public are encouraged to provide comments on the Draft and Final EIS.

Formal Public Hearing Comment Process

Note that the public hearing provides the only opportunity for members of the public to make comments on the Draft EIS in front of a study team panel (within a three-minute time limit). Court reporters will also be available to take individual verbal comments; comments provided to a court reporter are not subject to the three-minute limit. Comment forms will be available for written comments.

Online Public Hearing

All of the materials presented at the public hearing, including a study video and comment forms, will be available from May 21, 2013 to July 24, 2013 at **azdot.gov/SouthMountainFreeway**.

There are several opportunities for the public to provide comments on the Draft EIS. All comment methods are considered equal.

Community Forums

Community forums will be held at various locations in the study area after the public hearing. Technical staff will be at the forums to answer questions, and study materials, including the study video, will be available to view. Court reporters will be available to take individual verbal comments. Written comments can also be submitted, but no formal "hearing" will occur at these community forum meetings. Forum locations will be posted at **azdot.gov/SouthMountainFreeway**, emailed to the e-newsletter subscribers, and published in the newspaper and local publications.

Mail, E-mail, Phone

At anytime during the 90-day comment period, comments can be provided in the following methods:

ADOT Loop 202 South Mountain Freeway Study
1655 W. Jackson Street
MD 126F
Phoenix, Arizona, 85007

projects@azdot.gov

602.712.7006

azdot.gov/SouthMountainFreeway

When Would the Freeway be Built?

If the outcome of the study is a build alternative, then the timing of construction will depend upon the completion of final design, right-of-way acquisition, and utility relocation. A corridor implementation plan developed by ADOT will identify how to construct the overall project, including the length and sequence of construction segments. The current Regional Freeway and Highway Program identifies construction funding for the freeway to begin in fiscal year 2015.

ADOT TRACS No.: 202L MA 054 H5764 01L | Federal-aid Project No.: NH-202-D(ADY)
azdot.gov/SouthMountainFreeway
ADOT · U.S. Department of Transportation Federal Highway Administration · On the Move
April 2013

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: RE:Loop 202 Southe Mountain Freeway
Date: Friday, May 17, 2013 8:49:44 AM

From: Linda Wyman [mailto:lindawyman119@cox.net]
Sent: Friday, May 17, 2013 7:40 AM
To: Projects
Subject: RE:Loop 202 Southe Mountain Freeway

1

We will be unable to attend the Public Hearing on May 21, but we would like to have our voice heard! **We are in favor of the proposed Loop 202 South Mountain Freeway**. Driving from the West Valley (Goodyear) to Tucson or other points east on I-10, the Loop just makes good sense as it removes traffic from the heavy populated Metro Phoenix Area.

Please "count our vote as a YES and look forward to work beginning in 2015".

Don & Linda Wyman
15055 W Verde Lane
Goodyear, AZ 85395

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Judson Wynne
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 10:14:55 AM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) As an Arizona resident, one who has lived in Phoenix and frequently travels there, I assert the proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(3) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(4) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(5) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(6) At the risk of sounding crass, I have long known the culture of ADOT and realize that project is likely a foregone conclusion. However, if I am mistaken, please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

(7) Sincerely,

(8) Mr. Judson Wynne
661 Kiowa

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	Flagstaff, AZ 86001-9549 (928) 863-8628

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Mingming Xu
To: Projects
Subject: Comments on Loop 202 South Mountain Freeway (SMF) Study
Date: Tuesday, June 18, 2013 8:53:47 PM

I am against the loop 202 extension.

1 2

a. It would be environmentally irresponsible for the region! The SMF would become a truck by-pass, introducing much more truck traffic into the region and increasing pollution.

3

b. It would be an irresponsible destruction of natural resources identified for preservation!

4 5

c. It would be fiscally irresponsible! It would require a disproportionate amount of tax dollars to build the SMF, money that could be much more effectively used for other regional transportation projects.

Mingming Xu
16404 S 23rd Way,
Phoenix, AZ, 85048
602-565-4784

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Section 4(f) and Section 6(f)**	
4	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
5	**Purpose and Need, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Sierra Club on behalf of Peggy Yeargain-Williams
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 9:14:05 AM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

Please choose the no- build alternative!

(2) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. (3) ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(4) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more (5) vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(6) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be (7) destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(8) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

(1) Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Ms. Peggy Yeargain-Williams
16418 E Bradford Dr
Fountain Hills, AZ 85268-2229

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	(480) 837-3486

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Sierra Club on behalf of Peggy Yeargain-Williams
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Tuesday, June 04, 2013 2:16:28 PM

Jun 4, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

2 I urge you to protect South Mountain Park.

3 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

4 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

5 The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

6 The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

7 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

8 Sincerely,

Ms. Peggy Yeargain-Williams
16418 E Bradford Dr
Fountain Hills, AZ 85268-2229

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	(480) 837-3486

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Sierra Club on behalf of Ryan Yehling
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 2:45:03 PM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

As a native of Arizona, born and raised in Tempe, I am discouraged by our state's lack of consideration for it's natural environment. The desert landscape that surrounds Maricopa County has long been subject to environmental degradation and urban sprawl. It doesn't make sense, ecologically,that a seemingly uninhabitable terrain such as ours is

(2) developed the way it is. The South Mountain Freeway is just another example of how our citizens are being coerced into relying entirely on the private automobile for transportation. Our citizens would not choose this way of life if there were other alternatives. The money

(3) that is projected to build the freeway should go towards a more sustainable form of mass transportation, such as extending the Tempe light rail, because it is the most socially, and environmentally responsible way to address our state's transportation needs.

(4) The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer.

(3) ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

(5) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more

(6) vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

(7) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a

(8) freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

(2) The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

(Responses continue on next page)

Code	Comment Document

forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

1

Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Ryan Yehling
1311 W Baseline Rd
Apt 2134
Tempe, AZ 85283-5388
(480) 243-9343

Code	Issue	Response
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	
7	**Section 4(f) and Section 6(f)**	
8	**Biology, Plants, and Wildlife**	

Code	Comment Document
1	Akicita Yellowman Document Created: 5/21/2013 8:44:42 PM by Web Comment Form I do not see the point of saving 9 minutes or 6 minutes. I believe that saving only 6-9 minutes does not justify the means of building a highway.

Code	Issue	Response
1	**Purpose and Need**	Travel time savings is only one aspect supporting the purpose and need for the proposed freeway. While a single trip may only save 6 or 9 minutes, when travel time is considered for all travelers and all trips, the travel time savings is significant. In the section, *Impacts on the Traveling Public*, beginning on page 4-67 of the Final Environmental Impact Statement, travel time savings is monetized and as a region, implementation of the proposed freeway would save motorists an average of $200 million per year between 2020 and 2035.

Code	Comment Document

From: Sierra Club on behalf of Steven Yockey
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Wednesday, July 24, 2013 10:36:01 AM

Jul 24, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

(1) I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

(2) (3) (4) The proposed freeway would cause more problems than it would solve. decimation of the environment, increased air pollution, and unrelenting noise in a presently pristine locale would be the payment for predicted consumer convenience. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer, just as passing more laws to criminalise an act cannot make it more illegal. ADOT needs to focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them. Why have not the mediae of existing freeways been utilised for elevated rail construction? De-privatising public transportation, removing profit seeking from the equation, is a start. If Washington DC can have reliable bus service augmenting its rail service, so can Phoenix. LA did it. Why can't we?

(5) (2) (6) South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would acutely worsen, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, COPD, cancer, and other diseases, in both the pediatric and adult populations.

(7) (8) The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. In addition to violently assaulting the quality of life, blasting a freeway through a portion of this park will destroy wildlife and habitat. Movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area. When would a corridor be cut through Piestewa Peak Park, or Encanto Park?

(9) The freeway will exacerbate urban sprawl and further burden Arizona's taxpayers, not to mention the exacerbation of our already diminishing water supply. We live in a desert. At present, we squander our water resources keeping golf courses green. Let's not further the demise, by rapidly advancing growth, where it does not belong. This construction would continue ADOT's trend of forcing residents to remain

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Noise**	
4	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
5	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
6	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Section 4(f) and Section 6(f)**	
8	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document

vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center. Once again, rich, out of state developers win, while the People lose.

1

Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Mr. Steven Yockey
2231 N 69th Ave
Phoenix, AZ 85035-3315
(602) 796-4739

Code	Issue	Response
9	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 3:29 PM
CALLER: GARY YORK	CALLER ADDRESS: 2002 W. SUNNYSIDE AVENUE, APT 2115, PHOENIX, AZ 85029
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the freeway around South Mountain. Please put this freeway through. We need it. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 4:11 PM
CALLER: CYNTHIA YOUNG	CALLER ADDRESS: 13810 S. 155TH STREET, GILBERT, AZ 85296
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 My husband David and I are very supportive to build the South Mountain Freeway. We would love to see that happen. It would cut my husband's commute down drastically. We would love to go over to the west side more often and that freeway would really help us to see family and friends. It would cut our commute time shorter. It would be really wonderful. We are definitely in favor of building the South Mountain Freeway. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Strong support on building South Mountain Freeway (202)
Date: Tuesday, April 30, 2013 8:52:15 AM

From: Jeff Yuan [mailto:jeff.y.yuan@gmail.com]
Sent: Monday, April 29, 2013 12:23 PM
To: Projects
Subject: Strong support on building South Mountain Freeway (202)

1

Arizona economy needs this freeway. It will benefit working class. Please move forward and build it as soon as possible.

Thank you!

Jeff Yuan
Realtor

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Support for 202 freeway
Date: Monday, May 20, 2013 8:32:58 AM

From: Michael Zaback [mailto:michael@zaback.net]
Sent: Friday, May 17, 2013 11:34 PM
To: Projects
Subject: Support for 202 freeway

1

The 202 should have been done years ago. If our political leaders would have done their job. Get it done

Michael Zaback
480-814-8911

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway public input
Date: Friday, May 17, 2013 8:50:27 AM

From: Bill Zaffer [mailto:bzaffer@hotmail.com]
Sent: Thursday, May 16, 2013 7:29 PM
To: Projects
Subject: South Mountain Freeway public input

I heard on PBS Arizona Horizon about the new South Mountain Highway.

1 My input is like the system we have today and more highways will only cause more use of fossil fuels versus making cities green and more incentives for people to live in the inner city. This valley is so car orientated and an ugly city. It is to bad years ago this valley did not adopt Portland's land use policy.

2 We stay addicted to cars and oil and deny climate change then when we hear that the Artic ice is melting and all the countries can do is meet in Norway and find ways how they can use the resources which is all part of a system that will someday destroy humanity. We have hit over 400 ppm for carbon dioxide for first time and going to in twenty years hit 450 ppm.

3 How does that relate to South Mountain Highway? If people move out in these areas then do not expect me to pay for the sick of idea of progress of urban sprawl that destroys our connection to nature and sick system of progress.

To be honest, I just do not figure you can understand these concepts.\\

Enjoy the sickness and blowback.

William Zaffer
www.zafferhomes.com
Scottsdale, Arizona
480-201-7387

Stop being exploited, learn to eat healthier at home, learn to live a Earth Friendly lifestyle, shop local, and buy more American but moderation consumption.

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Code	Issue	Response
1	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
2	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
3	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 11:05 AM
CALLER: CHRIS ZAKERS	CALLER ADDRESS: 2620 [UNCLEAR], PHOENIX, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Yes, I definitely approve of the freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway
Date: Tuesday, May 14, 2013 9:36:47 AM

From: Tommy Zane [mailto:tzane24@gmail.com]
Sent: Monday, May 13, 2013 4:41 PM
To: Projects
Subject: South Mountain Freeway

Dear Sirs,

1 I would like to express my approval of the proposed new freeway. I feel it is a much needed improvement for not only the east but also the west valley. I applaud the Arizona Department of Transportation for there foresight in this matter. I feel it would be a mistake to wait on a project such as this. Waiting only causes more problems and helps no one. Thank you for considering my opinion.

Sincerely,

Thomas Zane

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:34:16 AM

-----Original Message-----
From: Ricardo Zapata [mailto:zap130@yahoo.com]
Sent: Friday, May 17, 2013 9:45 PM
To: Projects
Subject: 202

1

I'm ok

Sent from my iPhone

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4382

speak next, please move forward.

MR. MILLS: Thank you for your time. As someone who was born and spent his entire life in Arizona, I strongly support the South Mountain, even when it was initially voted upon in the mid '80s. I think it's a huge -- it would be a huge component in relieving traffic congestion, particularly in the central part of the Valley, greatly aid the commuter traffic from the West Valley over to the Southeast Valley.

And then also, in these pretty tough economic times, taking into account the construction industry, it'll bring immense value to the construction industry. Thank you for your time.

THE FACILITATOR: Thank you.

Debbie Zapatka.

MS. ZAPATKA: Hi, I'm Debbie Zapatka and I live in Laveen, and we've lived there for five years now with the hope of the 202 coming in, and it was kind of promised when we moved there. Our development in the area, we have empty shopping centers just sitting there, we really need economic development, and the only way for that to happen really is to get the 202 in, as well as our area has no hospital and a hospital will not come in unless the 202 gets in. And I don't even know where the closest hospital is, it's probably 99th Avenue and

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 McDowell, which in an emergency would be really far.
2 Let's see, we have heard that other people would
3 move in like a movie theater and shops and restaurant
4 owners, as well as the hospital if the 202 went in. The
5 only way for our rooftops -- right now we're at 40
6 rooftops, we need 50 for those people to start coming in.
7 If the 202 was built, Ahwatukee would then be counted as
8 a rooftop because they're so close, they're within our
9 mile range. That would make a huge difference to our
10 area economically.
11 I'd also love to see if the 202 gets built, the
12 sound barriers to be built nicely and maybe represent
13 Laveen in some way. I'm an artist and I would love to
14 even donate my time to create artwork that would go onto
15 the sound barriers and to have possibly hiking trails or
16 some kind of bike trails that follow the 202, because we
17 have that South Mountain so beautiful right there and
18 just to keep more trails and parks. Thank you for your
19 time.
20 THE FACILITATOR: Thank you.
21 Chad Hartley.
22 MR. HARTLEY: First I want to say thank you for
23 the opportunity to be able to voice opinions, we
24 appreciate that.
25 Second, I'm a daily commuter of the Broadway

1

Code	Issue	Response
1	**Alternatives**	The Arizona Department of Transportation Roadside Development Section is responsible for assigning a wide range of standard treatment applications and wall materials, including color, to noise barriers and other structures. Typically the community where the wall will be constructed would work closely with its City Architect or planning department to decide on a theme for the wall. Usually, this can be accomplished by using the Arizona Department of Transportation's standard applications. As an example, for State Route 101 Loop (Pima Freeway) in Scottsdale, the City of Scottsdale chose to add public art to the noise barriers. The City's intent went above and beyond the Arizona Department of Transportation's guidelines of reasonable aesthetic treatment and, therefore, the Arizona Department of Transportation did not fund the aesthetic portion of the project. The Arizona Department of Transportation and the City of Scottsdale entered into an intergovernmental agreement for the purposes of allowing Scottsdale rights to design and construct artistic embellishment on the Arizona Department of Transportation-supplied noise barrier. The Arizona Department of Transportation provided the funds for construction of the noise barriers themselves, but the City of Scottsdale provided the funds to cover the aesthetic portion of the walls. Draft Environmental Impact Statement pages 4-158 and 4-159 explain the process municipalities might take to achieve the desired aesthetic treatment for noise barriers or other structures.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 South Mountain Freeway
Date: Wednesday, May 29, 2013 1:06:37 PM

From: Heidi Zebro [mailto:hdzebro@yahoo.com]
Sent: Wednesday, May 29, 2013 1:04 PM
To: Projects
Subject: 202 South Mountain Freeway

1

This email is to voice my support for the 202 South Mountain Freeway Loop. I too am a resident of Laveen but would support this project if I lived anywhere in the Valley. The need for this Freeway was seen in the 80s and nothing has changed. This Freeway has been planned, promised and approved by vote since the 90s. Why do the loud voices of a relative few override the voices of the voters. The reasoning against this project by those in opposition make little sense. It does not add more pollution. The same amount of vehicles will be driven in the Valley. It will move some of the congestion and pollution from these vehicles from the densely populated area through Phoenix, Tempe and Chandler to the south side of South Mountain. This project can be constructed in a manner causing relatively minor disruption to the area while providing prosperity and access to many.
This project has my full support.

David Zebro

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain 202 Freeway
Date: Thursday, July 11, 2013 8:28:54 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Dave Zebro - SHERIFFX [mailto:D_Zebro@MCSO.maricopa.gov]
Sent: Wednesday, July 10, 2013 4:21 PM
To: Projects
Subject: South Mountain 202 Freeway

1 I would like to voice my approval of the 202 freeway. If not on tribal land then using the Pecos route that has been planned for ages. Stop letting the relative few dictate to the majority. This project has been postponed for decades. LETS GET IT BUILT.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Sierra Club on behalf of Ruth Zemek
To: Projects
Subject: Comments in opposition to South Mountain Freeway
Date: Monday, May 27, 2013 10:44:20 AM

May 27, 2013

Arizona Department of Transportation South Mountain Study Team
1655 W Jackson St, MD 126F
Phoenix, AZ 85007

Dear South Mountain Study Team,

1 I am writing to express my opposition to the proposed South Mountain Freeway and to urge ADOT to select the No-Build Alternative.

We count on our leaders to make sensible decisions on behalf of the public.
This freeway is a bad idea.

2 The proposed freeway would cause more problems than it would solve. In addition, it would only provide short-term congestion relief. As is evident by our numerous clogged roads and freeways, many of which have recently been built or widened, building more roads is not the answer. ADOT needs to instead focus on planning for and investing in long-term transportation solutions, including mass transit. The only way to effectively reduce congestion and mobilize people is by reducing the number of vehicles utilizing our roads, not by encouraging more to use them.

3 South Mountain Freeway would have incredible negative impacts on our communities. Despite what the DEIS claims, air quality in the region would worsen over time, increasing public health risks. As more vehicles fill the "uncongested" areas this freeway would temporarily provide, more pollution will be spewed into the air, exacerbating asthma, cancer, and other diseases.

4 5

The freeway would also negatively effect our environment. South Mountain Park is the largest city park in our nation. It was set aside to protect resources and to benefit our communities. By blasting a freeway through a portion of this park, wildlife and habitat will be destroyed, movement corridors will be cut off, valuable public spaces will be lost, and more. This would set a terrible precedent by demolishing what should remain a protected area.

6 7

The freeway will also exacerbate urban sprawl and further burden Arizona's taxpayers. Its construction would continue ADOT's trend of forcing residents to remain vehicle-dependent while paying for infrastructure so that others can live farther and farther from a city center.

8

1 Please help protect our communities, our health, and our environment by selecting the No Action Alternative. Thank you.

Sincerely,

Ms. Ruth Zemek

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
3	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
4	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Health Effects**	
6	**Section 4(f) and Section 6(f)**	
7	**Biology, Plants, and Wildlife**	

(Responses continue on next page)

Code	Comment Document
	3303 E Clarendon Ave Phoenix, AZ 85018-5709 (602) 956-3128

Code	Issue	Response
8	**Neighborhoods/ Communities**	Unplanned growth is often termed “urban sprawl.” Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions’ land use plans for at least the last 25 years.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:38:30 AM

-----Original Message-----
From: Joc Med [mailto:jozeng08@gmail.com]
Sent: Saturday, May 11, 2013 6:13 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

I support Building the South Mountain Freeway!!!!!!

Jocelyn Zeng

Sent from my iPhone

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I support 202, south mountain freeway
Date: Wednesday, May 22, 2013 10:54:50 AM

1

-----Original Message-----
From: JZ Yahoo [mailto:jzeng01@yahoo.com]
Sent: Monday, May 20, 2013 5:17 PM
To: Projects
Subject: I support 202, south mountain freeway

Jocelyn Zeng

Sent from my iPhone

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1

***

THE REPORTER: State your name, please.

MR. ZHONG: Yang Zhong.

I am a Laveen resident here to show my support for the proposed South Mountain Freeway. Because it's -- it's going to alleviate the traffic congestion anticipated in the near future. And without the freeway, the air quality is going to be much worse, because of the traffic congestion. And besides this, these environmental benefits, the freeway's going to greatly reduce the Laveen resident's time spent on traffic, also bring much needed facilities, such as hospitals, and business, such as shopping centers, to Laveen.

And I think these economical environmental issues should also be as part of the environmental impact. And I also noticed that in -- there are many -- I -- because I concerned about this freeway, I pay attention to the media, and any news about the freeway, and I noticed that certain communities has voiced out about this freeway, but I didn't see too much about what Laveen residents thinks and what they do, but I think, as a growing and continuing growing community, Laveen's opinions should also be considered.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

THE REPORTER: Is that it?
MR. ZHONG: Yeah.
THE REPORTER: Thank you.

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Save Soth Mountain
Date: Monday, May 20, 2013 8:27:27 AM

From: Steve Zimmermann [mailto:stevezim413@yahoo.com]
Sent: Saturday, May 18, 2013 5:40 PM
To: Projects
Subject: Save Soth Mountain

1 2

Spare South Mountain! We don't need another freeway. This freeway would ruin one of the top parks in the valley. Those people chose to live out there. If they don't like the traffic situation they can move.

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SAVE SOUTH MOUNTAIN!!!

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: south mountain connector
Date: Monday, May 20, 2013 8:28:06 AM

From: Geof Zinnecker [mailto:tamgeof1@yahoo.com]
Sent: Saturday, May 18, 2013 1:20 PM
To: Projects
Subject: south mountain connector

1

I'd like to express my support for the construction of the new freeway connection.

Geof Zinnecker
9525 w Camelback Rd. 101-303
Glendale AZ 85305

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

1 2

3

4

Gregory Zych Document Created: 7/15/2013 5:22:14 PM by Web Comment Form

No, No, No. We do not need to turn Pecos road into a freeway or have access around the south and west of South Mountain. This is Millions of Dollars wasted to save a handful of people a few minutes of driving time. If there are funds in the budget how about paying some decent teacher salaries or funding afterschool sports or music classes. Repair the roads that exist, clean up abandoned strip malls. There are so many more valuable was to spend these funds than to destroy a wonderful park and make it an island in a sea of freeways.

Code	Issue	Response
1	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
4	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway/202
Date: Wednesday, May 15, 2013 4:40:16 PM

From: birdmanfm@aol.com [mailto:birdmanfm@aol.com]
Sent: Wednesday, May 15, 2013 4:35 PM
To: Projects
Subject: South Mountain Freeway/202

1

There are always those who will object to progress and change. Frankly, I've found myself doing the same once in a while. But unless we think that our Valley of the Sun will get *smaller* over the years, and *less* busy, then I suggest we face the necessity of improving our freeway network. There is ample evidence to support the building of this extension.

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build freeway
Date: Monday, May 20, 2013 8:43:37 AM

From: aztecking602ss@yahoo.com [mailto:aztecking602ss@yahoo.com]
Sent: Friday, May 17, 2013 6:04 PM
To: Projects
Subject: Build freeway

1

Built it already I'm just to fast and furious

Sent from my HTC smartphone on the Now Network from Sprint!

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

follow-up to your question, then I'll wrap up with the last one.

Yes, ma'am.

MEMBER OF PUBLIC: Okay. Regarding the Game & Fish being approached in 2002 and 2003, have the discussions continued since then, because a lot of information has been learned about appropriate wildlife crossing structures since 2002, and made leaps and bounds of discovery since that time.

UNIDENTIFIED SPEAKER: Not specifically on that topic, no.

MEMBER OF PUBLIC: Okay.

THE FACILITATOR: One last question, the others remaining here we either addressed earlier tonight or have been referenced in the EIS, the draft. So we'll put the responses to these on the Internet so we have time for closing. Fair enough?

The last question, then, from Scott Sprague, "What about the Tucson Shovelnose Snake?," is that what it's called, it is another candidate species in the region.

MR. SPARGO: Yeah, it is a candidate species, so therefore, as a candidate species therefore it isn't something that has a regulatory requirement, but it will be considered. The initial

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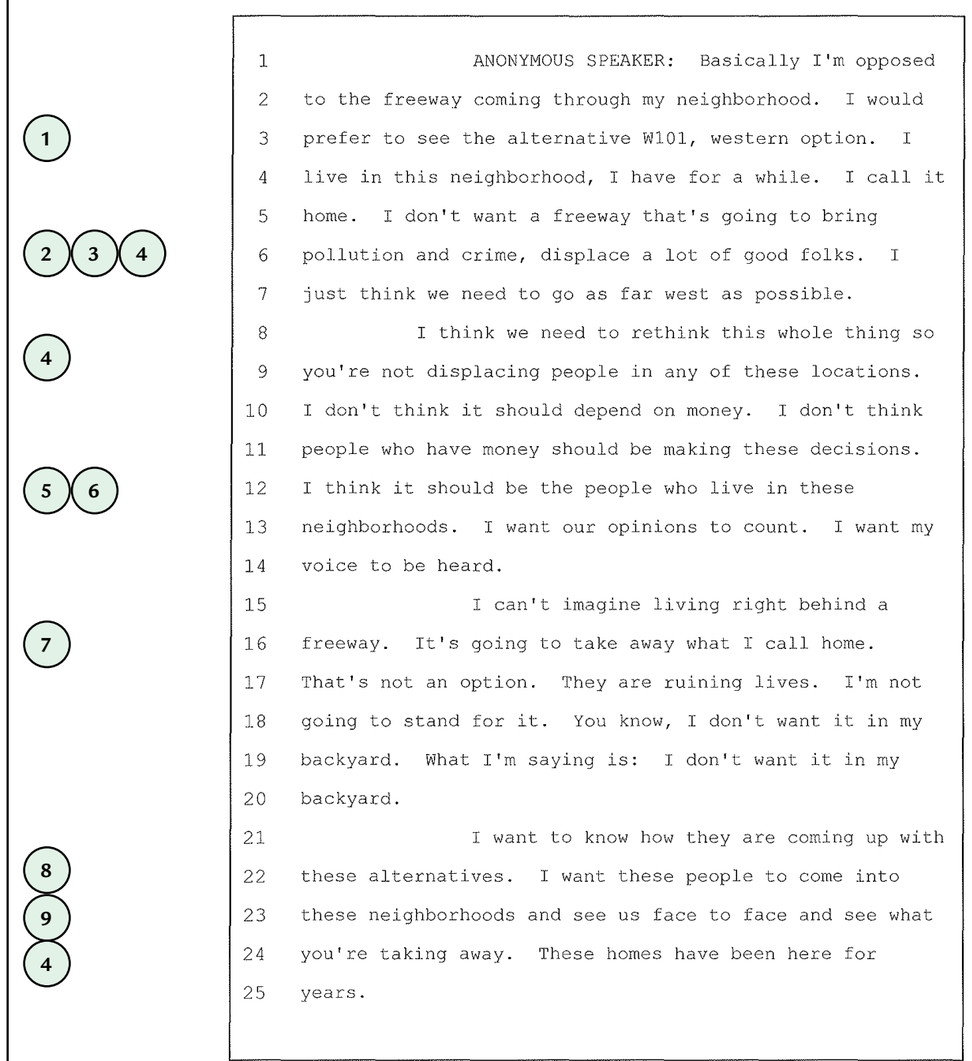
Code	Issue	Response
1	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document



ANONYMOUS SPEAKER: Basically I'm opposed to the freeway coming through my neighborhood. I would prefer to see the alternative W101, western option. I live in this neighborhood, I have for a while. I call it home. I don't want a freeway that's going to bring pollution and crime, displace a lot of good folks. I just think we need to go as far west as possible.

I think we need to rethink this whole thing so you're not displacing people in any of these locations. I don't think it should depend on money. I don't think people who have money should be making these decisions. I think it should be the people who live in these neighborhoods. I want our opinions to count. I want my voice to be heard.

I can't imagine living right behind a freeway. It's going to take away what I call home. That's not an option. They are ruining lives. I'm not going to stand for it. You know, I don't want it in my backyard. What I'm saying is: I don't want it in my backyard.

I want to know how they are coming up with these alternatives. I want these people to come into these neighborhoods and see us face to face and see what you're taking away. These homes have been here for years.

Page 7

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Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Alternatives, No-Action (No-Build) Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Public Involvement**	Public comments are a vital component in the decision-making process. Public comments have been solicited from project inception and through key milestones in the environmental impact statement process. The interests and needs of the public, along with all other social, economic, and environmental issues and impacts, must be fully analyzed and included in the Draft and Final Environmental Impact Statements. Comments made during development of the Draft Environmental Impact Statement have been used to adjust plans, explore new questions, or make changes—all within the scope of the National Environmental Policy Act. Public comments received on the Draft Environmental Impact Statement was reviewed and addressed in the Final Environmental Impact Statement. Public comments received on the Final Environmental Impact Statement will also be considered and addressed as appropriate. More information about the entire public involvement process up to publication of the Draft Environmental Impact Statement is available in Chapter 6, *Comments and Coordination*, of the Draft Environmental Impact Statement.
7	**Neighborhoods/ Communities**	While the W59 Alternative is adjacent to residential areas, a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
8	**Alternatives**	Chapter 3 in the Draft Environmental Impact Statement details the process used and alternatives developed in the course of the project.

(Responses continue on next page)

Code	Comment Document

They need to go back to the drawing board and rethink it. I don't think any of these people are living in any of the neighborhoods they are destroying, so I guess that's what I want to say. It's just sad. It's a sad day when you take down somebody's home and not care. It's just sad.

* * * *

(Proceedings concluded at 7:00 p.m.)

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Code	Issue	Response
9	**Public Involvement**	Chapter 6 in the Draft Environmental Impact Statement details the public outreach for this project. Pages 6-11 through 6-15 list the numerous meetings that the Arizona Department of Transportation has had with organizations, City of Phoenix, community leaders, homeowners associations, informal meetings with political leaders, etc. Numerous public meetings have been held throughout the Study Area to share information about the project.

Code	Comment Document

creator was from there, and he created us from out of clay. That was used on the mountain.

Maybe you people don't believe in any of that. You don't care. You just came out of nowhere, the dust of something. We don't know where you came from -- where you came from. We know where we came from and our beliefs. We know where we were created. I don't know where you people were created and you probably don't know either. That's why it's probably not significant to you. That's not our fault. That's your fault for leaving your land, then you would know where you came from. Let me see. Ok. I'm running out of stuff to say. Thank you.

FRANK EVEN: We need the highway badly. The only question we have is, can it be sooner rather than later. I mean, seriously. No, I mean, just in time to work, my commute on Baseline is miserable. Too much stop and go. It takes anywhere from 20 to 30 minutes to travel 14 miles, whereas with the new highway, I'll be able to do that in 10 to 15 minutes and probably use less gas in the process. The end. Please start it in 2013 instead of 2014 or I'll have to move out of the area. Now, the end.

1 ANONYMOUS SPEAKER: I want it faster. I have been waiting many, many years for this.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. This expansion will create more jobs, in return more revenue for the state. Build the W59 and E1 help our economy

1

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 3:17 PM
CALLER: ANONYMOUS1	CALLER ADDRESS: SUN LAKES, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the planning and construction of the South Mountain Freeway. I live in Sun Lakes and think the freeway would be a great asset to the community.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

though we're right next door until we and our kids and our people realize that we can make bigger strides if we apply ourselves and our children and not be afraid to stand in places where we need to stand up. That's about it.

Thank you very much.

MS. FORGY: My name is Janet Forgy. I have lived in Laveen area, the 67th Avenue and Baseline subdivision, Laveen Meadows, for about six years in November. And I can tell you we desperately need to have this 202. It's imperative. It's like we're out in the boondocks. Businesses are not developing. We have to go five miles to get to I-10, that's the shortest distance, five or 13 miles to get to an interstate.

I-10 is like a parking lot sometimes. There's no development of businesses. I mean, there's nothing. We need that desperately, and so I strongly encourage the 202 to be developed as soon as possible without any delays cause we definitely need it.

UNIDENTIFIED SPEAKER: One of the things I want to stress is that when I purchased my house in November of 2007 I saw the possibilities of development and I was assured that it was going to be developed. It subsequently has not. As a matter of fact I understand because of the economic situations, things had a way of

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

everything going downhill, but what it's done is it's just made it even worse in that area because of no development, not only because of the economy, but there's just no roads, no highways. We're just kind of like very secluded.

This should have been done a long time ago. It needed to be done a long time ago. We've got to look at the big picture.

And I looked at the studies. It looks like it's been done very thoroughly. It looks like all interests have been taken into account. Now it's time to get going on it and quit playing.

MR. WINNER: I live at 47th Avenue and Baseline roughly. I support the freeway coming through. I have a three-year-old daughter and the first two years of her life she was chronically ill. I was in and out of the hospital. The closest children's pediatric urgent care is at Central and Baseline. The closest hospital is obviously in downtown. There's nothing -- west there's Thunderbird and there's another hospital, I believe it's on 5th Avenue, so I support it primarily for the expected hospital facility that they are going to be putting in.

That's it. Simple.

UNIDENTIFIED SPEAKER: The problem with I-10 is it turns into a bottleneck, and they are not

Code	Issue	Response
1		Comment noted.

Code	Comment Document

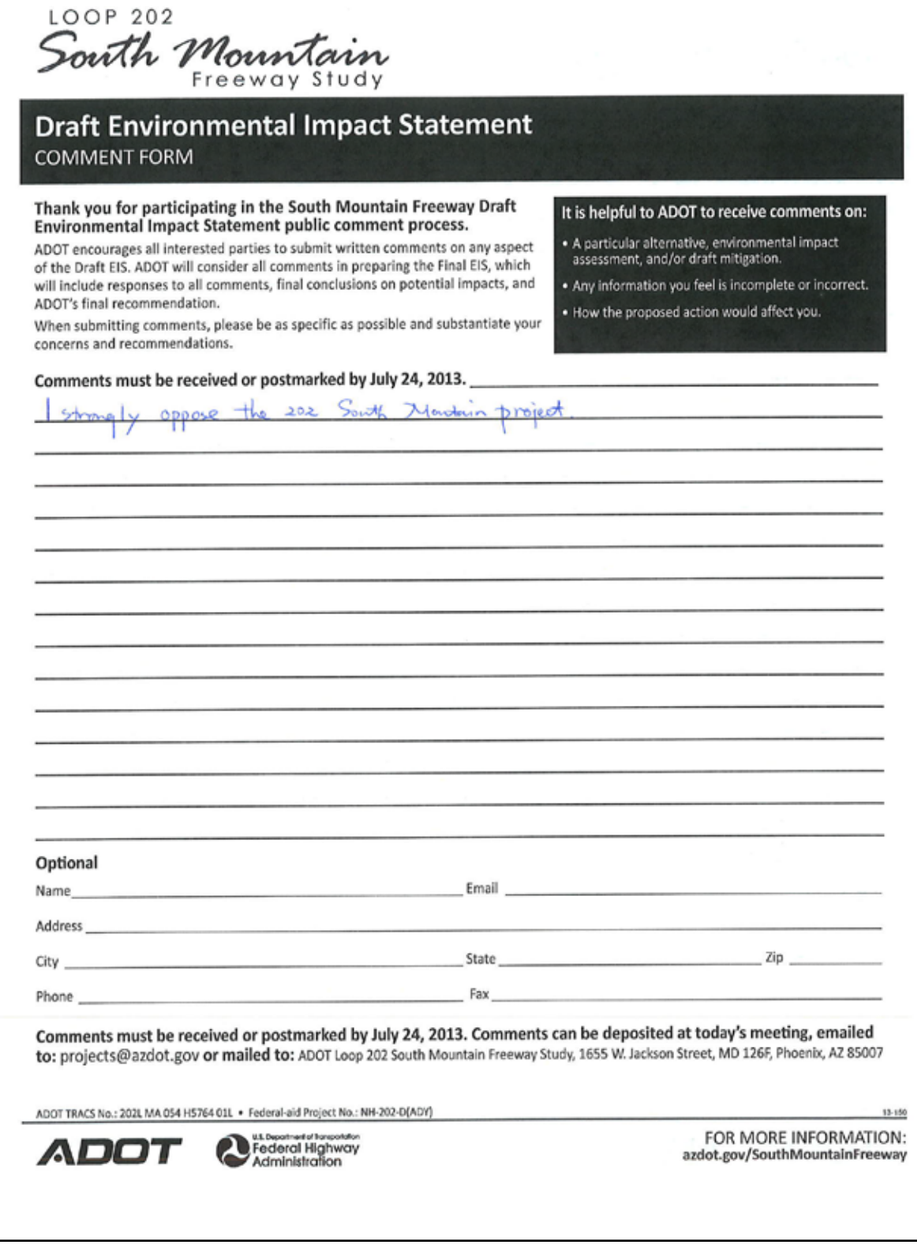
Document Created: 7/1/2013 4:00:14 PM by Web Comment Form

To Whom it May Concern:

(1) (2) (3) (4) (5)

I am a concerned homeowner in the Ahawatukee Foothills community who is not in favor of building the Loop 202 South freeway along Pecos Rd. The only thing between my home and the new freeway is an empty strip of land (a wash). I am of the understanding that my home is not considered to be in the right of way, and thus not eligible for housing relocation. My quality of life will change for the worse if the freeway is built, since I will have to not only endure all of the negative impacts of the construction of a major freeway in very short proximity to my home, but also will be subject to long term increased traffic noise, environmental pollution and the overall general change of the fabric of my community. My home, my quality of life, and community will suffer negatively if the freeway is built. Please do not build.

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Agencies may acquire only those properties located entirely or partly within the project right-of-way limits (see Draft Environmental Impact Statement page 4-45).
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

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When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

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- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

I strongly oppose the 202 South Mountain project.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

1 UNIDENTIFIED SPEAKER: Basically I guess
2 I have a lot of questions about the pollution issue
3 because I don't think that's really been analyzed
4 enough or discussed enough. And the fact that we
5 sort of have an environment here where we kind of go
6 up in elevation up to the mountain, and I live right
7 at the base of the mountain. I guess I'm more
8 concerned about pollution issues because I understand
9 it's going to get a lot of truck traffic, and trucks
10 are pretty dirty, dirtier than cars. So I'm more
11 concerned about the pollution issue than I am about
12 the sound issue.
13 Obviously if I lived next to the proposed
14 freeway, I would be more concerned about the sound
15 issue, but I'm three miles up, so, but I have mixed
16 emotions about it. I am on the surface right now not
17 really understanding everything about it. I'm
18 opposed to it. And I think the only way that we
19 could even begin to get our voices heard would be to
20 mobilize and litigate against it, but I -- I don't
21 know if people are afraid enough or understand it
22 enough, you know, to form a big enough organization.
23 I can see from a city standpoint to
24 complete the loop and put us where we're supposed to
25 be, but from an environmental standpoint, that's my

1

2

Page 7

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Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	

Code	Comment Document

3

biggest issue. And I guess the air quality is the major concern to me, but I don't think there's a brace that's mobilized for us residents to put up a logical fight against the freeway. I don't know, but I'm going to look into it.

And I guess the fact that it's going to be so close to the schools, to Desert Vista, I just -- I don't like that. Kids are graduating, they're gone, but I just, I have an issue with the environmental factor 100 percent so that's my comment. And, you know, to get people to mobilize and become one voice is very, very difficult. But if there's anything that would cause people to mobilize, it would be this freeway, I would think.

So I can see it from ADOT's standpoint, but I can see it from people who live next to the freeway. I don't know of a place in the Valley where a freeway cuts so close. Maybe the 101 goes up through Squaw Peak there. What is that, the 51? That's right up in the mountains there. I don't think they have a pollution issue, but I don't know. I mean, I just have never gotten involved.

Well, I'm going to become more aware of what's going on and voice my opinion because I'm not for this in any way, shape or form until they can

Code	Issue	Response
3	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

1 4

come up with some scientific evidence that pollution won't increase. But how will that increased pollution settle up against the mountain? Because that's one of the beauties is that the pollution index is very high on the other side of the mountain. Over here, minimal. So, I mean, that's -- that's one of my major concerns.

1

And obviously if you have an eight-lane freeway, you're dramatically increasing the pollution. But other than that, great looking plan.

5

I don't like them cutting up the mountain. I just go out the door and I'm on the mountain. I don't go that far down. I don't want to stop progress, but I have to make a stand at some point.

That's a hell of a presentation that ADOT's done. A tremendous amount of work. Very well done.

Page 9

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Code	Issue	Response
4	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
5	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202 bypass
Date: Wednesday, May 15, 2013 11:12:21 AM

From: Sunctklobz@aol.com [mailto:Sunctklobz@aol.com]
Sent: Wednesday, May 15, 2013 11:01 AM
To: Projects
Subject: 202 bypass

1 get off dead center and geter done.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

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1

I FAVORED THE CONSTRUCTION OF THE 202 LOOP FOR REASONS DESCRIBED BELOW
1) TRAVEL TIME ALONG THE 10 WILL BE GREATLY REDUCED.
FREEWAY FROM 59th AVE TO 10 FREEWAY INTERSECTION.
2) REDUCED TRAVEL TIME MEANT LESS GAS COST, LESS ENVIRONMENTAL IMPACT ON OZONE PRODUCTION ~~KEYS~~ THAT AFFECTS OUR ENVIRONMENT (AIR WE BREATH & POLLUTION.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 3:18 PM
CALLER: ANONYMOUS2	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the planning and construction of the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

everything going downhill, but what it's done is it's just made it even worse in that area because of no development, not only because of the economy, but there's just no roads, no highways. We're just kind of like very secluded.

This should have been done a long time ago. It needed to be done a long time ago. We've got to look at the big picture.

And I looked at the studies. It looks like it's been done very thoroughly. It looks like all interests have been taken into account. Now it's time to get going on it and quit playing.

MR. WINNER: I live at 47th Avenue and Baseline roughly. I support the freeway coming through. I have a three-year-old daughter and the first two years of her life she was chronically ill. I was in and out of the hospital. The closest children's pediatric urgent care is at Central and Baseline. The closest hospital is obviously in downtown. There's nothing -- west there's Thunderbird and there's another hospital, I believe it's on 5th Avenue, so I support it primarily for the expected hospital facility that they are going to be putting in.

That's it. Simple.

UNIDENTIFIED SPEAKER: The problem with I-10 is it turns into a bottleneck, and they are not

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

improving I-10 as far as adding additional lanes. I know the 202 is going to take a while to merge, but it's a bottleneck right there and this is going to make it worse because people are going to be coming down the 202 to go down for morning rush hour and then going home just the opposite. It's going to make that area worse.

From the 101 to around 35th Avenue is a nightmare in the morning, a nightmare, just a parking lot, a parking lot. And then coming home it's flip flopped. And I don't see them improving the I-10 at least adding one lane on each side. They are not doing nothing there.

Instead of building this freeway, why don't they just make our freeway wider?

That's my comment plain and simple. If they are going to add a freeway to a freeway, they need to add extra lanes to the freeway they are adding it to. Get rid of this bottleneck we have or else it's even going to get worse. It's a bottleneck now. It's going to make it worse. No doubt about it.

I mean, the freeway is awesome if it was all done at once, and it's not going to be. They will stop it at Baseline. It's going to make it bad for a long time for a lot of people. If it was done all the way to 202 all at one time and then open it, yeah, it

2

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www.drivernix.com

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The proposed connection to Interstate 10 (Papago Freeway) would include substantial improvements (widening) along Interstate 10 to allow traffic to and from the South Mountain Freeway to smoothly enter and exit the Interstate 10 main line.
2	**Construction**	The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would expedite the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years and the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period.

Code	Comment Document

would be fine, but it's not.

Thanks.

MR. NELSON: As a resident of the Gila Indian Community, I feel that the Loop 202 is needed. It would serve all the communities, not just the southern part, but the northern part.

As far as serving the state, I have to go back to the history of the loop of the I-10 when it was constructed in 1957 and the right-of-way was put through Gila River. In 1957 it was 11 miles. At that time there was promise of frontage roads, better interchanges. To this date there really hasn't been anything done as far as fulfilling any of those promises. So one thing that I would like to come out of the Loop 202, if it is to come into the community, is that those promises are fulfilled, not only for the Loop 202, but for the I-10 that goes through the community towards Casa Grande and into Tucson.

At this time, the landowners there are a small voice, but yet they are not as loud as the opposition in the community. One thing that the State and ADOT has to know on the federal highway is that those people that are against the Loop 202 don't speak for the whole community even though they speak loud.

One thing that's been done in the tribe is

Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. I do not want this South Mountain Freeway because it will cause major air, noise and congestion pollution within

1 2 3

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

Code	Comment Document

1 UNIDENTIFIED SPEAKER: I live in the
2 Lakewood community which I moved into in 1992 for one
3 reason is the fresh water well fed -- fresh water
4 wells. That's fresh water. Like, that's all we have
5 is the lake. We don't have a golf course. We don't
6 have anything else but that fresh water lake that's
7 literally filled with well water which we own as the
8 owners of Lakewood properties.
9 And they're telling us now that the
10 lake's -- I mean, the wells will be gone and they
11 said they could come up with an alternative water
12 source, but that's not acceptable. Those are stocked
13 with fish and that's the entire reason you would live
14 in Lakewood. Everything centers around that lake.
15 All of our greenbelts are around the lake. So I'm
16 totally opposed to this freeway for that and for the
17 possible climate.
18 We've got climate warming and everything
19 else and putting concrete all around that entire
20 community the way they want to do it, forget it.
21 They're going to destroy our quality of life. So I'm
22 completely opposed to this, and I really want the
23 wells addressed because we do not want reclaimed
24 water. We don't want -- we don't want any reclaimed
25 water. We don't want any city water to fill that

(1) (2) (3)

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www.drivernix.com

Code	Issue	Response
1	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See the text box on Final Environmental Impact Statement page 4-108.) The well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Transportation to effectively mitigate well impacts associated with its projects throughout the region.
2	**Air Quality**	Climate change is an important national and global concern. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do. Human-caused greenhouse gas emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these greenhouse gas emissions. Other prominent transportation-related Greenhouse gases include methane and nitrous oxide. Greenhouse gases trap heat in the earth's atmosphere. Because the atmospheric concentration of greenhouse gases continues to climb, our planet will likely continue to experience climate change-related phenomena (see Final Environmental Impact Statement pages 4-85 through 4-86). To date, no national standards have been established regarding greenhouse gases. Greenhouse gases are different than other air pollutants evaluated in federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere. The affected environment for greenhouse gas emissions is the entire planet. In contrast to broad-scale actions such as those involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand greenhouse gas emissions' impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under the National Environmental Policy Act, detailed environmental analysis should focus on issues that are significant and meaningful to decision making. The Federal Highway Administration has concluded, based on the nature of greenhouse gas emissions and the exceedingly small potential greenhouse gas impacts of the proposed freeway (as shown in Final Environmental Impact Statement Table 4-37 on page 4-85), that greenhouse gas emissions from the proposed freeway would not result in "reasonably foreseeable significant adverse impacts on the human environment" [40 Code of Federal Regulations § 1502.22(b)].
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

lake. We want our well water. Those are our wells
and from what they told us, they can't.

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:46:07 AM

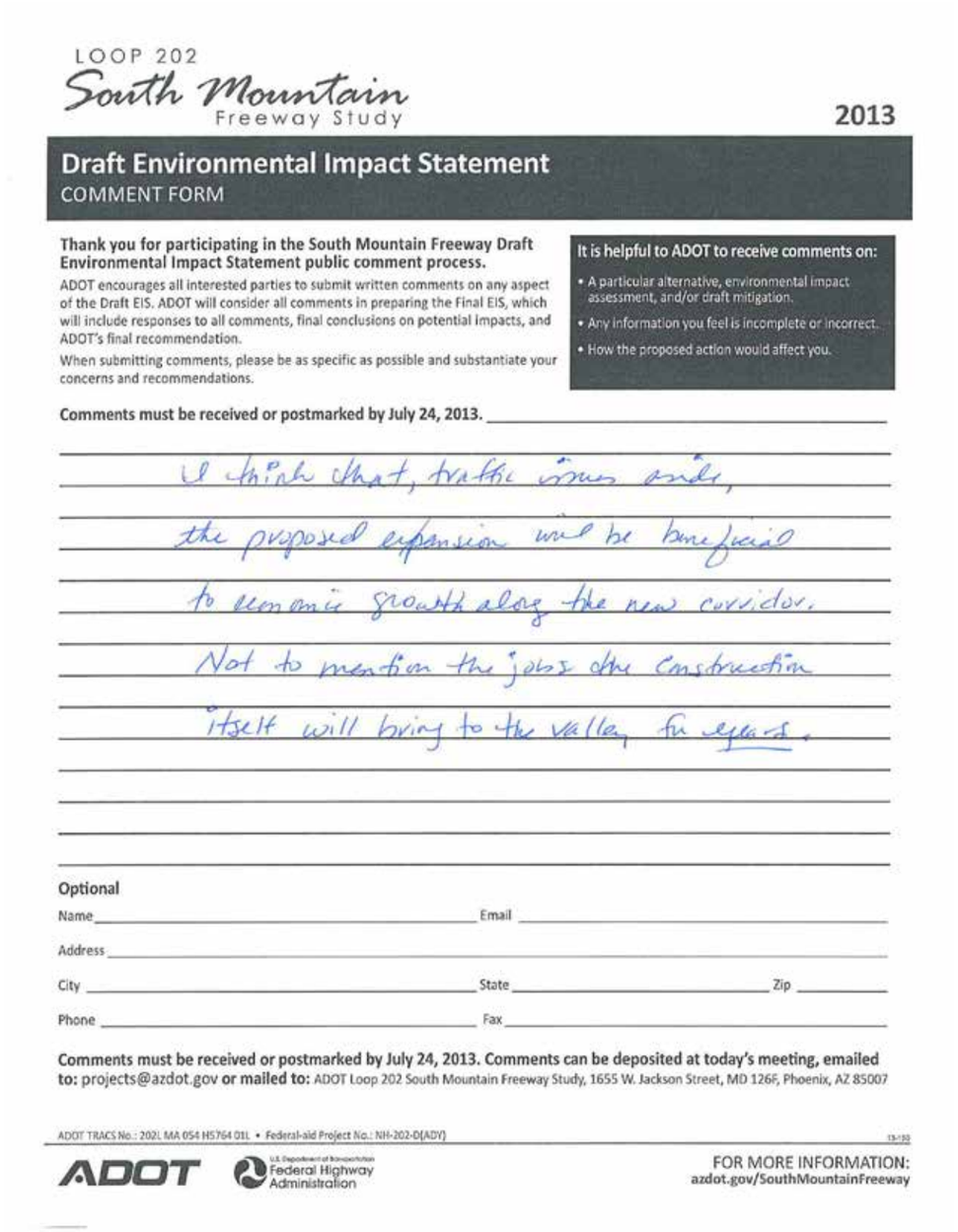
From: ROJcocola@aol.com [mailto:ROJcocola@aol.com]
Sent: Friday, May 10, 2013 6:57 PM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

PLEASE BUILD THE SOUTH MOUNTAIN FREEWAY!

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- How the proposed action would affect you.

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I think that, traffic issues aside, the proposed expansion will be beneficial to economic growth along the new corridor. Not to mention the jobs the construction itself will bring to the valley for years.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADV)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/9/13	INCOMING CALL TIME: 3:23 PM
CALLER: ANONYMOUS3	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the planning and construction of the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

get around the way we used to anymore and it's nearly impossible to get from our place to Ahwatukee, so we are in favor of -- we support the building of the freeway. We think it's way past time.

Thank you.

UNIDENTIFIED SPEAKER: I feel that while the study has been -- followed the process, it needs to be completed. It's been 12 years since this study has gone on. I think it's high time they finish it up and develop a road and move on with design. And I'm a proponent of having it on Pecos Road alignment. I'm a proponent of tying it into the 101, Loop 101, instead of 59 like Phoenix wants it.

I also feel Phoenix, it has been some of the delay because they allowed planning or community development along the Ahwatukee area when they could have easily set aside property and right-of-way. So I feel a lot of onus belongs to the City of Phoenix, not ADOT. Other communities have set aside properties as freeways have moved through. I'm talking about the East Valley in particular.

I'm a proponent of the South Mountain Freeway. I do not feel that air quality is an issue. And Ahwatukee is very -- there are a lot of opponents to Ahwatukee area, vocal, and they bring -- I think because

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www.drivernix.com

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Acquisitions and Relocations**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Draft Environmental Impact Statement.

Code	Comment Document

of the social status down there they have a lot of -- a strong voice unfortunately.

I don't care how they build it. I just hope they build within the next five, ten years. That's all I have to say.

UNIDENTIFIED SPEAKER: Maricopa County has about five or six million people. It takes a certain number -- a certain amount of facilities to move traffic for five or six million. Probably there's three plus million cars.

The corridor from California to the East Coast, we're right in the way. This tunnel down here was the last piece of I-10 that was built and opened, so we have been in bottleneck for a long time. Coming from across 10, this is really and truly parallel to I-40 and I-10 and they both go all the way coast to coast virtually. And so we need this commercial -- I'm hunting the word -- to be tied to a commercial link.

We're right out here in the middle of the desert not doing squat except collecting cactus, so it would be a good thing for us to have a link commercially between West Coast and East Coast and we do after a fashion.

I-40 doesn't go through either Tucson or Phoenix. I-10 does. So we need to do everything we can

Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

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Comments must be received or postmarked by July 24, 2013. THE ESSENSE OF THE LAKEWOOD COMMUNITY IS OUR FRESHWATER LAKES WHICH ARE FED BY FRESH WATER WELLS.

NO ACTION

I purchased my house in Lakewood in 1992 because of the spectacular environment & the wells fresh water lake - NO RECLAIMED WATER! NOT CITY WATER!

1 I do not want my quality of life adversely affected by another freeway. Our lakes in Lakewood are fed by wells - fresh water wells. Our lake water is not city water or reclaimed water!

We do not want these fresh water wells impacted by a freeway. Lakewood Residents own these wells & we do not want a substitute water source.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See the text box on Final Environmental Impact Statement page 4-108.) The well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Transportation to effectively mitigate well impacts associated with its projects throughout the region.

Code	Comment Document

1 UNIDENTIFIED SPEAKER: It's simple that
2 it would be a negative impact to everything we do in
3 Ahwatukee in that little, you know, part of Arizona.
4 It would be very, very devastating if everything, all
5 the construction takes place north of Pecos Road or
6 on Pecos Road to the north end of it. It seems like
7 it would be a truck route, it would be bad, it would
8 be noisy and smelly and environmentally bad. It
9 wouldn't make Ahwatukee a better place. And the
10 people who live here and have lived here 20 years
11 would be hurt by it. It's fairly simple.
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4

Page 12

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Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Air Quality**	
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

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So, I understand environmental impact side of construction but most of the alignment is desert shrubs - not even true prehistoric lake Sonoran Desert - just dried lake bed with creosote bushes. ADOT will do its usual good job of trying to lower impact as much as possible.

1

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/10/13	INCOMING CALL TIME: 10:16 AM
CALLER: ANONYMOUS4	CALLER ADDRESS: 10605 N. MASCAL LANE, FOUNTAIN HILLS, AZ 85268
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Build the South Mountain Freeway now.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

of the social status down there they have a lot of -- a strong voice unfortunately.

I don't care how they build it. I just hope they build within the next five, ten years. That's all I have to say.

UNIDENTIFIED SPEAKER: Maricopa County has about five or six million people. It takes a certain number -- a certain amount of facilities to move traffic for five or six million. Probably there's three plus million cars.

The corridor from California to the East Coast, we're right in the way. This tunnel down here was the last piece of I-10 that was built and opened, so we have been in bottleneck for a long time. Coming from across 10, this is really and truly parallel to I-40 and I-10 and they both go all the way coast to coast virtually. And so we need this commercial -- I'm hunting the word -- to be tied to a commercial link.

We're right out here in the middle of the desert not doing squat except collecting cactus, so it would be a good thing for us to have a link commercially between West Coast and East Coast and we do after a fashion.

I-40 doesn't go through either Tucson or Phoenix. I-10 does. So we need to do everything we can

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

to facilitate the movement of goods through Phoenix. If you come across 10 under this tunnel that we really didn't need and go around the curve past the airport, it's a constant strain and congestion. If you come down I-17 and it curves and go out, 17 is stopped from the Stack to where 17 meets 10. Well, that don't work. Now, if anything happens, an accident or anything, it's tied up for hours.

If we build the south -- build the 202, it's more than just a reliever. It will be used. They say it will move 150,000 cars, vehicles, a day. No, it won't. It will try to move 200,000 a day because, when I-17 and I-10 find out they can get by with not having to come through downtown Phoenix, they will use it and the traffic will increase, not exponentially, but almost. It will increase linearly.

And I know there are a lot of environmental impacts. I've been doing this all my life. So the problem is that there are a number of people that will be impacted, all 285 of them as opposed 200,000 every day. I feel sorry for the people that are impacted; however, there is, to my way of thinking, a greater good.

My stories can get pretty long and windy.

In the end, there is a greater good and

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

the greater good is right now Maricopa County could stand a two billion dollar boost, you know. That's what it's going to cost roughly. And that will all be spent in Maricopa County.

Finally somebody is talking about it. The governor came out with a letter and she was the first one I read that mentioned the economic benefit of building the 202 South Mountain.

There -- I'm trying -- I'm hunting for a place to put a period.

It's not that I'm not sympathetic to the Indian community, but they have delayed this long enough. And, in fact, you know, they play games, "Well, we're going to vote about putting it on our land."

When they did 101 on the east side, the people in Scottsdale said, "Well, put it on the Indian land." They did not understand that this was a separate sovereign country and you don't condemn a separate sovereign country's land, so they did this after the Pimas came out and closed their half of the Pima Road. Here was all these cars now having four lanes of cars on two lanes.

ADOT started buying right of way through Scottsdale. Well, as time went on, negotiations with the Pimas picked up and they were able to -- they didn't buy

Code	Issue	Response

Code	Comment Document

the right-of-way. They leased the right-of-way for two or 300 years. Indians can't sell it. They can lease it. The social benefit, the economic benefit to the Pimas, they ultimately got $189 million, a promise to buy all the materials from them, a promise to hire their young men to work on the project. They was pretty smooth. They beat the White man at his own game. Now they are pretty prosperous.

They've got a lot of coins in their pocket. These poor people that need help, the social help, like, you know, all the old people are hunting for a place to live and it's getting harder and harder to find nursing care, you know, just because of the money. Well, this is an opportunity for them to ensure the economy of the 35,000 people. I would hope that they would get on board. They haven't yet. And I don't agree with that. I can see that it can work like it did for the Pimas.

The road, I-10 from Phoenix to Tucson, is being widened to three lanes each way. It's really nice, maybe four lanes in some areas. Where I-10 crosses the GRIC land, it spans two lanes. GRIC wants to know, "Well, where is our widening?"

We ain't widening theirs. It's not a revenge motive. It's just they're too hard to deal with.

Code	Issue	Response

Code	Comment Document

It's still their land. The right-of-way that I-10 is on where the highway is built still belongs to the GRIC, so they have -- they have took dead aim at their foot and shot it, just about shot it off. I'm sorry.

In fact, my great, great grandmother was a full blooded Chickasaw, so I have not animus. I'm not anti-Red man but I'm anti being dumb, that's what I'm anti.

President Eisenhower signed the Interstate Act in 1956. The interstate system provided a means to make these connections. It was more than just a new highway system. All these cities with 50,000 population or more were connected all over the United States. These connections would connect us and Tucson, us and Denver, us and LA, on and on, Utah, Salt Lake City. I don't want to leave Salt Lake City out.

When the interstate system started, there was not a link between Phoenix and Flagstaff. There was an old Army road that you pulled your mules on wagons through. It went up toward Payson. I walked it. I worked on 87. Well, it followed the old Army road that would eventually get you to Flagstaff. Flagstaff was a pretty big place then.

You're getting a history lesson, you know.

Now I-40, it replaced U.S. 66. U.S. 66

Code	Issue	Response

Code	Comment Document

came from Chicago almost to L.A. It was a historic road. There was not very many transcontinental roads around then. U.S. 66 connected Chicago with the West Coast. That was good because they could haul -- we had two ways to get commerce to the West Coast and from the West Coast to the middle of the country-- trains and highways. The highways were not very fast. They went through every town of a hundred people, so you can imagine how many stop signs and stop lights there were from L.A. to Chicago. I-40 replaced most of that.

You could drive all the way from Chicago to L.A. and all you had to do was stop for gas and go to the restroom. And you could do it at high speeds, at 70 miles an hour. It meant the size of the trucks could increase to haul more commerce. They originally were like 40, 45 feet, the trailers were 40, 45 feet long, then they started putting two of them together. That was like a train on the road rather than on the tracks.

Well, the rails fell into disrepair because of a lot of reasons, but, if you notice a lot of places you'll see railroad ties as architectural landscaping. Well, they came from the railroads that was taken out, so the idea of the highways being a commercial link that link the whole United States, they hadn't thought of that ahead of time. They might have dreamed

Code	Issue	Response

Code	Comment Document

of it, but nobody thought of it.

All of the east/west highways, interstate highways end in a zero, I-40, I-10, I-20, I-50, I-60. All of the north/south ones end in usually a five, but they don't have to be a five. All of the diagonals are three numbers that usually end in either a five or zero. Look at the map sometime. You'll see what I'm talking about.

Where did the idea come from?

Well, when Eisenhower was in Germany in World War II Hitler had built these highways to move troops, materials, and whatnot. Eisenhower brought this idea back to the U.S. and did the same thing. The original reason for building the interstate system was to be able -- we were still in the cold war -- was to be able to move men and material. All the design specifications for bridges were to hold up tanks, not haul a truckload of furniture, but haul up these big low boys that had tanks on the back of them so when they drove across it the bridge wouldn't fall in.

Well, there's your history lesson. Thank you.

MR. MORALES: I'll keep it short. I'm concerned about the archeological sites. South Mountain is our most sacred of all sacred mountains. Elder

Code	Issue	Response

Code	Comment Document

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2013

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- How the proposed action would affect you.

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NO ACTION / NO ACTION / NO ACTION

We do not want our fresh water wells impacted!!! (In Lakewood)

As a Lakewood homeowner (Please protect our fresh water wells!)

1

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See the text box on Final Environmental Impact Statement page 4-108.) The well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Transportation to effectively mitigate well impacts associated with its projects throughout the region.

Code	Comment Document

1 2

3

2

UNIDENTIFIED SPEAKER: You know what's sad about Arizona, put the -- put the freeways in first and give us a chance to say whether we want to live near something. Don't take our quality in 20 years and then put something like that on top of us and say tough luck now. You know, you don't devalue someone's property.

Put the freeways around. If people want to choose to live by them afterwards, then build it around stuff, but don't add stuff later that destroys quality of life, right? That's what they're doing. That's absolutely appalling and that's what they've done.

I've been here 35 years and they do it everywhere and enough is enough. They've done it to other communities. They've destroyed other communities. We don't want it, so...

Code	Issue	Response
1	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Draft Environmental Impact Statement.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Acquisitions and Relocations**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values. A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build 202.
Date: Friday, May 17, 2013 8:50:19 AM

1

From: lc5w [mailto:lc5w@yahoo.com]
Sent: Friday, May 17, 2013 4:30 AM
To: Projects
Subject: Build 202.

Sent from my Samsung Epic™ 4G Touch

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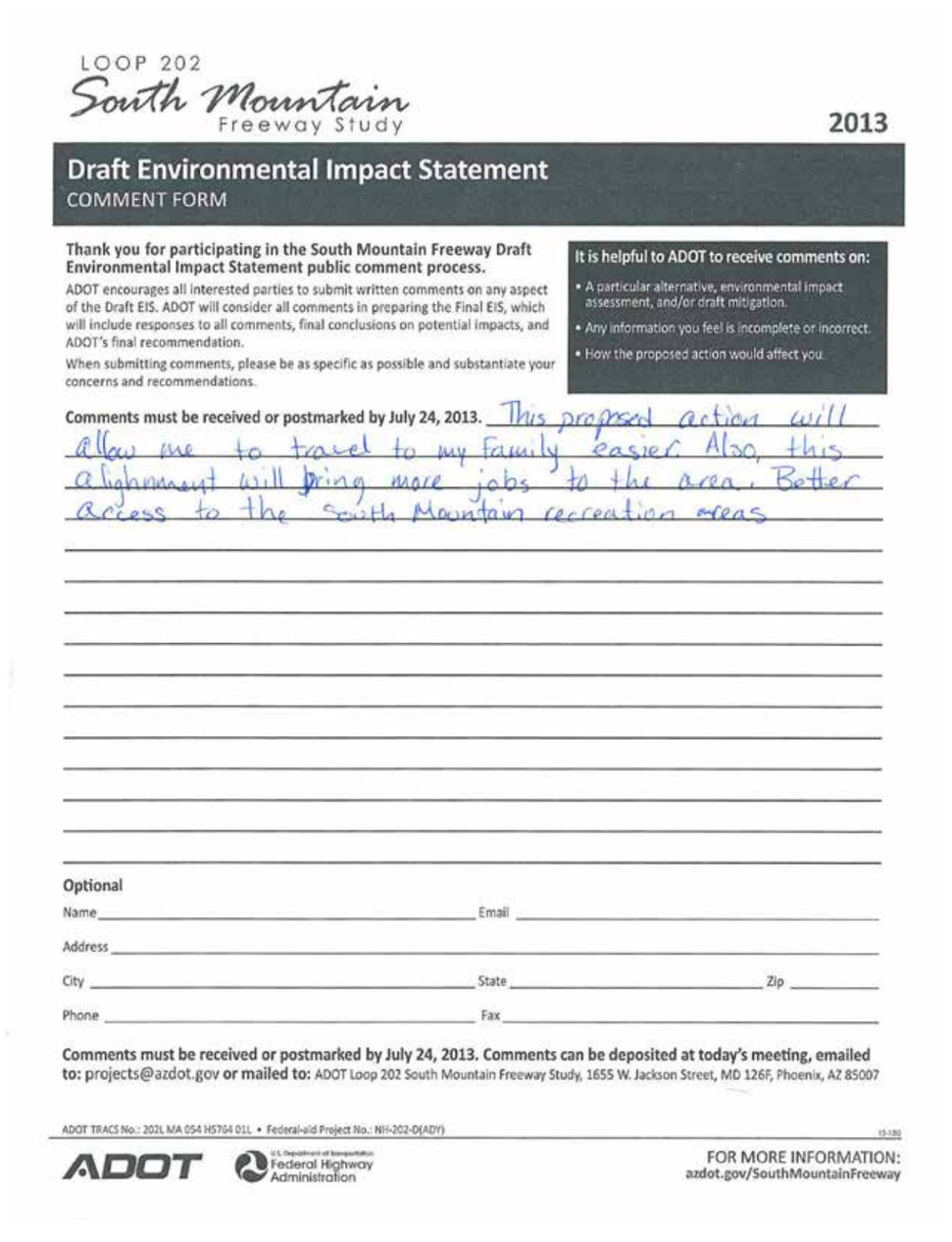
Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. This proposed action will allow me to travel to my family easier. Also, this alignment will bring more jobs to the area. Better access to the South Mountain recreation areas

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 5:02 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I am very much in favor of the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Ahwatukee Public Forum Meeting
6/18/13 4:00 PM to 7:00 PM

NO ACTION! LAKEWOOD OWNS WELLS!

1 I am very concerned how it is going to affect Lakewood and the Lake. The wells were on the books before the Freeway. Also, I am concerned about the water to the Lake at Miralago where my brother owns.

2 3 The Freeway on Pecos will severely affect Lakewood because reclaimed water will smell! Also, the Lagos School is right on Pecos. It is going to hurt our property values! Lakewood already has á crime due to its proximity to the freeway easy access in and out.

Geri Thompson
15830 S. 36th Street
Phoenix, AZ 85048
480-239-7589
gerithompson@gtcallhome.com

Code	Issue	Response
1	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See the text box on Final Environmental Impact Statement page 4-108.) The well replacement program as outlined by State law has been regularly implemented by the Arizona Department of Transportation to effectively mitigate well impacts associated with its projects throughout the region.
2	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

1 2 3 4

UNIDENTIFIED SPEAKER: We are totally opposed to it because of the noise and the pollution, and we do not want an exit off 17th Avenue because that will increase the amount of crime in the area. So we're totally opposed to that.

Page 27

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Design**	The locations of the planned traffic interchanges were determined in coordination with the City of Phoenix. The current plan balances the need to minimize impacts on the adjacent community with the need to provide acceptable access to the region's transportation system.
4	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. Completion of the loop 202 would improve the economy and highway travel throughout the valley drastically. It should be completed as soon as possible, as the project will only be more costly as more time passes. Some say it will cause environmental harm, but it would actually reduce total pollution. Development would also only affect a very small portion of South Mountain, which the native tribes had the opportunity to prevent. Please move forward with construction.

1

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the South Mountain Freeway
Date: Tuesday, May 14, 2013 9:38:11 AM

From: fpixley [mailto:fpixley@yahoo.com]
Sent: Sunday, May 12, 2013 3:34 AM
To: Projects
Cc: info@buildthe202.com
Subject: Build the South Mountain Freeway

1

Please build the 202!

From my Android phone on T-Mobile. The first nationwide 4G network.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

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When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. I highly think thes ought to build the 202. Just moving from the midwest I find the traffix situation a disgrace. I would not move to the area specifically because of it. It will bring people, money, jobs, and opportunity for those that move to the area.

1

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 12:14 PM
CALLER: ANONYMOUS6	CALLER ADDRESS: TEMPE, AZ
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I want this freeway to get built. Get 'er done.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

don't get their jobs back. We'll give them to people with sense in their heads.

Anyhow, thanks for listening. ADOT, you're depressing as always.

* * *

UNIDENTIFIED SPEAKER: The biggest thing right now, I think, is why is it that it's only one day and during the workday, like, this particular public hearing and the forum and everything like that? Because normal people work Monday through Friday, 8:00 to 5:00, so it seems like it would be better, like, on a weekend, all day Saturday and all day Sunday.

Because there's a lot of information for people to kind of comprehend, especially for the people who may be newer to the community and not familiar with the NEPA process, not familiar with the technical process, I think a bigger span of time would have been better.

* * *

MR. CASTLE: Patrick, C-a-s-t-l-e.

I just spoke in the other room, but I think that the key thing that we saw in years in living in an area

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Public Involvement**	This study, which began in July 2001, is expected to be completed in 2014. During the study process, community members have had and will continue to have various opportunities to ask questions, express opinions, and provide comments about the proposed action. The Draft Environmental Impact Statement had a 90-day comment period—twice the duration that federal regulations require. A public hearing was held on May 21, 2013, at the Phoenix Convention Center from 10 a.m. to 8 p.m. where individuals provided comments for up to 3 minutes in front of a project team panel or provided comments with no specific time limit to a court reporter. Comment forms were available for written comment. At any time during the 90-day period, comments could be made using e-mail, phone, the project Web site, and by mail. Six additional community forums were held at locations within and in close proximity to the Study Area.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

This "plan" has been going on much too long. In spite of what was in place 20 years ago, it should have been re-evaluated once so much of Ahwatukee was developed.

You are forcing a huge, ugly road on a community that was developed to be family-friendly, safe and yes, sheltered.

The funding for this road will not allow a highway to be built below grade to help reduce noise. There are schools too close to the roadway. There are homes that will be destroyed.

Please work more with the Indian Community and give them time to work thru their own process slow though it may be.

After this many years this road on the Pecos alignment is a horrible idea. It will be a truck route - no doubt about it.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-180

ADOT | U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
3	**Alternatives**	The project team analyzed the belowground option, also called the depressed freeway option. The analysis indicated that depressing the freeway would increase the cost of construction and right-of-way acquisition, displace additional residences, create the need for additional pump stations and detention basins, and still need the installation of noise barriers. Because the belowground option would result in substantially greater costs and residential displacements, this option was eliminated from further study (see Draft Environmental Impact Statement pages 3-15 and 3-18).
4	**Noise**	Although depressing the freeway would reduce noise levels, noise walls would still be needed to further reduce noise to meet the Arizona Department of Transportation noise policy. Whether the freeway is built aboveground with tall walls or belowground with shorter walls, the final mitigated noise levels would be nearly the same at nearby residences. The major disadvantage of building a depressed freeway would be the increased construction cost and the possible acquisition of additional right-of-way for pump stations and retention basins.
5	**Health Effects**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
7	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Alternatives, E1 Alternative**	
9	**Purpose and Need, Truck Bypass**	

Code	Comment Document

1 2 3 4

5 6

UNIDENTIFIED SPEAKER: You can just state there that I'm also totally opposed to the construction of this, and the reasons being for the fact that this will be additional noise, trucker traffic, pollution in an area that we purchased a home in in order to have the peace and quiet of the Ahwatukee atmosphere. And also particularly opposed to the exit off 17 having a new -- due to the fact that that will increase the crime rate in the area.

Page 28

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Truck Bypass**	
3	**Air Quality**	
4	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
5	**Design**	The locations of the planned traffic interchanges were determined in coordination with the City of Phoenix. The current plan balances the need to minimize impacts on the adjacent community with the need to provide acceptable access to the region's transportation system.
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

(1) (2) (3) I am in opposition to the extension of the 202 for many reasons. Among them are noise, crime and more pollution.

Noise:

People move out to this area for a number of reasons. One of them is to get away from the noise of the city and freeways. This will end with the building of the 202.

Crime:

With the building of this Freeway, neighborhoods will be much more accessible to criminals. This proposal contains (4) too many exit ramps opening up neighborhoods to increased crime.

Pollution:

(3) Eight to ten lanes of freeways will do nothing but add more pollution to the metro area, →

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

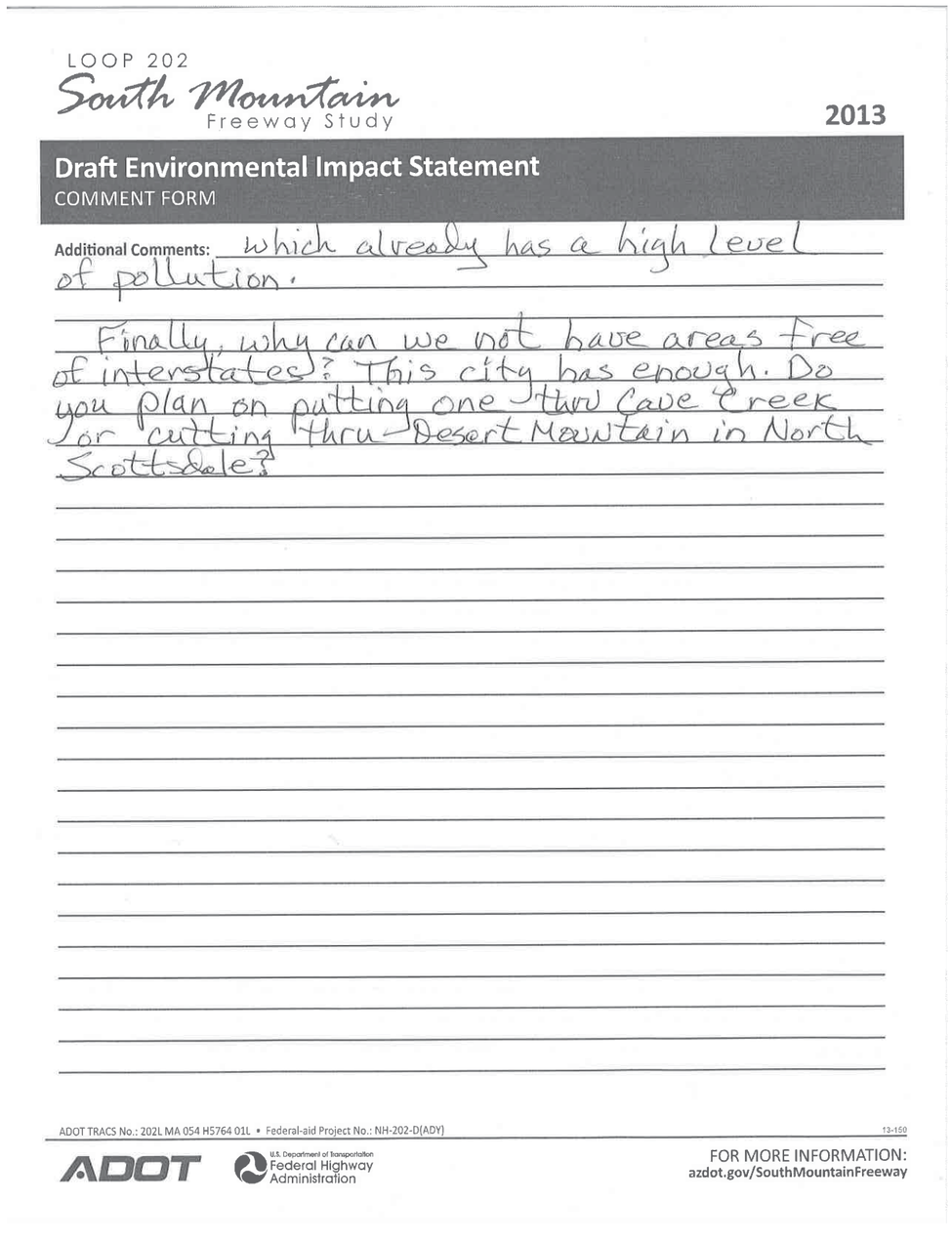
Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Design**	The locations of the planned traffic interchanges were determined in coordination with the City of Phoenix. The current plan balances the need to minimize impacts on the adjacent community with the need to provide acceptable access to the region's transportation system.

Code	Comment Document
5	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: which already has a high level of pollution.

Finally, why can we not have areas free of interstates? This city has enough. Do you plan on putting one thru Cave Creek or cutting thru Desert Mountain in North Scottsdale?

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
5	**Alternatives**	The proposed Loop 202 South Mountain Freeway has been a critical part of the Maricopa Association of Governments' Regional Freeway and Highway System since it was first included in funding approved by Maricopa County voters in 1985. It was also part of the *Regional Transportation Plan* funding passed by Maricopa County voters in 2004 through Proposition 400. There are no current plans to build a freeway through Cave Creek or Desert Mountain.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Indian Land
Date: Monday, May 20, 2013 8:45:05 AM

From: DasMole57@aol.com [mailto:DasMole57@aol.com]
Sent: Friday, May 17, 2013 5:38 PM
To: Projects
Subject: Indian Land

1

We support the freeway ONLY if it built on Indian Land.

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

1

Comments must be received or postmarked by July 24, 2013. BUILD MORE ROADS

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-156

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: Build More Roads, Progress is good

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

13-150

ADOT

U.S. Department of Transportation
Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 1:44 PM
CALLER: ANONYMOUS7	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I think the South Mountain Freeway is a great idea. This freeway would assist drivers going to the west side of town. I think it would be a great asset.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

back on the I-10 and 51st Avenue, and that would relieve a lot of the truck traffic and accidents and other things.

The other thing would be just -- that would also help pollution and air quality and cars idling and trucks idling. And so all of those benefits, I think, would be beneficial to building the freeway on that. And also HOV lanes and stuff would be included on the South Mountain Loop, so that's probably the main reasons why I support it.

* * *

MS. HERRING: Patrice Herring. And I definitely want a yes vote on the 202 for the W-59 link because I am a Laveen resident. I bought a house in Laveen because I was promised that this freeway was coming through. We have horrible traffic in our area. We have problems with the river -- when it gets flooded, getting over the river. Sometimes we're stuck where we can't even cross over to the other side of the city. This will reduce pollution, as well, and bring much needed businesses to the Laveen area, and link us to other areas of the city. We definitely need the Loop 202 freeway and we need the W-59 route. Thank you.

* * *

UNIDENTIFIED SPEAKER: I really want you to

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

build it as soon as you can. We need access to -- like a hospital, I know they're building a hospital, and I want to have a hospital close by. When it floods 67th and 91st, kind of out in the middle of nowhere, and it takes a long time. We have to go all the way to 51st from 74th Avenue.

And my parents live in Apache Junction and it takes us a long time to get from 74th to the 10, just to get on the 60. And there's a lot of traffic lights and they keep putting in more traffic lights and there's more traffic and it's overwhelming.

And the closest mall is probably ten miles, so that means more driving. I guess in order for us to get a hospital in our area, they need more access -- people that can access it. And the only way to do that is to build this highway. It would just make things so much easier.

I know I had -- one morning I had to take my husband to the hospital. He had a kidney stone and we had to go way across the north just to get to the hospital. It would be so much nicer to have one closer for emergencies. I mean, if it does flood on 67th and 91st, that means it would be taking longer time, if there was an emergency, for emergency vehicles to come to where we're at. We're just secluded over there in a corner,

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

with no access.

I guess that's pretty much it. We're in Laveen Meadows. It's just west of 67th and, well, it's just south of Baseline. I know I was talking to someone here that said that they -- this has come up before, and they still haven't gotten anywhere. And we really want to see it in the near future.

* * *

UNIDENTIFIED SPEAKER: I'll say a few words. I think from the perspective of creating over 30,000 jobs for the community that it would be a big benefit of the project. It would put in, like, a mall, as well as a hospital -- places I could possibly work since I'm unemployed. I just got a degree in behavioral health from Glendale.

It would definitely speed up traffic. And I think the pollution would kind of go down because there'd be less idling cars -- if that helps any. I think it just pretty much is going to put in some jobs. It's going to speed up the freeway, I mean, you know, the traffic so you can get over to Apache Junction quicker. And it doesn't look like it's going to move too many houses out. Obviously a couple businesses up along some areas, but that shouldn't affect it too much. The 59 alternate would be less houses. And it wouldn't affect

Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 30 years on the books / still no big changes
Why have we waited? no money to build
here, money elsewhere Chandler did a
great job at planning for the 202. PHX
chose to allow building instead of planning
in my opinion to gain PROP TAX $$.
Now the cost has sky rocketed.
1998 the Gila River Comm said they would
be interested in the 4th on their land
ADOT ignored them. 13 years after they
"penciled in" the plan they choose to ignore
A very easy answer here we are 17
years later looking at spending 3 billion
2 NOT A Good PLAN!

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-160

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Draft Environmental Impact Statement.

Code	Comment Document

1 2 3

4

5

2

UNIDENTIFIED SPEAKER: We're really against the freeway, and hope that they do not go through with it, and that it's going to cause a lot of pollution, noise, and aggravation for our community. And there will be too many homes that are lost.

So I don't know if I'm saying too much too fast?

COURT REPORTER: No, you're fine.

UNIDENTIFIED SPEAKER: But we're going to have to -- We'd rather that they even bought out our home. It's going to be too difficult for us to even stay there, probably, because we're too close to the wall and we can't -- we can't -- I don't think that we're going to be able to take all the noise and everything. So I'm hoping that they do something else. Okay?

I know they're still going to build it.

Page 5

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Noise**	
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
4	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
5	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Agencies may acquire only those properties located entirely or partly within the project right-of-way limits (see Draft Environmental Impact Statement page 4-45).

Code	Comment Document

Estudio de la Autopista
South Mountain
LOOP 202

2013

Reporte Del Impacto Ambiental
FORMULARIO DE COMENTARIOS

Gracias por participar en el proceso de recopilación de comentarios sobre el Reporte del Impacto Ambiental del proyecto de la autopista South Mountain.

ADOT alienta a todos los interesados, a presentar sus comentarios por escrito sobre cualquier aspecto del Reporte del Impacto Ambiental. ADOT considerará todos los comentarios en la preparación final de este reporte e incluirá las respuestas a todos los comentarios, conclusiones finales sobre impactos potenciales, y la recomendación final de ADOT.

Para ADOT es muy útil recibir comentarios sobre:

- Alguna alternativa en particular, cúal sería su impacto ambiental y las medidas propuestas para reducir dicho impacto.
- Cualquier información que usted sienta que está incompleta o incorrecta.
- Cómo le afectará a usted la acción propuesta.

Los comentarios deben ser recibidos o tener el sello postal con fecha límite del 24 de julio de 2013.

We moved to the Ahwatukee area because of its beauty, quiet, and high quality of life. All of this is threatened by the building of an 8-10 lane interstate freeway. We will no longer be able to look south and see the beauty of the open desert land of the Gila River Community. We will instead see vehicles and concrete. The structure of South Mountain will be cut through by the freeway. We live in one of the few areas of metro Phoenix where you cannot hear a freeway or major arterial. If this highway is built, the sound of cars, trucks, and semis will be constantly heard. There will be increased air pollution in an already polluted area. This will further compromise health. Our area which has relatively low crime will probably see an increase with easy access to neighborhoods provided by the Interstate with its many on and off ramps and associated development at these areas.

1 2 3 4 5 6 7 8

Continued on back →

Opcional

Nombre _____ Correo Electrónico _____

Dirección _____

Ciudad _____ Estado _____ Código Postal _____

Teléfono _____ Fax _____

Los comentarios deben ser recibidos o tener el sello postal con fecha límite de Julio 24,2013. Los comentarios pueden ser depositados en la reunión de hoy, enviados por correo electrónico a projects@azdot.gov **o por correo regular a :**
ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT · U.S. Department of Transportation Federal Highway Administration

PARA MÁS INFORMACÓN:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Noise**	
4	**Noise**	The Maricopa Association of Governments regional travel demand model forecasts approximately 10 percent truck traffic on the South Mountain Freeway in 2035 (see Final Environmental Impact Statement page 3-64). This percentage is similar to current conditions on Interstate 10 between Loop 101 and Interstate 17 and on U.S. Route 60. Noise modeling for the Draft Environmental Impact Statement used this forecast truck traffic, with the model accounting for greater noise generation by trucks in the future (see Final Environmental Impact Statement page 4-88). Noise mitigation is designed for this predicted noise level, including the noise from trucks.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Health Effects**	
7	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
8	**Design**	The locations of the planned traffic interchanges were determined in coordination with the City of Phoenix. The current plan balances the need to minimize impacts on the adjacent community with the need to provide acceptable access to the region's transportation system.

Code	Comment Document

Estudio de la Autopista
South Mountain
LOOP 202

2013

Reporte Del Impacto Ambiental
FORMULARIO DE COMENTARIOS

Comentarios Adicionales:

9

The above problems happen every time a freeway is built. It completely changes the neighborhoods it is built through and near. A complex, expensive study did not have to be done. Look at any area in Arizona or in the country where an interstate has been built. The numbers can easily be manipulated to the bias of the people who want it built.

For these reasons and others I am very opposed to the building of the freeway in this area.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

PARA MÁS INFORMACÓN:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
9	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: 202
Date: Monday, May 20, 2013 8:44:43 AM

From: reo58@aol.com [mailto:reo58@aol.com]
Sent: Friday, May 17, 2013 5:38 PM
To: Projects
Subject: 202

1

Please build the South Mountain 202 Loop. Thanks.

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. this will help traffic & Im all for more roads!

1

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-159

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:07 PM
CALLER: ANONYMOUS8	CALLER ADDRESS: 8328 S. 48TH DRIVE, LAVEEN, AZ 85339
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the construction of the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

with no access.

I guess that's pretty much it. We're in Laveen Meadows. It's just west of 67th and, well, it's just south of Baseline. I know I was talking to someone here that said that they -- this has come up before, and they still haven't gotten anywhere. And we really want to see it in the near future.

* * *

UNIDENTIFIED SPEAKER: I'll say a few words. I think from the perspective of creating over 30,000 jobs for the community that it would be a big benefit of the project. It would put in, like, a mall, as well as a hospital -- places I could possibly work since I'm unemployed. I just got a degree in behavioral health from Glendale.

It would definitely speed up traffic. And I think the pollution would kind of go down because there'd be less idling cars -- if that helps any. I think it just pretty much is going to put in some jobs. It's going to speed up the freeway, I mean, you know, the traffic so you can get over to Apache Junction quicker. And it doesn't look like it's going to move too many houses out. Obviously a couple businesses up along some areas, but that shouldn't affect it too much. The 59 alternate would be less houses. And it wouldn't affect

Code	Issue	Response
1		Comment noted.

Code	Comment Document

me because I'm over on 74th Avenue. That's pretty much all I have.

* * *

UNIDENTIFIED SPEAKER: I think they're a little late in doing this, but I hope they do do this at some point. I don't see any reason not to do this. I think in Phoenix, in general, they wait until it's too late to do some of this planning. So I think with all the information available, it's very overwhelming. But this project is definitely needed and just to alleviate some of the stress downtown with traffic and help have alternative ways of getting to West Phoenix other than driving through Central Phoenix.

So I'm a native to Ahwatukee, and this has been something on the burner for a while now and hasn't come to fruition, so I think that's my statement.

I don't see any reason why they haven't built it around. I think of all the new opportunities, it will -- housing and jobs and stuff, just "build it and they will come" kind of thing. If they build a freeway, there might not be anything there now, but why wait until everything is there and then build it -- not aggressive or proactive, but that's basically it.

* * *

MR. NOWAKOWSKI: Michael Nowakowski. I am

Code	Issue	Response

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- How the proposed action would affect you.

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NO!!

1 2 Why would you destroy a perfectly placed township of Foothills by building a truck by pass freeway. From the materials presented it seems evident that no significant steps have been adopted to mitigate the following issues:

3 4 5 6 7 8 9 10
1. property value losses (views / noise / crime)
2. visibility of overpass (± 30 feet up in the air)
3. pollution
4. the destruction of S. Mountain park
5. dislocation of "houses of worship"

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
4	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
5	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Visual Resources**	Draft Environmental Impact Statement page 4-158 of the mitigation section for visual impacts lists four measures that could be taken to mitigate the visual impacts of overpasses: · placing landscape treatment on the periphery of right-of-way areas at overpass locations as well as at other areas adjacent to residential development · using earth colors for overpasses, retaining and screen walls, and noise barriers · using bridges and overpass structural systems that help unify a visually complex landscape · minimizing structural sizes and/or recessing the face of structural members from the edge of the roadway to reduce real or apparent breadth of structures" Additionally, Draft Environmental Impact Statement page 4-159 discusses "how structures are aesthetically treated and how the public could be directly involved in developing aesthetic treatments."
8	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
9	**Section 4(f) and Section 6(f)**	
10	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

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UNIDENTIFIED SPEAKER: I prefer anonymous but as a resident of Ahwatukee.

I'd like to say that, first of all, I'm extremely concerned about the air quality, the degradation of air quality. We all know that Mexico has a different standard for their trucks than the United States does. There are all sorts of studies that -- For example, one just came out today that shows that diesel particulates, the women that have lived near highways with that have twice the rate of autism of women that don't. And we know that there's even some studies saying that up to three miles away from this highway, this truck route for Mexicans and long-haul truckers and Canadians, will only damage Ahwatukee.

It's going to destroy our neighborhoods. It will increase crime. And I don't see any benefit to the Ahwatukee residents. We have a wonderful community here. So I'm very disappointed. It's near schools. It's near parks. It's near many houses. And there's just no value.

That's it, I guess. I would highly recommend that they look for an alternative path. And I wish that they would take the residents' opinions into consideration, versus doing what they want to do, which is really what it is.

So thank you.

(The public hearing proceedings concluded at 7:00 p.m.)

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Trucks**	
3	**Health Effects**	
4	**Purpose and Need, Truck Bypass**	
5	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
6	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
7	**Purpose and Need**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments:

→ Fig 1-4 Should Represent Future 2013 – 2035
Fig 1-4 GROWTH RATE 1950 – 2000
THESE Curves might have to
be revised. There are outdated
because They don't co-relate with
Other Data like.

1 • Electricity Demand is way down
(Republic 4/26/2013) Sec. D

2 • Unemployment is ↑
• Wages are ↓

3 • Electric Vehicles are the way to go
• Population is moving to the city cores
• Older population is ↑ they drive
on off peak hours.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Socioeconomics**	The analysis in the Draft Environmental Impact Statement requires socioeconomic and traffic projections at the regional analysis zone and traffic analysis zone level. While the Arizona Department of Administration published population projections based on the 2010 Census in 2012, Arizona Department of Administration estimates only provide control totals at the county level. At the time of publication of the Draft Environmental Impact Statement, Census 2010-based socioeconomic data at the regional analysis zone and traffic analysis zone level had not been adopted by the Maricopa Association of Governments and was not available to the project team. Therefore, the data used in the Draft Environmental Impact Statement was the most appropriate information available. In other areas of the Draft Environmental Impact Statement, such as Environmental Justice and Title VI, Census 2010 data was used. The project team acknowledged the potential uncertainty in the projections in the sidebar, "*How will the economic downturn affect growth rates?*", on page 1-11 of the Draft Environmental Impact Statement. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.
2	**Purpose and Need**	The worldwide recession that began in late 2007 generated a substantial downturn in growth rates for new housing and employment across the United States. Arizona particularly suffered the effects of this recession because, beginning in the early 2000s, Arizona in general and Maricopa County specifically experienced some of the fastest population, housing, and employment growth rates in the country. Because the need for the proposed freeway is predicated in part on projected growth, one might conclude the recession reduced that need. An economic downturn associated with a given recession is, however, generally considered a short-term phenomenon with respect to the longer-term planning horizon established for the proposed freeway. Socioeconomic indicators have steadily and consistently increased in the region since the early 1900s. The critical factors underlying these indicators remain unchanged. (See the sidebar on Final Environmental Impact Statement page 1-11.)
3	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

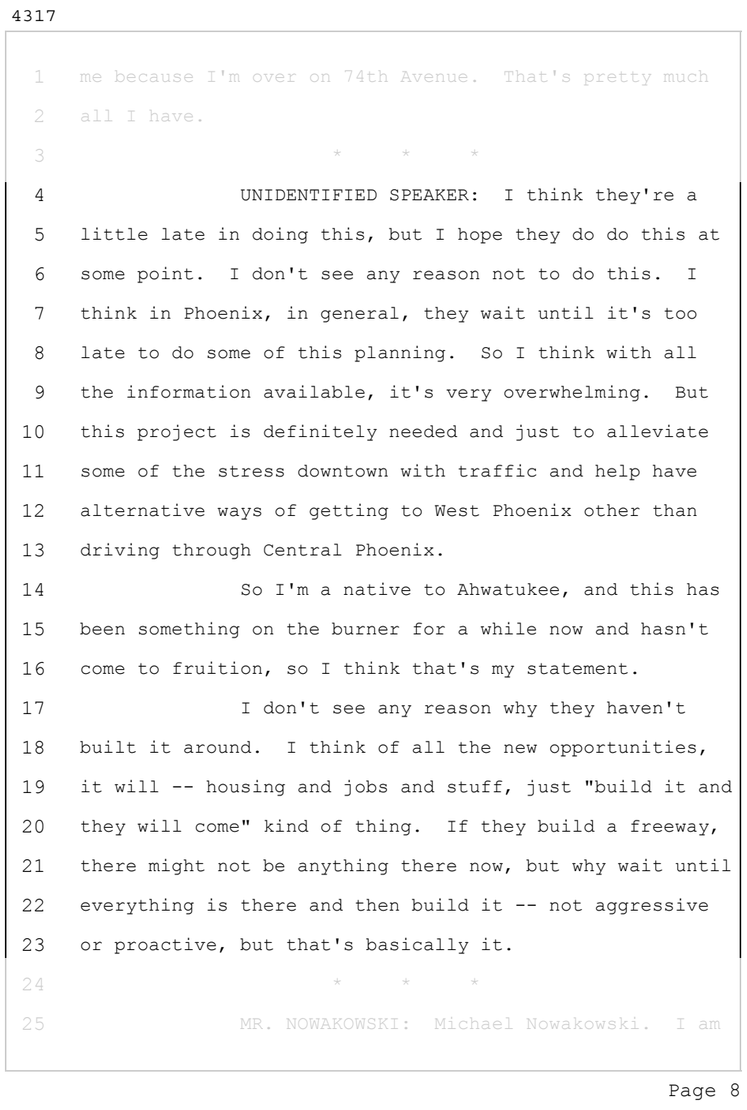
TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/13/13	INCOMING CALL TIME: 2:36 PM
CALLER: ANONYMOUS9	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I am in support of the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document



4317

me because I'm over on 74th Avenue. That's pretty much all I have.

* * *

UNIDENTIFIED SPEAKER: I think they're a little late in doing this, but I hope they do do this at some point. I don't see any reason not to do this. I think in Phoenix, in general, they wait until it's too late to do some of this planning. So I think with all the information available, it's very overwhelming. But this project is definitely needed and just to alleviate some of the stress downtown with traffic and help have alternative ways of getting to West Phoenix other than driving through Central Phoenix.

So I'm a native to Ahwatukee, and this has been something on the burner for a while now and hasn't come to fruition, so I think that's my statement.

I don't see any reason why they haven't built it around. I think of all the new opportunities, it will -- housing and jobs and stuff, just "build it and they will come" kind of thing. If they build a freeway, there might not be anything there now, but why wait until everything is there and then build it -- not aggressive or proactive, but that's basically it.

* * *

MR. NOWAKOWSKI: Michael Nowakowski. I am

Page 8

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

1

Code	Issue	Response
1	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Draft Environmental Impact Statement.

Code	Comment Document

LOOP 202
South Mountain Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1 WE HAVE LIVED IN AHWATUKEE FOR ALMOST 20 YRS. AND LOVE IT HERE. WE LOVE THE FACT
2 THAT IT'S KIND OF PRIVATE, THERE'S NOT
3 VERY MUCH CRIME OR NOISE AND THAT'S THE WAY WE WANT IT TO STAY!

1 ALLOWING THE 202 TO BE BUILT ALONG PECOS RD. WILL CERTAINLY DISRUPT THIS WAY OF LIFE.

4 BUILDING THIS AT THIS POINT IS TOTALLY UNFAIR
5 TO THOSE THAT HAVE BEEN ALLOWED TO BUILD IN THE PAST 20 YRS.; HOMES, CHURCHES, SCHOOLS. TO TEAR THESE DOWN WOULD BE A CRIME!

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Draft Environmental Impact Statement.
5	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

1

ANONYMOUS SPEAKER: I just want to know what kind of --

How do I want to say this?

What kind of study has been done as far as making the 101 go south to the I-10 through Chandler and hooking to the I-10?

That would alleviate a lot of the traffic they are talking about alleviating up through the 101 allowing people to go to Flagstaff or whatever they want to do and allowing people to leave the city going to Tucson instead of via the 10. So it would be a plus in both directions.

2

I also want to know what kind of impact study they've done as far as the residents and the owls and the wildlife that's going to be eliminated?

Because I have two owls right now that fly over my house every night. And as soon as this freeway goes over, it's not going to happen. They land on my fence and they are there every night. Not going to happen.

3 4

Pollution up against the mountain obviously is going to increase.

2

I don't think some of these questions have been fully answered. And I think they need to answer more questions as far as a wildlife study.

Page 9

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www.drivernix.com

Code	Issue	Response
1	**Alternatives**	The proposed freeway was developed to improve mobility between the western and southeastern portions of metropolitan Phoenix. See the text beginning on Final Environmental Impact Statement page 3-27 for more information related to the responsiveness of the proposed freeway to the purpose and need criteria. The new freeway linkage (extending State Route 101 Loop [Price Freeway] south to Interstate 10) proposed by the commenter would address a potential need; however that need is not consistent with the purposed and need identified for this study. The Arizona Department of Transportation and Maricopa Association of Governments continue to study regional transportation needs, and this new linkage may be considered in other future studies.
2	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Air Quality**	
4	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

Code	Comment Document

5

6

7

8

There's obviously other routes they can take. And I don't think they are looking at what's best for the people other than the cost. They need to look at what they are spending on this compared to some other alternatives they have.

You know, they have had some issue in other areas with the type of road construction they've done and how long the road is going to last until it needs to be repaired again. Because, by the time they finish the project, it looks like they probably will have to start making repairs already.

So how long is it going to go until it's completely done? What's the overlook as far as the ongoing construction?

People in the area need to know that.

You know, the lights, that's out here, they are just not as bright an area as the City of downtown Phoenix.

Have they done a study on the crime that's going to go up?

I have seen nothing on what they expect the crime for Ahwatukee to be. They will have more access to the city. Instead of one way in and one way out, it's going to be anybody can jump on the freeway and go wherever they want. I don't know if they've done any

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Code	Issue	Response
5	**Alternatives**	Alternatives were screened for their (see Draft Environmental Impact Statement page 3-3): · ability to satisfy purpose and need · ability to minimize impacts on the human and natural environments · ability to improve operational characteristics of the region's transportation system · degree of public and political acceptability · ability to be constructed within project budget
6	**Construction**	The Arizona Department of Transportation is evaluating construction delivery methods for the proposed freeway. One concept is to deliver it as a single design-build project. This method would expedite the construction duration for the entire project to around 3 to 3.5 years. Another concept would be to deliver the project in a more traditional method breaking the 22-mile corridor into nine segments (each 1 to 3 miles long) and constructing them in phases. Each segment would be under construction for 1 to 3 years and the total construction duration for the entire corridor would be 5 to 6 years. A discussion of construction implementation is provided beginning on page 3-59 of the Final Environmental Impact Statement. Any particular area of the Preferred Alternative would not be expected to see construction activities beyond an approximate 2-year period.
7	**Visual Resources**	Light from the freeway would be produced from vehicle headlights and taillights and from fixed light poles at interchanges along the freeway. Nighttime users of the park and residents of Ahwatukee Foothills Village may see lines of seemingly crawling vehicles, each with lights front and back. Fixed freeway lighting would be provided for safety reasons only at interchange exit and entrance points. Freeway lighting at these locations would be designed to reduce illumination spillover onto sensitive light receptors such as residential areas (see page 3-58 of the Final Environmental Impact Statement).
8	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.

Code	Comment Document

impact study as far as what the crime will be around here. That needs to be checked also. I'd like to see those answers.

That's it.

Code	Issue	Response

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Yes put in the loop. Itll b a godsend for traffic congestion...
Date: Monday, May 20, 2013 8:41:34 AM

From: kkrutak [mailto:kkrutak@aol.com]
Sent: Friday, May 17, 2013 7:36 PM
To: Projects
Subject: Yes put in the loop. Itll b a godsend for traffic congestion...

1

Yes I support construction of the 202 southwest loop

Sent from my Verizon Wireless 4G LTE Smartphone

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

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- How the proposed action would affect you.

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(1) (2) (3) (4)

I support the building of the 202 only if it was built on the Gila River Indian Reservation. I do not support the building of the free way on the peras road alignment. I live in the ahwatukee foothills and the free way would be less than 1 mile from my home, the freeway would bring exessive noise & pollution to my community. I strongly oppose the current aligned proposal of E1.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-158

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, E1 Alternative**	
3	**Noise**	
4	**Air Quality**	

Code	Comment Document

4321

hospital 40 hours a week, and this is from my own experience. And it is not caused by cars driving on the 202. In fact, having the 202 will reduce the stop-and-go traffic that you have on the surface streets and reduce pollution in that way, I believe. So that's all I had to add.

* * *

UNIDENTIFIED SPEAKER: I'm very much for the highway for Laveen, I feel that it would bring in jobs, especially for the youth and the community; and I think that that will assist with some of the crime and the graffiti if we had the highway, which would bring more businesses.

The hospital, we have a lot of senior citizens that live in the area, and unfortunately, the nearest hospital is -- I think it's Maricopa Integrated, and that is a long way when it's an emergency.

So that is my comment, and my reasons for supporting the I-10 highway -- Loop 202 South Mountain Freeway.

1

* * *

MR. HERNANDEZ: David Hernandez. I live in the preferred route, 59th Avenue south of I-10, and they need to build the freeway. Yes, I agree with it. However, the route that they are taking is shortsighted.

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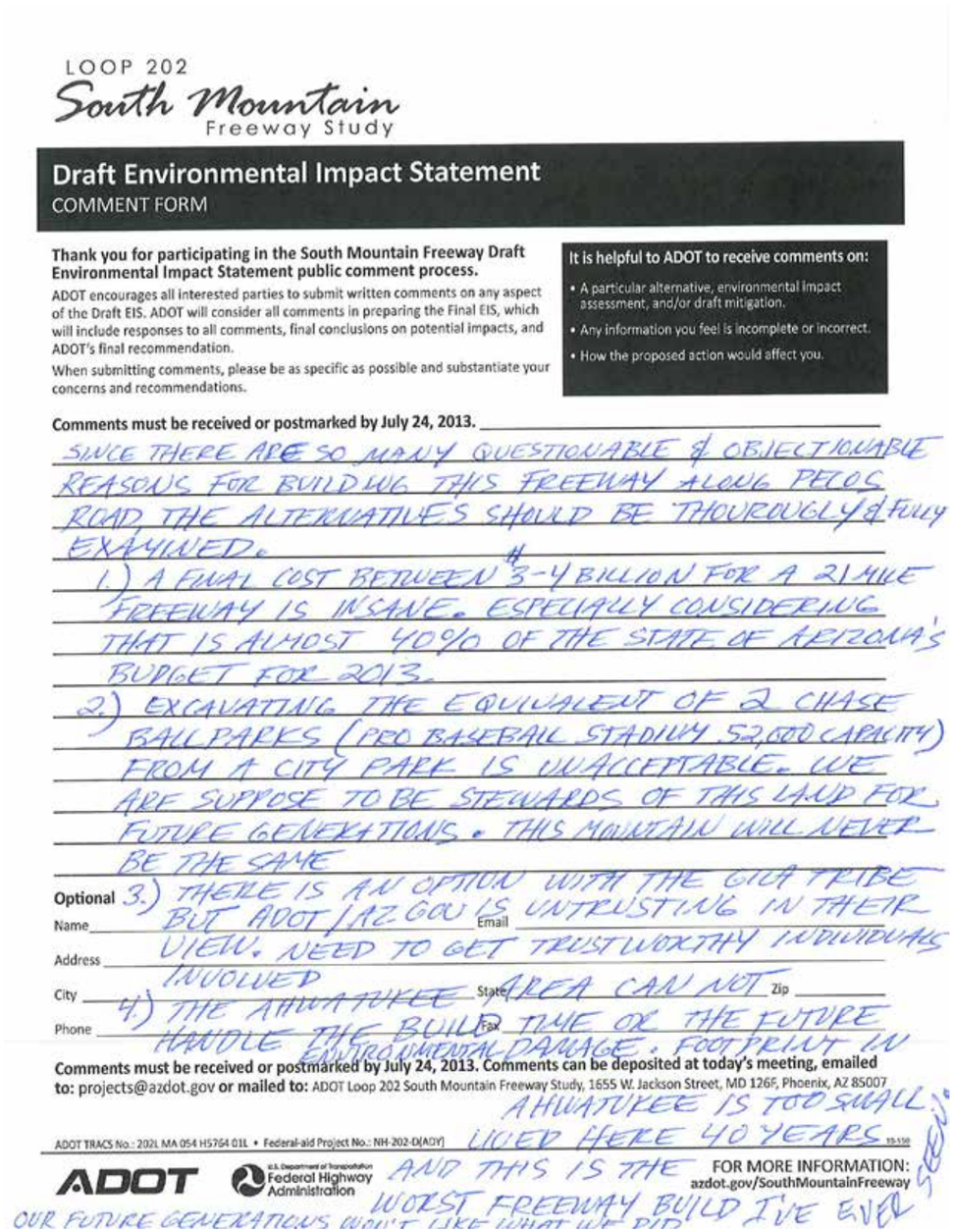
Code	Issue	Response
1		Comment noted.

Code	Comment Document
1 2 3 4 5 6	

LOOP 202
South Mountain
Freeway Study

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- How the proposed action would affect you.

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1 SINCE THERE ARE SO MANY QUESTIONABLE & OBJECTIONABLE REASONS FOR BUILDING THIS FREEWAY ALONG PECOS ROAD THE ALTERNATIVES SHOULD BE THOUROUGLY & FULLY EXAMINED.

2 1.) A FINAL COST BETWEEN 3-4 BILLION FOR A 21 MILE FREEWAY IS INSANE. ESPECIALLY CONSIDERING THAT IS ALMOST 40% OF THE STATE OF ARIZONA'S BUDGET FOR 2013.

3 2.) EXCAVATING THE EQUIVALENT OF 2 CHASE BALLPARKS (PRO BASEBALL STADIUM 52,000 CAPACITY) FROM A CITY PARK IS UNACCEPTABLE. WE ARE SUPPOSE TO BE STEWARDS OF THIS LAND FOR FUTURE GENERATIONS. THIS MOUNTAIN WILL NEVER BE THE SAME

4 **Optional** 3.) THERE IS AN OPTION WITH THE GILA TRIBE BUT ADOT/AZ.GOV IS UNTRUSTING IN THEIR

Name _____ Email _____

Address _____ VIEW. NEED TO GET TRUSTWORTHY INDIVIDUALS INVOLVED

City _____ State AREA CAN NOT Zip _____

Phone _____ Fax 4.) THE AHWATUKEE BUILD TIME OR THE FUTURE HANDLE THE ENVIRONMENTAL DAMAGE. FOOTPRINT IN AHWATUKEE IS TOO SMALL.

5 **Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to:** projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

6 ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) LIVED HERE 40 YEARS

ADOT Federal Highway Administration AND THIS IS THE WORST FREEWAY BUILD I'VE EVER SEEN!

FOR MORE INFORMATION: azdot.gov/SouthMountainFreeway

OUR FUTURE GENERATIONS WON'T LIKE WHAT WE DID

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Economics, Socioeconomics**	The proposed freeway would not cost $3-$4 billion as indicated by the commenter. The proposed South Mountain Freeway would be funded by State, federal and local dollars. The total budget for constructing the proposed freeway is $1.9 billion, approved by the Maricopa Association of Governments Regional Council in May 2012. The approved program includes design, right-of-way, and construction of the proposed action. Funding for project-related activities is included in the current 5-year program identified in the regional Transportation Improvement Program as well as in the State Transportation Improvement Program. The cost estimates for the proposed freeway, as described beginning on page 3-59 of the Draft Environmental Impact Statement, were developed in accordance with accepted engineering practices by professional engineers. The project has been subject to multiple peer reviews of both the quantities and unit costs used in the estimate by the Arizona Department of Transportation, Federal Highway Administration, Maricopa Association of Governments, and their consultants. In each case, the estimate was found to be reasonable and accurate.
3	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Alternatives, Gila River Indian Community Alignment**	
5	**Construction**	The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Draft Environmental Impact Statement page 3-2.)
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/15/13	INCOMING CALL TIME: 9:17 AM
CALLER: ANONYMOUS10	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yeah, let's get 'er done. Let's build that. It makes some jobs too. So we need that freeway. It's going to help congestion. Alright, bye now.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: build the 202
Date: Monday, May 20, 2013 8:41:25 AM

1

From: Goldwing66 [mailto:goldwing66@aol.com]
Sent: Friday, May 17, 2013 7:44 PM
To: Projects
Subject: build the 202

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

4323

attention.

I've talked to some of the homeowners in the area that live nearby me, and they never received this mail that stated that they were going to have an ADOT meeting today.

If I got it, why didn't they get it? Or did they just pepper the area with this mailing about announcing this meeting? That's not right. So, like I say, I agree, they should make the freeway, but it should be further west. And if they are, which I believe they will, build it down 59th Avenue, I wish they'd buy the homes on the west side of 59th Avenue and build a bigger buffer with the existing houses that are there, because it's going to ruin the area, as far as I'm concerned. That's it.

* * *

UNIDENTIFIED SPEAKER: I just feel that there's a reason that this has not been built. It was first proposed about 25 years ago and there's a reason why it wasn't built; that's because it's a bad idea.

This is one of the few good things about this area is South Mountain, one reason why people come to this area because of the natural beauty of the South Mountains. So it's going to be an economic loss. It's also just truly beautiful, and we don't have a lot of

Page 15

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Section 4(f) and Section 6(f)**	

Code	Comment Document

3

4

beauty because we have a lot of urban sprawl. And to take that away, after 25 years of avoiding it, is a travesty to the city.

I'm also furious because I keep hearing about how this state has no money, but there is money when it comes to building this freeway that should not be built -- this freeway from hell that's going to destroy one of the most beautiful parts of this area.

And I was just talking to my friend, in fact, and she thinks that this freeway might actually create additional problems in destroying the habitat and also the natural corridor for their travel.

But she thinks that the situation might be worse for people who are headed south. They might start using other streets such as Baseline to cut across the Valley so it could actually cause additional problems in some areas because of this factor that people will be using this freeway then and maybe also taking surface streets. So it could create problems for people in that area.

But basically my major objection is that it's going to destroy a beautiful and natural habitat and a source of recreation and beauty for this area.

* * *

UNIDENTIFIED SPEAKER: I live in Central

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www.drivernix.com

Code	Issue	Response
3	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
4	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Michelle Thompson
To: ADOT
Subject: FW: Build the south mountain freeway. It is critically needed.
Date: Monday, May 20, 2013 2:55:22 PM

Michelle Thompson
Senior Community Relations Officer
1655 W. Jackson St. MD: 126F
Phoenix, AZ 85007
602.316.4057
azdot.gov

-----Original Message-----
From: jimonealaz@aol.com [mailto:jimonealaz@aol.com]
Sent: Monday, May 20, 2013 2:19 PM
To: Projects
Subject: Build the south mountain freeway. It is critically needed.

1

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

We need the jobs -

build the road.

1

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4324

beauty because we have a lot of urban sprawl. And to take that away, after 25 years of avoiding it, is a travesty to the city.

I'm also furious because I keep hearing about how this state has no money, but there is money when it comes to building this freeway that should not be built -- this freeway from hell that's going to destroy one of the most beautiful parts of this area.

And I was just talking to my friend, in fact, and she thinks that this freeway might actually create additional problems in destroying the habitat and also the natural corridor for their travel.

But she thinks that the situation might be worse for people who are headed south. They might start using other streets such as Baseline to cut across the Valley so it could actually cause additional problems in some areas because of this factor that people will be using this freeway then and maybe also taking surface streets. So it could create problems for people in that area.

But basically my major objection is that it's going to destroy a beautiful and natural habitat and a source of recreation and beauty for this area.

* * *

UNIDENTIFIED SPEAKER: I live in Central

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

Phoenix, just near Baseline and Central. As you know, Baseline is the main corridor for people who live in Laveen and work/shop in the East Valley. I suspect that an interchange on the proposed freeway at Baseline will now funnel even more traffic through the area. In fact, all of the West and Northwest Valley will now have access to east/west roads through South Phoenix.

Already, when there is a problem on I-17 or I-10, Baseline becomes a parking lot. Now, image the potential for a problem on any of the I-10, I-17, or Loop 202. Baseline will bear the full brunt.

Perhaps South Phoenix, because it is home to many lower economic residents of Phoenix, is not of particular import to the powers that be. We certainly saw that when the city counsel thumbs its nose at the Baseline master plan and allowed developers to run roughshod over the area.

Another consideration is the Phoenix point of pride -- South Mountain Park. The road to San Juan Lookout, which is closed to traffic every day except for one weekend per month, goes through a valley that is a quiet haven. That, of course, will no longer be true when a freeway runs adjacent.

What good is the claim to the largest city park if that park is perpetually bombarded with traffic

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Traffic**	As shown in Figure 3-12 on page 3-29 of the Final Environmental Impact Statement, traffic on Baseline Road between 17th Avenue and 48th Street would be less in 2035 with the proposed freeway than without the proposed freeway.
2	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

3

2

noise? How is it possible that we do not have space and inclination for just one quiet retreat within the confines of this sprawling city? I urge you to reconsider the plan to build a freeway with so much impact on South Mountain Park.

(The proceedings concluded at 8:00 p.m.)

Code	Issue	Response
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Although recreation uses are considered in the noise analysis as noise-sensitive land uses, another consideration is the reasonableness of providing noise mitigation for a particular land use. For recreational land uses, typical considerations include the number of people using the facility and the amount of time the facility is in use throughout the day. Many of the recreational uses in the western portion of Phoenix South Mountain Park/Preserve receive infrequent use, and noise mitigation would not be reasonable given the high cost of construction.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- How the proposed action would affect you.

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1 2 3 4 5

Our Community Should not be Considered only for the Congestion, Tax Money should be Spent for a Freeway that will not Alleviate traffic. It's worth it if its not necessary to Change. The money used for this Can be best used for other purposes. Like to Extend Metro

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-108

ADOT · U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
2	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Purpose and Need**	The proposed freeway is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. The *Regional Transportation Plan*, as described on pages 1-5 and 1-10 of the Draft Environmental Impact Statement, addresses freeways, streets, transit, airports, bicycle and pedestrian facilities, freight, demand management, system management, and safety. The proposed freeway is only one part of the overall multimodal transportation system planned to meet the travel demand needs of the Maricopa Association of Governments region.
4	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 10:39 AM
CALLER: ANONYMOUS12	CALLER ADDRESS: 7227 WEST CARTER ROAD, LAVEEN, AZ 85339
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain loop. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the freeway
Date: Monday, May 20, 2013 8:35:48 AM

-----Original Message-----
From: tmt86@juno.com [mailto:tmt86@juno.com]
Sent: Friday, May 17, 2013 9:32 PM
To: Projects
Subject: Build the freeway

1

I am getting tired of dealing with bumper to bumper traffic. Please build and expand the 202.

_____

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.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
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- How the proposed action would affect you.

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1 Traffic stinks! Build more roads - commute from westside to east side is long. Light rail is not going to fix.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4335

If we did that sort of thing, we would be able to cut down the amount of cardiovascular disease that we have, we would reduce Alzheimer's. All these terrible diseases. We would do away with all of that. We could eliminate a lot of these diseases, or decrease them certainly. Guess I can't think of anything else.

MS. KEENAN: Erika Keenan, E-r-i-k-a K-e-e-n-a-n, Laveen, Arizona. I took time off from work today to come down to speak, and I said my three minutes, and I was cut off at my three-minute mark. I understand why rules are in place, but the panel had been sitting there for at least 20 minutes with no one to speak, and I was the only one next in line to speak, so I'm not sure why they couldn't have given me the courtesy of letting me finish what I had to say, especially since we're taking our personal time to come down and say this and there was nobody else around. Thank you.

UNIDENTIFIED SPEAKER: We live on Pecos Road on the street right there, and it's right next to, you know, where the highway would be or -- and on the other side of that would be the Indian reservation where they're struggling to come to a decision. And I've lived there for about nine years,

Page 19

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www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

but there's been just a big fight, and that's been going on for about 30 years now. And really it's just a waste of money and it's a waste of time. Everybody's just trying so hard to focus on the highway.

1 You know, 30 years ago, everybody was always just focused on the highway. It's been going on that long. You know, and Phoenix has grown. We do know that, but it's not enough. You know, trains. We don't use enough trains. Oh, sure we have the Light Rail. We do have that, but I mean, that's just not enough. We need more transportation, like the 101 east or maybe the west 101. I mean, we have all of that. We have all these highways all over the

2 place, and I think that we need less pollution is what we need less of.

3 And the highway like I-10 that runs right through, we need less of that, you know, because people can go to trains instead because it saves on gas and, thus, going to save insurance. Going to save all that money.

4 And so as far as the government, you know, focusing all the time on trying to build this freeway and do some sort of improvements, they're not trying to do improvements, they're only trying to

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Alternatives, Nonfreeway Alternatives**	
4	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.

Code	Comment Document

focus on the freeway. And the government owes $16 trillion. That's how much the government owes, and we're still just focusing on all of this. Trying to pay off for all the work that's going to be done for the staff, for the advertisements, for everything. All that money, the interpreter. It's just so expensive to do this, to focus on this. It's been going on for 30 years now and really it's just a big waste.

I just recently had a sign that said about how, hey, look up on this website, usdebtclock -- usdebtclock.org and you can see how much money is owed right there. Trillions of dollars just wasted and wasted. And, you know, what I want, what we want is to not have it built. Just to be done with it. Just to stop it and to save money.

I would just like there to be peace, you know, for the tribes, the reservation and for our area where we live where the freeway would be. Just leave it alone, and maybe just focus on the public transportation, on the trains, and grow it that way instead.

You know, you're going to ruin our homes. You're going to run right through our homes. It's going to cause more pollution, there's going to be

5

6 2

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
5	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)

Code	Comment Document

7
8
2

more trucks, semi-trucks blowing their smoke everywhere, people's health is going to be affected. The homes are going to be dirty. They're going to have black shoot on the windows. I mean, everything's going to be dirtier outside.

8

And kids that are in the area, all the children, how they play around right now, I mean, they won't be able to do that then. It's just going to be much more limited for them and I don't think that's right. I think that we need to focus on public transportation, like trains, and cause less pollution that way and less destruction to the environment. Maybe focus on solar electricity and things like that. So, please, I want everybody to stop fighting about it, and I don't want a freeway to be built period. That's it.

UNIDENTIFIED SPEAKER: Hello. I live in Ahwatukee in Phoenix on Pecos and 32nd Street, right there, and it's been about eight or nine years. You know, I felt like it was the best place for my kids to go to school, and now they're graduated and they left the nest and they've gone to college, and now I feel kind of stuck because I can't really sell my property because of all the struggle that's going on with the freeway.

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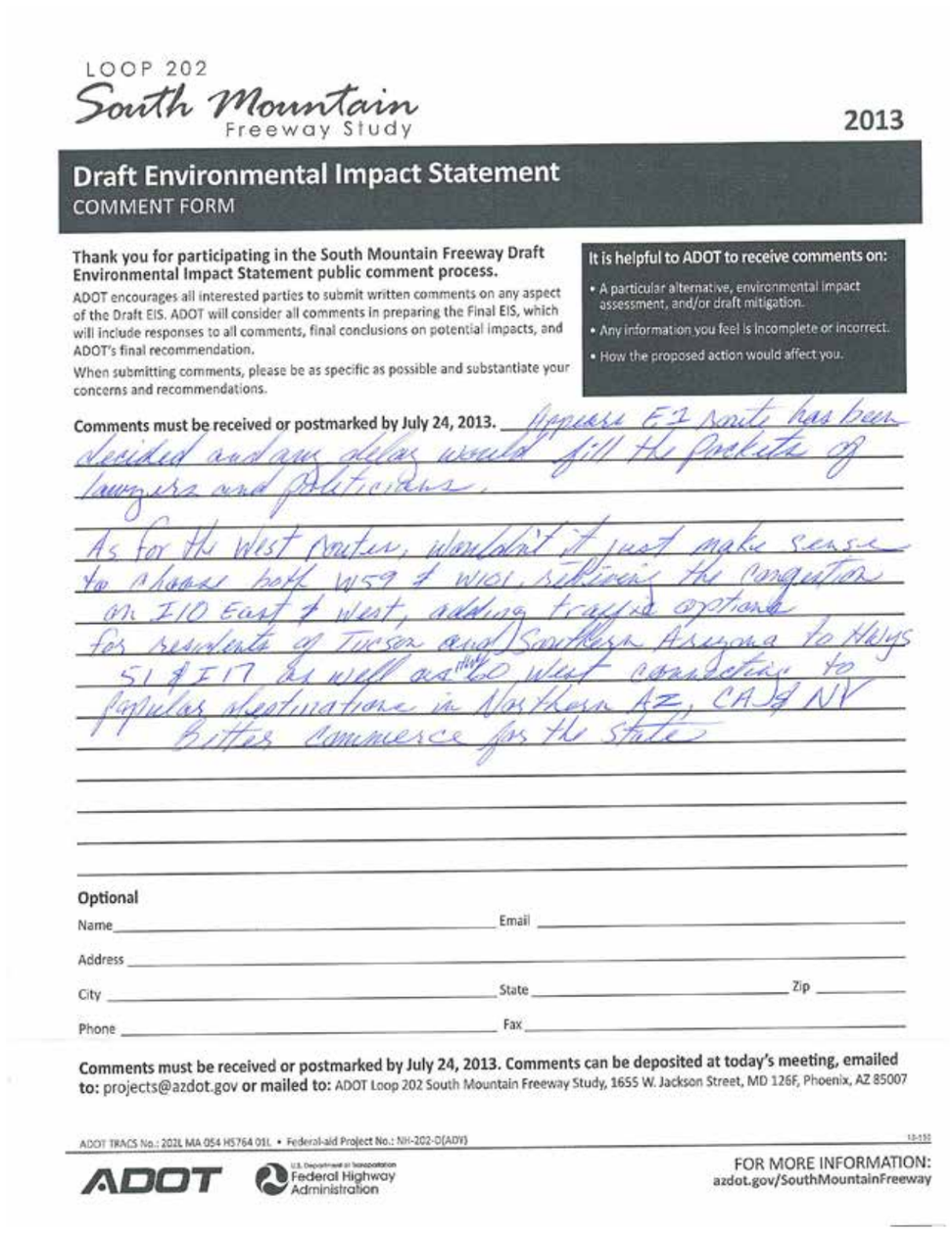
Code	Issue	Response
7	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Health Effects**	

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

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As for the West Routes, wouldn't it just make sense to choose both W59 & W101, relieving the congestion on I10 East & West, adding travel options for residents of Tucson and Southern Arizona to Hwys 51 & I17 as well as the I10 West connection to popular destinations in Northern AZ, CA & NV Better commerce for the state.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 10-13

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:04 PM
CALLER: ANONYMOUS13	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the construction of the Loop 202 South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: DO NOT SUPPORT
Date: Monday, May 20, 2013 8:31:01 AM

From: KuyGOLF@aol.com [mailto:KuyGOLF@aol.com]
Sent: Saturday, May 18, 2013 8:45 AM
To: Projects
Subject: DO NOT SUPPORT

1 I DO NOT support this project. You are destroying out community.

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Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

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1

FAVORED CONSTRUCTION OF 202 LOOP –

- CONSTRUCTION ACTIVITIES WILL CREATE MORE JOBS FOR THE CONSTRUCTION COMPANIES
- MORE JOBS – MORE TAXES GENERATED FOR STATE (MORE REVENUE TO COVER STATE EXPENSES)
- MORE JOBS WILL REDUCE UNEMPLOYMENT AND WILL REDUCE STATE EXPENSES

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-156

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4336

more trucks, semi-trucks blowing their smoke everywhere, people's health is going to be affected. The homes are going to be dirty. They're going to have black shoot on the windows. I mean, everything's going to be dirtier outside.

And kids that are in the area, all the children, how they play around right now, I mean, they won't be able to do that then. It's just going to be much more limited for them and I don't think that's right. I think that we need to focus on public transportation, like trains, and cause less pollution that way and less destruction to the environment. Maybe focus on solar electricity and things like that. So, please, I want everybody to stop fighting about it, and I don't want a freeway to be built period. That's it.

UNIDENTIFIED SPEAKER: Hello. I live in Ahwatukee in Phoenix on Pecos and 32nd Street, right there, and it's been about eight or nine years. You know, I felt like it was the best place for my kids to go to school, and now they're graduated and they left the nest and they've gone to college, and now I feel kind of stuck because I can't really sell my property because of all the struggle that's going on with the freeway.

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1
2
3
4

You know, I feel like my investment has been in there, and it's not fair because, I mean, other people want to move in and out to be near family, to be near schools with their children, and that's what they would want to do and they're doing that in my area, but I'm stuck because we're older. You know, everybody else has opportunities for their families.

And I think that we should fight about that because my point is, as far as the reservation goes right there, you have tribes. And we have to honor and respect their spiritual being and the thing that they're trying to do there. And if you destroy their land, I don't know what would happen to them. Because I did learn to respect tribes and learned it from Israel. They pass things down from generation to generation. And I feel like we need to respect and honor their nature and their tribes and their lives and so that's why I want to stop it.

I think maybe think twice about it, you know, increasing the amount of trains and things. Because when people have so many cars, it's so expensive. Electricity 's becoming expensive. I mean, there's just more opportunities I know, and more things economically for people to do if we had

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Cultural Resources**	
4	**Purpose and Need, Lack of Support**	

Code	Comment Document

more trains and things like that. Oh, and no more building near our home, please. We want to respect the Indian reservation. We want to work in cooperation with them. Thank you.

UNIDENTIFIED SPEAKER: So we live on Pecos and from what I see on the map over there, there's going to be a new bridge that's being built and I don't want it to ruin my home. There's not going to be any type of privacy. People can look right down into my home. I mean, sure there will be a wall, but you can still see over it. It's going to cause more accidents. What if accidents come over the wall into our home area and destroy it, and that's something I don't like. Please, please stop building it. Thank you.

MS. INNIS: Hi, I'm Lillian Innis and I lived in the Gila River community for quite some time, and I've also lived in Ahwatukee for a couple of years and I've been going to school in Ahwatukee since I was in kindergarten, and I do not like this freeway or I do not -- I feel like what some people say that, like, the freeway is going to do, I feel like it won't meet up to their expectations. And a lot of them think money first instead of with, like, actual thoughts of future generations and me when I

Code	Issue	Response

Code	Comment Document

Estudio de la Autopista
South Mountain
LOOP 202

2013

Reporte Del Impacto Ambiental
FORMULARIO DE COMENTARIOS

Comentarios Adicionales: My comments are very brief. I think the video presentation is excellent. All of the visual documentation around the room is very good and somewhat technical. My main concern is the air quality issue which I think is everyone's concern. Many days in the year air quality in Phoenix on the other side of the mountains is very poor yet ours is minimal due to our location. The proposed freeway would obviously change the overall quality of the air which would cause us to look like Phoenix proper on a high pollution day.

I can see the need to complete the loop around Phoenix but I think the environmental potential issues are enough to put me against the freeway.

Obviously the only way we can be heard is to organize and become a total force against this project. The chances of people putting their passion and money against this are unlikely. But if there is an issue which would unite this community I think this is it.

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

PARA MÁS INFORMACÓN:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
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Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 3:34 PM
CALLER:	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Please build the South Mountain Freeway. I am definitely in favor of it. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: I do not support the south mountain freeway
Date: Monday, May 20, 2013 8:30:24 AM

From: dtarazon [mailto:dtarazon@aol.com]
Sent: Saturday, May 18, 2013 9:27 AM
To: Projects
Subject: I do not support the south mountain freeway

1 I do not support the building of the south mountain freeway.. Don't build it.

Sent from my Verizon Wireless 4G LTE Smartphone

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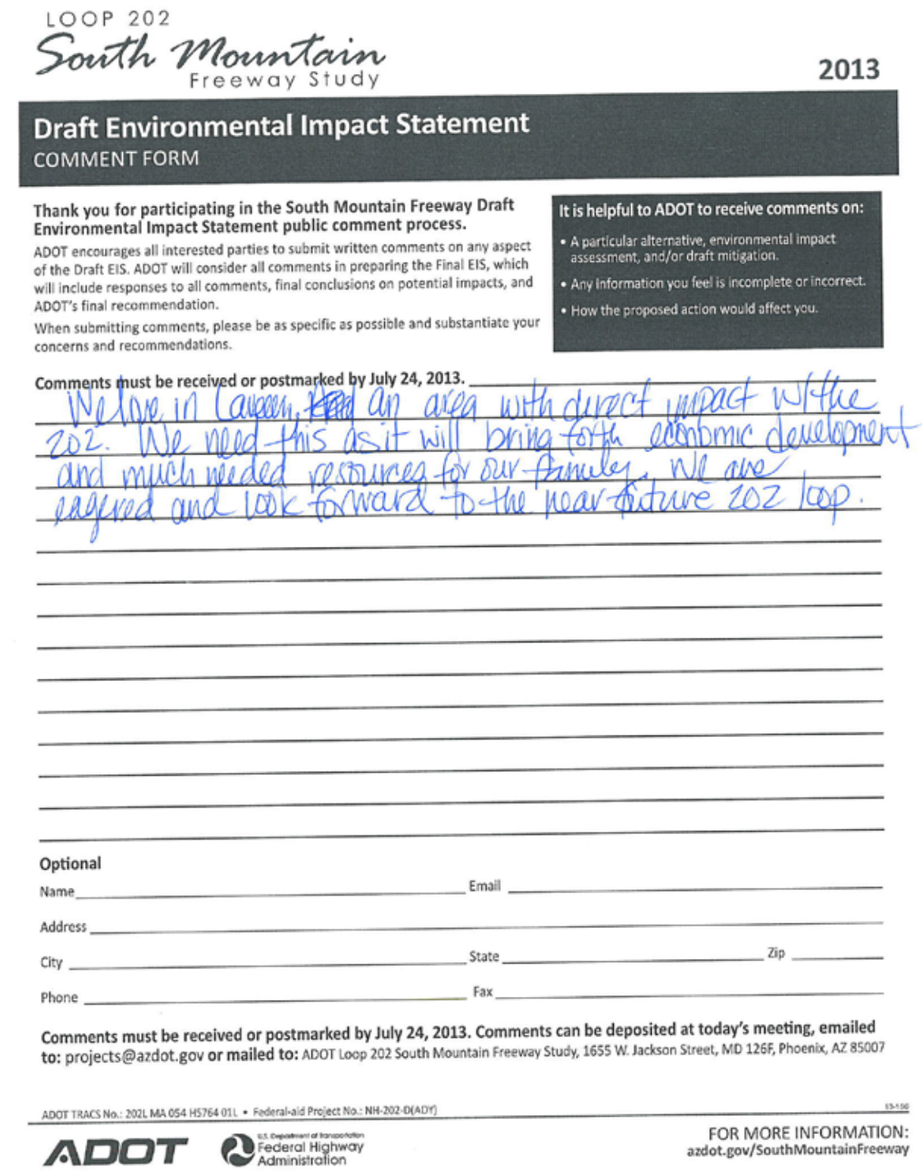
Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

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We live in Laveen, and an area with direct impact w/the 202. We need this as it will bring forth economic development and much needed resources for our families. We are eagered and look forward to the near future 202 loop.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT · U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4337

more trains and things like that. Oh, and no more building near our home, please. We want to respect the Indian reservation. We want to work in cooperation with them. Thank you.

UNIDENTIFIED SPEAKER: So we live on Pecos and from what I see on the map over there, there's going to be a new bridge that's being built and I don't want it to ruin my home. There's not going to be any type of privacy. People can look right down into my home. I mean, sure there will be a wall, but you can still see over it. It's going to cause more accidents. What if accidents come over the wall into our home area and destroy it, and that's something I don't like. Please, please stop building it. Thank you.

MS. INNIS: Hi, I'm Lillian Innis and I lived in the Gila River community for quite some time, and I've also lived in Ahwatukee for a couple of years and I've been going to school in Ahwatukee since I was in kindergarten, and I do not like this freeway or I do not -- I feel like what some people say that, like, the freeway is going to do, I feel like it won't meet up to their expectations. And a lot of them think money first instead of with, like, actual thoughts of future generations and me when I

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Design**	The proposed freeway main line is no closer than 100 feet from any residences along Pecos Road. The bridge sections include concrete barriers that prevent vehicles from leaving the roadway. The noise walls along the proposed freeway would be of a height such that vehicles could not see over them and into residences.
2	**Safety**	To reduce the number of freeway accidents and the expenses associated with responding to them, particular attention was paid to safety factors in the design of the proposed freeway. The proposed South Mountain Freeway's eight-lane section is shown on Draft Environmental Impact Statement page 3-58, with discussion and remarks that the freeway would be consistent with the design of other freeways in the region and thereby would improve driver expectancy and safety. The sidebar on Draft Environmental Impact Statement page 3-59 discusses the safety features of auxiliary lanes (used at traffic interchanges) for facilitating acceleration and deceleration, thereby reducing potential conflicts with through-traffic and travelers merging onto or exiting from the proposed freeway.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

1

Additional Comments:
Do NOT Want Loop 202 down Pecos for many many reasons.
I believe you have heard many reasons

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

12-150

ADOT

U.S. Department of Transportation
Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

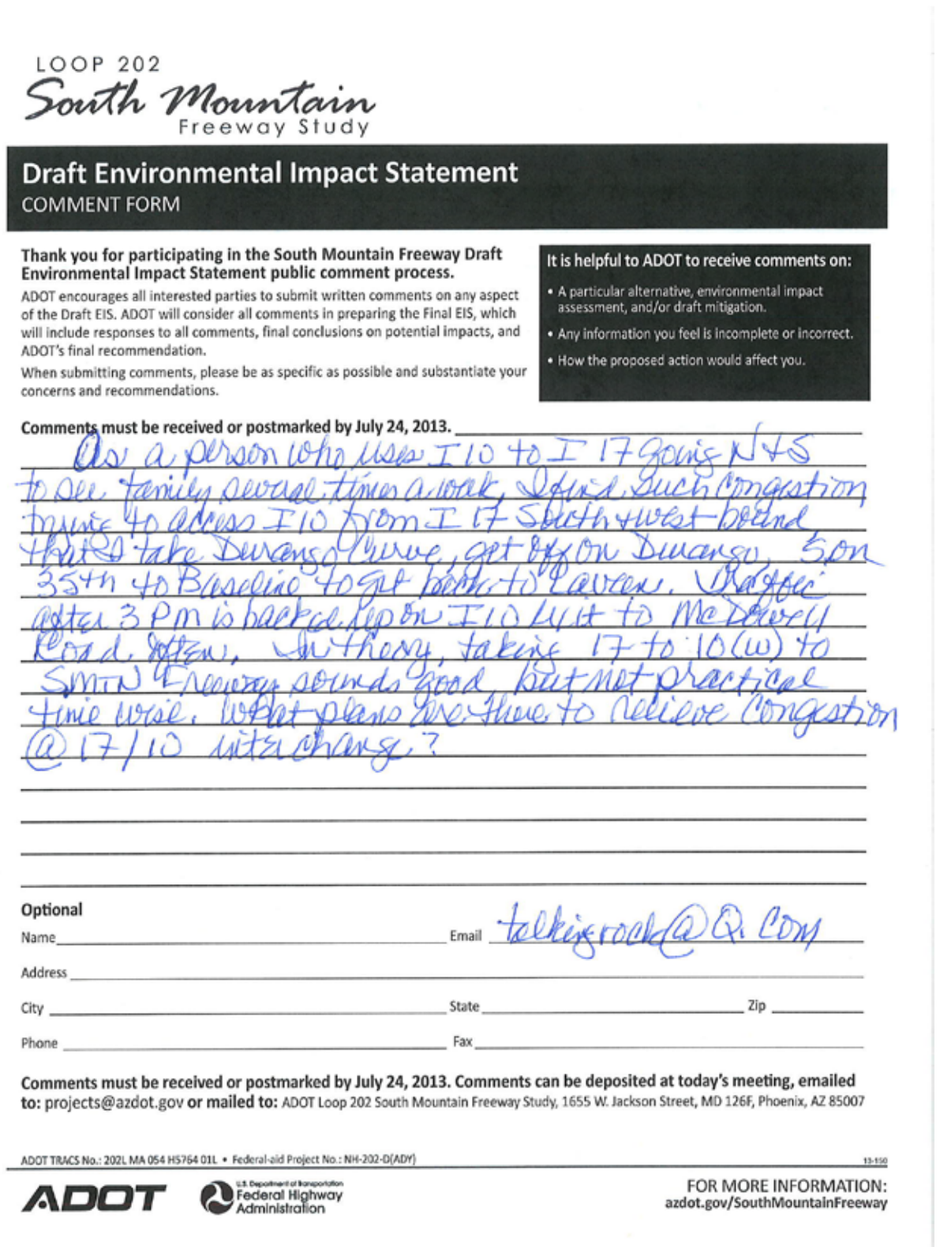
INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 4:36 PM
CALLER: ANONYMOUS16	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

I do believe that the 202 extension is needed. I would like to see it finished and hope that everything gets going here, real quick.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

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As a person who uses I 10 to I 17 going N/S to see family several times a week, I find such congestion ironic to access I 10 from I 17 South+West bound that I take Durango Drive, get off on Durango Son 35th to Broadway to get back to Laveen. Traffic after 3 PM is backed up on I 10 exit to McDowell Road. Often, in theory, taking 17 to 10(W) to SMTN & Norway sounds good, but not practical time wise. What plans are there to relieve congestion @ 17/10 interchange.?

Optional

Name _____ Email talkingrock@Q.com

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Traffic**	The recommended improvement is not within the scope of the Preferred Alternative. The Arizona Department of Transportation and Maricopa Association of Governments continually evaluate bottlenecks within the existing regional freeway system and identify opportunities for fixing problems. The *Regional Transportation Plan* includes funding for improvements along the Interstate 10 and Interstate 17 corridors. Information related to these projects can be found at <azdot.gov/projects/phoenix-metro-area>.

Code	Comment Document

4340

constraints of all the drainage out of Ahwatukee trying to sync the -- subset the bridges as low as possible at all the major interchanges, in particular 40th Street. Every foot the bridge can go down, the better for the sound walls. So I think that's kind of most of it.

UNIDENTIFIED SPEAKER: Hello. Okay. I have another perspective now that I've been looking around at all of these advertisements and these banners and I've been seeing what's been posted, and I'm understanding a little bit more completely now. But something that had me thinking twice is the level of medication that other people take, maybe the prescriptions, maybe these people who take prescriptions and different pills can't drive because they're afraid of getting a DUI, or maybe people who have, you know, no driver's licenses or something like that. I mean, they don't have the opportunities. Sure, there's going to be a freeway there. Maybe we should think twice about maybe putting a train there instead.

You know, it would be a little bit less of a headache for other people, you know, other people who have had DUIs or mental illness or something and they're a risk to other drivers. And

1

Page 26

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

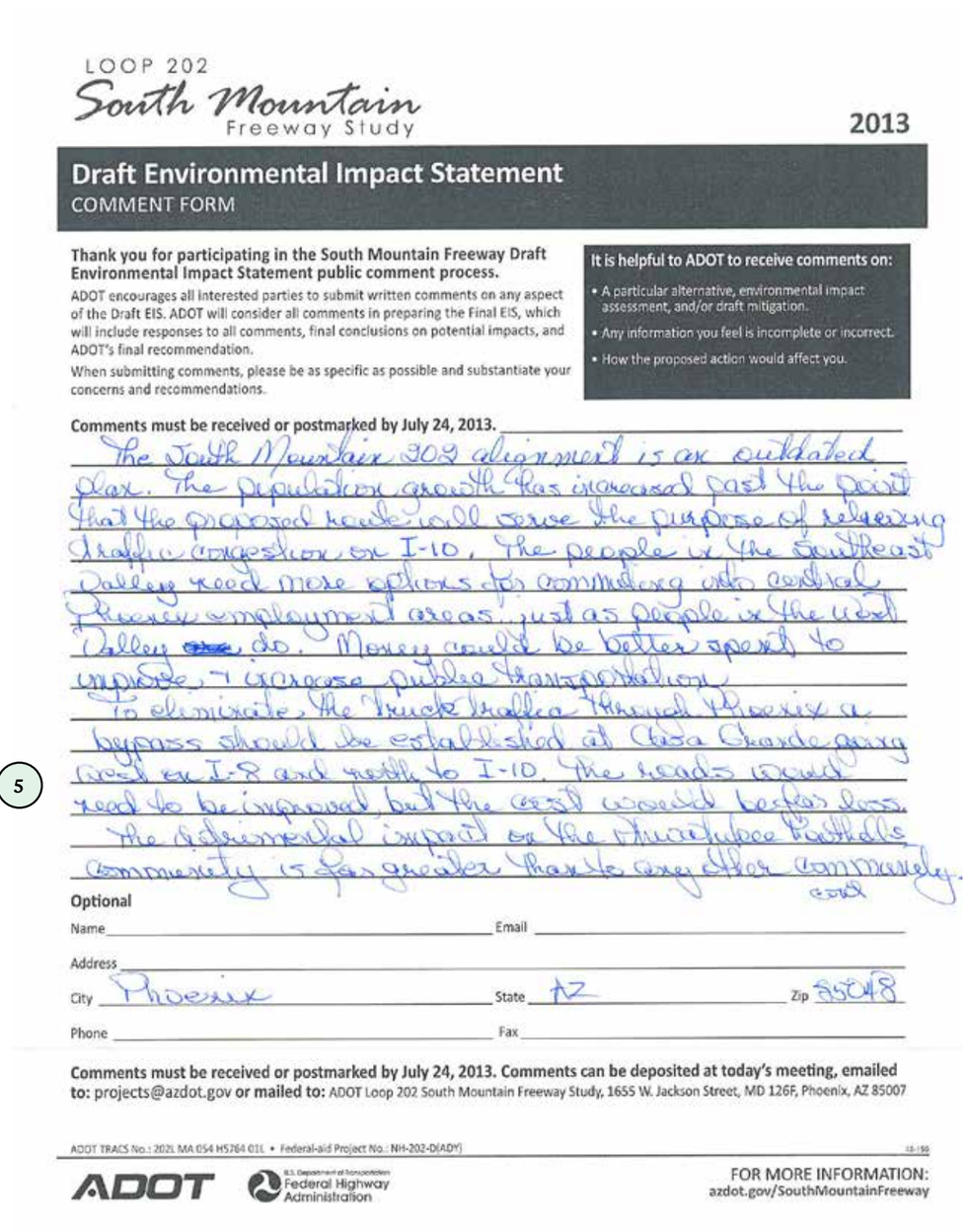
so if we put a train there instead of the freeway, I think that will be better. That way blind people could have the opportunity to get around the valley. People who have a disability, they could be more social while on a train. They wouldn't have to worry about a car because a lot of people are stuck and they can't use a car or they can't afford a car. But if they're riding on a train, it would be more social.

If people don't have driver's licenses, they'll get in less trouble with DUIs or accidents. You know, maybe people are out for a good time and they'll have better opportunities to be able to take public transportation instead of driving, and I just think those are things that you could think twice about.

UNIDENTIFIED SPEAKER: I was just discussing this with Ben about the 32nd Street and the Pecos interchange right there, the crossroads right there. There's going to be a bridge built over it and it's going to block it, and there's no way I'm going to be getting through because there's not being a ramp there. There are homes in the area on both sides, but those people in the homes won't be able to use straight through 32nd Street. They're going to

Code	Issue	Response

Code	Comment Document



LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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1 The South Mountain 202 alignment is an outdated plan. The population growth has increased past the point that the proposed route will serve the purpose of relieving traffic congestion on I-10. The people in the Southeast Valley need more options for commuting into central Phoenix employment areas, just as people in the West Valley do. Money could be better spent to improve & increase public transportation.

2 3 To eliminate the truck traffic around Phoenix a bypass should be established at Casa Grande going East on I-8 and south to I-10. The roads would need to be improved but the cost would be less.

4 5 6 The detrimental impact on the Ahwatukee Foothills community is far greater than the savings after commuter cost

Optional

Name _____ Email _____

Address _____

City Phoenix State AZ Zip 85048

Phone _____ Fax _____

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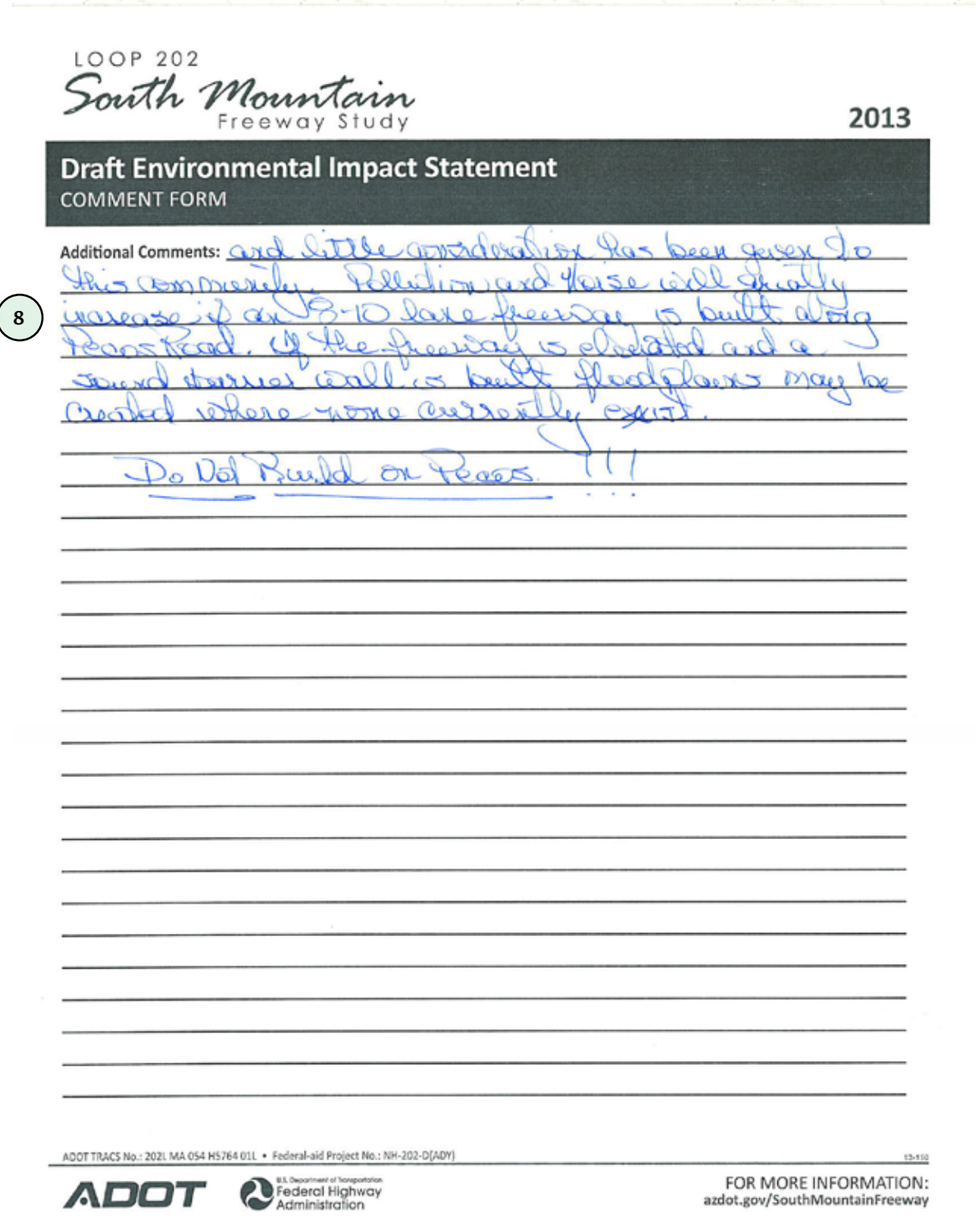
ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY)

ADOT · U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	
3	**Alternatives**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa Association of Governments region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund its projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make available additional funds for other statewide projects.
4	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives**	The study considered an alternative that would run along Interstate 8 in Casa Grande to State Route 85 from Gila Bend to Interstate 10 (see text on page 3-9 of the Draft Environmental Impact Statement). State Route 85 is currently being reconstructed as a four-lane, divided highway with limited-access control, and Interstate 8 is a four-lane, divided Interstate freeway with full access control. Existing signs at each terminus designate the route as a truck bypass of the metropolitan Phoenix area. This route would continue to be available for interstate and interregional travel, but it would not meet the proposed action purpose and need as part of a regional transportation network and, therefore, was eliminated from further consideration.
6	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document
7 8 9 10	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Additional Comments: and little consideration has been given to this community. Pollution and noise will greatly increase if an 8-10 lane freeway is built along Pecos Road. If the freeway is elevated and a tunnel or trench is built floodgates may be created where none currently exist.

Do Not Build on Pecos

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT

U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
7	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Noise**	
9	**Drainage**	Pecos road drainage is designed as a pass-through system. In other words water is allowed to drain along its natural existing pathway underneath the freeway and to Gila River Indian Community land. If an action alternative were to become the Selected Alternative, the E1 Alternative would be constructed aboveground and the existing culverts would extend to pass drainage under the freeway. Pecos Road currently has numerous existing culvert crossings. Depressing the freeway in this area would eliminate the existing culvert crossings and potentially have adverse flooding impacts on adjacent properties. Extending the existing culverts or upsizing the culverts would maintain or improve drainage flows. Doing so would ensure that there would be no adverse flooding impacts to adjacent properties. (See Draft Environmental Impact Statement pages 3-18, 4-98, and 4-107.)
10	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 5:10 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway, it really is needed. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	**From:** Projects **To:** ADOT **Subject:** FW: 202 South Mt. Freeway **Date:** Monday, May 20, 2013 8:24:31 AM **From:** RMeyerBuck [mailto:rmeyerbuck@msn.com] **Sent:** Sunday, May 19, 2013 11:00 AM **To:** Projects **Subject:** 202 South Mt. Freeway Let's stop all the back and forth with the Indians and build it. If the Indians won't let it go on their land don't put any on or off ramps for them to use. Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

Code	Issue	Response
1	**Alternatives**	Federal law prohibits the denial of access to any community. Thus, traffic interchanges would be located along the freeway where it borders the Gila River Indian Community (see Draft Environmental Impact Statement page 3-51). Roadway connections on Gila River Indian Community land to the traffic interchanges would be the responsibility of the Gila River Indian Community, in coordination with appropriate jurisdictions.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- How the proposed action would affect you.

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1

Please save it cuz no money NEED Trains All around cuz people cant afford buy car. NO Jobs So NEED Start Train people can enjoy NO WORRY. for MMJ RX Blinds people BA people.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

4341

so if we put a train there instead of the freeway, I think that will be better. That way blind people could have the opportunity to get around the valley. People who have a disability, they could be more social while on a train. They wouldn't have to worry about a car because a lot of people are stuck and they can't use a car or they can't afford a car. But if they're riding on a train, it would be more social.

If people don't have driver's licenses, they'll get in less trouble with DUIs or accidents. You know, maybe people are out for a good time and they'll have better opportunities to be able to take public transportation instead of driving, and I just think those are things that you could think twice about.

UNIDENTIFIED SPEAKER: I was just discussing this with Ben about the 32nd Street and the Pecos interchange right there, the crossroads right there. There's going to be a bridge built over it and it's going to block it, and there's no way I'm going to be getting through because there's not being a ramp there. There are homes in the area on both sides, but those people in the homes won't be able to use straight through 32nd Street. They're going to

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www.drivernix.com

1

Code	Issue	Response
1	**Design**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix. The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. At the same time, the City conducted a traffic circulation study to evaluate the impacts of the freeway (and the removal of an access point at 32nd Street) on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

Code	Comment Document

have to go through -- through an area of a lot of homes, and there's going to be a lot of cars going through the residential area in order to arrive to 40th Street. So there's going to be a lot of cars and a lot of traffic in that area.

You know, so's there's going to be a lot of cars taking those smaller side roads and a lot of traffic in that area. And you have to think about, it's just a waste of time. You know, it's going to take me 10 to 15 minutes just to go through that residential area. I don't think that's right. I don't think it's fair. You have to respect our home, our community, 32nd Street. There's a high school right there.

2

It's easy if we had a ramp to get right through there. It would be a lot easier. We could get through. And from the Indian reservation, they could come straight through on 32nd Street and get off right there, and they could go to the high school in that area. There's just too many -- it's too crowded in that area on 40th Street and from 32nd Street because there's a lot of homes right there in that area. I think it's a really bad idea, so please don't build this over on 32nd Street. Okay. Done.

UNIDENTIFIED SPEAKER: Don't waste any

Code	Issue	Response
2	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:52 PM
CALLER: ANONYMOUS17	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the bill, the expansion. We need all the freeways we can get. Thank you. Bye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Build the Sount Mountain Freeway
Date: Monday, May 20, 2013 8:22:32 AM

1

From: Tragrc2 [mailto:tragrc2@aol.com]
Sent: Sunday, May 19, 2013 9:13 PM
To: Projects
Subject: Build the Sount Mountain Freeway

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

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Freeway Study

2013

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I am a recent (2 years) relocatee to Phoenix. As a resident who spends substantial time in the West Valley area, primarily work, the effects of the new freeway section will be obvious. It would relieve overall congestion, provide access to the East Valley, and allow for an efficient way to travel on I-10 East. There for I support the project as proposed, it will be tough on some in the path, but the overall population will benefit, in my opinion.

1

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13/130

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

have to go through -- through an area of a lot of homes, and there's going to be a lot of cars going through the residential area in order to arrive to 40th Street. So there's going to be a lot of cars and a lot of traffic in that area.

You know, so's there's going to be a lot of cars taking those smaller side roads and a lot of traffic in that area. And you have to think about, it's just a waste of time. You know, it's going to take me 10 to 15 minutes just to go through that residential area. I don't think that's right. I don't think it's fair. You have to respect our home, our community, 32nd Street. There's a high school right there.

It's easy if we had a ramp to get right through there. It would be a lot easier. We could get through. And from the Indian reservation, they could come straight through on 32nd Street and get off right there, and they could go to the high school in that area. There's just too many -- it's too crowded in that area on 40th Street and from 32nd Street because there's a lot of homes right there in that area. I think it's a really bad idea, so please don't build this over on 32nd Street. Okay. Done.

UNIDENTIFIED SPEAKER: Don't waste any

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1

4342

more time talking with the Gila River tribe about putting the freeway on their land. Don't waste money on another 99-year lease. Build it where you already own 85 percent of the land on Pecos Road.

UNIDENTIFIED SPEAKER: I live in Tempe by ASU so it sounds like a good idea to me, but I just want to make sure that consideration of the other people that it affects more closely is taken into account. So I'll make other comments online, but for now I just -- seems like a good idea to relieve congestion of traffic, but if it affects people's homes and things like that, I want to make sure those people are treated fairly. So that's my biggest concern.

(The proceedings concluded at 8:00 p.m.)

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 6:53 PM
CALLER: ANONYMOUS18	ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I do support the South Mountain Freeway, the 202. It will be a big advantage to the whole community. Thank you. Goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Loop 202 South Mountain Freeway Study Opinion
Date: Tuesday, April 30, 2013 8:53:26 AM

From: K B [mailto:xbjquip@hotmail.com]
Sent: Friday, April 26, 2013 3:01 PM
To: Projects
Subject: Loop 202 South Mountain Freeway Study Opinion

1 I would just like to say that the E1 Alternative and W59 Alternative looks like the best option for the Loop 202 South Mountain Freeway expansion.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

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South Mountain
Freeway Study

2013

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- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013. PLEASE BUILD THIS IMPORTANT FREEWAY SOON!

1

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4343

more time talking with the Gila River tribe about putting the freeway on their land. Don't waste money on another 99-year lease. Build it where you already own 85 percent of the land on Pecos Road.

UNIDENTIFIED SPEAKER: I live in Tempe by ASU so it sounds like a good idea to me, but I just want to make sure that consideration of the other people that it affects more closely is taken into account. So I'll make other comments online, but for now I just -- seems like a good idea to relieve congestion of traffic, but if it affects people's homes and things like that, I want to make sure those people are treated fairly. So that's my biggest concern.

(The proceedings concluded at 8:00 p.m.)

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 6:56 PM
CALLER: ANONYMOUS19	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the freeway. Put it in. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South mtn freeway
Date: Wednesday, May 22, 2013 10:54:47 AM

From: Ronron8611 [mailto:ronron8611@gmail.com]
Sent: Monday, May 20, 2013 5:43 PM
To: Projects
Subject: South mtn freeway

1

Build it asap to take the pressure off I 10 traffic.

From my Android phone on T-Mobile. The first nationwide 4G network.

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Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

Freeways are friendlier to the environment. With freeways we see less pollution + less traffic accidents. It keeps ~~our~~ our city streets from being as populated. This project will bring jobs to the Valley which Phoenix is hurting for. It will provide employment opportunities to many and bring jobs back to our state. Our parkways are already very busy + this freeway will help to redirect some of the traffic + help with rush hour traffic. The 202 project will definitely be a win win !!!

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 12-150

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4350

I-10 plugs up, they all hit the surface streets, and the surface streets from South Phoenix to Laveen just get jammed up. A lot of accidents are starting to happen, more serious accidents than ever before.

So I am in favor of building the freeway. I have been in the path of the freeway since '85 when it was designed, and we voted for it in '86. And we are still waiting to see whether this is going to be built or not. But I would strongly suggest that the freeway be built.

Thank you very much.

ANONYMOUS: Well, we are for it, wish it would happen. I have been following it since 1985. Nothing has happened that we can see. And I live on 51st, off of 51st Avenue. And right now the traffic is horrendous. Two miles down south of where I live, the Vee Quiva will open its new phase in July with seven restaurants and a resort, which they don't have right now. So it already -- 51st Avenue will be a freeway. And that's our concern.

We want the freeway.

ETHEL WILLIAMS: The main thing I would like to do is say that my whole family -- not my whole family, but two-thirds of us, three-fourths of us, moved to Laveen because of all the things they promised

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/16/13	INCOMING CALL TIME: 6:55 PM
CALLER: ANONYMOUS20	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Yes, I support the freeway, put it in. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4430

UNIDENTIFIED SPEAKER: Where to start. Well, I guess, first of all, I'd like to say that I'm a little frustrated by this whole process, because I'm an Ahwatukee resident. I've been coming to these meetings for years now. And nothing ever really changes. It's the same smoke and mirrors every year, every meeting. And it's like, oh, well, this is the study that we're doing, and this is where we're going. And yet we never get there. There's never a decision. There's never a, this is the drop-dead date, which, you know, in my line of work, in any job I've ever had, you know, if you have a job, you always have a suspense date that, you know -- by which it's supposed to be finished. And so that's probably the most frustrating thing with this, living in an area that's going to be affected by this.

The other thing too is that I really resent the fact that this has always been marketed as a commute alternative and a way to improve people that work downtown Phoenix and are commuting from the East Valley to downtown Phoenix, because it's not. This doesn't even take you downtown. It takes you way on the west side, 59th Avenue.

So that's great if you're going out of town or if you're a semi or people passing through Phoenix. I just wish that they would market it and address it for what it is. It's a city outer loop truck bypass. It's

1

2

Page 32

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www.drivernix.com

Code	Issue	Response
1	**Purpose and Need**	The proposed freeway was developed to improve mobility between the western and southeastern portions of metropolitan Phoenix. See the text beginning on Draft Environmental Impact Statement page 3-27 for more information related to the responsiveness of the proposed freeway to the purpose and need criteria.
2	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

not a commute option.

In fact, it even shows on their board over there that this will save you six minutes travel time from Ahwatukee to downtown. The problem with that is, one, like I said before, it's not taking you downtown. And two, if it's saving you that time, it's because you're still going down the I-10, and maybe there's fewer cars or trucks on there because now they're taking the outer loop because they're not going downtown. So...

And as a -- as a homeowner that's going to be directly affected by this, it would be really nice if they'd have some dates and some drop-dead, concrete dates that they could give, or at least some, you know, proposed dates that, hey, by this date, this is going to happen, because I can't -- I'm -- I've been living in limbo. Can't make any decisions on my house or what to do.

3

So I guess that's -- that's it.

And -- oh, one more thing. And the people that are giving positive comments are the people that don't live in an area that's affected by it. I can tell you that the meetings I've gone to, all those that speak highly of this are the people that -- in Ahwatukee, anyway, because I can't really speak to the Laveen area -- are those folks that live north of Chandler Boulevard. So they're not affected by this. But I guarantee you if they

Code	Issue	Response
3	**Construction**	The schedule for the next steps includes publishing the Final Environmental Impact Statement in 2014. A 60-day public review period will be provided. Then the record of decision would be published. If a build option is selected, construction could begin as early as 2015.

Code	Comment Document

were, then their comments wouldn't be so positive.

One more thing. Since it's always been said that, well, this has been in the works since like 1985 or before and -- that being the case, why were the homes that are built along the right-of-way of the freeway or even, in my case, right up to the freeway, allowed to have been built? Because initially they were not in the planning as far as those communities. Where my house sits, and the whole row of houses, were not originally supposed to be built.

Likewise, there's a brand-new housing development down on the west part of Pecos at probably about 15th Avenue that was just built in the last few years. And it's going to be taken out by the freeway.

So the only rationale I can see is that they wanted to draw property taxes on it until they finally did make a decision on the freeway. But since they knew this was going to go through all along, those should never have been allowed to be built.

UNIDENTIFIED SPEAKER: I was studying this -- a map over here, and the layout and everything, and I can see that there's going to be new bridges that are going over the top. And I just think that it's just too many trucks that are going to be passing over the top of the bridges. And I think it's -- suppose they crashed?

Page 34

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www.drivernix.com

Code	Issue	Response
4	**Social Conditions**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land based on the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Draft Environmental Impact Statement.

Code	Comment Document
1	Document Created: 7/10/2013 1:53:15 PM by Web Comment Form I think the freeway should be as elevated as possible because elevated freeway sections are better looking, and keep the sound out of the underlying communities. I think the freeway would best serve the people if it was entirely elevated.

Code	Issue	Response
1	**Noise**	The freeway profile, or elevation, is determined by a number of engineering factors including geology, drainage, and cost, among others. Like most freeways in the Phoenix metropolitan area, the proposed South Mountain Freeway would maintain a rolling profile, being elevated above most major cross streets and dropping to near ground level between interchanges.

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: Loop 202 S. Mt Comment #1314162819
Date: Wednesday, May 22, 2013 10:51:22 AM
Attachments: image001.png

Another comment from Envoy:

5/21/2013 5:14:50 PM
I am unable to attend the hearings you held regarding the loop 202 extension West of the I10 South of Phoenix toward I 10 on the West side. Not only do I support this extension I hope it can be done sooner rather than later. Hopefully the indians will allow routing on the reservation which would be of economic advantage to them. I recommend the routing connecting with the Loop 101 and I10 to maximize the benefit of bypass traffic to get off I-10 as far west as possible and reduce traffic congestion into Phoenix from this point.

1
2

Thanks,

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, W59 Alternative Versus W101 Alternative**	

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

FAVORED 202 LOOP CONSTRUCTION DUE TO THE FOLLOWING ADVANTAGES.

- THE ALIGNMENT WILL BYPASS DOWNTOWN AREA FOR BIG TRUCKS GOING TO TUCSON OR EAST SIDE — LESS TRAFFIC VOLUME AT THE 10 FREEWAY — LESS BIG TRUCKS LESS ACCIDENTS DUE TO LESS VEHICLES @ SUCH HAULS.
- IT WOULD OPEN UP NEW BUSINESSES & HOUSING DEVELOPMENT ALONG THE NEW 202 LOOP ALIGNMENT

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-159

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4432

UNIDENTIFIED SPEAKER: I was resident of Laveen. I was there since 2007 to 2000 -- end of 2012. I work in Chandler, and my commute was only through Baseline Road, and it was like a nightmare every day, and I pretty much couldn't stay anymore because I had to have early morning meetings, so I had to move out to Chandler. But I still have my home back in Laveen. And I'm -- it's rented right now.

So I'm very interested to see this freeway getting built, because if you stay -- if you ever go to Laveen, you'll see that area has a lot of prospects, but it's just not developing or growing because of not having a proper freeway there yet. It's just like a cul-de-sac, with only one road, Baseline, going back and forth.

So -- so I really hope and thank the ADOT team for committing the years. I know it's a long process, and I hope this process moves faster and quickly so that the freeway gets built as soon as possible.

MR. ROSS: Richard Ross, R-i-c-h-a-r-d, R-o-s, as in Sam, -s, as in Sam.

So I am against the building of this road for a lot of reasons. One, I don't believe -- I don't believe we have the money. Or another way of saying it is I think the money could be spent in a better way. I don't believe we need more roads built. We have an incredible

1

Page 37

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www.drivernix.com

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 1:52 PM
CALLER: ANONYMOUS22	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway extension.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: Envoy #1314145299 S. Mt. Comment
Date: Tuesday, May 21, 2013 2:24:01 PM
Attachments: image001.png

Another South Mt. Loop 202 Comment.

1

5/21/2013 12:22:54 PM
It is completely unclear to me what it is that you are planning to do, there are so many options listed, that I cannot tell what you really have planned. Our existing highways need correction already, why would I want you to build another problem child? I-10's cut down of lanes at 75th Avenue is the worst of the traffic hazards. The way the freeways travel now, I can get to work almost as fast by avoiding it for the most part.

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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.

Code	Issue	Response
1	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions of delays on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

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OUTSTANDING WORK ADOT TEAM. THIS IS A MUCH NEEDED ALTERNATE FREEWAY CORRIDOR THAT WOULD ADDRESS FUTURE TRAFFIC GROWTH. THE SOUTH MOUNTAIN FREEWAY WOULD PROVIDE THE TRAVELLING PUBLIC MORE OPTIONS AND WOULD REDUCE CONGESTION ON I-10.

1

BUILD IT NOW!

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

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ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

4431

were, then their comments wouldn't be so positive.

One more thing. Since it's always been said that, well, this has been in the works since like 1985 or before and -- that being the case, why were the homes that are built along the right-of-way of the freeway or even, in my case, right up to the freeway, allowed to have been built? Because initially they were not in the planning as far as those communities. Where my house sits, and the whole row of houses, were not originally supposed to be built.

Likewise, there's a brand-new housing development down on the west part of Pecos at probably about 15th Avenue that was just built in the last few years. And it's going to be taken out by the freeway.

So the only rationale I can see is that they wanted to draw property taxes on it until they finally did make a decision on the freeway. But since they knew this was going to go through all along, those should never have been allowed to be built.

UNIDENTIFIED SPEAKER: I was studying this -- a map over here, and the layout and everything, and I can see that there's going to be new bridges that are going over the top. And I just think that it's just too many trucks that are going to be passing over the top of the bridges. And I think it's -- suppose they crashed?

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document

1 2 3 4 3 5 6

They could crash directly into our home and destroy our home, destroy our lives, destroy our houses. It's just a threat. It's just a threat to our life and the environment as well. It's just going to ruin the environment.

My home has these windows. They're going to be dirty. They're going to be black with soot. The roofs are going to be black because there's too many trucks on these highways and of all the traffic that's going to be passing by. So there's just no way.

I mean, if there's cars, that's okay, but it's just the trucks that I'm worried about. Trucks are always filthy and full of pollution with all the smoke that they create.

And I just think it's going to be very, very dangerous for our environment, for our health, you know, for the farm and the gardening that we have in the back yard. It's going to ruin the environment completely with the pollution.

There's schools in the area. There's lots of schools in the area where kids play sports or just around, and it's just going to be -- and their health is going to be affected by it all along this area.

And if you have the bridge -- if you have this bridge built, people aren't going to buy my house,

Driver and Nix Court Reporters - (602) 266-6525
www.drivernix.com

Code	Issue	Response
1	**Safety**	To reduce the number of freeway accidents and the expenses associated with responding to them, particular attention was paid to safety factors in the design of the proposed freeway. The proposed South Mountain Freeway's eight-lane section is shown on Draft Environmental Impact Statement page 3-58, with discussion and remarks that the freeway would be consistent with the design of other freeways in the region and thereby would improve driver expectancy and safety. The sidebar on Draft Environmental Impact Statement page 3-59 discusses the safety features of auxiliary lanes (used at traffic interchanges) for facilitating acceleration and deceleration, thereby reducing potential conflicts with through-traffic and travelers merging onto or exiting from the proposed freeway.
2	**Design**	The proposed freeway main line is no closer than 100 feet from any residences along Pecos Road. The bridge sections include concrete barriers that prevent vehicles from leaving the roadway. The noise walls along the proposed freeway would be of a height such that vehicles could not see over them and into residences.
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Purpose and Need, Truck Bypass**	
5	**Health Effects**	
6	**Visual Resources**	Draft Environmental Impact Statement page 4-158 of the mitigation section for visual impacts lists four measures that could be taken to mitigate the visual impacts of overpasses: · placing landscape treatment on the periphery of right-of-way areas at overpass locations as well as at other areas adjacent to residential development · using earth colors for overpasses, retaining and screen walls, and noise barriers · using bridges and overpass structural systems that help unify a visually complex landscape · minimizing structural sizes and/or recessing the face of structural members from the edge of the roadway to reduce real or apparent breadth of structures Additionally, Draft Environmental Impact Statement page 4-159 has nearly a full page discussing "how structures are aesthetically treated and how the public could be directly involved in developing aesthetic treatments."

Code	Comment Document

7
8
9

because it's going to be right there. So it's going to hurt the resale of our house. It's not going to be worth it for them to spend money on my house.

The government already owes -- the government already owes money, $16 trillion in debt. It's not worth fighting for this. It's been 30 years.

So please, please don't build this. It's just going to be horrible. You should no build the bridges across the top because of the bad environment. There are other organizations that already filed complaints. Just ADOT, you know, they're going to -- and other organizations will also file complaints some day.

MS. MILES: My name is Carmen Miles, and I've been living on the Gila River Indian Reservation for all of my life. And whenever I leave the reservation, I still never forget it. If I move -- I have moved away for a year. But I still always remember that's where I -- I was raised, and that's my home. And knowing that people want to use my land as a transportation system that might affect it for the future and all the generations to come, it hurts me, and it also hurts my people. So I don't feel like this is helping my land at all. Looking at it, how it's still in a bad condition today, but I will always work for my land. I was always -- I always have hope for my land, and I always support it.

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www.drivernix.com

Code	Issue	Response
7	**Property Values**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
8	**Acquisitions and Relocations**	By law, the State must pay market value for real property acquired. Market value is determined by an independent appraiser. Additional information about the property acquisition process is available on the Arizona Department of Transportation's Web site at <azdot.gov/business/RightofWay_Properties/booklets-and-manuals>.
9	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 2:37 PM
CALLER: ANONYMOUS23	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yeah, I support the South Mountain Freeway, I think it would be great for the Phoenix metropolitan area. I think it would alleviate a lot of traffic through the city at rush hour. All good things. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: Envoy #1314144101 S. Mt.
Date: Tuesday, May 21, 2013 2:22:20 PM
Attachments: image001.png

This comment came to me through Envoy.

1 2 3 4 5 6

5/21/2013 12:14:41 PM
Hello: I am writing on behalf of my oppositions to the loop 202 freeway going through Pecos st. I am an ahwatukee resident and I am against the freeway being built on Pecos. South of Pecos would be fine. I live in lakewood on a lake and am concerned about the relocation of the wells as well as the increased noise and pollution. Home prices have taken a hit over the years and i am concerned.

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Gila River Indian Community Alignment**	
3	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to state regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	
6	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

- A particular alternative, environmental impact assessment, and/or draft mitigation.
- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

One full Saturday and Sunday meeting-facilitation would have provided increased opportunity to engage diverse audience. Many people have limited time to grasp full comprehension of impacts.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-150

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Public Involvement**	This study, which began in July 2001, is expected to be completed in 2014. During the study process, community members have had and will continue to have various opportunities to ask questions, express opinions, and provide comments about the proposed action. The Draft Environmental Impact Statement had a 90-day comment period—twice the duration that federal regulations require. A public hearing was held on May 21, 2013, at the Phoenix Convention Center from 10 a.m. to 8 p.m. where individuals provided comments for up to 3 minutes in front of a project team panel or provided comments with no specific time limit to a court reporter. Comment forms were available for written comment. At any time during the 90-day period, comments could be made using e-mail, phone, the project Web site, and by mail. Six additional community forums were held at locations within and in close proximity to the Study Area.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 3:31 PM
CALLER: ANONYMOUS24	CALLER ADDRESS: 840 E. PURDUE, PHOENIX AZ 85020
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Yes, I am a registered voter, elected PC and I am in favor of the freeway extension. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Mark
To: Projects
Subject: Loop 202 South Mtn.
Date: Thursday, June 06, 2013 3:43:49 PM

1

Build the Loop 202 South Mtn. Freeway. The traffic congestion on the I-10 through west Phoenix is intolerable. The traffic moves at a snails pace for much of the day and this freeway will take much of this traffic off the I-10. The traffic congestion is only going to get worse on the I-10 (if that is possible) over time if this segment of the 202 is not built. I feel the pain of the homeowners in the freeway corridor, but not enough to stop construction. Most were well aware of the future plans for their area before they purchased their property. They should be compensated for their property, but should not be allowed to stop the construction of the Loop 202 South Mtn.. Build the Loop 202 South Mtn. Freeway - the sooner the better. Thank you for this opportunity to give my input.

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

From: Mark
To: Projects
Subject: Pecos Road Loop 202 South Mtn.
Date: Thursday, June 06, 2013 3:34:06 PM

1

Build the Loop 202 South Mtn. The traffic conditions on the I-10 in west Phoenix are intolerable. Traffic during most of the day moves at a crawl. Something has to be done to relieve this situation and I think building the Loop 202 South Mtn. will relieve much of this traffic congestion. Those people who bought and built in the freeway corridor should be compensated, but then should have no legal right to continue to stall freeway construction. Thank you for this opportunity to comment on the freeway project.

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

ADOT encourages all interested parties to submit written comments on any aspect of the Draft EIS. ADOT will consider all comments in preparing the Final EIS, which will include responses to all comments, final conclusions on potential impacts, and ADOT's final recommendation.

When submitting comments, please be as specific as possible and substantiate your concerns and recommendations.

It is helpful to ADOT to receive comments on:

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- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

MAY 21 - 2013.

I have been a resident of Phoenix for over 18 years and have seen this city grow/sprawl with no overall strategic planning. What a shame for a city I really enjoy living in. This freeway is another project which will increase sprawl — cost tax payers over $3 billion and affect so many communities in the name of progress. We will be no different than LA with its sprawl and countless bill boards which are now, sadly, part of Phoenix landscape.

1
2
3

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-159

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed freeway would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.
2	**Construction**	The proposed freeway would not cost $3 billion as indicated by the commenter. The total budget for constructing the proposed freeway is $1.9 billion, approved by the Maricopa Association of Governments Regional Council in May 2012. The cost estimates for the proposed freeway, as described beginning on page 3-59 of the Draft Environmental Impact Statement, were developed in accordance with accepted engineering practices by professional engineers. The project has been subject to multiple peer reviews of both the quantities and unit costs used in the estimate by the Arizona Department of Transportation, Federal Highway Administration, Maricopa Association of Governments, and their consultants. In each case, the estimate was found to be reasonable and accurate.
3	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/15/13	INCOMING CALL TIME: 9:17 AM
CALLER NAME: ANONYMOUS25	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Yeah, let's get her done, let's build that and make some jobs too. So we need that freeway it's going help with congestion. Alright, Bye now.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

Draft Environmental Impact Statement
COMMENT FORM

Thank you for participating in the South Mountain Freeway Draft Environmental Impact Statement public comment process.

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

1

A world-class bike and hiking facility will need to be provided in order to get support from my community.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-153

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1	**Alternatives**	The study has considered concepts for parallel multiuse paths; however, the main line of the proposed freeway would not have a bicycle route as part of the design. The design of the traffic interchanges includes provisions for pedestrian and bicycle movement in accordance with current design guidelines and regulations. While not currently included, enhancements such as pedestrian bridges or multiuse paths may be added during the final design phase through coordination with the City of Phoenix (see page 3-60 of the Draft Environmental Impact Statement). The cost and maintenance of these enhancements would be the responsibility of the City of Phoenix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/163	INCOMING CALL TIME: 4:37 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Yeah, I'm in support of the South Mountain Freeway. Even though I live up in the North Valley I think it would be good for us.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

The Preferred Alternative will be a great addition to the System. Reduced emissions and reduced travel times by regional traffic are big plusses +!

1 Please go forward with the Preferred Alt.

Optional

Name _____ Email _____

Address _____

City Mesa, AZ State _____ Zip 85203

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-186

ADOT Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: South Mt. Freeway #1317455182
Date: Monday, June 24, 2013 8:10:35 AM
Attachments: image001.png

From Envoy:

1

6/23/2013 3:15:19 PM
Build the freeway! It has been delayed far to long.

Thanks,

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 4:50 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: Hello, Hello. Oh crumb, cripe.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

LOOP 202
South Mountain
Freeway Study

2013

Draft Environmental Impact Statement
COMMENT FORM

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- Any information you feel is incomplete or incorrect.
- How the proposed action would affect you.

Comments must be received or postmarked by July 24, 2013.

Heavy traffic on 51st Avenue, Raveon, is primarily due to semi-trailers avoiding I10 Thru downtown Phoenix. This is more than a nuisance; it is a safety-factor for pedestrians small vehicles, bikes, etc.

1 S Mountain must be built. It was needed 10 years ago, it is needed now. And it need will never be eliminated.

Optional

Name _____ Email _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____

Comments must be received or postmarked by July 24, 2013. Comments can be deposited at today's meeting, emailed to: projects@azdot.gov **or mailed to:** ADOT Loop 202 South Mountain Freeway Study, 1655 W. Jackson Street, MD 126F, Phoenix, AZ 85007

ADOT TRACS No.: 202L MA 054 H5764 01L • Federal-aid Project No.: NH-202-D(ADY) 13-106

ADOT U.S. Department of Transportation Federal Highway Administration

FOR MORE INFORMATION:
azdot.gov/SouthMountainFreeway

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: South Mountain Freeway - JUST DO IT!!!!!!
Date: Monday, July 15, 2013 3:37:04 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Reedphx@aol.com [mailto:Reedphx@aol.com]
Sent: Monday, July 15, 2013 3:31 PM
To: Projects
Subject: South Mountain Freeway - JUST DO IT!!!!!!

1

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 5:02 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Yes, …unintelligible… I think your message is way too long. I think people will hang up before they hear all of this but I think we should definitely have it. Bye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Member of PARC
Date: Tuesday, July 16, 2013 10:07:24 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: Front Desk2 [mailto:Alice@desertfoothillsdental.com]
Sent: Tuesday, July 16, 2013 9:41 AM
To: Projects
Subject: Member of PARC

1 2

Please DO NOT let the freeway go thru South Mountain, it will be dangerous to the public and the health of our children!

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Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 5:17 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I support that freeway. Voted on it several times, please put the freeway in. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SM Comment
Date: Tuesday, July 16, 2013 3:57:41 PM

Thank you,
Felicia Beltran
Senior Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-319-7709
azdot.gov
ADOT Communications

From: Thom [mailto:thoml@cox.net]
Sent: Tuesday, July 16, 2013 3:51 PM
To: Projects
Subject:

1

Build the freeway
Too many damn wrecks on the freeway going to Ahwatukee

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 1:14 PM
CALLER: ANONYMOUS30	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the freeway. However, these idiots that had me transferred to you are calling people who live North of Shay near the 51 Freeway and the second thing is I support building the freeway. Have no opinion because the lack of information right now on the various routes. So the survey they did was somewhat skewed drastically. Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document
1	Document Created: 7/21/2013 6:05:02 PM by Web Comment Form Firstly build it already

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: ADOT
Date: Tuesday, July 16, 2013 4:33:56 PM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: sbarbara74@aol.com [mailto:sbarbara74@aol.com]
Sent: Tuesday, July 16, 2013 4:31 PM
To: Projects
Subject: ADOT

1

The freeway link around South Mountain is very important. You all know it. It was approved decades ago. So why are you all allowing those racists people in Auwatukee control this decision. The Gila have suggested a plan and the public voted on a plan. What is the problem????

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:33 PM
CALLER: ANONYMOUS32 PHONE:	CALLER ADDRESS: 4473 E. MOCKINGBIRD LANE, PARADISE VALLEY, AZ EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: jeb13@cox.net
To: Projects
Subject: Re:
Date: Tuesday, July 23, 2013 6:01:02 PM

South Mountain Freeway public comment

From: Projects
Sent: Tuesday, July 23, 2013 8:53 AM
To: jeb13@cox.net
Subject: RE:

Good morning,
Thank you for contacting the Arizona Department of Transportation. Can you please give me more information in regards to your question below? If you have a project name that would be very helpful.

Thank you,

Salina Tovar
Community Relations Officer
1655 W. Jackson St.
MD 126F, Room 170
Phoenix, AZ 85007
602.712.4629
azdot.gov

ADOT Communications

From: jeb13@cox.net [mailto:jeb13@cox.net]
Sent: Monday, July 22, 2013 6:13 PM
To: Projects
Subject:

1

HOW WILL THIS BE PAID FOR? No more Taxes. We are soaked enough.

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Code	Issue	Response
1	**Economics, Socioeconomics**	The proposed South Mountain Freeway would be funded by State, federal and local dollars. The total budget for constructing the proposed freeway is $1.9 billion, approved by the Maricopa Association of Governments Regional Council in May 2012. The approved program includes design, right-of-way, and construction of the proposed action. Funding for project-related activities is included in the current 5-year program identified in the regional Transportation Improvement Program as well as in the State Transportation Improvement Program.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 4:41 PM
CALLER: ANONYMOUS33 [UNCLEAR] PHONE:	CALLER ADDRESS: [UNCLEAR] EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, [unclear] I do support the freeway, the traffic is horrible. I go back and forth to Tucson and anything that would get rid of [unclear] that I experience every single week I support it and create jobs I think it would be great, thanks. [unclear]

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Rusty Crerand
To: ADOT
Subject: Loop 202 S. Mt. Opinion
Date: Wednesday, July 24, 2013 8:33:42 AM
Attachments: image001.png

Here's another opinion on the 202 S. Mt. project.

1

7/24/2013 8:25:41 AM
The 202 Should be built along the original planned route. I looked at housing near Desert Vista High School in 1989 before the school was even built. At that time the builder was advising potential buyers that the houses were being built on planed freeway land. Anyone who did due diligence knew they could lose the house, church, or any other building on the land. Additionally the original builder in that area went out of business for being honest with buyers many of the homes there were framed and finished years later very weathered wood surprising that they passed inspections. there is absolute no reason tax payers should have to buy additional land at today's prices.

Rusty Crerand
Constituent Services Officer
206 S. 17th Ave.
MD 118A Room 101
Phoenix, AZ 85007
602.712.7856
dcrerand@azdot.gov

ADOT Communications

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Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:24 PM
CALLER: ANONYMOUS34	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Please get the South Mountain Freeway built – the sooner, the better. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Otto Rocket
To: Projects
Subject: No to building the South Mountain Freeway
Date: Wednesday, July 24, 2013 2:22:49 PM

ADOT,

1 I am writing this in opposition of constructing the Loop 202 Freeway down Pecos Rd and through the community of Ahwatukee. As a new resident to the state of AZ (just over a year) I was drawn to the outdoor lifestyle, weather, mountains, and parks. As I spent more and more time in Ahwatukee, I realized this was the community for my family and me.

2 As I have read more and researched details about the proposed highway I cannot believe that this is still being considered. For something that was planned years and years ago does not mean it applies to current times and population of the area. Yes I have read that people and organizations knew that the freeway was a possibility and built there anyway. So you're going to uproot hundreds of families, greatly decrease property values, and have houses and schools back straight up to the freeway? Let's not mention the new pollution that will be trapped between South Mountain and the Estrella range.

3 4 5 6 In a time where cities are restoring their parks and protecting their historical districts this project is going to blast a hole through our park? The largest municipal park in the United States? Phoenix will be a laughing stock. Is this worth ruining one of the most unique communities (worlds largest cul de sac) and a state park (yes it will ruin both) for a roadway we do not need or at the very most a convenience for a small number of commuters?

7 8 9 10 The money reserved for this project could be used for existing infrastructure that is more than adequate for current commuters. I have read that funds are lacking for maintenance and upkeep of existing roads and this money could be used to alleviate that situation.

Please do the sensible thing and re purpose these funds to fix current infrastructure, do not write off Ahwatukee, the GRIC, and South Mountain to build this unnecessary roadway.

Thank you,

Concerned Resident

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Old Plan or Use of Old Data**	
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
5	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Neighborhoods/ Communities**	While the E1 Alternative is adjacent to the largely residential areas of Ahwatukee Foothills Village (to the north), a freeway has been planned in this location for many years (see Draft Environmental Impact Statement pages 4-16 and 4-21). Where existing residential uses are adjacent to the proposed freeway, noise mitigation would be implemented according to Arizona Department of Transportation policy (see Final Environmental Impact Statement page 4-91).
9	**Purpose and Need, Lack of Support**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Purpose and Need**	The proposed project is part of the *Regional Transportation Plan* for the Maricopa County region. In 2004, the voters of Maricopa County approved the *Regional Transportation Plan* and the extension of a half-cent sales tax to fund the projects. The funding for the right-of-way acquisition and construction of the proposed project would come from a combination of Federal (National Highway Performance Program) and County (half-cent sales tax, also known as Regional Area Road Funds) sources. Use of these funds for construction of the proposed freeway would not affect available funds for statewide projects nor would not constructing this facility make additional funds available for other statewide projects.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/19/13	INCOMING CALL TIME: 4:57 PM
CALLER: ANONYMOUS35	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Well, after you gave me all the things in Spanish and English you didn't…it went blank so I finally pushed a button to talk to somebody. I'm for the freeway but your survey stinks. You give us all this information but you hang us dry and we can't respond, so now I'm trying to respond and I think your freeway is good and I think it would help the economy, it would help the traffic situation and so on. But you don't give out this long dissertation what your project is and then you left us all just hanging dry. There is no way of talking, so that's how I finally pushed the speed dial, or whatever I pushed and I got this far. So anyway, I'm for the freeway. I live in north Phoenix and you need to change your menu 'cause people will just hang up on you. Thank you bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: epr1474@cox.net
To: Projects
Subject: freeway
Date: Wednesday, July 24, 2013 9:09:36 PM

1 2 3 4 5 6 7 8 9 4

We all know that this will be a TRUCK ROUTE to bypass downtown which will include all hazardous materials ! I look south of pecos and see only desert but you want to tear down houses , a church & build next to a school. Why can't you at least put on land just south of pecos, which will keep from taking down structures. The best would be to move it out closer to riggs road. If built on pecos traffic would be a nightmare during construction chandler blvd could not handle it all & there is no road besides pecos to foothills reserve where I live. There would also be a lot of pollution for years while being built , with everyone using surface streets, stop lights/stop signs etc. There would be a lot of traffic going next to a lot of schools ,since all streets would be very busy & schools are on main side streets. Please talk to indians on res. & put just south of pecos at the very least would save $$ time & prevent traffic congestion . Thanks, Ahwatukee resident since 1978

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Hazardous Materials**	
3	**Neighborhoods/ Communities**	Prospective home buyers and members of the church built after the freeway was conceived, according to State law, should have been informed of the proposed facility. (Sellers are obligated by Arizona common law to disclose all known material facts about a property to the buyer.)
4	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives, Gila River Indian Community Alignment**	
6	**Alternatives**	A Riggs Road Alternative was considered. It would replace 51st Avenue south of its connection to Interstate 10 (Papago Freeway) for approximately 21 miles. It would then replace approximately 4 miles of Beltline Road in an easterly direction. At the Riggs Road/State Route 347 intersection, the alternative would replace approximately 3 miles of Riggs Road before connecting to Interstate 10 (Maricopa Freeway) (see Final Environmental Impact Statement page 3-9). Nearly two-thirds of any alternative using Riggs Road would be on Gila River Indian Community land. While the Riggs Road Alternative would serve regional mobility needs, particularly of those living in the Maricopa area, meeting this travel demand would not address specific planning goals for an integrated regional transportation network. The *Regional Transportation Plan* identifies the proposed South Mountain Freeway as a critical link in the Regional Freeway and Highway System. The Riggs Road Alternative would not complete the Phoenix metropolitan area's loop system as part of State Route 202L, thereby causing substantial out-of-direction travel for motorists. Therefore, the Riggs Road Alternative would not meet the project's purpose and need criteria and was eliminated from further study.
7	**Traffic**	The freeway construction staging plan for the area along Pecos Road would allow for keeping east–west travel open during construction. One side of the freeway would be constructed while traffic remained on Pecos Road. When complete, traffic would be shifted from Pecos Road to the new freeway. At that time, the other side of the freeway would be built. Therefore, traffic would be able to continue to operate as it currently does during construction. However, temporary detours may be needed during construction. (See Draft Environmental Impact Statement page 3-27.) In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
8	**Safety and Health**	To reduce the amount of construction dust generated, particulate control measures related to construction activities must be followed. The following mitigation measures would be followed, when applicable, in accordance with the most recently accepted version of the Arizona Department of Transportation *Standard Specifications for Road and Bridge Construction* (2008). Prior to construction and in accordance with Maricopa County Rule 310, Fugitive Dust Ordinance, the contractor shall obtain an approved dust permit from Maricopa County Air Quality Department for all phases of the proposed action. The permit describes measures to be taken to control and regulate air pollutant emissions during construction (see page 4-173 of the Final Environmental Impact Statement).
9	**Construction**	Although the overall duration for constructing the proposed project would be about 5 years, construction duration in any one area would take roughly 18 months, not years.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 3:54 PM
CALLER: ANONYMOUS36	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway. Bye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:10 PM
CALLER: ANONYMOUS37	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: SMF EIS Written Comments (projects@azdot.gov)
Date: Wednesday, June 26, 2013 10:42:18 AM
Attachments: image001.png

Thank you,
Matthew Eberhart
Community Relations Officer
1655 W Jackson St. MD 126F
Phoenix, AZ 85007
602-712-2060
azdot.gov
ADOT Communications

From: exit2lef@gmail.com (Google Drive) [mailto:exit2lef@gmail.com]
Sent: Wednesday, June 26, 2013 10:12 AM
To: Projects
Subject: SMF EIS Written Comments (projects@azdot.gov)

I've shared an item with you.

SMF EIS Written Comments

Google Drive: create, share, and keep all your stuff in one place.

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Code	Issue	Response

(Comment codes begin on next page)

Code	Comment Document
1 2 3	I am commenting as a concerned citizen and not as a representative of any organization. In discussing the proposed freeway's impact on South Mountain, ADOT Spokesperson Tim Tait has said the following: "You can't build a freeway without some sort of consequence …." That's true, but the statement fails to distinguish between acceptable consequences and unacceptable ones. If we allow the world's largest municipal park to be violated by a freeway, Phoenix may become the world's largest municipal laughing stock. If we absolutely must have this freeway, then another route must be found. Nevertheless, it's unclear if this freeway is needed at all. After reading the entire report, I believe it is based on out-of-date assumptions and faulty reasoning. Starting with the issue of induced demand, I quote from the draft: "The purpose of the proposed action is not to promote economic development but to respond to a growing need for additional transportation capacity as a result of regional growth occurring now and as projected. Therefore, the action alternatives are not expected to contribute to induced growth in the region." That wording is astonishing. The claim being made in the passage above can be compared to going to the doctor, telling him or her that you eat nothing but bacon, but that you don't expect any negative impact on your health because you aren't eating bacon with the intent of hurting your health. If only we could simply wish away the unintended consequences of our actions. The more likely outcome is that this freeway will provide short term relief but then induce more traffic. Contrary to the claims made in the report, induced demand happens routinely as a result of road building, even when transportation demand exceeds supply. The induced traffic may not come primarily from the Laveen and Ahwatukee neighborhoods linked by the proposed freeway, but instead from more far-flung suburban regions that become more appealing when a commute that had been previously unthinkable suddenly becomes "not so bad." Is it really in the best interests of the metropolitan area to enable daily drives between Buckeye and Queen Creek, for example? Supporters of the South Mountain Freeway claim that construction of this road will bring economic development to Laveen. While a freeway is likely to bring construction projects and real estate investment to the area, the most likely result will be inefficient, unsustainable job sprawl instead of a strong local economy. The idea of decentralized employment has been pursued for years, most notably in Phoenix's urban village concept, and its failure is evident in the long suburb-to-suburb commutes that have resulted. Because contemporary labor markets are so specialized, few job seekers find work in their particular professional niches close to home. Instead, the jobs in one suburb are often filled not by nearby residents, but instead by people commuting long distances in single-occupant motor vehicles from another suburb miles away. Even if one is lucky enough to find work close to home, job transfers and office relocations are such a frequent occurrence that the congruence of residence and workplace can disappear with little notice. Likewise, even someone employed close to home may find his or her spouse, domestic companion, or adult child traveling a long distance to find employment in his or her area of specialized area of expertise. For all those reasons, a far better scenario is not a freeway connecting two suburban

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Purpose and Need, Lack of Support**	
3	**Neighborhoods/ Communities**	Unplanned growth is often termed "urban sprawl." Generally, this term is used in the context of rapid and uncontrolled urban growth onto previously undeveloped land—usually on the outskirts of an existing urban area. Projects like the proposed freeway are often identified as contributors to urban sprawl. Freeway projects are often cited as making land at the urban fringe more accessible and, therefore, more attractive for development. However, examination of data comparing population and land use between 1975 and 2000 suggests major transportation projects like the proposed freeway do not induce growth in the region (see Final Environmental Impact Statement pages 4-170 through 4-174). The proposed action would be implemented in a historically quickly urbanizing area (most noticeably in the Western Section of the Study Area, although the nationwide recession which began in 2007 slowed growth). In the Eastern Section of the Study Area, the proposed freeway would abut public parkland, Native American land, and a near-fully developed area—therefore, any contribution to accelerated or induced growth would be constrained. The proposed freeway would be built in an area planned for urban growth as established in local jurisdictions' land use plans for at least the last 25 years.

Code	Comment Document
4	neighborhoods and encouraging unproductive land use, but instead enriching those areas with the best possible rail and bus links to existing employment centers. Unfortunately, the draft report dismisses these options with insufficient consideration. Chapter 3 notes that no planned rail lines will serve the territory connected by the proposed freeway, but doesn't even contemplate that additional rail lines beyond those currently planned could be added. That's quite an omission considering how many times the map of planned light rail extensions has been revised since the passage of Proposition 400 in 2004. The original map did not envision light rail in South Phoenix, but a line to that part of town is now being studied. A second phase extending that line to Laveen might be feasible. While the study acknowledges that other modes of transport could be added in the future, relegating non-automotive modes to a wish list is not responsible planning. The time to look at those alternatives in depth is now, before any park land is sacrificed for a freeway.
5 6	Similarly, the report considers each mode of transport in isolation without appropriate attention to the possibilities that an appropriate mixture of modes might present. Could the proposed freeway be built as a parkway with a smaller footprint? The study claims that would not fulfill transportation needs by itself, but doesn't address the possibility of a parkway combined with investments in public transit as a more balanced approach to regional transportation needs.
7	A strategy that does not rely exclusively on automotive travel would be in line with shifting demographic realities, ones that were ignored if the draft EIS. Since 2005, the date from which most projections in the report are extrapolated, there has been a substantial downturn in driving and car ownership, particularly by young adults. Quoting from the U.S. Public Interest Research Group's May 2013 report, "The Millennial generation is leading the change in transportation trends. 16 to 34-year-olds drove a whopping 23 percent fewer miles on average in 2009 than in 2001— the greatest decline in driving of any age group." Why then assume that patterns that held prior to 2005 will inevitably be repeated over the next few decades?
	Of course, one might argue that a reduction in driving could offset the induced traffic mentioned earlier in these comments. That optimal balance between opposing forces would come about only with extraordinarily good fortune. Instead of relying on luck, why not reinforce the positive trend toward diminished driving instead of building roads that might have a contrary effect of inducing traffic? In addition, why spend substantial amounts of money on a freeway that may not be needed when it is clear that increasing numbers of Americans want to see more investment in public transit, along with bicycling and pedestrian infrastructure.
2 7	In light of all these considerations, the only logical conclusion is that the draft report relies on outmoded data and assumptions to forecast growth in vehicle miles traveled, and it casually dismisses non-automotive modes of travel that might meet transportation demand, either by themselves or in conjunction with a smaller road project. Even if ADOT's VMT projections are accurate, it likely the freeway will only worsen the problem due to induced demand. Don't destroy part of South Mountain on the basis of such insufficient justification. Please rethink this report and the freeway it advocates.

Code	Issue	Response
4	**Alternatives, Nonfreeway Alternatives**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Alternatives**	Federal regulations stipulate that an environmental impact statement shall "rigorously explore and objectively evaluate all reasonable alternatives" (40 Code of Federal Regulations § 1502.14; see Final Environmental Impact Statement page 3-1). All alternatives were screened using a multidisciplinary set of criteria. Nonfreeway alternatives were considered (see Final Environmental Impact Statement pages 3-3 through 3-6). Among other things, the study took into account improving existing freeways, improving or expanding other travel modes, strategies to reduce travel demand, and various roadway configurations. This study examined not only the potential impacts from improvements, but also the consequences of building nothing, the No-Action Alternative. As proposed by the Maricopa Association of Governments, the South Mountain Freeway would be part of the Regional Freeway and Highway System. Other transportation improvements such as mass transit and local roads are specified in the *Regional Transportation Plan* and were considered during the evaluation of this proposed new freeway. As noted in the Final Environmental Impact Statement (see page 3-60), the proposed freeway would provide opportunities to enhance operation of future mass transit improvements.
6	**Alternatives**	In the best-case scenario, a parkway would carry approximately 105,000 vehicles per day, well below the average daily traffic on the proposed freeway, which would range from 117,000 to 190,000 vehicles per day (see Final Environmental Impact Statement page 3-19). As a result, the Arizona Parkway would lack sufficient capacity to meet projected travel demand. The Arizona Parkway would not adequately address the projected transportation system capacity deficiency, would not remove a sufficient amount of traffic from arterial streets, and, therefore, would not meet the project's purpose and need. For these reasons, the Arizona Parkway was eliminated from further consideration.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
7	**Traffic**	The historical growth in the Maricopa County region is discussed in the Draft Environmental Impact Statement beginning on page 1-5. The critical factors such as available land, mild climate, affordable cost of living, and employment opportunities that led to the historical growth rates in the region remain unchanged. The comment relies heavily on national trends for travel; however the local conditions and setting of the Phoenix metropolitan area are not consistent with areas of high-density cities in other parts of the country. In Maricopa County, daily vehicle miles traveled levels increased by almost 2 percent between 2011 and 2012 and the 2012 daily vehicle miles traveled is approaching the prerecession peak in 2007. (*Source*: Arizona Department of Transportation Multimodal Planning Division Highway Performance Monitoring System Data for the Calendar Year 2012 and 2011). Even if the trend of vehicle miles traveled "per capita" decreasing continues, the total vehicle miles traveled in the region would still increase along with increases in total population. A critical factor not acknowledged in the comment is that the proposed project is needed today. Details of this need are presented in the Final Environmental Impact Statement beginning on page 1-13. While new projections based on the 2010 Census and emerging national trends may show a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the need for the freeway has not changed. The Maricopa Association of Governments approved new population, employment, housing, and traffic projections in June 2013. The new data are presented in the Final Environmental Impact Statement beginning on page 1-11. The purpose and need and analysis of alternatives were updated and reevaluated using these new socioeconomic projections and corresponding projections related to regional traffic. While new projections based on the 2010 Census showed a lower anticipated population and vehicle miles traveled in 2035 than the previous projections, the conclusions reached in the Draft Environmental Impact Statement were validated in the Final Environmental Impact Statement (see Chapter 3, *Alternatives*). The traffic analysis demonstrated that the proposed project is needed today and will continue to be needed into the future.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 4:27 PM
CALLER: ANONYMOUS38	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Yes, if nothing else, it would take the heavy 18-wheeler truck traffic out of the middle of the street and if you could get that done as quick as possible we would appreciate it because we need to get more flow of people coming home from work and all that stuff and all those trucks are throwing rocks and taking up so much room anyway. Thanks very much for the call and I appreciate it, bye bye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:15 PM
CALLER: ANONYMOUS39	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the passage.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 2:15 PM
CALLER: ANONYMOUS40	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the freeway. I support it, support it, support it.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Document Created: 7/24/2013 6:13:43 PM by Web Comment Form

1
2

The draft ESI did not take into consideration that the freeway will be within several hundred meters of several schools including gradeshcools. The freeway will be right next to these shcools and the playgrounds of these schools. The study did not accuratley are adequately study or address the harmful and permanent damage that freeway pollution has on human lungs especially gradeschool children whose lungs are developing.

3

The study did not include or reference completed scientific studies which have shown and proven the long term health effects of freeway pollution on human lungs especially gradeshcool age children who will be spending 8 hours a day 5 days a week breathing the smog from the freeway. Leaving out these scientific studies and only referencing studies that are not complete is gross negligence and incompetency bordering on fraud to blindly support a freeway which has been poorly planned.

The freeway does not belong at this location.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	
3	**Air Quality**	The Draft and Final Environmental Impact Statements present information and analysis about the proposed action and the enhanced conditions when compared against the No-Action Alternative and would not cause significant adverse effects. The Federal Highway Administration and Arizona Department of Transportation Draft and Final Environmental Impact Statements account for the potential effects when considering both adverse and beneficial impacts. The Draft and Final Environmental Impact Statements provide in-depth discussion of potential air quality impacts of the proposed alternatives. The carbon monoxide analysis presented on page 4-65 of the Draft Environmental Impact Statement and updated on page 4-75 of the Final Environmental Impact Statement represents projected carbon monoxide concentrations along the project corridor, including those proposed interchange locations along the South Mountain Freeway corridor. The Arizona Department of Transportation also conducted a quantitative particulate matter (PM_{10}) hot-spot analysis that is discussed on page 4-76 of the Final Environmental Impact Statement. Both of these analyses demonstrate that the health-based National Ambient Air Quality Standards for carbon monoxide and particulate matter (PM_{10}) would not be exceeded at worst-case locations along the project corridor. The emission modeling developed for the proposed action showed that for the mobile source air toxics study area, there would be little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions (see discussion beginning on page 4-77 of the Final Environmental Impact Statement). The carbon monoxide and particulate matter (PM_{10}) analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation, or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/10/13	INCOMING CALL TIME: 1:42 PM
CALLER: ANONYMOUS43	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 2

I do not support the building of 202 South Mountain Freeway. It may reduce traffic but it will increase fuel emissions and I believe our tax dollars should be used instead to develop better public transportation systems instead of more highways. Thank you.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Alternatives, Nonfreeway Alternatives**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/10/13	INCOMING CALL TIME: 3:36 PM
CALLER ANONYMOUS44	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Would you please get the freeway done, it's been voted on and voted on and we want to get it done. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/11/13	INCOMING CALL TIME: 6:18 PM
CALLER ANONYMOUS45	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I want to support the building of the freeway on South Mountain.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 5:51 PM
CALLER: ANONYMOUS46	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE:	INCOMING CALL TIME:
6/13/13	1:02 PM
CALLER	CALLER ADDRESS:
ANONYMOUS47	
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1

I live in the Laveen area. We do not want the South Mountain Freeway in our backyard, I'll guarantee you that. It will only create more issues for our wonderful little village that has been ruined by all the growth. And a freeway through our backyard is only going to ruin it even more so. We are a village not a city. This freeway would only make more sense to go out to 91st or 99th Avenue, where it goes into the industrial area, it goes into businesses, not through peoples lives, not through our backyards. We don't want it and I will do everything in my power to oppose it and have others who feel the same way stand up for our rights. We don't want it.

2

3 4 5

Crime rates have gone up in Laveen and the outlying area. As I sit today and watch the news there is another homicide in Laveen. Bringing in freeways brings in crime, brings in pollution, brings in noise pollution, creates a lot of bad problems and we don't want them. We want to live in peace, it's something we just don't need here. Go to 99th or 91st Avenue, don't ruin our lives.

Code	Issue	Response
1	**Neighborhoods/ Communities**	The Laveen Village area is anticipated to have a built-out population of over 105,000 (see Final Environmental Impact Statement page 4-5). This proposed level of development places increasing demand on the road network. The City of Phoenix's General Plan for Laveen Village has designated areas along the proposed freeway for commercial development that cannot support the projected densities without implementation of the proposed freeway. Without the proposed freeway, the conversion of land from undeveloped and agricultural uses to residential, commercial, and industrial land uses would likely continue, placing a greater demand on surface streets (see Final Environmental Impact Statement page 4-14).
2	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
4	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Air Quality**	

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/12/13	INCOMING CALL TIME: 3:56 PM
CALLER: ANONYMOUS45	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

I support the 202 Freeway. I would like more information and [unclear] get into more and know what it refers to. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/14/13	INCOMING CALL TIME: 1:25 PM
CALLER: ANONYMOUS 49	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the freeway. Bye	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/14/13	INCOMING CALL TIME: 3:08 PM
CALLER: ANONYMOUS 50	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 Hi, South Mountain? Yeah I think you must either tie it in to the 101 Aqua Fria freeway or take it over to even the 303 and connect it there. Or even earlier across to Buckeye or even 85. Thank you.

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 9:53 AM
CALLER: ANONYMOUS 52	CALLER ADDRESS: 9533 W. CALICO DRIVE, SUN CITY, ARIZONA
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I support the freeway, 100%. Once again I support it 100%. I wish it was in today. Thank you. Goodbye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 11:55 AM
CALLER: ANONYMOUS 53	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Yeah, go ahead and build that freeway. I moved here from LA 9 years ago and I want this place to best remind me of home. So let's build the freeway. More freeways less traffic if you know what I mean.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/15/13	INCOMING CALL TIME: 12:34 PM
CALLER: ANONYMOUS 54	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Please support the freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 05/15/13	INCOMING CALL TIME: 9:20 AM
CALLER: ANONYMOUS11	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Yes, I'm in support of the South Mountain Freeway. I have family members that live further southeast of me. I am in the West Valley and I would like to be able to use a freeway to connect. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/16/13	INCOMING CALL TIME: 5:59 PM
CALLER: ANONYMOUS41	CALLER ADDRESS: [UNCLEAR], GILBERT, AZ
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Please build the Freeway. We need it to go to the west valley. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/11/13	INCOMING CALL TIME: 2:09 PM
CALLER:	CALLER ADDRESS:
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
Ok, I am calling to affirm that I am against the W59 alternative and I am for the W101 alternative.

RESPONSE:

Estoy llamando para afirmar que yo estoy en contra de la alternativa W59 y estoy por la alternativa w101.

RESPONSE DATE:	RESPONSE TIME:	HDR STAFF INITIAL:

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/18/13	INCOMING CALL TIME: 2:52 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Please, I support the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/20/13	INCOMING CALL TIME: 3:37 PM
CALLER: ANONYMOUS41	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 6/14/13	INCOMING CALL TIME: 3:48 PM
CALLER: ANONYMOUS 51	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Yes, I agree with that South Mountain freeway. I think it would be a great thing. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 5/17/13	INCOMING CALL TIME: 5:07 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

1

CALLER REMARKS/QUESTIONS:
I support the building of the freeway.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 9:48 AM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain freeway. We need it, we need the money, we need the jobs.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 10:23 AM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I think I do support the South Mountain freeway. [Unclear]

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 11:08 AM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I am in favor of the freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 2:00 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

1 I'm very much in favor of that freeway around the south side. Thank you very kindly, I think it's good for the city. Bye.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 2:35 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Yes, I support the South Mountain freeway, thank you. Goodbye.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/23/13	INCOMING CALL TIME: 5:04 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I agree we should get that new freeway in. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 10:47 AM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I support the South Mountain Freeway.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 11:39 AM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
Please build the freeway. It will greatly improve the economy of Phoenix, Arizona. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 12:15 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:
I'm in favor of the South Mountain freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 1:17 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:

CALLER REMARKS/QUESTIONS:

Please build the South Mountain freeway. It's so hard to get out of this city headed west to Los Angeles or any of the other western cities. It's very important for us to have this freeway. Thank you.

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

TELEPHONE CONVERSATION RECORD
SOUTH MOUNTAIN FREEWAY INFORMATION LINE

INCOMING CALL DATE: 7/24/13	INCOMING CALL TIME: 2:19 PM
CALLER: ANONYMOUS	CALLER ADDRESS:
PHONE:	EMAIL:
CALLER REMARKS/QUESTIONS: I support the South Mountain Freeway.	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

From: Projects
To: ADOT
Subject: FW: Please start and complete the southern 202. It is vital to the growth of the valley for all who live and visit here.
Date: Monday, May 20, 2013 8:29:45 AM

1

-----Original Message-----
From: captianb07@yahoo.com [mailto:captianb07@yahoo.com]
Sent: Saturday, May 18, 2013 10:40 AM
To: Projects
Subject: Please start and complete the southern 202. It is vital to the growth of the valley for all who live and visit here.

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Code	Issue	Response
1		Comment noted.

CITIZEN COMMENTS RECEIVED AFTER COMMENT DEADLINE

Code	Comment Document

SOUTH MOUNTAIN FREEWAY HOTLINE

INCOMING CALL/COMMENT DATE: 8/27/13	INCOMING CALL/COMMENT TIME:
CALLER: Steve Brown	CALLER ADDRESS:
PHONE: 602-989-2485	EMAIL:

COMMENTER REMARKS/QUESTIONS:

1 Wanting to know how viable Alt Route-371 is and the likelihood of that route being used as the final option. He is looking to purchase property that may be impacted by it

Code	Issue	Response
1	**Alternatives**	Alt Route-371 is not being considered in the study.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY HOTLINE

INCOMING CALL/COMMENT DATE: 10/16/13	INCOMING CALL/COMMENT TIME:
CALLER: Chad	CALLER ADDRESS:
PHONE: 480.435.0623	EMAIL:

1

COMMENTER REMARKS/QUESTIONS:

Information on the Loop 202

Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 7/29/2013	INCOMING CALL/COMMENT TIME:
CALLER: Georgette Chase	CALLER ADDRESS:
PHONE:	EMAIL: GEORGETTE.CHASE@YAHOO.COM

COMMENTER REMARKS/QUESTIONS:

STATEMENT ON THE PROCEEDINGS OF THE PROPOSED 202 FREEWAY AT SOUTH MOUNTAIN

TO: Governor Jan Brewer, State of Arizona
FROM: Georgette Chase
Member of the GILA RIVER INDIAN COMMUNITY
SUBJECT: Proposed 202 Freeway Extension at South Mountain

(1) South Mountain, where you propose to construct a freeway on your boundary side is not acceptable to the Gila River Indian Community. Your Department of Transportation office states that the freeway will not be harmful to the City of Phoenix. It does not say that it will not be harmful to the Gila River Indian Community, because it will.

(2) Adolf Hitler, Germany, put the Jewish people to death in gas chambers. I do not know what kind of gas he used to accomplish this, but I do know what kind of gas Arizona will use to try to kill our people. It will be automobile emission fumes. The pollution will settle between South Mountain and the (3) Estrella Mountains in the District 6 and District 5 areas. Governor Brewer will succeed in doing what the U.S. Calvary could not do. What a feather in her gaudy hat! Come to think of it, what kind of a feather, a roadrunner feather perhaps?

In about 1909 the Pima Tribe had ONE case of diabetes. Today our 21,000 Gila River population is the grand total of 80% diabetic. If your auto emission's poison doesn't wipe us out first your fast food industry and all

Code	Issue	Response
1	**Alternatives, E1 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	
3	**Air Quality**	According to the Arizona Department of Transportation, 2013, *Air Quality Assessment South Mountain Freeway 202L Draft Report*, review of wind data from the Gila River Indian Community monitoring site at St. Johns suggests that during the morning hours and associated with mountain-drainage air flows and stable atmospheric conditions, wind flows are from the southeast and follow the Gila River channel to the north. Locations to the east of St. Johns tend to flow from the east to the lower elevations along the Gila River. During the warmer hours' improved mixing, flows typically follow the river channel and come from the north and northwest. Likewise, during a 1-month-long meteorological monitoring period (November 20, 2006, through December 21, 2006) at Pecos Road and 40th Street and a second 1-month-long monitoring period at Pecos Road and 24th and 40th streets (April 19, 2007, through May 21, 2007), winds during the morning hours typically were from the northeast. During the warmer hours, and with improved mixing, winds typically were from the west.

Code	Comment Document

kinds of unhealthy chemical additives in just about every product sold will do the job. But don't get too gleeful about that yet. We are survivors.
Your settlers upstream helped themselves to our life giving river water and then the Coolidge Dam was constructed and it took the rest. The Gila River went dry. Giant cottonwood trees dried up and fell every which way like giant white toothpicks lying motionless like dead bones waiting for time and the hot desert wind to erase the evidence that they ever existed. Cries of babies were heard throughout the land. The once plentiful sweet melons and crops were gone, game perished or left. Children were hungry. Mothers cooed, "Hush" as they rocked them to sleep.
The gracious government with all its cruel power was going to herd us off to the far away land of Oklahoma, but our Chief Azule out-maneuvered them. Not with bows and arrows, but with diplomacy. Our people were spared the tragedy of "The Long Walk" the Navajos called their experience. And the Cherokees called theirs, "The Trail of Tears." We temporarily escaped that grievous trial. The government's Relocation Program we did not escape, but many came back home. We survived. We are still here and so you will have to deal with us today. We are going nowhere.
Dawes Act gave away; or "sold" to white settlers 90 million of the 140 million acres of tribal lands granted for Indian reservation. They took back what they promised! Have you no shame? I guess not if you have no integrity to begin with. In Docket 228 this same federal government gave 6 million dollars to three tribes, Gila River, Salt River and Ak Chin for lands taken by Americans in settling Arizona. That computed at 25 cents an acre. You settlers have taken enough of our lands for little or nothing, this "the buy low, sell high," business tactic that made this country an economic wonder was used on us. You got 90 million acres for nothing, sold it for $1.25 an acre and collect taxes from cattle ranches, etc. up to this day. We migrated here some time, somehow, for whatever reason, but the fact is that we were here first. That is why we call it our land. Furthermore, we displaced no one. Not even the wildlife that was here. We did not pollute the water or the air. We lived in harmony with Nature.
We rescued and took care of your ancestors on their way to California, the

Code	Issue	Response

Code	Comment Document

same as the natives on the East Coast rescued and took care of the remnant Pilgrims from across the ocean. We likewise also accommodated the U.S. Calvary in various ways mostly with supplies of food. There is a story of a Calvary officer who came to a Maricopa village, asking to purchase food. The Maricopa Chief said, “Food is to eat, not to sell. Take what you need.” The officer told the Maricopa Chief that it was only right to pay for the supplies. The Chief replied, “If you want to pay for the food and have money than alright, but if you had come to us and had no money it would have been our pleasure to give to you.”
Our people were kind, generous, and compassionate. But we were dealing with foreigners very different from us. And it did not take long to learn that. Now we are not going to take care of your present day settlers, getting them to the west side of Phoenix at their convenience. They knew when they got their jobs and decided to live however far away from their jobs that time spent and transportation to and fro was going to be a major problem. You made the decision now live with it. The problems we have today are the result of the decisions we made yesterday.
Do not demand that we bail you out. Enough is enough. Grow up and take care of yourselves. Should you insist on pursuing the construction of the proposed extension of your 202 Freeway, expect a legal battle in court. You already got Interstate I-10. We are not going away and we are not going to roll over and play dead. You had other avenues earlier and failed to act, saying, you had other priorities.
A copy of this correspondence will be forwarded to President Obama and Vice President Biden, the Department of the Interior, the Senate and the House of Representatives, because they have trust responsibility over Indian Nations.

Code	Issue	Response

Code	Comment Document

SOUTH MOUNTAIN FREEWAY HOTLINE

INCOMING CALL/COMMENT DATE: 10/16/13	INCOMING CALL/COMMENT TIME:
CALLER: Cheri	CALLER ADDRESS:
PHONE: 480.406.4622	EMAIL:

COMMENTER REMARKS/QUESTIONS:

1 Want to know when the Loop 202 will start to take homes. There was no meeting dates on the website.

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The schedule for the next steps includes publishing the Final Environmental Impact Statement in 2014. A 60-day public review period will be provided. Then the record of decision would be published. If a build option is selected, construction could begin as early as 2015. Right-of-way acquisition would begin after the record of decision.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 12/26/2013	INCOMING CALL/COMMENT TIME:
CALLER: Dave Coble	CALLER ADDRESS: 4550 N. 12th Street • Phoenix, Arizona • 85014
PHONE: direct: 602.285.4752 cell: 602.418.0637	EMAIL: Dcoble@cvlci.com

COMMENTER REMARKS/QUESTIONS:

1

I have worked on the Foothills West Project for several years.
We had shown a 200' ADOT take line.

I recently received another document showing a much larger proposed take.

Would you please send me the latest alignment for this area please?

This is the location

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 7/31/2013	INCOMING CALL/COMMENT TIME:
CALLER: Felicia Corbett	CALLER ADDRESS: 4811 W. Gwen St. Laveen, AZ 85339
PHONE:	EMAIL: corbettfam5@gmail.com

COMMENTER REMARKS/QUESTIONS:

1

I moved to Laveen over eight years ago because I thought the freeway was going to be built. I live near 51st Ave & Dobbins and look foward to the day the freeway will open.

Thank you.

Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 11/7/2013	INCOMING CALL/COMMENT TIME:
CALLER: Jay Donahue	CALLER ADDRESS:
PHONE:	EMAIL:

COMMENTER REMARKS/QUESTIONS:

1

To Whom It May Concern,
I am a student in California and am doing some research on public private partnerships specifically related to transportation projects and how P3s might impact the future of urban planning. I am particularly interested in the South Mountain freeway project in Maricopa County and was wondering if you could let me know how ADOT determined that a public private partnership would be beneficial as well as what the process is for accepting bids, the timeline, as well as if P3 bidding processes are public.
I look forward to hearing from you. Thanks for your time.
Jay Donahue
UC Berkeley

Code	Issue	Response
1	**Public-Private Partnerships**	Information related to the unsolicited public-private partnership proposal and the Arizona Department of Transportation's P3 Initiatives can be found on the Arizona Department of Transportation Web site <azdot.gov/business/programs-and-partnerships/Public-PrivatePartnerships(P3)>.

Code	Comment Document

Early

Document Created: 7/25/2013 1:05:43 AM by Web Comment Form

For the east project we support utilizing the existing Pecos Rd corridor.

1 Please consider adding an exit at 32nd street for Desert Vista High School. Skipping this road will add excessive traffic burden to Chandler Blvd.

2 Noise abatement is important to the residential areas so plan ample budget for walls and other noise abatement methods. Thank you for attention to blending and beautifying landscaping.

3 In the simulation the majority of the exits/entrances to the freeway are the traditional design that require two traffic lights to get through the intersection. I recommend the design that requires only one traffic light to get vehicles through the entire intersection (e.g. freeway 143 & Washington St.).

Code	Issue	Response
1	**Design**	The determination to not include an interchange at 32nd Street was made in coordination with the City of Phoenix. The interchange would have required the displacement of over 100 homes and would have been located near an existing high school. The City recommended that, based on these impacts, the interchange be removed from the study. At the same time, the City conducted a traffic circulation study to evaluate the impacts of the freeway (and the removal of an access point at 32nd Street) on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Design**	The diamond interchange configuration was used to evaluate service traffic interchange needs. The actual configuration(s) of the service traffic interchanges would be determined during the design phase of the Selected Alternative, if an action alternative were to be identified.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
CALLER: Georgana Frieh	CALLER ADDRESS: US Airways - Reliability 4000 E. Sky Harbor Blvd. Phoenix, AZ 85034
PHONE: 480-693-7263	EMAIL: GEORGANA.FRIEH@USAIRWAYS.COM

COMMENTER REMARKS/QUESTIONS:

1

Reggie,
I haven't received any status updates since the informational gathering at the convention center in early June.
Have there been any updates that I should know about?
Regards,

Georgana Frieh
US Airways - Reliability
4000 E. Sky Harbor Blvd.
Phoenix, AZ 85034
480-693-7263

Code	Issue	Response
1	**Public Involvement**	Updates on the status of the study are posted to the project Web site <azdot.gov/southmountainfreeway>.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
7/29/2013	
CALLER: Beth Gagnon	CALLER ADDRESS: Ahwatukee & Pecos Road resident
PHONE:	EMAIL: beegee62@hotmail.com

COMMENTER REMARKS/QUESTIONS:

(1) I totally oppose the South Mountain loop of the 202, but am glad to see ADOT finally be honest and calling it what it truly is - a truck bypass - "...provide a long awaited route to bypass downtown Phoenix." It is not a commute route for people living in the southeast valley and working in downtown Phoenix and will, therefore, not reduce commute traffic on I-10. It will, however, be a truck bypass, or outer loop, for commercial trucks and other commercial and private vehicles who wish to bypass downtown Phoenix as they pass through Arizona.

(2) (3) (4) It will also be a means by which traffic, pollution and crime will be brought into Ahwatukee. This has already been demonstrated by the connection of Pecos Road to I-10. It will also result in businesses such as fast-food restaurants, gas stations/convenient stores, truck stops and other such businesses along the proposed freeway, which will bring in more transient populations, creating the potential for increased crime, not to mention the noise, light and air pollution. All of this will result in the decrease (5) (6) (7) in property values of homes in the Ahwatukee area, and other residential areas near the freeway.

You can argue that the freeway plans have been on the books for 20-30 years, but what you fail to acknowledge is the fact that the area where homes now sit along the alignment was originally zoned as commercial. These homes along or in the path of the freeway were not to be built, which would make sense with the original plans. However, in the State's desire and greed to collect property taxes on land that would otherwise sit "useless" until the freeway could be funded and built, the area was rezoned and 100s of homes built along the freeway route. If the original zoning can be changed; the freeway alignment can be changed! The zoning should never have been changed and the homes (8) should never have been built, if the State is going to stand by 30-year old plans!

In addition, the continued song and dance, and smoke and mirrors performances by ADOT just delays what appears to be the inevitable and places a major hardship on those of us most directly affected by the freeway (the homes along Pecos). We cannot sell our houses, because who wants to buy a house that is either going to be demolished or have a freeway running through its backyard? And we cannot make needed improvements/repairs, because it is wasted money, if our home is only going to be torn

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the freeway on the local street system. The City study found no adverse effects on the local street system from the proposed freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
3	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
5	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
6	**Visual Resources**	Because Pecos Road is already a four-lane arterial street and is in approximately the same location as the proposed E1 Alternative, viewers would not be seeing any phenomena they do not already see (see Final Environmental Impact Statement page 4-169). The proposed freeway would have eight lanes of traffic and carry more vehicles, but what park users and residents would see would not be substantively different from what they already see along Pecos Road. Page 4-170 in the Final Environmental Impact Statement lists measures that should help to avoid, reduce, or mitigate aesthetic impacts. Larger saguaro cacti, mature trees, and large shrubs that would likely survive the transplanting and sitting-in period would help in visually sensitive or critical roadway areas.
7	**Economics, Socioeconomics**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138-47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

(Responses continue on next page)

Code	Comment Document
	down to make way for a freeway. I am a disabled veteran and a single mom. I worry daily if I am physically going to be able to continue to perform my current job. My very future hangs in limbo because of ADOT's inability to stop tap-dancing around with all of these repeated studies and meetings that never present anything new or different, and just make a decision. I cannot change jobs or move. I also cannot plan financially for my potential inability to work by doing things such as paying off my house, because it is not financially sound for me to pay off a house that is either going to be destroyed or made unlivable by the freeway. If you do nothing else, have the common decency and courtesy to be upfront and honest with (at least) the homeowners along Pecos Road and state, flat-out, in writing, exactly what is the future status of our homes (demolished/bought-out/or giant sound wall and freeway in our backyards) and on exactly what date will this occur. If you cannot do this, and ADOT is determined to build the freeway, then the State should be obligated to acquire the homes along Pecos, so that we can all get on with our lives. Bottomline: you preach that the plans are 30 years old…well, 1) obviously, they are outdated and irrelevant to the current situation and 2) Phoenix, as well as the communities directly affected by the proposed alignment have grown, prospered and survived without (and because of the lack of) the freeway. This is blatant and concrete evidence that the proposed freeway will not serve these communities and is not needed.
9	
10	

Code	Issue	Response
8	**Neighborhoods/ Communities**	While the City has some ability to control development through its zoning ordinances, the City does not have the authority to stop private land from being developed. The Arizona Department of Transportation was able to acquire large tracts of land along the Pecos Road alignment in the 1980s, but funding shortfalls kept the Arizona Department of Transportation from acquiring all of the needed land. Developers were aware of the potential freeway and made the decision to develop the land despite the risk that the freeway would eventually be built. Citizens were also aware of the potential and chose to buy homes near the freeway despite the same risk. Information related to freeway awareness and the responsibilities of the City of Phoenix, developers, and the Arizona Department of Transportation related to disclosure of the planning for the freeway is presented on page 4-13 of the Draft Environmental Impact Statement.
9	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
10	**Purpose and Need, Old Plan or Use of Old Data**	

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
CALLER: George	CALLER ADDRESS:
PHONE:	EMAIL: gvheadley@aol.com
COMMENTER REMARKS/QUESTIONS:	

1

Code	Issue	Response
1		No comment noted.

Code	Comment Document

Gould

Document Created: 7/25/2013 1:14:54 AM by Web Comment Form

1 We desperately need this freeway completed. I am driving every day to the East Valley and the commute is too long. In addition, my kids feel very isolated here - we spend several hours each week just driving to and from activities - and the freeway would cut our drive time in half! I hope and pray we have this freeway completed soon. Thank you!

Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 9/23/2013	INCOMING CALL/COMMENT TIME:
CALLER: Adam Graham	CALLER ADDRESS:
PHONE:	EMAIL: grahamshouse1212@gmail.com

COMMENTER REMARKS/QUESTIONS:

1

To whom it may concern,
As a Laveen resident who lives off 67th Avenue and Baseline, I strongly feel as though the proposed South Mountain Freeway would be a huge benefit to the community. The simple fact is that traffic on Baseline is, in truth, horrendous. A drive that should take no more than 20 minutes takes more than twice as long simply due to the amount of traffic on Baseline. A freeway would help alleviate this issue.
I also feel as though it would add to the quality of life, as residents would be better able to move about freely and easily take part in activities throughout the Valley.
Thank you for your time,

Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 7/26/2013	INCOMING CALL/COMMENT TIME:
CALLER: Karen Gresham	CALLER ADDRESS: 85020
PHONE:	EMAIL: KARENAGRESHAM@GMAIL.COM

COMMENTER REMARKS/QUESTIONS:

1 I realize the comment period just ended but PLEASE do not build a freeway through the South Mountain Preserve!

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

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SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 10/14/2013	INCOMING CALL/COMMENT TIME:
CALLER: Todd Hamilton	CALLER ADDRESS: 2150 E Highland Ave Suite 207 Phoenix, AZ 85016
PHONE: 602-386-1226	EMAIL: thamilton@cutlercommercial.com

COMMENTER REMARKS/QUESTIONS:

Hello,

(1) I am inquiring on the status of the Loop 202 Freeway. When will the project proceed?

(2) I represent several Building owners in the potential path

Code	Issue	Response
1	**Public Involvement**	Updates on the status of the study are posted to the project Web site <azdot.gov/southmountainfreeway>.
2	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.

Code	Comment Document

RECEIVED
APR 30 2014
AZ Dept of Transportation

25 April 2014

Victor M. Mendez, Federal Highway Administrator
Federal Highway Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Mr. Mendez:

Since 2005, I've been living in a house under the pall of the Loop 202 South Mountain Freeway. I bought my new house in July of 2004 and moved in in August of 2005. About a month later, ADOT – under your stewardship – foisted an announcement upon the public at a local hotel that my house would be plowed down to make way for the freeway. As a lawyer, physicist, engineer, and business professional, I'm typically fairly well informed. Further, I had visited relatives in the Lakewood area for more than a decade beforehand. I was well aware of the general concept of a freeway.

But, watching the construction of the I-10 / Pecos interchange orientation taking shape, noticing the placement of houses, schools, and churches along Pecos Road, and finally, purchasing a house freshly permitted and built where mine was, the logical take-away was that the freeway would not be built or be built elsewhere. All else was hearsay. But I appear to have been mistaken. Wow, how counter intuitive. Or, rather, what administrative arrogance.

Let me explain something to you: I will not fold like a cheap card table. And I will not wait another 8 years until you decide to authorize this freeway or not. I am tired of waiting. Like so many others in my neighborhood, I have no back yard, my house is valued well below what I paid for it and what I expended in real cash American, and I cannot move without great personal cost. I live in a transient neighborhood that has become largely blue collar. And, until I complained last year, ADOT-owned houses were not kept up in keeping with the HOA requirements we are all bound to. This is an *interest in land* that your agency and ADOT is tinkering with. Your counsel will understand what that "*interest in land*" thing means.

Let me also explain to you that I also know of your involvement with VINTEK and REDFLEX. I know how the laws of the state of Arizona were modified in violation of the federal mandate for MUTCD to bring Redflex to Arizona. That's why they're headquartered in Arizona, isn't it? That whole thing is a travesty. VINTEK has no idea what title means, but they're here complicating our lives and earning money. Don't even get me started about your involvement with the National Forest Service in Oregon. Do we all really need to understand your business connections?

Code	Issue	Response

U.S. Department of Transportation
Federal Highway Administration

May 12, 2014

1200 New Jersey Ave., SE
Washington, D.C. 20590

In Reply Refer To:
HEPE

Mr. Dietmar Hanke
2729 West Redwood lane
Phoenix, AZ 85045

Dear Mr. Hanke:

Thank you for your letter to Federal Highway Administrator Victor M. Mendez regarding the proposed Loop 202 South Mountain Freeway.

The Arizona Department of Transportation (ADOT) initiated the freeway project and is responsible for project development. The Loop 202 South Mountain Freeway has been included in the Maricopa Association of Governments' Regional Freeway Program since 1985 when Maricopa County voters approved funding under Proposition 300. In 2004, the voters again approved funding under Proposition 400 for the Regional Transportation Plan, which included the freeway.

In cooperation with our Arizona Division Office, ADOT is advancing the proposed project in compliance with the National Environmental Policy Act (NEPA). As part of this process, ADOT prepared a draft environmental impact statement (EIS) examining the potential environmental effects of proposed alternatives for the project and identifying measures to mitigate adverse impacts. The draft EIS also identified a preliminary preferred alternative for the proposed freeway. On April 14, 2013, Division Administrator Karla S. Petty approved the draft EIS.

Public involvement is an important element in any NEPA review process. The ADOT made the draft EIS available to the public for review and comment from April 26 through July 24, 2013, and held a public hearing on May 21, 2013. We appreciate your detailed comments, which ADOT has received. All substantive comments on the draft EIS are being carefully considered as ADOT prepares the final EIS. The final EIS will identify the preferred alternative and evaluate all reasonable alternatives considered. The final EIS will also include responses to all substantive comments received on the draft EIS and describe any mitigation measures that will be incorporated into the proposed action.

Following our approval, ADOT will make the final EIS available to the public. No less than 60 days later, Ms. Petty may approve the Record of Decision (ROD), which will present the decision, the basis for it, and summarize any mitigation measures incorporated as part of the project. The ROD is the final administrative step in the NEPA review process.

Code	Comment Document

Here's the deal: I can keep ADOT and the FHA in court for years. But, I can keep my mouth shut too. I'm originally from California and I understand precisely the history of the Long Beach Freeway litigation and the fallout (e.g. 210 Foothill Freeway). Litigating costs me virtually nothing. And, I have good friends in many legal places.

So, my proposition is this: I will be happy to entertain your agency's offer to *remove my standing* (e.g. Administrative Settlement) pursuant to *my math*. In the alternative, I will file suit in Maricopa Superior Court to finally get some resolution to this matter. And, I will do so shortly: May 31st, to be precise. And I may do so irrespective of your subsequent actions. I have waited in limbo long enough. I will not wait until the "industry" responds to the latest request for information. That would be the very industry that stands to profit from the building of this freeway.

Go on, give me all of your lawyers' trite responses. I have no problem with that at all. I deal with those kinds of responses all day long. You all might be surprised about what *Kelo v. New London* really means in the broader sense, irrespective of what the pundits and your lawyers say.

In the meantime, you should read the attached response I sent to ADOT about the South Mountain Freeway DEIS a few months ago. While I have absolutely no confidence most of my points will be addressed even obliquely, it should give you an idea about the legal battle you (FHA) and ADOT are in for. You might also want to view my LinkedIn profile as well. Understand this: at some point, things do get personal. And I don't get intimidated. And you're on notice that you're about to waste a lot of taxpayer money.

Hoping to hear from you soon. Time is of the essence. Choose your next words wisely.

Best Regards,

Dietmar Hanke
2729 West Redwood Lane
Phoenix, AZ 85045

cc: Fred R. Wagner, Chief Counsel
Federal Highway Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

John S. Halikowski
Arizona Department of Transportation
Motor Vehicle Division
P.O. Box 2100, MD 555M
Phoenix, AZ 85001

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You requested purchase of your property now via an administrative settlement. Real property needed for a Federal-aid highway project is normally acquired after the ROD and detailed design. Because ADOT is responsible for the project, its officials can best respond to your request for acquisition.

The Federal Highway Administration is not involved in decisions by local officials on permits for homes. You may wish to contact appropriate local officials if you have any questions about the issuance of the permit.

Sincerely yours,

Gloria M. Shepherd
Associate Administrator for Planning,
Environment, and Realty

cc:
Mr. John Halikowski
Director, Arizona Department of Transportation

Ms. Karla S. Petty
FHWA Division Administrator
Phoenix, Arizona

Code	Comment Document

The Honorable Janice K. Brewer
Arizona Governor
Executive Tower
1700 West Washington Street
Phoenix, AZ 85007

KTAR
7740 16th Street, Suite 200
Phoenix, AZ 85020
(602) 274-6200

National Public Radio
1111 North Capitol Street, NE
Washington DC 20002

Kate Nolan
The Arizona Republic
P.O. Box 1950
Phoenix, AZ 85001

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South Mountain Freeway (Loop 202) SR202L

ADOT Project Number: 202L MA 054 H5764 01L
Federal Aid Project Number: NH-202-D(ADY)
Draft Environmental Impact Statement ("**DEIS**")

Homeowner: 2729 West Redwood Lane ("I")

1

1. Environmental Impact Statement Process

While the document presented is truly impressive in its sheer folly and largess, it contains virtually nothing in the way of facts or analysis as required by 42 U.S.C. § 4321 et. seq., nor does it conform to the goals articulated by the preamble to the National Environmental Policy Act of 1969.

This particular Draft Environmental Impact Statement formally enlists the input and considers the needs of "business leaders" and representatives of "The Indian Nation" in addition to the mayors of the cities within Maricopa County (MAG). Neither of the two former categories of participants, irrespective of state legislature and executive actions, are competent to make decisions that affect private land owners in these United States of America. In fact, MAG as it stands is an unconstitutional form of representative government.

Under what authority and pursuant to what facts are members of the Indian Nation to be included in the decision making process for the Pecos Road Alignment, an alignment which is NOT on the lands of The Indian Nation? Surely it's not the single forged hieroglyph found in the proposed right of way on South Mountain or the vista onto the lands not on the Indian Nation lands from a *sovereign nation*. This artifact of Arizona government has not yet been challenged. But it will be.

2. Historical Context

The South Mountain Freeway may have been originally included in the proposed 232 -mile Maricopa Association of Governments (MAG) Regional Freeway System (now called the Regional Freeway and Highway System) as planned in 1985. However, it was never indicated as an easement or even a possibility on any plat anywhere near my house. What was indicated was an easement 500 feet from my house for the extension of Pecos Road.

Since 1985, the city of Phoenix has issued building permits in what is now to be considered the "right of way" for the proposed freeway. In my case, less than one year before the notorious homeowner notification in October of 2005. If the "general location" of the proposed freeway was so well known, why were these building permits issued? Isn't this a glaring case of wasting taxpayer money? Also, if the

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1		Responses to the originally submitted letter can be found on page B1828

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Pecos Road alignment was so precisely defined and a decision had already been made years ago, why weren't there any right of way markers indicating where it would go? California had to learn that concept the hard way, decades ago!

3. Purpose and Need

The DEIS purports that traffic in general will continue to increase at exponential rates in Maricopa county. This is identified as the primary reason for the need for the South Mountain Freeway. All biological systems that experience geometric growth will stabilize or collapse at some point in time. This is a concept of real science. Why is this concept not a factor in the DEIS? It is omitted altogether. In a day and age when telecommuting is increasing at geometric rates, this is inexcusable.

Furthermore, the DEIS cites a fictitious need for residents of the Central West Valley to commute to the Chandler/Gilbert/Queen Creek area and vice versa. Surely we are all in agreement that there is no such "need" between the residents of Chandler and Ahwatukee Foothills and the residents of Tolleson; the demographics just don't comport. Why isn't there any study mentioned of how many cars travel from Chandler/Ahwatukee Foothills to the Central West Valley now? License plate recognition software and hardware is readily available and can access registrations nearly instantaneously. That's because such travel doesn't exist. Isn't ADOT's insistence of the former merely a case of "if you build it, they will come"? How are general valley traffic volume statements and projections even relevant here?

Inherently, there is no local need now. After all, Chandler and Ahwatukee Foothills are more than 95% developed. Everything south of Pecos Road and west of its current terminus is Indian Nation lands. ADOT, Phoenix, and MAG (if it is legal entity) cannot make decisions about private lands in Arizona based on the needs of the Indian Nation. Isn't that the exclusive purview of the BIA of the Department of Interior for these United States of America?

So where *could* increased traffic come from? The better question is where *will* increased traffic come from? It will come from the CANAMEX Highway. When Congress adopted NAFTA, this highway became a requirement of the United States Government – not Arizona. But where is the segment between the I-10 at Pecos Road and Las Vegas? It doesn't exist! Which is why the federal government is paying for a significant portion of the local freeway. Why is the CANAMEX traffic load not considered in the DEIS? How is CANAMEX a responsibility of the Arizona or Maricopa or Phoenix taxpayer?

To cast the need for the South Mountain Freeway in terms of relieving the congestion on the I-10 freeway between Pecos Road and the 143, irrespective of the CANAMEX Highway, overlooks two fundamental issues. First, from Pecos Road to the 143, fourteen lanes of traffic are crammed into seven. Worse, carpool travelers going to PHX from the I-60 must cross six lanes within the most crammed quarter mile to get

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to the airport. Wouldn't an elevated HOV cross-over be much more efficient? Isn't this the real problem?

4. Gila River Indian Community Coordination

The Federal Highway Administration may not have the right to survey the lands of The Indian Nation, but the federal government does have the right to condemn lands of the Indian Nation under eminent domain. That's exactly why the USDOT has stepped back in this case. Just as the Bureau of Indian Affairs is chartered to address the transportation needs of the Indian Nation, the states and their subordinate organizations are *not*! More specifically, MAG's "coordination" is not/should not be decision-making. Fire Departments, ambulance companies, and hospitals all coordinate with each other, but neither makes decisions for any other. How can ADOT confuse such fundamental concepts?

Significantly, the proposed South Mountain Freeway alignment is not within any portion of the tribal lands of the Gila River Indian Community. One tribe's lands are even completely outside of Maricopa County. Why is that community involved in the decision-making process affecting the properties of Phoenix landowners? More importantly, why is ADOT proposing off ramps and street stubs that serve the property and business developments of The Indian Nation? Who in The Indian Nation's allotted landowners stands to profit from Casino developments and billboard placements? Does the greed of these Indian Nation profiteers outweigh the rights of those residents not within the Indian Nation? Apparently, they also outweigh the desires of the rest of their tribal members.

Finally, how can a tribal representative for a tribe of a few hundred have the same voting or veto power as the mayor of Phoenix? Don't we have a concept of one person one vote in these United States of America? ADOT needs to revisit the standards against which its administrative agency action is tested. After all, Kelo v. New London only added another standard; it didn't replace the other tests (arbitrary & capricious, illegal, prohibited actions) to the validity of administrative actions.

5. Alternatives

Proclaiming a fictitious need inherently corrupts any further analysis of the viable alternatives. This is a fundamental concept of real science and the scientific method. Unfortunately, this concept is, modernly, largely lost on administrative agencies that rely on repeating unfounded dogma and buttressing the interests of special interest groups until most people believe it.

Thus, if one is to proceed with the notion that there is a real, current need for commuter travel from the Central West Valley to the Chandler/Gilbert/Queen Creek area and vice versa, certainly an extension of Pecos Road would suffice. After all, it's a four lane divided road with very few traffic control signals. Why is the lack of achieving a "projected traffic" flow of dubious origins for a freeway whose true

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nature and purpose are not addressed even relevant here? That's because traffic flow is a yardstick for CANAMEX Highway purposes.

And, if the real need is to comport with the lane and flow requirements of CANAMEX, both a real freeway is required and multiple alternatives come to mind. The logical question that follows is *why did ADOT not consider an alternative route from Casa Grande (or close by on the I-8) to Tolleson*? Such an alternative would not cause any of the social or environmental consequences identified below, nor traverse tribal lands or cost as much. It would cost much less, in fact. It would, however, lie almost exclusively on federal lands. Is this a conflict of interest for USDOT? Why was this alternative not studied by ADOT or identified in Figure 3-5 of the DEIS?

The Casa Grande to Tolleson alignment can be detailed to exclude all residential property condemnation. Further, it would truly be a truck bypass, avoiding all residential contact except for, possibly, but not necessarily, a one eighth ($1/8^{th}$) of a mile long stretch. How does such an alignment differ from any "studied" alignment for interstate traffic purposes? Why was that not discussed in the DEIS?

The Casa Grande to Tolleson alignment can also be designed to include two or more lanes that interchange with the I-10 or I-8 at the southern end and at the 303 and the I-10 at the northern end without significantly disrupting traffic. This is required by the CANAMEX Highway specifications. The Pecos Road alignment, on the other hand, would require massive reconstruction to achieve such. Why was this not discussed in the DEIS?

Furthermore, why did USDOT not study condemning lands of the Indian Nation for the Riggs Road Alternative? If this is a CANAMEX segment, USDOT certainly should be at the forefront of the alignment studies and condemning decisions; *not ADOT, not MAG, not anyone else*.

Vertical alignment is much more complex than the short shrift given to it in the "Alternatives" section of the DEIS. The complexities of this are discussed in the relevant sections below.

6. No-Action Alternative

As noted above, there is no articulable, scientifically supportable need for this freeway, absent CANAMEX. The "No-Action Alternative" and/or the Casa Grande to Tolleson alignment (for CANMEX traffic) are the only two supportable alternatives. Further, an I-60 to 143 overpass is notably a significant I-10 traffic mitigation option which is likely to yield the most results for non-CANAMEX traffic. Why was this not discussed in the DEIS as a viable traffic mitigation option?

a. Displacements, Relocations, and Economic Impact

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What's a home worth? That's the overriding issue ADOT has not addressed. It's the elephant in the room. I purchased my new home in 2004 in the Mountain Reserve after reviewing 128 model houses in all states of completion. I moved in in August 2005. I paid $355,000.00 for it and spent another $40,000.00 in front yard and window coverings required by the association. I spent much more on cabinetry. I had leveraged the economy of a tract builder with the freedom to request a multitude of customizations. My house is truly unique.

I had put $140,000 down as a down payment. I have no back yard. Most people who bought near around the time I did don't (check Google Earth). Why? Because ADOT announced that my house probably will be mowed down for the Loop 202 Freeway, seven weeks after I moved in. That was before the housing bubble collapsed and values collapsed even further.

The last house that sold on my street (with a back yard and a pool) sold for $173,000 (check Zillow.com). Wow, I might as well have flushed $100,000.00 down the toilet eight (8) years ago and I'd still be more than $60,000.00 ahead of the game. I may even have had a back yard down through those years. How much is a back yard worth? …for 8 long, hot years? I think that most people will agree that it's worth a lot.

Also, I have lived in a community where transient rentals were the norm for eight (8) years. Monthly rentals were common. There was absolutely no sense of community. Indeed the HOA had no forum of board members for years. Nobody cared. The ADOT owned houses were blight in the neighborhood for many years. What's that worth? Is there any mention of this in the DIES?

I moved to my neighborhood because of the views and the low levels of traffic, noise pollution, light pollution, air pollution, and lack of fast access by the criminal elements of the various crime riddled areas of the west valley. Why is the latter not addressed in the DEIS?

So, again, what is a house worth? Is it the current standard of the "reasonable market value"? Or is it something else? I suggest it is the value of buying property, building the same house thereon, and putting my family up in a resort during the time of its construction. And further, that property has to have similar characteristics with regard noise, views, light and air pollution, property taxes, and access by criminal elements. Why not? Can anyone articulate why not?

In the end, how much is all of this worth to a tax-paying resident of Phoenix? One that's been paying property taxes for eight years and commuting to a remote location *when he's never been able to even realize a back yard*? The DEIS does not address this. Why? Because it's painful and expensive maybe? Yes it is. And, ADOT may not want to admit to the true cost of such land acquisition and the replacement of a *home*.

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b. Noise

The DEIS addresses noise pollution. Unfortunately it uses the average hourly noise level as its only metric and does not incorporate any temporal variations. While it does acknowledge that it barely achieves federal maximum mandates, it does not even address the more pertinent parameters of the characteristics of noise and timing of thereof. Internationally, noise classification has advanced well beyond the crude "average pressure level" used in the DEIS.

Irrespective of the international classifications, the DEIS statement does identify that the Pecos Road alignment will barely achieve federal maximum noise levels in most cases, even if abatement walls are used. Why is that not a major problem? Further, these maximum classifications are based on abstract generalizations of laterally displaced noise level estimates. Why is there no mention of the "directed" and "channeled noise" from the freeway segments converging on Parcel D of the Mountain Preserve? Mountain reserve residents would be subject to air brake and incline ascending noises of both domestic and CANAMEX trucks, both of which are of a frequency not subject to ADOT's simple projections. Lower frequencies travel farther. Period. What if the actual noise levels exceed the federal maximum noise levels? What then? What's the homeowner's recourse?

And, more basically, ADOT submits factually incorrect current ambient noise levels for comparison. Noise levels not within the narrow arrival and departure times of commuters and not within the high heat, air conditioning months (October through May) are much lower than presented in my neighborhood. Typically, they are in the decibel ranges from the 30's to low 40's on my back porch at my house and even lower during the night. Why has ADOT not provided the true, evening, no-AC, ambient noise levels?

Furthermore, noise can come in all forms. ADOT would have one believe that the sounds of birds at my bird feeder and sounds of my neighbor's children playing are equivalent to the recurrent, revolving, and pulsating mechanical sounds of lumbering trucks and motorcycles. It's embarrassing to even have to address this. The rest of the world has moved on. The quintessential question is why does ADOT rely on outdated and erroneous metrics? Most likely because they're convenient, obfuscating tactics that serve the profiteers. There are much more relevant international standards and measurements that are available.

ADOT itself pontificates that "it is recognized that transportation noise is perhaps the most pervasive and difficult source to avoid in society today". This is exactly what we currently don't have at the western end of Pecos Road! This was a major consideration when I bought my house. How is the maximum tolerable noise level relevant here? How about maximum noise pollution, air pollution, light pollution, disaster risk, and transient crime combined? Who would want to live in such an environment? Think about that.

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Finally, the question of time of day when noise is absent is avoided entirely. Why? So a noise at midnight is equal to a noise during the day. How is that possible? Is it rational? Whether CANAMEX or a general truck bypass is the main ingredient of the traffic on the proposed freeway, it is likely that the louder, lower frequency noise generated by large trucks will dominate. And, that this noise will continue 24x7 and carry further at night. How does that compare to the crude measurement and prediction that ADOT proffers? It doesn't. It really doesn't. And, why has ADOT not addressed the conflict between wildlife corridor bridges and sound barriers? (More on that topic below.) All this appears to be absent in the DEIS.

c. Water Resources & Floodplains

The DEIS identifies the flood plain relevant to the Pecos Road alignment. Unfortunately, its roaming generalizations do not address several pertinent aspects of drainage. The South Mountain Park and adjacent southern alluvial flood plains drain to the south. It is this author's experience that, during summer deluges, the entire area from South Dessert Foothills Parkway to Chandler floods and drains through and *across* Pecos Road.

This drainage can cause the entire area from Chandler to South 17th Avenue to flood and drain through the multiplicity of drainage culverts *and over Pecos Road itself*. The current "alignment" proposes that the Loop 202 will be elevated along its passage by my house and, that the alignment (not including any sound barrier) will be 22 feet above the current grade. Wow, kind of like Hoover Dam in your back yard. (More on that later.)

With only one drainage culvert in the segment, what is the strategy to channel/buffer drainage waters? Further, and more significant, what are the consequences of erosion damage on the tribal lands of The Indian Nation? Now it is farm land, but it will be casinos if the freeway is built. Why has the DEIS not even addressed this? It is a sure consequence of law that the damages of The Indian Nation will be adjudicated by the Indian Council (see recent decisions by the federal courts) and dictated to Arizona taxpayers. What is the potential cost of that? I don't see anything that addresses this in the DEIS. Nothing at all. It is an environmental issue that potentially has large cost implications.

d. Biological Resources

The South Mountain Park ("SMP") is the largest municipal park in the world. It is the place where local citizens can enjoy *nature*. It hosts a plurality of *natural* inhabitants, from the Chuckwalla lizard to numerous bird species. It is a natural ecosystem that interacts with the desert flatlands and the adjacent Estrella Mountains on a genetic and predator-prey basis.

If anyone can believe all species in an isolated park can proliferate for more than a few years though a couple of tunnels (4 that I see) and one bridge traversing a 300 or

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500 foot right of way, please present the scientific evidence. While the importance of wildlife corridors, such as those in the Ahwatukee Foothills area, have been scientifically established, drainage culverts and bridge corridors have not. That's a fact.

Quite the contrary, for many species they present a gauntlet to navigate while opportunistic predators, such as foxes and coyotes, cash in on the parade of traversers. Furthermore, position, size, food sources, and cover are key factors in determining which species will attempt to employ the use of such underpasses. Progressive proposals have been made to create vast corridor overpasses over the I-10 to Tucson. Is ADOT regressing in its thinking? Does it have better data?

The species least likely to traverse a tunnel or bridge corridor would be Road Runners, the Giant Sonoran Desert Toad, Desert Tortoises, Gila Monsters, horned lizards, Chuckwallas, rabbits, squirrels, skinks, low flying birds such as the Gila Woodpecker and Gambels Quail. And even if they do, the restricted opportunities to traverse will sharply decrease their genetic diversity and survival chances in the SMP's ecosystem.

Most of these species are not likely to cross at the proposed Rio Salado Oeste project area either, as they do not inhabit marshes. All of these species have appeared in my back yard. Most of these species are an intimate part of the *nature* evident in the park today. Many of these species migrate daily or seasonally from the mountains to the flatlands. All communicate genetically with the greater Sonoran Desert inhabitants. The bottom line is this: Coyotes and Javelinas are the most likely species to use the tunnel and bridge corridors. Is there any shortage of those? Why has the natural biodiversity, genetic isolation, unbalanced predation, and ecosystem health of the SMP's fauna not been addressed in the DEIS? This is fundamental stuff, folks.

Further still, should ADOT decide that a bridge corridor is necessary somewhere in the vicinity of the Pecos Road terminus, what is the strategy for a sound barrier there? I've never seen such a barrier on a bridge outside of Europe. Bridge corridor, vertical alignment, sound barrier, and ecosystem health are all related. There's no discussion of this in the DEIS. None. Most significantly, the DEIS avoids altogether the question of what the goals of the mitigation efforts are. Is to save endangered species? Or is it to maintain the health of the SMP's ecosystem and natural state?

Let's also not forget that any corridor's effectiveness can be completely thwarted by commercial developments on the Lands of the Indian Nation. Quite frankly, evidence has shown that they just don't care. They'll build a casino where ever they please and recent court challenges have borne out yet again that no agreement with municipalities or the State of Arizona has any affect. Why is that fact completely ignored in the DEIS?

e. Hazardous Materials

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The current alignment would have the CANAMEX, or highway trucker-bypass, a few yards from my house, if it's not torn down altogether. But, then again, ADOT hasn't decided on the true right of way width yet. So we don't know. Do we? Why is that? Irrespective of this indecisiveness, the specter of a mishap on the Loop 202 resulting in an errant vehicle carrying hazardous materials rolling down the 22 foot embankment into a residential neighborhood is scary.

Why is there no discussion of this vertical alignment issue, especially with CANMEX truckers in mind, other than in general concepts? Isn't the transport of hazardous and harmful materials a key element to the freeway's alignment? How is the above scenario different than the Deck Park Tunnel? Has Homeland Security been advised of this? Is it aware of this?

ADOT instead chose to concentrate this section of the DEIS on the potential to disturb *existing* Haz-mat sites. How about what the proposed alignment (both horizontal and vertical) *creates* as far as Haz-mat circumstances and situations? Why hasn't that been considered? Interesting, isn't it?

f. Visual Resources

As mentioned above, the current vertical alignment places the Loop 202 at 22 feet above grade near the terminus of Pecos Road. With another 20 feet of sound barrier on top of that, the remaining front line of homes will be greeted by the view of Hoover Dam to the south. While some folks are worried about sacred views of mountains *not on their lands*, taxpayers near the right of way will be greeted by an atrocious industrial strength view that is tantamount to visual blight *on the lands of the United States from the lands of these United States*. What's the value of that? And why is there no mention of this specter in the DEIS? And why aren't non-Indian Nation landowners' views even considered.

g. Light Pollution

The DEIS avoids altogether any discussion of light pollution. Though discussed at various public meetings, ADOT summarily responds with generalizations about mitigation measures. Light pollution is, however, a complex issue poorly understood by administrative agencies such as ADOT. Light pollution is a matter of water vapor, particulate air pollution, and the location and direction of light sources.

Merely lowering light standards is laughable. Even thirty foot standards would emit light 52 feet above grade near Parcel D of the Mountain Preserve. Furthermore, vehicle lights traveling in both directions approaching Parcel D of the Mountain Preserve will illuminate the area from higher elevations based on the proposed

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vertical alignment. Vehicles also emit the very particulates and water vapor notorious for scattering and reflecting light. Particulate emissions from Mexican trucks (CANMEX) will be even higher than domestic commercial diesel trucks.

Even more important, what will stop the business interests on the adjacent tribal lands from erecting illuminated billboards and jumbotrons? One need only look at the Santan Freeway between I-10 and the Loop 101. Does ADOT think a contract with the Indian Nation not to build such will be upheld in federal court? Recent decisions indicate they won't. And the Indian Nation only cares about revenue, nothing else.

I purchased a home in Parcel D of the Mountain Preserve because I can see the Milky Way on many evenings. That is not possible even in the Lakewood area of Ahwatukee Foothills. How much is that worth and who gets to decide that?

h. Air Pollution

As noted above, air pollution is a function of the level of traffic, the type of traffic, even the time of such traffic and the direction of the prevailing winds. There is absolutely no mention of what the pollution levels will be during cool evenings when the truckers dominate and the air is heavy, moving only slowly in the direction of the prevailing winds in parallel with the proposed Pecos Road alignment. Why is this worst case evening scenario not even addressed in the DEIS?

i. Temporary Construction Impacts and other Issues

Finally, the DEIS statement only obliquely addresses temporary construction impacts. Where is the estimated commute time to get from South Mountain Preserve to the Santan Freeway? There is no mention of the air quality and local health impact of soil stabilization techniques (lime and potassium chloride), diesel fumes, blasting noise from the mountain gorge, and temporary water drainage. Why? How much is living next to a construction site for several years' worth?

Why does the DEIS summarily avoid the cost impact of implementing all of the mitigation measures on the overall cost of the freeway? Could it be because the freeway would never be built if these cost estimates were actually included?

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Code	Comment Document

Hoffman

Document Created: 7/25/2013 9:23:34 AM by Web Comment Form

1 I am waiting for 18 years that the Loop 202 (South Mountain Freeway) is getting build. Phoenix needs this Loop to offload the through traffic going through the center of the city. With the expansion of I-10 to three lanes between Tucson and Phoenix the traffic on I-10 in Phoenix will be 12 hours a day at 25 miles/hour.
Living at 7th Street I would like to avoid going through the city every time I need to go to the West side of Phoenix.

Code	Issue	Response
1		Comment noted.

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SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 12/15/2013	INCOMING CALL/COMMENT TIME:
CALLER: Umang Jokhaker	CALLER ADDRESS: 16922 S. 16th Lane, Phoenix AZ 85045
PHONE: 704 517 0256	EMAIL: umangj80@gmail.com

COMMENTER REMARKS/QUESTIONS:

Hi,

1 I live at 16922 S. 16th Lane, Phoenix AZ 85045. My House is right off of Pecos and 17th Ave and right adjacent to Pecos. I am really curious to understand if my house will be taken away as part of this 202 Extension. Can you please advise? You may also call me 704 517 0256 if needed.

Thank you,

Umang Jokhaker

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.

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SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 8/30/2013	INCOMING CALL/COMMENT TIME:
CALLER: Brian Kohlenberg CAD Engineer	CALLER ADDRESS:
PHONE: (602)-532-2671	EMAIL: Brian.Kohlenberg@Flextral.com

COMMENTER REMARKS/QUESTIONS:

1

Hello,
Please build the Loop 202 South Mountain Freeway, W59 Alternative.
Thank you,

Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
CALLER: Janice Layco Assistant to Richard P. Ross	CALLER ADDRESS: HARRY ROSS INDUSTRIES 24955 Pacific Coast Highway, Ste. C303 Malibu, CA 90265
PHONE: Phone: 310.317.1915 Fax: 310.317.0996	EMAIL: jplayco@gmail.com

COMMENTER REMARKS/QUESTIONS:

1

Thank you , Mr. Rector.
I greatly appreciate the information.
Have a wonderful weekend.

Regards,

Code	Issue	Response
1		Comment noted.

Code	Comment Document

Machuca

Document Created: 7/25/2013 12:41:24 AM by Web Comment Form

1 Transportation officials who are part of 202 planning were to have taken cultural awareness trainings put on by the Gila River Indian Community, as stated by Community Manager David White. When were those trainings conducted, what GRIC department conducted them, and what were the policy shifts, if any, that resulted from the cultural awareness trainings?

2 Was the Section 106 process for South Mountain ever begun between the Tribal Historic Preservation Office and the Arizona Department of Transportation? If no, when can GRIC expect that process to start, in order to comply with the Religious Freedom and Restoration Act, as well as the National Historic Preservation Act?

3 If the freeway were to be built, what type of assurances are there that air quality assessments for Gila River and Maricopa County will be kept separate? Gila River brought honor to our community when GRIC was awarded a Clean Air Excellence award by the Environmental Protection Agency. Our community does not want any of our air quality measurements to fall under the

4 On January 19, 2011, the Environmental Protection Agency Regional Administrator signed the Gila River Indian Community's (GRIC) Tribal Implementation Program (TIP) into effect. The effect of this action was to make the TIP federally enforceable. The TIP regulates air quality within the boundaries of Gila River, and its purpose is to enforce air quality standards in the GRIC reservation. Within the TIP, there are ordinances that require GRICDEQ staff, tribal attorneys, and if needed, the GRIC tribal police, to assume civil and criminal enforcement actions against persons who violate clean air standards outlined in the TIP. If the E1 alignment is built, and air quality monitors in Gila River exceed PM10 and ozone standards, what will be the procedure for Gila River to prosecute federal agencies or persons whose actions violate clean air standards within the TIP?

5 On January 25, 2011 the State of Arizona withdrew plans for a State Implementation Plan (SIP) to meet particulate matter-10 standards in the Maricopa County PM-10 nonattainment area, thus failing to comply with provisions of the Clean Air Act. By withdrawing the SIP, the State of Arizona triggered a January 31, 2011 decision by the Environmental Protection Agency to begin a sanctions clock on Maricopa County, because the county's air quality plan does not adequately protect human health. What air quality permits will the Arizona Department of Transportation have to secure in order to begin construction on the E1 alignment in Maricopa County, especially in light of being under the sanctions clock by the EPA?

6 Because of South Mountain's religious and cultural significance to the Gila River Indian Community, the Salt River Pima-Maricopa Indian Community, and the Colorado River Indian Tribes, building the E1 alignment will have an adverse impact on the exercise of Native

Code	Issue	Response
1	**Cultural Resources**	Cultural sensitivity training sessions were held on May 24, 2010, June 14, 2010, December 28, 2010, and January 20, 2011. The training sessions were led the Gila River Indian Community's Tribal Historic Preservation Officer and by staff from the Gila River Indian Community's Cultural Resource Management Program. The purpose of the training was to raise awareness and sensitivity to cultural and natural resources that would be encountered by personnel as they conducted field investigations on Community land for the proposed Gila River Indian Community Alignment. The training was recommended by the Gila River Indian Community's Cultural Resources Standing Committee at the time they issued the right of entry to the South Mountain project team. The training did not result in policy shifts or scoping comments for the study. As noted on page 2-8 of the Draft and Final Environmental Impact Statement, the coordinated referendum occurred in February 2012, and Community members voted in favor of the no-build option. Therefore, the Gila River Indian Community Alignment was eliminated from further study.
2	**Cultural Resources**	Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. In 2003, the Federal Highway Administration and Arizona Department of Transportation initiated National Historic Preservation Act Section 106 consultations with all Native American tribes that claimed cultural affiliation to the Study Area. Consultations were initiated with the Ak-Chin Indian Community, Gila River Indian Community, the Hopi Tribe, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe. As noted in Table 4-47 that begins on page 4-145 of the Final Environmental Impact Statement, the Gila River Indian Community was consulted in 2003 with subsequent contact in 2005, 2006, 2007, 2008, 2010, 2011, 2012, and 2013. This supports an early and continued consultation with the Gila River Indian Community related to resources of importance. In 2005, the Federal Highway Administration and Arizona Department of Transportation consulted with all Native American tribes in Arizona to ensure all interested Native Americans were included in the process and had the opportunity to communicate their concerns. These tribes were the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community, the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos

(Response 2 continues on next page)

Code	Comment Document
6	American religious beliefs. If MAG, ADOT, and the State of Arizona continue with plans to build the proposed E1 alignment, these agencies and the state will be violating parts of the Religious Freedom And Restoration Act (RFRA), specifically as defined in 42 U.S.C. Amendment 2000cc-5. The proposed E1 alignment would introduce visual, atmospheric, and audible elements that would diminish South Mountain's cultural and religious significance. Many O'odham feel that South Mountain is in eminent danger from construction plans that will impact their sacred site for all time. There has been a lack of good faith consultation with O'odham traditional religious leaders, and almost a complete lack of diligence in the Section 106 process with GRIC. When will ADOT begin to consult closely with O'odham religious leaders, and to also inform them that the proposed 202 extension is also part of the Maricopa Association of Governments' plan to build the Sun Corridor between Phoenix and Tucson?
7	Roughly 30 acres of the South Mountain Preserve would be taken to build the E1 alignment, and since a city park qualifies as a 4(f) resource, as it is a publicly owned park, why hasn't ADOT had to comply with a 1985 City of Phoenix provision that a roadway could not go through preserve land without having a public vote on the matter? Why was ADOT simply allowed to create a freeway proposal through a nature preserve without a public vote? How is ADOT going to be able to secure right of ways in a nature preserve?
	) Truck Traffic from Mexico and High-Sulfur Diesel; Truck Bypass Negated
8	The modeling of air pollution impacts in the DEIS do not include the additional air pollution from truck traffic from Mexico. The DEIS briefly mentions the issue, but it claims it has no way to know what impact this would be. Patently absurd.
	We should remember why the idea of a truck bypass came up in the first place, all those years ago. It is because there have been chronic issues about air quality in the Phoenix metro area, so bad and for so long that public policy makers suggested as one of the strategies to reduce particulate matter from truck exhaust in urban Maricopa County was to designate a bypass for truck traffic around the urban area. This bypass is also now the designated route of the Canamex Highway, and it is Interstate 8 (south of Casa Grande) to State Highway 85, to Interstate 10, west of the Phoenix metro area. If the South Mountain Freeway is built, the bypass route, which has few amenities, would be a substantially longer route, about 55-60 miles longer than the route using the SMF. There is no law that would force trucks to use the longer route, so it is entirely likely all these trucks would come through Phoenix, negating the whole bypass strategy, and negating a public policy decision. By completing the South Mountain Freeway, this would all be negated, but the reversal of this public policy decision is never mentioned in the DEIS.
	Further, trucks originating in Mexico will be fueled with diesel that doesn't meet the CARB diesel standards adopted by Arizona over a decade ago. In Mexico, there is no regulation about the sulfur in diesel fuel. In Arizona, the law was changed to allow only diesel fuel to be sold that has had 98% of the sulfur removed. This was another part of the strategy to bring

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2 (cont.)		Apache Tribe, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Tribe, and the Yavapai-Prescott Indian Tribe. Most of these tribes did not express an interest in the proposed project. The Ak-Chin Indian Community, the Salt River Pima-Maricopa Indian Community, and the Tohono O'odham deferred to the Gila River Indian Community to take the lead with Section 106 consultations on this proposed action project. Consultation with Native America tribes has been extensive and demonstrates a reasonable and good faith effort to include all interested Native American tribes in the process to take their concerns seriously in the planning effort.
3	**Air Quality**	The Clean Air Excellence Award was awarded to the Gila River Indian Community Department of Environmental Quality Air Quality Program Team based on the development of a multi-program Air Quality Management Plan to regulate air quality, the first of its kind for an Indian Community. The award was not in any way an indication of the quality of the air within Gila River Indian Community land. The Gila River Indian Community is not included in the Maricopa County Carbon Monoxide Maintenance Area or the Maricopa 8-hour Ozone Nonattainment Area. The northern part of the Gila River Indian Community is within the Maricopa County Particulate Matter Nonattainment Area (see Figure 4-20 on pages 4-61 and 4-71 of the Draft and Final Environmental Impact Statements, respectively). The Community is part of the Maricopa Association of Governments and as such is included in air quality conformity demonstrations for the Maricopa Association of Governments region. The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. No violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. For mobile source air toxics, the analysis showed that for the Study Area, constructing the freeway would have a marginal effect on annual emissions in 2025 and 2035 (less than a 1 percent difference in total annual emissions between the Preferred Alternative and No-Action Alternative). With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. The air quality analyses were updated for the Final Environmental Impact Statement, including a quantitative particulate matter (PM_{10}) analysis, and are more fully described beginning on page 4-68 of the Final Environmental Impact Statement. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.

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	Maricopa County into compliance with the particulate matter standards required by the Clean Air Act (CAA).There was extensive modeling of the effect of adopting the CARB diesel standards and a discussion of this at the Arizona legislature, where it passed, so the data is in government hands. Also, we know exactly the number of trucks arriving from Mexico and their destinations in the US, so this is data that is available for the DEIS. And again, the reversal of this public policy decision is never mentioned in the DEIS. Once this additional pollution is honestly quantified and factored in, there would be a huge net increase in air pollution from the SMF, and associated increases in asthma, heart disease, premature death, and other adverse health impacts.
9	2) Air Toxics Already a Crisis but Not Mentioned In 2005, there was an extensive air monitoring of certain toxic chemicals (air toxics) conducted by EPA and ADEQ in a joint effort named the Joint Air Toxics Assessment Program (JATAP). The monitoring sites included a site near St. Johns on the GRIC, and some in west Phoenix and South Phoenix. The JATAP monitoring results were reported in 2006, during a time the data for the DEIS was being gathered, and it found levels of certain toxic chemicals associated with vehicular emissions were above the standard of a one in a million chance of cancer in a lifetime of exposure in the west Phoenix, south Phoenix, and GRIC sites. The JATAP monitoring found in the high end of the monitoring levels, formaldehyde at 34 times this standard; benzene at 8 times this standard, 1,3 butadiene at 7.5 times this standard, acetaldehyde at 3.4 times this standard. And, remember, citizens are being subjected to all of these carcinogens, not just one. Some of these chemicals are attributed to “mobile sources,” or vehicular traffic burning hydrocarbons. Obviously, adding more vehicular traffic emissions by building a freeway where there had not been one would add to this toxic burden. The JATAP results are not included in the DEIS, but instead there is a strange missive about the uncertainty of the risk from these air toxics standards, which is simply not true. The cancer risk standards have been promulgated and published by EPA after extensive research and study, and they are well-known.
10	3) Risks from Hazardous Materials Transportation Incidents Due to the SMF There are no industries using and emitting toxic chemicals in Ahwatukee Foothills, and no hazardous materials (hazmat) transportation issues and risks because none of these chemicals, other than gasoline and diesel, are being shipped into the area, other than incidentally adjacent on Interstate 10, which is east of the area. Since the NEPA process started, Ahwatukee Foothills residents and others have consistently raised concerns about the added risks from the transportation of hazmat on the new SMF, and in doing so they have consistently voiced concerns regarding the additional problems with hazmat response

Code	Issue	Response
4	**Air Quality**	The Gila River Indian Community’s primary purpose for developing the Tribal Implementation Plan and the Air Quality Management Plan is to provide a regulatory structure for industrial sources that were not permitted by the Gila River Indian Community nor U.S. Environmental Protection Agency. The Gila River Indian Community’s regulatory authority is limited to enforcement of these permitted facilities.
5	**Air Quality**	In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona’s decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the U.S. Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information). The air quality assessment for the proposed freeway analyzed impacts from carbon monoxide and particulate matter (PM_{10}) and followed U.S. Environmental Protection Agency guidelines. No violations of either the carbon monoxide or particulate matter (PM_{10}) standards were identified, even at worst-case locations along the project corridor. Thus, the carbon monoxide and particulate analyses demonstrated that the proposed freeway would not contribute to any new localized violations, increase the frequency or severity of any existing violation or delay timely attainment of the National Ambient Air Quality Standards or any required interim emissions reductions or other milestones. The Arizona Department of Transportation will need to obtain dust control permits from Maricopa County Air Quality Department. These requirements are typical for this type of project.

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	in the affected area. Ahwatukee Foothills has its own unique layout and design, sometimes characterized as a large cul-de-sac, and in the event of a hazmat incident requiring shelter in place, or especially involving evacuation, there would be particular problems and risks. Due to the proximity of schools, parks, and other public facilities, there would have to be extensive planning and drills for shelter in place and evacuation, an assessment of the types and amounts of hazmat traffic and the chemicals involved, and much more. NEPA requires examination of cultural, social, and economic impacts, and the new hazmat traffic and risks caused by the SMF would affect all of these topic areas. The data about the types and amounts of hazmat on the highways is collected and analyzed periodically by the Arizona State Emergency Response Commission using federal funds, in something called a Commodity Flow Study, which also includes hazmat moved by rail. So an agency of the state government has this information. In a real DEIS, the analysis of this data is common. But there is nothing in the DEIS that even mentions the hazmat transportation and risks issue! This raises many issues, from the $20 million spent on this deficient study, to the scoping for the DEIS that was designed to restrict citizen input rather than allowing and encouraging it, to the blatant ignoring of actual, well documented statements of these concerns by citizens. Hazardous Materials has been mostly limited in the DEIS to a discussion of hazardous materials that might be encountered in the soils during construction. Yet, despite this alleged concern, the fact that the proposed path of the freeway crosses contaminated property near Interstate 10 near 55th Avenue is neither mentioned or examined, much less the financial liability the taxpayers might be assuming by purchasing the contaminated property. That would certainly be an economic impact. 4) More Air Quality Issues: The Straw That Broke the Camel's Back
11	The portion of Maricopa County that is characterized as the Phoenix metro area has had problems for decades meeting the air quality standards for particulate matter (PM) and other criteria pollutants. (Ozone levels are too high in the East Valley and Fountain Hills, for example.) There have been several exceedances of the standards for PM set by EPA under the authorities given the agency by the Clean Air Act (CAA). The problem has been so bad over the years that every possible delay and postponement allowed under the CAA to come up with a plan to meet regulatory levels of particulate matter have now been exhausted. So, currently, EPA is examining sanctions that include blocking a billion dollars in highway funds. The Arizona Department of Environmental Quality has tried to explain away the several exceedances of the PM standards in the last year or so by blaming it on dust storms and weather-related problems. (Having reviewed the ADEQ arguments, I don't believe it was all related to weather.)

Code	Issue	Response
6	**Cultural Resources**	Since the beginning of the environmental impact statement process, the Federal Highway Administration and Arizona Department of Transportation have been carrying out cultural resources studies and engaging in ongoing, open consultation with the Gila River Indian Community Tribal Historic Preservation Office regarding the identification and evaluation of places of religious and cultural importance to the tribe that may be adversely affected by the proposed freeway. Such places are referred to as traditional cultural properties. As a result of these discussions and of studies conducted by the Gila River Indian Community's Cultural Resource Management Program, the Gila River Indian Community has identified traditional cultural properties that are eligible for listing in the National Register of Historic Places and that could be affected by construction of the proposed freeway. In certain cases, listing these properties on the National Register of Historic Places may offer them protection under Section 4(f) of the Department of Transportation Act. The traditional cultural properties identified are culturally important to other Native American tribes as well. For more discussion of traditional cultural properties, see the section, *Cultural Resources*, beginning on page 4-140 of the Final Environmental Impact Statement and pages 5-26 through 5-28. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires that federal agencies take into account the effects of their undertakings on historic properties. This process requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, many different tribal authorities, and the State Historic Preservation Office. The consultation has resulted in concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The Draft Environmental Impact Statement, after consultation and coordination efforts, accommodates and preserves (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. A very small portion of the mountain would be impacted by the proposed freeway (less than 0.03 percent of the total area). Although the Draft Environmental Impact Statement describes the impact on the South Mountains as adverse, Native Americans would not be kept from practicing their beliefs, access to the mountain would be maintained, and mitigation measures would be implemented based on input from members of the Community. As detailed in Chapter 1, *Purpose and Need*, in the Final Environmental Impact Statements, the proposed action is needed to address local capacity deficiencies, not to address the Sun Corridor between Tucson and Phoenix, and has been developed in response to local growth in population, housing, employment, and travel levels. As further discussed, on page 1-5 of the Final Environmental Impact Statements, the proposed action is based on logical termini, sufficient length, independent utility, projected travel needs, and construction priorities. The proposed action is not needed in response to national freight movement, nor is it intended to provide service primarily for freight movement.

(Responses continue on next page)

Code	Comment Document

Almost every one of these PM exceedances have been detected at the air quality monitor at 43rd Avenue and Broadway Road. The placement of a freeway about a mile to a mile and a half upwind from a monitor that has had all these high levels seems foolish and short sighted. And of course, the impacts and risks of this are not examined in the DEIS. Nor does the DEIS examine the dust that would be kicked up during the construction phase, when thousands of tons of dirt would be moved around upwind of the monitor. The proposed path of the South Mountain Freeway would take it over the Salt River bed. To construct the bridges would involve extensive earthmoving. Also, blasting South Mountain would also release enormous amounts of dust (PM), and the natural wind currents and prevailing wind patterns would push this PM toward the air monitor at 43rd Avenue.

The South Mountain Freeway could therefore be the most expensive freeway ever built. Not only the construction costs, and the $20 million already spent on the bogus DEIS, but then there would be the loss of the billion dollars in highway funds. This is a gift that keeps on giving, or taking, as there would be subsequent billions lost through the years due to PM exceedances.

12

5) Traffic Congestion Issues at West I-10 Junction

The junction of the South Mountain Freeway on its west end with Interstate 10 may have been an idea conceived many years ago, but the traffic congestion that exists at the area between 59th and 51st Avenues on that freeway during morning and evening rush hours is already more than extreme. It is like a parking lot. Yet there is no mention in the DEIS of the cumulative impacts and effects of traffic congestion at that proposed junction. (A long line of vehicles sitting with engines idling while waiting to get on Interstate 10 at the junction with the SMF would also likely impact the aforementioned air monitor at 43rd Avenue and Broadway.)

There is much talk about the problems at the Broadway Curve, which is near the confluence of Highway 60, the 143, and Interstate 10. Let us be reminded that the Maricopa Association of Governments (MAG) and ADOT caused this problem through their shortsightedness and design problems. They planned these traffic nightmares. So now these same agencies, failed agencies, want to do this South Mountain Freeway. Will we be talking about the new junction in west Phoenix in the same way?

ADOT already completely ignored the recommendations of the original SMCAT, the group ADOT formed to skirt the proper NEPA scoping, in choosing the proposed alignment. The SMCAT, after months of study, had recommended that the SMF connect to the 101 on the west. So ADOT ignored even the recommendations of its own group and planned the SMF to connect with the I-10 at the currently proposed alignment.

This leaves a large question: If ADOT did that at that time long ago, what is to stop it from completely ignoring the current SMCAT should SMCAT vote for a “NO BUILD” option?

Code	Issue	Response
7	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
8	**Trucks**	
9	**Air Quality**	Assessment of mobile source air toxics is presented in the Draft Environmental Impact Statement beginning on page 4-68 and the summary information about the findings of the Joint Air Toxics Assessment Project study is provided as background information in the Draft and Final Environmental Impact Statements, but the study itself is not relevant to the type of analysis done pursuant to the Federal Highway Administration’s mobile source air toxics guidance, which is an emissions analysis. Monitored ambient concentrations of mobile source air toxics (the focus of the Joint Air Toxics Assessment Project) do not inform this type of analysis. While monitoring data can be useful for defining current conditions in the affected environment (to the extent that the monitoring data are current), they don’t tell us anything about future conditions, or the impacts of the project itself, which is why an emissions analysis was performed. The mobile source air toxic analysis presented beginning on page 4-77 of the Final Environmental Impact Statement is an estimated inventory of mobile source air toxic emissions for the entire Study Area for 2025 and 2035. This approach was used because the inventory estimate accounts for changes in traffic and emissions on all roadways affected by a proposed project, and would, therefore, be a more reliable predictor of changes in exposure to mobile source air toxics. The mobile source air toxics emission modeling developed for the project (which factored in the U.S. Environmental Protection Agency’s recent rules for the 2035 analyses) and discussed beginning on page 4-77 of the Final Environmental Impact Statement found little difference in total annual emissions of mobile source air toxics emissions between the Preferred and No-Action Alternatives (less than a 1 percent difference) in 2025 and 2035. With the Preferred Alternative in 2035, modeled mobile source air toxics emissions would decrease by 57 percent to more than 90 percent, depending on the pollutant, despite a 47 percent increase in vehicle miles traveled in the Study Area compared with 2012 conditions. Available information from the U.S. Environmental Protection Agency indicates that mobile source air toxics are a small component of overall cancer risk, and the analysis for the Final Environmental Impact Statement indicates both that the Preferred Alternative would result in a small change in the emissions contributing to this risk and that emissions will decline by a large amount regardless of alternative. As discussed on page 4-79 of the Final Environmental Impact Statement, results from a health risk assessment would be influenced more by the uncertainty introduced into the process through assumptions and speculations rather than by genuine insight into the actual health impacts directly attributable to mobile source air toxic exposure associated with a project. Therefore, outcomes of such a health risk assessment do not provide useful information for decision makers, as required by 40 Code of Federal Regulations Section 1502.1. The Federal Highway Administration emissions analysis meets the requirement to produce information that is useful for both disclosure and decision making because it allows the public and decision makers to see which alternative has less mobile source air toxic emissions, with much less uncertainty than a health risk assessment.

(Response 9 continues on next page)

Code	Comment Document
13	6) Blasting South Mountain: Religious and Racial Discrimination and Civil Rights Violations in SMF DEIS The DEIS clearly discriminates on the basis of religion and race, and the ongoing ADOT plans for blasting Muhadagi Doog (South Mountain) are ongoing civil rights violations. Throughout the DEIS, it is acknowledged that the GRIC and other native American tribes hold Muhadagi Doog as a sacred site. From the actual language of the DEIS: "The South Mountains are highly valued and considered sacred by some Native American communities. The Community, which includes the Akimel O'odham (River Pima) and Pee Posh (Maricopa) tribes, and other Native American entities—including the Colorado River Indian Tribes and three O'odham groups: the Salt River Pima-Maricopa Indian Community, the Ak-Chin Community, and the Tohono O'odham Nation—consider the South Mountains to play a role in their cultures, identities, histories, and oral traditions." There is plenty of correspondence in the DEIS and its Appendices in which the GRIC repeatedly asserts and reminds ADOT of this, to no avail. ADOT plans to blast Muhadagi Doog. If we were to take a look at the same issue and frame it as a danger to a sacred site that plays a role in cultures, identities, histories, and oral traditions of a white, European-based religion, such as the Vatican, a sacred site for the Roman Catholic Church, we can illuminate how this is clearly religious discrimination, and likely racial discrimination. If Rome, Italy decided there needed to be a freeway that needed to take out part of the Vatican, well, that would just be unthinkable to the people there of the Roman Catholic faith. Think of the outrage and outcry such a proposal would muster, even worldwide! So what is the difference between the Vatican and Roman Catholics' beliefs, and Muhadagi Doog and the "Native American entities?" This attitude and planned action deliberately and intentionally violates the civil rights of the "Native American entities." In a 1979 consultation on the issue, the United States commission on civil rights defined religious discrimination in relation to the civil rights guaranteed by the Fourteenth Amendment to the United States Constitution. [Section 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.] As for racial discrimination, the equal protection clause was originally added to deal with the lack of equal protection provided by law to all in the course of administering justice in the states that had Black codes. The United States commission on civil rights noted, "Whereas religious civil liberties, such as

Code	Issue	Response
9 (cont.)		Given the uncertainty of a mobile source air toxic health risk assessment, the Federal Highway Administration instead addresses the potential impacts of mobile source air toxics through an emissions assessment in its National Environmental Policy Act documents. For smaller projects with a lower likelihood of a meaningful impact, this discussion is qualitative. For larger projects, emissions analysis is conducted. The Federal Highway Administration approach is consistent with the Council on Environmental Quality's direction in 40 Code of Federal Regulations Section 1502.2(b) to discuss impacts in proportion to their significance. The results of an emissions analysis can be summarized concisely in a National Environmental Policy Act document and provide useful information for decision makers (e.g., an alternative that has lower emissions is likely to be "better" from a mobile source air toxics health risk standpoint than one that has higher emissions). While the U.S. Environmental Protection Agency and the Federal Highway Administration both agree on the usefulness of addressing mobile source air toxics in National Environmental Policy Act documents for highway projects, the agencies disagree about the value of health risk assessment as a method for doing so. Another consideration with respect to health impacts is that the Preferred Alternative would also reduce in-vehicle mobile source air toxics exposure as opposed to the No Action Alternative. The U.S. Environmental Protection Agency has found that in-vehicle benzene concentrations were between 2.5 and 40 times higher than nearby ambient concentrations, based on a review of studies discussed in the Regulatory Impact Analysis for the U.S. Environmental Protection Agency's 2007 mobile source air toxics rule-making (Final Regulatory Impact Analysis, Environmental Protection Agency 420-R- 07-002, 3-17 [February 2007]). Construction of the Preferred Alternative would result in a reduction in benzene exposure to drivers and passengers for two reasons: decreased travel times (motorists would spend less time in traffic to reach their destinations) and lower emissions rates (attributable to speed improvements). Reducing on-road exposure would provide a health benefit for motorists using the roadway network. Congestion relief resulting from the proposed freeway would provide localized air quality emissions reductions on area freeways and arterial streets and at interchanges, benefiting users of area highways and those living near congested roads.
10	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

(Responses continue on next page)

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	the right to hold or not to hold a religious belief, are essential for Freedom of Religion (in the United States secured by the First Amendment), religious discrimination occurs when someone is denied "the equal protection of the laws, equality of status under the law, equal treatment in the administration of justice, and equality of opportunity and access to employment, education, housing, public services and facilities, and public accommodation because of their exercise of their right to religious freedom." (Emphasis added.) Also, the American Indian Religious Freedom Act (commonly abbreviated to AIRFA) is a US federal law and a joint resolution of Congress that was passed in 1978. It was created to protect and preserve the traditional religious rights and cultural practices of American Indians, Eskimos, Aleuts and Native Hawaiians. These rights include, but are not limited to, access of sacred sites, repatriation of sacred objects held in museums, freedom to worship through ceremonial and traditional rites, including within prisons, and use and possession of objects considered sacred. (Emphasis added.) The Act required policies of all governmental agencies to eliminate interference with the free exercise of Native religion (Emphasis added.), based on the First Amendment, and to accommodate access to and use of religious sites to the extent that the use is practicable and is not inconsistent with an agency's essential functions. It also acknowledged the prior violation of that right. Clearly, the No Build Alternative is the only viable option that does not constitute a violation of the 14th Amendment to the Constitution and a violation of the American Indian Religious Freedom Act as any freeway alternative proposed in the DEIS of the South Mountain Freeway requires blasting away part of Muhadagi Doog.

Code	Issue	Response
11	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. A response to this issue can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. In May 2012, the Arizona Department of Environmental Quality submitted a revised Maricopa Association of Governments 2012 Five Percent Plan for the region. On July 20, 2012, the U.S. Environmental Protection Agency made an official finding that the Maricopa Association of Governments 2012 Five Percent Plan was administratively complete. This decision ended the sanctions clocks associated with Arizona's decision to withdraw the Maricopa Association of Governments 2007 Five Percent Plan. On February 6, 2014, the U.S. Environmental Protection Agency published a notice in the *Federal Register* proposing to approve the Maricopa Association of Governments *2012 Five Percent Plan for Attainment of the PM-10 Standard* for the Maricopa County Nonattainment Area. In the same notice, the U.S. Environmental Protection Agency stated that it would concur with exceptional event (as a result of haboobs and dust storms) documentation prepared by the Arizona Department of Environmental Quality, which would give the region the 3 years of clean data needed for attainment of the particulate matter (PM_{10}) 24-hour standard. Finally on May 30, 2014, the U.S. Environmental Protection Agency approved the 2012 Five Percent Plan and found the area in attainment of the 24-hour particulate matter (PM_{10}) standard based on monitoring data for the years 2010 to 2012 (see page 4-72 of the Final Environmental Impact Statement for more information).
12	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. A response to this issue can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Analysis of impacts in future conditions accounted for cumulative effects of the planned 2035 roadway network including the proposed freeway. 40 Code of Federal Regulations § 1508.7 defines cumulative impacts as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions." The future conditions with and without the proposed freeway are presented in Figure 3-40 on page 3-66 of the Final Environmental Impact Statement. As noted on page 1-13 of the Final Environmental Impact Statement, the 2035 transportation network includes all improvements from the Maricopa Association of Governments *Regional Transportation Plan* except for the proposed freeway in the Study Area. The traffic projections also included Maricopa Association of Governments' projected growth in population, housing, and employment in the Maricopa Association of Governments region, which can result from public or private actions.

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
13	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY LETTER

INCOMING CALL/COMMENT DATE: 8/14/2013	INCOMING CALL/COMMENT TIME:
CALLER: Ayalin Maher	CALLER ADDRESS:
PHONE:	EMAIL:

1 2 3 4 5 6

COMMENTER REMARKS/QUESTIONS:

The current DEIS does not currently address the following issues: Poor air quality for the community, increased health risks (childhood Leukemia, asthma, autism, coronary disease, cancer, and lung disease), traffic congestion, polution of High-Sulfer Diesel, air toxics, Hazardous material transported near housing developments, and blasting along religious areas, Civil Rights violations, and racial discrimination.

Code	Issue	Response
1	**Air Quality**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Health Effects**	
3	**Purpose and Need**	Although the region's freeways are now congested during the peak travel period, conditions in 2035 without the proposed freeway would be substantially worse with more congested areas and congested conditions for longer periods of time (see Final Environmental Impact Statement pages 1-21 and 1-22). Congestion relief resulting from the proposed freeway would provide localized reductions on arterial streets and at interchanges. Reduced travel times would result in lower exposure to elevated concentrations of mobile source air toxics occurring in traffic. Other benefits of the proposed freeway in comparison to the No-Action Alternative are presented in Table 3-9 on page 3-38 of the Final Environmental Impact Statement.
4	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
5	**Cultural Resources**	

(Responses continue on next page)

Code	Comment Document

Code	Issue	Response
6	**Environmental Justice/Lifestyle**	The Draft Environmental Impact Statement describes a decade-long consultation and coordination effort led by the Arizona Department of Transportation and the Federal Highway Administration with the Gila River Indian Community and other Native American tribes. As a result of the consultation, the cultural importance of the South Mountains is acknowledged in the Draft Environmental Impact Statement in several locations, notably page 5-26. The proposed project, would accommodate and preserve (to the fullest extent possible from the available alternatives) access to the South Mountains for religious practices. Section 106 of the National Historic Preservation Act requires a government-to-government relationship between the Federal Government and Indian tribes as described beginning on page 4-140 of the Final Environmental Impact Statement. Section 106 requires federal agencies take into account the effects of their undertakings on historic properties and requires consultation with tribal authorities. Consultation has occurred with Gila River Indian Community government officials, the Tribal Historic Preservation Officer, the Cultural Resource Management Program, other tribes, and the State Historic Preservation Office and has led to concurrence from the Gila River Indian Community Tribal Historic Preservation Office and the State Historic Preservation Office on National Register of Historic Places eligibility recommendations (including traditional cultural properties like the South Mountains), project effects, and proposed mitigation and measures to minimize harm. This consultation has been ongoing and will continue until any commitments in a record of decision are completed. The section entitled *Title VI and Environmental Justice*, beginning on page 4-29 in the Draft Environmental Impact Statement, presents acceptable methods, data, and assumptions to assess the potential for disproportionately high and adverse effects from the proposed action on environmental justice populations and disparate impacts to populations protected under Title VI. Based on the content of the section, no such effects would result from the action alternatives. In light of comments received on the Draft Environmental Impact Statement, the above-referenced conclusions were confirmed in the preparation of the Final Environmental Impact Statement. To provide further clarity, the discussions of environmental justice and Title VI were separated and additional text explaining the relationship of environmental justice and Title VI to various environmental elements was added throughout Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, as exemplified by the inserted text on page 4-29 of the Final Environmental Impact Statement.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY HOTLINE

INCOMING CALL/COMMENT DATE: 9/10/13	INCOMING CALL/COMMENT TIME:
CALLER: Louis Mante	CALLER ADDRESS:
PHONE: 602-605-8183	EMAIL:

1

COMMENTER REMARKS/QUESTIONS:

What happens after the DEIS ends

Code	Issue	Response
1	**Public Involvement**	The schedule for the next steps includes publishing the Final Environmental Impact Statement in 2014. A 60-day public review period will be provided. Then a record of decision would be published. If a build option is selected, construction could begin as early as 2015. Right-of-way acquisition would begin after a record of decision.

Code	Comment Document

Sent: Friday, August 16, 2013 4:01 PM
To: Nathan Pryor; Kelly Taft
Subject: FW: Do not build the SMF 202

From: webmaster@azmag.gov [mailto:webmaster@azmag.gov]
Sent: Friday, August 16, 2013 3:54 PM
To: Lindy Bauer
Subject: Do not build the SMF 202

Subject: Do not build the SMF 202

To: Lindy Bauer

Name of Sender: Mike McAlister
Email Address: flashteq@msn.com
Organization:
City/State: ,
Phone:

Sent: 8/16/2013 3:53:52 PM

1 2 The SMF will become a truck by-pass, introducing much more truck traffic into the region and increasing pollution. Do not build the SMF 202 along Pacos Road.

This email has been sent to you from the MAG Website.

Code	Issue	Response
1	**Purpose and Need, Truck Bypass**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. A response to this issue can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Air Quality**	

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
7/31/2013	
CALLER: Marc Mignolet	CALLER ADDRESS: 15822 South 13th Place Phoenix, AZ 85048
PHONE:	EMAIL: marc03@asu.edu

COMMENTER REMARKS/QUESTIONS:

Dear Sir or Madam,

My wife and I have read with interest the accounts of the latest report and developments in regards to the loop 202. We have been residents of the Foothills since 1995 and have been looking forward to a decrease in congestion the I-10 traffic for many years. Yet, the proposed alignment, in particular the East part, is simply not appropriate.

While we are about 3/4 mile from Pecos, we will affected very negatively by the freeway is build along Pecos:

1 (1) the crimes/thefts are likely to increase dramatically with the much increased access. Being the "largest dead end" of the world has limited the unintended/crime driven traffic making the entire area a pretty safe area.

2 (2) the traffic, especially of trucks, is likely to increase making the roads more congested and creating much danger for the schools many of which are close to Pecos

3 4 (3) the noise, etc. will likely generate further decreases in house prices already much depressed.

5 When we came, in 1995, it was the perception that the East alignment would be somewhat South of Pecos on the reservation. That is a perfect solution, it takes care of the I-10 traffic issue while disconnecting (mostly) the freeway from the entire Foothills, Club West, Lakewood, Mountain Park Ranch communities. It is my understanding that the tribe does not support the construction of the freeway but as in many problems, incentives are key...

Code	Issue	Response
1	**Neighborhoods/ Communities**	While the City of Phoenix Police Department reported in 2005 that it did not have any statistics specific to crime adjacent to freeways, the Police Department did note that, based on its experience, there does not appear to be a correlation between crime rates and freeways. See Final Environmental Impact Statement sidebar on page 4-21.
2	**Traffic**	In 2006, the City of Phoenix conducted a traffic circulation study to evaluate the impacts of the proposed freeway on the local street system. The City study found no adverse effects on the local street system from the freeway (see Appendix 3-1 in the Final Environmental Impact Statement).
3	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Property Values**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the transportation infrastructure and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.
5	**Alternatives, Gila River Indian Community Alignment**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.

Code	Comment Document

Milanovich

Document Created: 7/25/2013 1:48:36 AM by Web Comment Form

The Loop 202 South Mountain Freeway was envisioned decades ago, and included in plans approved by voters that built and expanded hundreds of miles of freeway across the Valley. While the South Mtn Fwy was lower on the priority level, other freeways were built or added capacity as part of a bigger plan. Without the reliever freeway, other communities will continue to suffer traffic tie-ups and bottlenecks. It's time to begin construction as soon as possible.

As we've seen, any crash on I-10 between the Broadway Curve and Chandler Boulevard quickly causes gridlock. Backups can quickly extend into Tempe, Mesa and Chandler. And when it's a bad one (like the deadly tanker truck fire at Chandler Blvd in 2011), there aren't many options. Neither Priest Drive nor 48th Street are really major thoroughfares North of Elliot. Because of that, even on a regular day, the I-10 is bumper-to-bumper most mornings. The wait to turn from Eastbound Elliot Road to Westbound I-10 can often take several cycles. A reliever freeway just South of Ahwatukee would funnel some traffic off of I-10, and during traffic events, would give drivers a much needed alternative.

That said, ADOT should look very closely at how they design and build this freeway. This is a one-time chance to create a new generation of freeway from scratch, with the best in safety and design standards. It should be a showcase for our state to be proud of, and for ADOT to win plenty of awards for.

(1) At the Eastern end of the alignment, if the Pecos Road route is indeed the final decision, I strongly encourage ADOT to place the freeway below grade, like the US 60 and Loop 101 through Tempe. Because of the uniqueness of Ahwatukee, it would be best if the freeway not be seen, and dropping the lanes below grade would also help with noise pollution.

(2) Echoes from cars and trucks on I-10 already bounce off the mountain. An elevated or at-grade freeway would exasperate matters. Cross street overpasses should be placed at grade, and freeway lighting should use lower light standards where needed and practical. Many understand the concerns of those who live in the area. Lowering the freeway would be an acceptable way to address concerns about noise and property values.

(3) At the Western end of the freeway, not connecting directly to the Loop 101/I-10 interchange is a recipe for disaster. With both the Cardinals and Coyotes playing in Glendale there will be many days (and especially nights) where you'll see folks in the East Valley jump on the South Mountain Freeway to get to the West side. But having to get off on I-10 and then go West to the Loop 101 would create new bottlenecks. Imagine what traffic on I-10 between the two freeways would look like for Monday Night Football? Or the Fiesta Bowl? The idea of this "reliever" freeway is to take traffic OFF of other freeways… especially Interstate 10. This would do the opposite. Anyone trying to use the freeway to bypass Phoenix traffic would still be caught in it, in a way defeating the purpose of the whole thing.

If the concern is about giving people access to Downtown Phoenix, then a suggestion would be consider extending the terminus of the SR 801/SR 30 project further East, looping it back to I-10 or to I-17 at the Durango Curve. That would be much better than dumping a bunch of traffic on I-10 halfway between the Loop 101 and I-17. The West side commute would become even more of a nightmare, and the next generation would have to expand I-10 to 16 lanes to fix it.

Code	Issue	Response
1	**Design**	A depressed freeway option was evaluated in the Final Environmental Impact Statement and is described on pages 3-15 and 4-91. Although depressing the freeway would reduce noise levels, noise walls would still be needed to further reduce noise to meet the Arizona Department of Transportation noise policy. Whether the freeway is built aboveground with tall walls or belowground with shorter walls, the final mitigated noise levels would be nearly the same at nearby residences. The major disadvantage of building a depressed freeway would be the increased construction cost and the possible acquisition of additional right-of-way for pump stations and retention basins.
2	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Alternatives, W59 Alternative Versus W101 Alternative**	

Code	Comment Document

Lastly, if for some unfortunate reason the final decision is “no build,” then I highly recommend cutting-off unrestricted access to the Loop 202 and I-10 at Pecos Road. Right now, drivers who use Pecos as their own personal freeway don’t even have to stop at a ramp meter before getting on either freeway. Of course they don’t want to see this freeway built. They’d have to share “their” road. There’s nowhere else in the Valley where anyone has such unrestricted access. If there were ramp meters on the fly-ramp to I-10, maybe the backup down to the US 60 each morning wouldn’t be as bad.

Arguments by the GRIC about “destroying” the mountain are moot. There are already roads around the base of the mountain, parts cut away for homes and golf courses, and dozens of transmission towers at its summit. A freeway would not be any more intrusive, even if there was some blasting work done to create it.

Complaints about potential pollution in the area (especially schools) are also hypocritical. Drivers who use Pecos add to the congestion on I-10, backing up traffic throughout Tempe, where several schools are located along the US 60. A reliever freeway may alleviate some of those backups, and improve quality of life in surrounding communities.

Everyone knows ADOT needs to reconfigure the Broadway Curve. In order to do that, overpasses at 48th Street and Broadway Road will almost undoubtedly need to be torn down for future expansion of the I-10. The South Mountain Freeway should be built first. It will give drivers an alternative to get around what will likely be our own version of “Carmageddon.”

I have lived in Tempe and now Ahwatukee for the better part of the last 20 years. When I first came here, I-10 was two lanes in each direction South/East of Baseline Road. The freeway plan that widened I-10 and allowed for the dramatic growth South of Baseline, is also the same plan that includes the South Mountain Freeway. No one’s saying we should go back to two lanes in each direction. No one’s calling for the demolition the access ramps from I-10 and Loop 202 to Pecos Road. And as such, no one should be saying “don’t build the freeway.”

It’s time to turn the shovels and get to work!

Code	Issue	Response

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
CALLER: James Morris	CALLER ADDRESS:
PHONE:	EMAIL: Morris.JR.CTR@orbital.com

COMMENTER REMARKS/QUESTIONS:

1

PLEASE build the South Mountain 202 loop to:
Relieve traffic pressure on the 101 and 202 junction plus the 10 North bound.
Create AZ jobs
Better connect the East and West valley.

thanks,

James Morris

Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
CALLER: LEWIS OKERT	CALLER ADDRESS:
PHONE:	EMAIL: Lewisokert@aol.com

COMMENTER REMARKS/QUESTIONS:

1

I live on the route of the loop 202 in Ahwatukee, right along Pecos road. I need to know how much time I have left before I have to Move. Is there even a rough timline on when homes will be bought. I live in the east 2700 block of Redwood Lane.
Thank You, Lewis

Code	Issue	Response
1	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. The schedule for the next steps includes publishing the Final Environmental Impact Statement in 2014. A 60-day public review period will be provided. Then a record of decision would be published. If a build option is selected, construction could begin as early as 2015. Right-of-way acquisition would begin after a record of decision.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 8/26/2013	INCOMING CALL/COMMENT TIME:
CALLER: J. Lindsay O'Neill Library Information Specialist Lead State and Local Arizona Documents Government Documents	CALLER ADDRESS: Arizona State University Libraries
PHONE: 480-965-1389	EMAIL: Lindsay.ONeill@asu.edu

COMMENTER REMARKS/QUESTIONS:

Hello,

1 I collect ADOT and other state and local digital documents for inclusion in ASU Libraries' SALAD repository. I'd really like a complete copy of the South Mountain draft EIS. Is there any way I'd be able to get my hands on the full PDF so that I can add it to our repository?

Thanks so much,

Code	Issue	Response
1	**Public Involvement**	The document is available as a PDF on the project Web site <azdot.gov/southmountainfreeway>.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 3/24/2014	INCOMING CALL/COMMENT TIME:
CALLER: **Mary Patton**	CALLER ADDRESS: 8016 S. 69th Drive, Laveen, Arizona 85339
PHONE: 480-251-178	EMAIL: M.Patton@elliotthomes.com
COMMENTER REMARKS/QUESTIONS: Hi, would it be possible to request a packet of information along with a map regarding the 202 freeway and where it will be connecting to the I-10. Thank you,	

1

Code	Issue	Response
1	**Public Involvement**	Maps and other materials are available on the project Web site <azdot.gov/southmountainfreeway>.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY HOTLINE

INCOMING CALL/COMMENT DATE: 10/16/13	INCOMING CALL/COMMENT TIME:
CALLER: Pete	CALLER ADDRESS:
PHONE: 602.222.5029	EMAIL:

COMMENTER REMARKS/QUESTIONS:

1 Would like to know where we can find a visual or map for the Loop 202

Code	Issue	Response
1	**Public Involvement**	Maps and other materials are available on the project Web site <azdot.gov/southmountainfreeway>.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
CALLER: Jim Radzik	CALLER ADDRESS: Storage Equipment Systems SE Corner 59th Ave/Washington St.
PHONE: 602-269-1188	EMAIL:
COMMENTER REMARKS/QUESTIONS:	

1

Code	Issue	Response
1		No comment noted.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
CALLER: Ross	CALLER ADDRESS:
PHONE:	EMAIL: ross@rossrents.com
COMMENTER REMARKS/QUESTIONS:	

1

Code	Issue	Response
1		Comment noted.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
CALLER: Donna Snow	CALLER ADDRESS:
PHONE:	EMAIL: carart617@hotmail.com

COMMENTER REMARKS/QUESTIONS:

Hello,

I live in Laveen and I've been reviewing the information on the proposed Loop 202 South Mountain Freeway on the ADOT website. I have some questions about the information that was presented in the video about this project.

(1) The video states sound walls will be constructed to reduce noise. Assuming the preferred W59 alternative is adopted, where in Laveen would these walls be placed? Will the adjacent surface streets (such as Dobbins, Baseline and Broadway) be redone with rubberized asphalt? I live in Laveen Meadows (which is located near 67th Avenue and Baseline) and I currently experience significant traffic noise from Baseline even though my house is not next to Baseline. (My house is closer to the Laveen conveyance channel than it is to Baseline.) Since I currently hear considerable traffic noise during the morning rush hour and I would expect this freeway to generate even more traffic I would hope that using rubberized asphalts on these major streets is being planned to help mitigate some of these noise.

(2)

(3) Will any of the houses in Laveen be acquired by the City and if so, can you tell me approximately where these houses are located? I am very concerned about the impact of this project to the value of my home. I realize having convenient access to freeways is considered a "plus" but I also know that a home that is close to a highway where there is significant highway noise is not desirable.

(4)

Code	Issue	Response
1	**Noise**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Potential barrier locations are shown on Figures 4-26 through 4-29 beginning on page 4-90 of the Final Environmental Impact Statement.
2	**Noise**	Surface replacement of arterial streets is the responsibility of the local jurisdiction, such as the City of Phoenix. Rubberized asphalt will be applied to the freeway pavement.
3	**Acquisitions and Relocations**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix. Aerial maps showing the proposed freeway (W59 and E1 Alternatives) are accessible through the project Web site, <azdot.gov/southmountainfreeway>.
4	**Property Values**	A review of the literature reveals few detailed and comprehensive analyses of the relationship between the built environment and residential property values (Transportation Research Record: Journal of the Transportation Research Board, No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010, pp. 138–47; "Impact of Highways on Property Values: Case Study of the Superstition Freeway Corridor"). A recent study by the California Department of Transportation concluded that freeway facilities did not substantially affect sales prices in residential areas adjacent to the facility. The study concluded that it is the visibility of the freeway that may influence selling price and not distance or noise. As a result, the researchers generally concluded that the more the visibility of a new freeway is reduced, the less it would determine the sales price of homes sold in the area.

Code	Comment Document
5	The video also mentioned the Dobbins Road interchange was planned for a possible future connection with State Road 30. Can you please elaborate on this? I was unable to locate any information online about SR 30 in relation to the Loop 202 South Mountain Freeway (I did find information about the 303 and SR 30) so any information you can provide on this additional project would be greatly appreciated. Thank you in advance for your response. Sincerely, Donna Snow

Code	Issue	Response
5	**Design**	The reference in the video was to State Route (SR) 30. The State Route 30 alignment is currently under study by the Arizona Department of Transportation.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
CALLER: Jim St. Leger	CALLER ADDRESS:
PHONE: 602.300.8873	EMAIL: jim.st.leger@intel.com

COMMENTER REMARKS/QUESTIONS:

1

Can you please help me understand how you can be working on the Loop 202 South Mountain Freeway when this still seems to be an unapproved project?Phoenix Area Projects for 2014 Loop 202 South Mountain Freeway Can you please provide some specifics on what work exactly AZ DOT will be doing on this project in 2014?Regards,Jim St. Leger 602.300.8873

Code	Issue	Response
1	**Public Involvement**	The schedule for the next steps includes publishing the Final Environmental Impact Statement in 2014. A 60-day public review period will be provided. Then a record of decision would be published. If a build option is selected, construction could begin as early as 2015. Right-of-way acquisition would begin after a record of decision.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE:	INCOMING CALL/COMMENT TIME:
CALLER: Brent Stanrt	CALLER ADDRESS:
PHONE:	EMAIL: brent.start@hatchmott.com
COMMENTER REMARKS/QUESTIONS:	

1

Code	Issue	Response
1		No comment noted.

Code	Comment Document

Szarka

Document Created: 7/25/2013 2:14:06 PM by Web Comment Form

PMPC is steadfastly opposed to any alignment of the Loop 202 South Mountain Freeway that allows for trespass onto the Mountain Preserve or for any excavation into the South Mountain what so ever. These mountain preserves ensures a lifestyle that 80% of Arizona voters consistently support. The mountain preserves are unique and are for people and wildlife, not for vehicle trespass. PMPC does not agree with many of the DEIS assumptions finding them objectionable and deficient in the following analysis areas.

(1)

Unexceptable Pre-Decisional Actions: ADOT has made some pre-decisional actions with the purchase of property before the Draft Environmental Impact Statement (DEIS) was released. Phoenix Mountains Preservation Council (PMPC) questions the legality of this action and the entire DEIS when it appears ADOT has already made considerable financial investment to establish the alignment for the South Mountain Freeway rather than follow the prescribed process.

(2)

Dismal Wildlife Connectivity: The DEIS does not meet the minimal requirements for coordination and analysis of wildlife resources. The Arizona Game and Fish Department was consulted in 2009 during scoping. The current connection to the Estrella Mountains allows for passage of mule deer, javelina, bobcat, and mountain lion. There is no evidence of further efforts to ascertain wildlife connectivity needs or possible mitigation. The Sonoran desert tortoise provides additional evidence of inadequate cumulative analysis given its status as a U.S. Fish & Wildlife Service's candidate species. The mountain ridge area slated for demolition meets the definition for the tortoise's habitat.

(3)

Unreasonable Taking of Mountain Preservation Lands: The DEIS states in Figure 5-7 Public Parkland the avoidance of taking over 30 acres of the Preserve is "not prudent and feasible". The taking of this mountainside will destroy important archeological, spiritual, cultural and recreational sites with no realistic or reasonable mitigation possible in the study. The study failed to recognize and address new two trails, Gila and Bursera Trails, created in the southwest end of the Preserve in 2010.

(1) (4) (5)

Outdated Data Projections Used: The DEIS is based on outdated data projections that are now six to eight years old. The analysis does not acknowledge the impact the major economic downturn had and it brings into question the validity of projected growth levels put forth in the DEIS. In all the alternative studies, the DEIS does not provide one alternative analysis to the demolition of the southwest ridges of South Mountain. Furthermore, nowhere in this study is there an assessment of hazardous material truck traffic nor any mention of managing this truck traffic and the consequences of a serious hazard waste incident.

(6)

Over 3 million visitors come to South Mountain Park/Preserve annually, according to City of Phoenix statistics. Destroying any part of the mountain to align a high-capacity freeway will only have a negative impact on tourism and the many unique resources the park offers.

(7)

We urge ADOT to stop providing studies that do not accurately or thoroughly address the impact this freeway has on South Mountain. It's time to stop the $20 million and more in wasted tax payer's money to study the environmental impact and design for an alignment that no longer makes sense.

Code	Issue	Response
1	**Section 4(f) and Section 6(f)**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
2	**Right-of-way**	Federal Highway Administration regulations do not allow the ownership of right-of-way to be a factor in the decision regarding the selection of an alternative.
3	**Biology, Plants, and Wildlife**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
4	**Cultural Resources**	
5	**Section 4(f) and Section 6(f)**	South Mountain's newest trails are the Bursera and Pyramid Trails (see Final Environmental Impact Statement page 5-8). The E1 Alternative is approximately 1 mile south of the Pyramid Trail and even farther from the Bursera Trail; thus, it would not affect either trail. The trails have walk-in access from Chandler Boulevard and 19th Avenue, with on-street parking. This walk-in access would be north of and adjacent to the planned extension of Chandler Boulevard and, thus, would not be directly affected. The walk-in access point and the part of the Pyramid Trial at the access point are located adjacent to a residential neighborhood and the City of Phoenix's planned Chandler Boulevard Extension. These trails are typically used for high-intensity recreational activities such as running, hiking, and biking, not noise- or viewshed-sensitive activities. All proposed action alternatives would span existing and proposed trails to avoid impacts. However, during construction (if an action alternative were selected), trails that would be spanned or would be near potential freeway construction would be closed for limited times for safety reasons. Closures would necessitate that trail users detour around construction sites to rejoin the trails farther along their length. According to Phoenix South Mountain Park/ Preserve rangers, the Gila Trail—although well-defined—is not a designated trail within the park. That said, the Gila Trail would not be affected by the proposed freeway or by the Chandler Boulevard Extension. The Final Environmental Impact Statement Appendix page A665 contains information directly from the Phoenix General Plan and early coordination with the City of Phoenix Parks Department. The trails in the preserve are exceptions to this statement and were always meant as such. The trails within 1/4 mile of the proposed alternatives were treated separately, as in the case of the Maricopa County Regional Trails System. Should an alternative be selected, the Arizona Department of Transportation and Federal Highway Administration would work closely with the City of Phoenix during final design to ensure the connectivity of trails is maintained, whether they are eligible as Section 4(f) resources or not.
6	**Purpose and Need, Old Plan or Use of Old Data**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
7	**Hazardous Materials**	

Code	Comment Document

Thompson

Document Created: 7/25/2013 12:10:46 AM by Web Comment Form

1 I am satisfied with the alignment as proposed. It will provide a much needed, unhindered travel path through South Phoenix, Laveen, and connect both ends of the I-10.

I know that this draft is to discuss the alignment and environmental impacts. I also want to voice my concern that this freeway not be an ugly scar across the lands, without any consideration of art or plant beautification along the way. For example, I don't want it to look anything like the ugly brown ditch we call the I-17. Freeways in the East Valley and the more recent extensions have been given some consideration as to the overall look presented to those traveling on the freeway,. The same consideration needs to be given to this project, as it will be one of the first impressions visitors traveling through the area will see. Local travelers should also consider this a source of pride, not just another eyesore in the South Phoenix corridor.

Code	Issue	Response
1	**Visual Resources**	The proposed freeway would include aesthetic treatments similar to the other loop freeways in the region (see page 4-171 in the Final Environmental Impact Statement).

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 7-25-13	INCOMING CALL/COMMENT TIME:
CALLER: SHARI TUCKER-GASSER	CALLER ADDRESS: 3619 E. WINDSONG DR PHOENIX, AZ 85048
PHONE:	EMAIL: tuckers@svn.com

COMMENTER REMARKS/QUESTIONS:

1 2 3 4

Very concerned about how the SMF will affect the wells along Pecos that supply water to the Lakewood lakes and landscaping.
The close proximity to homes and schools and the ability to evacuate 85,000 people should there be a major chemical spill. Also concerned about blasting through sacred South Mountain. (The hiking trails will no longer be used because no one wants to exercise in a smog infested area.

Code	Issue	Response
1	**Groundwater**	If a well were adversely affected by construction activities, the well might need to be abandoned or the well owner would be compensated by drilling a new well according to State regulations/standards. (See text box on Final Environmental Impact Statement page 4-108.)
2	**Hazardous Materials**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.
3	**Cultural Resources**	
4	**Air Quality**	

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 9/23/2013	INCOMING CALL/COMMENT TIME:
CALLER: Chad Wakefield	CALLER ADDRESS: Overland, Pacific & Cutler, Inc.
PHONE: (510) 760-6071	EMAIL: cWakefield@opcservices.com

COMMENTER REMARKS/QUESTIONS:

1

What is the status of the EIS? Has a design team been selected?
Thank you, Chad

Code	Issue	Response
1	**Public Involvement**	The schedule for the next steps includes publishing the Final Environmental Impact Statement in 2014. A 60-day public review period will be provided. Then a record of decision would be published. If a build option is selected, construction could begin as early as 2015. Right-of-way acquisition would begin after a record of decision.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 9/8/2013	INCOMING CALL/COMMENT TIME:
CALLER: Linda Waring	CALLER ADDRESS:
PHONE:	EMAIL: lwaring2728@gmail.com

COMMENTER REMARKS/QUESTIONS:

1 I live in Laveen. We need to get this highway project started.

Code	Issue	Response
1		**Comment noted.**

Code	Comment Document

SOUTH MOUNTAIN FREEWAY EMAIL OR INFORMATION LINE

INCOMING CALL/COMMENT DATE: 11/7/2013	INCOMING CALL/COMMENT TIME:
CALLER: Linda and Bill Weaver	CALLER ADDRESS:
PHONE:	EMAIL:

COMMENTER REMARKS/QUESTIONS:

1

We have viewed your video and interactive materials found online for the proposed South Mountain 202 Freeway. It sounded like the deadline to submit comments was July 2013. Have you determined then where the 202 loop will most likely occur? Is the 59th Ave corridor still the "preliminary preferred," or did you determine that one of the alternative plans is better?

Thank you for your time,
Linda and Bill Weaver

Code	Issue	Response
1	Alternatives	A combination of the W59 Alternative in the Western Section and the E1 Alternative in the Eastern Section is identified as the Preferred Alternative in the Final Environmental Impact Statement.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY HOTLINE

INCOMING CALL/COMMENT DATE: 7/31/13	INCOMING CALL/COMMENT TIME:
CALLER:	CALLER ADDRESS:
PHONE:	EMAIL:

COMMENTER REMARKS/QUESTIONS:

1 Can you send me some information on the freeway? "CLICK ...HUNG UP"

Code	Issue	Response
1	**Public Involvement**	Maps and other materials are available on the project Web site <azdot.gov/southmountainfreeway>.

Code	Comment Document

SOUTH MOUNTAIN FREEWAY HOTLINE

INCOMING CALL/COMMENT DATE: 7/25/13	INCOMING CALL/COMMENT TIME:
CALLER:	CALLER ADDRESS:
PHONE:	EMAIL:

COMMENTER REMARKS/QUESTIONS:

1

Would like to see loop 101 alignment option. Extremely opposed to 59th ave alignment

Code	Issue	Response
1	**Alternatives, W59 Alternative Versus W101 Alternative**	The Arizona Department of Transportation and Federal Highway Administration identified several issues and concerns that were frequently noted by commenters. Responses to these issues can be found in the *Responses to Frequently Submitted Public Comments* beginning on page B733 of this appendix.